THIRD DIVISION

[G.R. No. 266371 [Formerly UDK No. 17775]. August 13, 2025]

RANDY DELA CRUZ *Y* DEGUERO AND RICKY VIDANES *Y* OSELA, PETITIONERS, VS. PEOPLE OF THE PHILIPPINES, RESPONDENT.

D E C I S I O N

INTING, J.:

Before the Court is a Petition for Review on *Certiorari*[1] filed by Randy Dela Cruz *y* Deguero (Randy) and Ricky Vidanes *y* Osela (Ricky) (collectively, petitioners) assailing the Decision[2] dated July 13, 2022, of the Court of Appeals (CA) in CA-G.R. CR No. 44960. The assailed CA Decision affirmed, with modification as to the monetary awards, the Decision[3] dated February 18, 2020, of Branch 80, Regional Trial Court (RTC), Morong, Rizal in Criminal Case No. 03-6050-M that found petitioners guilty beyond reasonable doubt of Homicide under Article 249[4] of the Revised Penal Code.

Assailed as well is the Resolution dated January 16, 2023 of the CA which denied petitioners' Motion for Reconsideration.

The Antecedents

The case stemmed from an Information[5] dated June 30, 2003, that charged petitioners with Homicide. The accusatory portion of the Information reads:

> That on or about the 22nd day of June, 2003, in the Municipality of Pililla, Province of Rizal, Philippines, and within the jurisdiction of this Honorable Court, the above-named accused, conspiring and confederating together and both of them mutually helping and aiding one another, with the use of stone, and with intent to kill, did, then and there willfully, unlawfully and feloniously attack, assault and hit with said stone one ALBERTO VERSOZA y MARTINEZ, hitting him on his head, thereby inflicting upon him mortal wounds which directly caused his death.
>
> CONTRARY TO LAW.[6]

Upon arraignment on September 9, 2003, petitioners entered their pleas of "Not Guilty" to the crime charged.[7]

After the pre-trial, trial on the merits ensued.

The Version of the Prosecution

The prosecution presented Abigail Garcia (Abigail) and Evangeline Versoza (Evangeline) as its witnesses.

Abigail is the niece of the victim, Alberto Versoza *y* Martinez (Alberto). She testified that on June 22, 2003, while she was in front of their house in San Antonio Street, Quisao, Pililla, Rizal, she witnessed Randy hit Alberto on the head with a stone approximately 3 to 4 inches in diameter. At the time Randy hit Alberto, she was behind the latter. Abigail recalled that Randy struck Alberto once on the top of his head, which caused the latter to lose consciousness. Thereafter, she saw Ricky jump and land on Alberto's stomach. Then, petitioners fled.[8]

Evangeline, Alberto's sister, testified on the medical and burial expenses they incurred due to the incident. She attested that Alberto was initially brought to a hospital for treatment, where they spent about PHP 4,300.00. However, Alberto eventually died on June 25, 2003. Evangeline further asserted that they incurred burial expenses, which include PHP 10,000.00 for the coffin and PHP 3,000.00 for the autopsy.[9]

The Version of the Defense

Randy testified that on June 22, 2003, at around 5:00 p.m., he was having a drinking spree at a vacant lot in San Antonio Street, Barangay Quisao, Pililla, Rizal, with 10 of his friends, including Ricky, to celebrate the birthday of a certain Renan. Alberto passed by and had a drink with them that lasted for one and a half hours. After the drinking spree, Randy decided to go home. On his way home, he passed by Alberto's house, where Alberto called him. When Randy turned around, he saw Alberto pointing a knife at him. Randy ran away from Alberto. When he looked back at Alberto, he saw him stumble on a canal while holding the knife. Randy saw Alberto get up; he was bleeding. Randy was uncertain where the blood was coming from.

