

Title: Director of Prisons vs. Hon. Jose Teodoro, et al.

Facts: This case is a special proceeding of certiorari concerning an injunction issued by the Court of First Instance of Negros Occidental. On August 21, 1954, Rafael Lacson was convicted and sentenced to death along with 21 co-accused. Shortly after his conviction, Lacson was confined in the Provincial Hospital of Negros Occidental under guard with the order from the Court of First Instance.

On September 9, 1954, Lacson filed a special civil action of certiorari petitioning that his transfer from the hospital to the New Bilibid Prisons would worsen his health condition, citing medical certificates. He asked for a preliminary injunction to stay in the Provincial Hospital for another 30 days, which Judge Eduardo D. Enriquez granted.

Prior to this, Lacson filed for certiorari with the Supreme Court, asking to post bail pending his murder case appeal, which was denied. Respondents (Director of Prisons and others) answered the amended petition, claiming lack of jurisdiction and denying the endangerment allegations. The Provincial Fiscal moved to lift the injunction, asserting it was unlawful, which was denied by Judge Jose Teodoro, Sr., after appointing a medical committee to assess Lacson's health, which advised against the transfer.

Lacson's case was elevated, with an appeal perfected, to the Supreme Court as respondents challenged the jurisdiction and authority of the lower court to issue an injunction post-conviction. The petitioners argued that the trial court lost jurisdiction once the appeal was made.

Issues:

1. Whether the Court of First Instance had jurisdiction to issue a preliminary injunction after the conviction and appeal of Rafael Lacson.
2. Whether Lacson's health condition could justify the continuation of the injunction preventing his transfer.

Court's Decision: The Supreme Court ruled that the Court of First Instance did not have jurisdiction to issue the injunction. It was emphasized that once a case is appealed, the trial court loses jurisdiction over the subject matter, and in this criminal case, specifically over Lacson's person. The appeal transfers jurisdiction solely to the appellate court, ensuring procedural orderliness. Jurisdiction over Lacson had shifted to the Supreme Court after September 5, 1954, thereby nullifying the actions related to the injunction made thereafter.

Doctrine: The case reinforces the concept that lower courts lose jurisdiction over both the record and the person upon a perfected appeal, promoting an orderly procedural system. The 'necessary regard for orderly procedure' demands that actions affecting an already filed appeal's matters or parties lie exclusively with the appellate court, not concurrent jurisdiction with the trial court.

Class Notes:

- Principle of Loss of Jurisdiction: Appeals perfecting a case results in the trial court losing jurisdiction over it, including the subject and all related judicial actions.
- Procedural Orderliness: Maintaining a singular, direct judicial oversight in appellate phases to avoid jurisdictional conflicts and confusion.
- Criminal Procedure Insight: Highlighting parallel application of civil procedural rules to criminal matters concerning jurisdiction post-appeal.

Historical Background: This case occurred during a period where procedural principles were still being solidified in judicial practice, particularly in post-war Philippines adapting to contemporary justice systems. The decision underscores the judiciary's emphasis on procedural clarity amidst rising complexity in criminal law appeals processes during the 1950s.