

Title: People of the Philippines v. Paras

Facts:

- Incident:** In March 1996, Democrito Paras was accused of committing rape against AAA, who was 17 years old. The alleged crime resulted in the filing of Criminal Case No. TCS-2729 against Paras in the Regional Trial Court (RTC) of Toledo City, Branch 29.
- Trial and Conviction:** After a full trial, the RTC, on October 18, 2005, found Paras guilty of the crime charged. He was sentenced to reclusion perpetua (life imprisonment), ordered to pay P50,000 as compensatory damages, and P100,000 as moral damages.
- Court of Appeals:** Paras appealed the RTC decision. On February 2, 2010, the Court of Appeals issued a decision affirming the RTC's ruling but modifying it by convicting Paras of qualified rape under Article 335 of the Revised Penal Code, as amended by R.A No. 7659. He was ordered to pay P50,000 as moral damages, P25,000 as exemplary damages, and P50,000 as civil indemnity.
- Appeal to the Supreme Court:** On February 15, 2010, Paras appealed his conviction to the Supreme Court.
- Demise of Paras:** Unknown to the Court, Paras died on January 24, 2013, from pulmonary tuberculosis while in the New Bilibid Prison Hospital.
- Supreme Court Decision:** On June 4, 2014, unaware of Paras's death, the Supreme Court affirmed his conviction with modifications, adjusting the exemplary damages and adding legal interest on the total damages at 6% per annum.
- Discovery of Death:** The Supreme Court was informed of Paras's death only on August 27, 2014, via a letter from the officer-in-charge of the New Bilibid Prison, accompanied by a certified true copy of Paras's death certificate.
- Legal Impact of Death:** Paras's death during the pendency of his appeal led to the extinguishment of his criminal liability and the civil liability directly arising from the crime.

Issues:

- Effect of Accused's Death on Criminal and Civil Liability:** Whether the criminal liability and the civil liability ex delicto of Democrito Paras were extinguished due to his

death during the pendency of his appeal.

Court's Decision:

1. **Extinction of Criminal Liability and Civil Liability ex delicto**: Citing Article 89 of the Revised Penal Code, the Court held that Paras's death prior to the final judgment automatically extinguished his criminal liability and the civil liability directly based on the crime.
2. **Dismissal of Criminal Case**: As a result, the Court resolved to set aside its June 4, 2014, decision and dismissed the criminal case against Paras.

Doctrine:

- **Extinguishment of Liability upon Death**: Per Article 89 of the Revised Penal Code, the death of the accused pending appeal extinguishes both the criminal liability and the civil liabilities directly arising from the crime (People v. Bayotas doctrine).

Class Notes:

- **Elements of Rape Under Philippine Law**: Rape involves carnal knowledge of a woman under circumstances defined by the Revised Penal Code and relevant amendments, including force, intimidation, or when the victim is below the age of consent or otherwise incapable of giving valid consent.
- **Impact of Accused's Death on Appeals**: Under Article 89, Revised Penal Code, accused's death before final decision results in extinguishment of criminal liability and civil liability ex delicto.

Historical Background:

- The judicial principles applied concerning the impact of the accused's death before final judgment have been significantly shaped by previous jurisprudence (People v. Bayotas). This underscores the importance of final judgment in the continuity of liabilities under the Philippine legal system, reflecting universal principles where the personal punishment aspect of criminal law cannot survive the accused.