Randy alleged that he hit Alberto with a stone before fleeing. After a few minutes, he returned to the area of the incident to confront Alberto. However, there was a commotion and he noticed that Alberto was lying on the ground.[10]

Randy further testified that upon learning that Alberto's family had accused him and Ricky of killing Alberto, they voluntarily went to the Office of the Barangay Captain.[11]

As for Ricky, he narrated that on June 22, 2003, while they were having a drinking session at 5:00 p.m., Alberto arrived and joined them. After drinking and eating with

them, Alberto left without saying a word. When they ended their drinking session, Ricky told Randy to go home first as he had to return the things they borrowed for the drinking spree. When he went out, Randy was ahead of him.[12]

Ricky further narrated that upon reaching the scene of the incident, he saw Alberto already lying on the ground while holding a knife. Alberto is known to carry a bladed weapon often. Priorly, Alberto and Randy did not engage in any heated argument. But by the time he arrived at the scene of the incident, the altercation between Alberto and Randy had already transpired, and people were hovering around. When he was about to approach Alberto, a certain Ariel Amongo brought out a long piece of wood and chased him.[13]

The Ruling of the RTC

In its Decision[14] dated February 18, 2020, the RTC convicted petitioners of Homicide. The dispositive portion of the Decision states:

> WHEREFORE, premises considered, this Court found accused RANDY CRUZ [*y*] Duguero and RICKY VIDANES y Osela GUILTY beyond reasonable doubt of the crime of Homicide and sentences them to suffer the indeterminate penalty of eight (8) years and one (1) day of prision mayor, as minimum, to fourteen (14) years, eight months, and one (1) day of reclusion temporal, as maximum. They are further ordered to pay the heirs of Alberto Versoza y Martinez the amount of [PHP] 75,000.00 as civil indemnity, [PHP] 75,000.00 as moral damages and [PHP] 75,000.00 as exemplary damages with legal interest at 6% from the date of filing of the [Information until fully paid and the costs of suit.
>
> SO ORDERED.[15]

The RTC gave full credence to the testimony of Abigail and ruled that petitioners conspired to kill Alberto. The RTC noted that the Certificate of Death, presented by the prosecution, which indicated the cause of death as "intracranial hemorrhage as a result of traumatic injuries, head," corroborated the testimony of Abigail and Randy's admission that the latter struck Alberto with a stone.[16]

Aggrieved, petitioners appealed to the CA.[17]

On appeal, petitioners argued that their constitutional right to speedy trial was blatantly violated, as the case remained pending for approximately 17 years before the RTC rendered its final Decision.[18] After their arraignment, the scheduled hearings were repeatedly postponed due to the absence of the public prosecutor assigned, the absence of the Medico Legal Officer and other prosecution witnesses, and other delays not attributable to petitioners. Petitioners further asserted that the RTC erred in convicting them of the crime charged, as the prosecution failed to establish their guilt beyond

reasonable doubt.[19] Lastly, petitioners argued that the prosecution did not sufficiently prove that they acted in conspiracy to kill Alberto.[20]

The People of the Philippines, through the Office of the Solicitor General (OSG), countered that petitioners' right to speedy trial was not violated. The OSG asserted that petitioners failed to invoke their right to speedy trial timely. It further explained that the prosecution was able to establish all the elements of the crime of Homicide.[21]

The Ruling of the CA

In its Decision[22] dated July 13, 2022, the CA affirmed petitioners' conviction but modified the monetary awards, viz.:

> WHEREFORE, the instant appeal is DENIED. The Decision dated February 18, 2020 of the Regional Trial Court of Morong, Rizal, Branch 80, in Criminal Case No. 03-6050-M, convicting accused-appellants Randy Dela Cruz y Deguero and Ricky Vidanes [*y*] Osela of Homicide under Article 249 of the Revised Penal Code, as amended, and penalizing them therefor, is AFFIRMED with MODIFICATION that they are ordered to solidarily pay the heirs of victim Alberto Versoza the following reduced amounts: [PHP] 50,000.00 as civil indemnity, [PHP] 50,000.00 as moral damages and [PHP] 50,000.00 as temperate damages. Said award shall earn interest at the rate of six percent (6%) per annum from the date of finality of this Decision until fully paid.
>
> SO ORDERED.[23]

The CA held that the right to speedy trial of petitioners was not violated. It reasoned that petitioners failed to show that the causes of the delay in the prosecution of the case were unjust, unreasonable, and oppressive.[24] It further ruled that the prosecution was able to prove beyond a reasonable doubt all the elements of Homicide, and that petitioners conspired in the killing of Alberto. It gave credence to the testimony of Abigail and her positive identification of petitioners as the perpetrators.[25]

Undeterred, petitioners filed a Motion for Reconsideration,[26] but the CA denied it in the assailed Resolution[27] dated January 16, 2023.

Thus, the Petition for Review on *Certiorari*.

Petitioners' Argument

Petitioners argue that the CA erred in not dismissing the criminal case on the ground of blatant violation of their right to speedy trial. Petitioners highlight various reasons for the undue delay in resolving the criminal case: (1) pending availability of court records; (2) lack of notice to the private complainant and the intended prosecution witness; (3)

insufficient time; (4) the Presiding Judge was indisposed and on sick leave; (5) prosecution witnesses did not appear; (6) the Presiding Judge had an unavoidable engagement; (7) the Presiding Judge was on forfeitable leave; and (8) the trial prosecutor was unavailable.[28]

Petitioners assert that the postponements of hearings were not attributable to them but rather to the prosecution and the lower court.[29]

Further, petitioners argue that the prosecution failed to prove their guilt beyond reasonable doubt. They contend that the testimony of Abigail, the sole eyewitness for the prosecution, was full of inconsistencies. They insist that she is not a credible witness.[30]

In the Comment, the OSG maintains that there was no violation of petitioners' constitutional right to a speedy trial. The OSG contends that petitioners failed to substantiate their bare allegations with competent and specific evidence. In particular, petitioners did not provide any factual details as to the causes, extent, or circumstances of the alleged delay; neither did they demonstrate that the same was unjustified, unreasonable, vexatious, or oppressive so as to warrant the dismissal of the case on constitutional grounds.[31]

Moreover, the OSG posits that the prosecution was able to establish all the essential elements of the crime of Homicide beyond reasonable doubt. It underscores that petitioners' defenses of denial and alibi are inherently weak and cannot prevail over the positive and categorical identification by the eyewitness, Abigail, whose testimony was unwavering, straightforward, and corroborated by material details.[32]

The OSG further asserts that conspiracy among the petitioners was convincingly proven through their concerted acts leading to the victim's death. It was sufficiently established that Randy struck the victim, Alberto, on the head with a stone, causing him to collapse, after which Ricky jumped on the victim's abdomen. Thereafter, both petitioners hastily fled the crime scene. Such concurrent and successive acts, according to the OSG, demonstrate a common design and unity of purpose to kill the victim, thereby rendering them equally liable for the crime charged.[33]

The Issue

The core issue to be resolved by the Court is whether the CA erred in not dismissing the case for violation of petitioners' right to speedy trial.

The Ruling of the Court

The Petition is meritorious.

In a Rule 45 petition, the jurisdiction of the Court is limited only to reviewing errors of

law as the Court is not a trier of facts.[34] As a rule, the Court is not duty-bound to analyze and weigh again the evidence considered in the proceedings below.[35] The Court cannot therefore assume the role of trier of facts which, by law and jurisprudence, belongs to the lower courts. However, this rule is not without any exceptions. In the case of *Ditiangkin v. Lazada E-Services Philippines, Inc.*,[36] the Court enumerated such exceptions:

> (1) when the factual findings of the Court of Appeals and the trial court are contradictory;
> (2) when the conclusion is a finding grounded entirely on speculation, surmises, or conjectures;
> (3) when the inference made by the Court of Appeals from its findings of fact is manifestly mistaken, absurd, or impossible;
> (4) when there is a grave abuse of discretion in the appreciation of facts;
> (5) when the Appellate Court, in making its findings, went beyond the issues of the case and such findings are contrary to the admissions of both appellant and appellee;
> (6) when the judgment of the Court of Appeals is premised on a misapprehension of facts;
> (7) *when the Court of Appeals failed to notice certain relevant facts which, if properly considered, would justify a different conclusion*;
> (8) when the findings of fact are themselves conflicting;
> (9) when the findings of fact are conclusions without citation of the specific evidence on which they are based; and
> (10) when the findings of fact of the Court of Appeals are premised on the absence of evidence but such findings are contradicted by the evidence on record.[37] (Emphasis supplied)

It is a well settled rule that the factual findings of the trial court are accorded great weight and respect on appeal, especially when such findings are supported by substantial evidence on record.[38] It is only in exceptional circumstances, such as when the trial court overlooked material and relevant matters, that the Court, on review, will re-calibrate and evaluate the factual findings of the court below.[39] This exception applies in the case at bar.

The constitutional right to speedy trial of petitioners was blatantly violated; thus, they should be acquitted

The right of an accused to "a speedy, impartial, and public trial" in criminal cases is guaranteed under Article III, Section 14(2)[40] of the Constitution. Its salutary objective is to assure that an innocent person may be free from the anxiety and expense of a court litigation or, if otherwise, of having his or her guilt determined within the shortest possible time compatible with the presentation and consideration of whatsoever defense he or she may interpose.[41] The right to speedy trial is deemed violated when the

proceedings are attended by vexatious, capricious, and oppressive delays; when unwarranted postponement of the trial are requested and granted; or when, without cause or justifiable reason, an unreasonable period elapses without the case being brought to trial.[42]

The constitutional right to speedy trial was embodied and enforced through Republic Act No. 8493,[43] otherwise known as the "Speedy Trial Act of 1998." Relevantly, Republic Act No. 8493 was instructive when it provided that the time limit for trial in criminal cases, except those subject to the Rules on Summary Procedure, or where the penalty prescribed by law does not exceed six months imprisonment, or a fine of PHP 1,000.00 or both, irrespective of other imposable penalties, shall not exceed a period of 180 days from the first day of trial, to wit:

> SECTION 6. *Time Limit for Trial*. – In criminal cases involving persons charged of a crime, except those subject to the Rules on Summary Procedure, or where the penalty prescribed by law does not exceed six (6) months imprisonment, or a fine of One thousand pesos (P1,000.00) or both, irrespective of other imposable penalties, the justice or judge shall, after consultation with the public prosecutor and the counsel for the accused, set the case for continuous trial on a weekly or other short-term trial calendar at the earliest possible time so as to ensure speedy trial. In no case shall the entire trial period exceed one hundred eighty (180) days from the first day of trial, except as otherwise authorized by the Chief Justice of the Supreme Court pursuant to Section 3, Rule 22 of the Rules of Court.

Further, Section 7 of Republic Act No. 8493 provides that the "arraignment of an accused shall be held within [30] days from the filing of the information, or from the date the accused has appeared before the justice, judge or court in which the charge is pending, whichever date last occurs," and the "[t]rial shall commence within [30] days from arraignment as fixed by the court."[44] Additionally, the Court incorporated these guidelines into Rule 119 of the Revised Rules on Criminal Procedure, as well as the Revised Guidelines for [the] Continuous Trial of Criminal Cases in A.M. No. 15-06-10-SC.[45]

Notwithstanding, the Court has consistently emphasized that a mere mathematical reckoning of the time involved is not sufficient to rule that an accused's right to speedy trial was violated.[46] The conduct of both the prosecution and the defense must be weighed.[47] Accordingly, in determining whether this right has been infringed, the Court applies the balancing test, which considers the following factors: (1) the length of the delay; (2) the reasons for the delay; (3) the accused's assertion of the right; and (4) the prejudice suffered by the respondent."[48]

Now, to clearly assess the case at bar, the Court takes note of the incidents pertaining to the postponements of the trial:ycnaj

Date	Action Taken	Cause of Postponement
June 30, 2003	Information filed	
September 9, 2003	Date of Arraignment	
January 28, 2004	Scheduled Pre-Trial Conference	Postponed because the Presiding Judge attended an Orientation Seminar.
February 18, 2004	Scheduled Pre-Trial Conference	Postponed due to the absence of the public prosecutor[49]
March 17, 2004	Pre-Trial Conference commenced	
July 5, 2004	Scheduled initial trial	Reset to July 26, 2004, due to the absence of the prosecution witness, Dr. Jose Marquez.[50]
July 26, 2004	Scheduled initial trial	Reset to October 13, 2004, due to the manifestation of the public prosecutor to give the mother of the victim ample time to collate receipts and evidence relative to the medical expenses.[51]
October 13, 2004	Scheduled initial trial	Reset to December 1, 2004, because the Presiding Judge was indisposed.[52]
December 1, 2004	Scheduled initial trial	Reset to February 16, 2005, due to the manifestation of the public prosecutor that the first witness, who is the mother of the victim, failed to provide a summation of the expenses and receipts.[53]
February 16, 2005	Scheduled initial trial	The first witness, Evangeline, was presented.[54]
May 4, 2005	Scheduled cross-examination of Evangeline.	Reset to August 3, 2005, due to the request of the public prosecutor who will be attending an urgent personal matter at the Sandiganbayan.[55]
August 3, 2005	Scheduled cross-examination of Evangeline	Reset to October 19, 2005, due to the unavailability of the Transcript of Stenographic Notes (TSN) dated February 16, 2005.[56]
October 19, 2005	Conclusion of the testimony of Evangeline. [57]	

January 25, 2006	Direct Examination of the prosecution's second witness, Abigail.[58]	
April 26, 2006	Conclusion of the testimony of Abigail.[59]	Reset to August 9, 2006 for the continuation of the presentation of evidence the prosecution.
August 9, 2006	Presentation of evidence by the prosecution was postponed.	Reset to October 16, 2006 because the Presiding Judge was on sick leave.[60]
October 16, 2006	Presentation of prosecution witnesses, PC/Insp. Jose Arnel Marquez (PC/Insp. Marquez).	Reset to February 28, 2007, due to the absence of the prosecution witness and the counsel for the accused.[61]
February 28, 2007	Presentation of prosecution witness, PC/Insp. Marquez	Reset to May 9, 2007, due to the absence of the prosecution witness and the counsel for the accused.[62]
May 9, 2007	Presentation of prosecution witness, PC/Insp. Marquez	Reset to July 2, 2007 due to the absence of the prosecution witness.[63]
July 2, 2007	Presentation of prosecution witness, PC/Insp. Marquez	Reset to September 10, 2007, due to the unavailability of the public prosecutor. [64]
September 10, 2007	Presentation of prosecution witness, PC/Insp. Marquez.	Reset to November 13, 2007, due to the absence of the prosecution witness. The counsel for the accused was also changed due to the repeated absence of Atty. Michael Perocho, hence, Atty. Allan Catmunan was appointed *counsel de officio*.[65]
November 13, 2007	Presentation of prosecution witness, PC/Insp. Marquez.	Reset to February 25, 2008, due to the absence of the prosecution witness.[66]
February 25, 2008	Presentation of prosecution witness, PC/Insp. Marquez.	Reset to May 19, 2008, since February 25, 2008 was declared as a non-working holiday[67]
May 19, 2008	Scheduled hearing and presentation of prosecution witness.	Reset to August 6, 2008, due to the unavailability of the court record.[68]
August 6, 2008	Scheduled hearing and presentation of prosecution witness	Reset to November 5, 2008, due to the manifestation of the public prosecutor for lack of notice to the private

		complainants of the case and unavailability of PC/Incp. Marquez.[69]
November 5, 2008	Scheduled hearing and presentation of prosecution witness	Reset to March 23, 2009, due to the unavailability of the PAO lawyer[70]
March 23, 2009	Scheduled hearing and presentation of prosecution witness	Reset to October 12, 2009, due to unavailability of court records.[71]
October 12, 2009	Scheduled hearing and presentation of prosecution witness	Reset to March 5, 2010, due to lack of material time[72]
March 5, 2010	Scheduled hearing and presentation of prosecution witness	Reset to July 5, 2010, because the Presiding Judge had to attend the Philippine Women Judges Association Convention and Seminar.[73]
July 5, 2010	Scheduled hearing and presentation of prosecution witness.	Reset to October 11, 2010, due to failure to send subpoena to the mother of the victim.[74]
October 11, 2010	Scheduled hearing and presentation of prosecution witness.	Reset to October 19, 2010, due to lack of material time.[75]
October 19, 2010	Scheduled hearing and presentation of prosecution witness.	Reset to February 14, 2011, due to lack of material time.[76]
February 14, 2011	Scheduled hearing and presentation of prosecution witness.	Reset to May 10, 2011, because the Presiding Judge was indisposed.[77]
May 10, 2011	Scheduled hearing and presentation of prosecution witness.	Reset to August 23, 2011, because the Presiding Judge was on sick leave.[78]
August 23, 2011	Scheduled hearing and presentation of prosecution witness, the mother of the victim.	Reset to November 22, 2011, due to the absence of the prosecution witness.[79]
November 22, 2011	Scheduled hearing and presentation of prosecution witness.	Reset to April 17, 2012, because the Presiding Judge had a sudden unavoidable engagement.[80]
April 17, 2012	Scheduled hearing and presentation of prosecution witness.	Reset to August 7, 2012, due to the absence of prosecution witnesses, Guadalupe Versoza and Marilou Manalon, mother and sister of the

		victim, respectively, despite being notified multiple times.[81]
August 7, 2012	Scheduled hearing and presentation of prosecution witness.	Reset to November 20, 2012, suspension of work due to inclement weather.[82]
November 20, 2012	Scheduled hearing and presentation of prosecution witness.	Reset to April 15, 2013, because the Presiding Judge was on forfeitable leave.[83]
April 15, 2013	Scheduled hearing and presentation of prosecution witness.	Reset to September 16, 2013, due to the absence of the prosecution witness.[84]
September 16, 2013	Scheduled hearing and presentation of prosecution witness.	Reset to February 18, 2014, due to the absence of the prosecution witness.[85]
February 18, 2014	Scheduled hearing and presentation of prosecution witness.	Reset to August 19, 2014, due to the absence of the public prosecutor.[86]
August 19, 2014	Scheduled hearing and presentation of prosecution witness.	Reset to February 10, 2015, due to the absence of the new prosecution witness, PO1 Patricio Talavera.[87]
February 10, 2015	Scheduled hearing and presentation of prosecution witness.	Reset to June 8, 2015, because the Presiding Judge was on forfeitable leave.[88]
June 8, 2015	Scheduled hearing and presentation of prosecution witness.	Reset to December 7, 2015, because the public prosecutor was not around.[89]
December 7, 2015	Scheduled hearing and presentation of prosecution witness.	Reset to June 6, 2016, considering that the Public Attorney's Office (PAO) lawyer assigned attended a Training Towards Accountability, Capacity, Building and Empowerment of Public Attorneys.[90]
June 6, 2016	Scheduled hearing and presentation of prosecution witness.	Reset to October 11, 2016, because the Presiding Judge was on forfeitable leave.[91]
October 11, 2016	Scheduled hearing and presentation of prosecution witness.	Reset to April 25, 2017, because the PAO lawyer assigned was on official business.[92]
April 25, 2017	Scheduled hearing and presentation of	Reset to August 29, 2017, due to the absence of the public prosecutor.[93]

	prosecution witness.	
August 29, 2017	Scheduled hearing and presentation of prosecution witness.	Reset to November 23, 2017, because the Presiding Judge was on sick leave.[94]
November 23, 2017	Conclusion of the presentation of the prosecution.	The presentation of the defense was scheduled on April 23 and May 10, 2018.[95]
February 19, 2018	The RTC issued an Order[96] admitting the formal offer of evidence from the prosecution.	
May 10, 2018	Scheduled hearing and presentation of witness for the defense.	Reset to September 11, 2018, because the PAO lawyer assigned was attending another trial before Branch 79, RTC, Morong, Rizal.[97]
September 11, 2018	Scheduled hearing and presentation of witness for the defense.	Reset to February 19, 2019, because the public prosecutor was indisposed.[98]
February 19, 2019	Scheduled hearing and presentation of witness for the defense.	Reset to August 13 and October 14, 2019, upon request of petitioners.[99]
August 13, 2019	Scheduled hearing and presentation of witness for the defense.	Reset to October 14, 2019, because the Presiding Judge attended a briefing on Region IV Judges of newly created courts at the Supreme Court.[100]
October 14, 2019	Randy testified.	The next scheduled hearing was on November 26, 2019.[101]
February 18, 2020	The RTC rendered its Decision.[102]	

It is appalling that the case took almost 17 years to be resolved by the RTC. While it is settled that the determination of inordinate delay is not susceptible to a mechanical formula, the Court has consistently held that the totality of the circumstances must be considered. These include the volume of evidence, and the simplicity or complexity of the issues raised.[103] Even more, the causes of the delays must be properly laid out and evaluated.[104] Here, the records reveal a pattern of systematic inefficiencies and prosecutorial lapses that are just inexcusable.

The Information against petitioners was filed on June 30, 2003. They were arraigned on September 9, 2003, almost three months later, which already violates Section 7 of Republic Act No. 8493, which mandates that an accused must be arraigned within 30

days from the filing of the information or from the date the accused appeared before the court.

Even more alarming is the course of the proceedings that followed. The Pre-trial Conference, which was intended to facilitate an expeditious trial, was postponed twice because of the unavailability of the Presiding Judge and the absence of the public prosecutor. The initial trial date was set for July 5, 2004, but was postponed due to the prosecution witnesses' absence. Consequently, trial only commenced on February 16, 2005—about two years after the Information was filed—again violating Section 7 of Republic Act No. 8493. The initial trial was rescheduled three times mainly because of the prosecution's fault.

From that point onward, the proceedings were marred by repeated delays, most of which was attributable to the prosecution. In contrast, in all of the postponements of the hearings, petitioners were present.[105]

Notably, it was only on November 23, 2017, or over 14 years since the filing of the Information, that the prosecution finally rested its case. This *protracted delay* was caused by: (1) the repeated absence of prosecution witness; (2) the unavailability of court records and TSN; and (3) the frequent absences and unavailability of the public prosecutor, the Presiding Judge, and the assigned PAO lawyer. Again, throughout all these delays and resetting of the case, petitioners were present in court. In fact, even on occasions when their assigned PAO lawyer was unavailable, petitioners were present.

Given the circumstances, the Court deems it unjust and would be the height of injustice to put the fault on the petitioners for their alleged failure to assert their right to speedy trial at an earlier stage. Generally, the negligence of counsel binds the client, encompassing even mistakes in the application of procedural rules.[106] Albeit, the application of this general rule is contingent upon the surrounding circumstances present in the given case, the Court, thus, recognizes established exceptions: (1) where reckless or gross negligence of counsel deprives the client of due process of law; (2) when its application will result in outright deprivation of the client's liberty or property; or (3) where the interests of justice so require."[107] In such instances, the court is obliged to step in and accord relief to a party-litigant.[108]

The present case squarely falls under these exceptions. The failure of petitioners' counsel to timely invoke their constitutional right to a speedy trial before the RTC constitutes gross negligence, which directly led to the prolonged deprivation of petitioners' liberty and fundamental rights. Such negligence cannot be equated to petitioners' mere acquiescence to the delay or a voluntary waiver of the right. Petitioners, being laypersons unfamiliar with the intricacies of the law and court procedures, cannot be expected to assert and protect their legal rights with the same competence and diligence as members of the Bar. Without a final verdict from the court, petitioners remain ordinary citizens seeking justice through the legal system. Thus, to deny them the protection of their constitutional right on the sole basis of their counsel's negligence would be a grave injustice to the very essence of the courts of

justice, which are mandated to dispense justice efficiently and fairly.

Time and again, this Court has fortified the constitutional guarantee of speedy trial, recognizing it as an indispensable safeguard against the oppressive delays of the justice system.

In *Lumanlaw v. Judge Peralta, Jr.*,[108] the Court categorically ruled that the right to a speedy trial was violated when the RTC incurred an undue delay of one year, nine months, and four days merely to conduct the arraignment of the accused. The Court dismissed the Information, finding the delay unjustified, especially since it was primarily caused by the absence of the accused's counsel *de officio* and the failure of the jail warden to present the accused in court.[109] In so ruling, the Court stressed that "courts must strive to maintain a delicate balance between the demands of due process and the strictures of speedy trial, on the one hand; and, on the other, the right of the State to prosecute crimes and rid society of criminals."[110]

In a similar vein, the Court in the case of *Aytona v. Paule*[111] found it necessary to depart from the conventional rule that the negligence of counsel binds the client, invoking the interests of justice as a higher consideration.[112] The Court recognized that the accused's right to a speedy trial was violated being the five-year delay in the proceedings was clearly attributable to the prosecution.[113]

In the recent case of *Galorio v. People*,[114] the Court found that the prolonged delay of approximately 14 years, coupled with the prosecution's lack of diligence and the trial court's repeated procedural lapses, constituted a blatant violation of the accused's right to speedy trial. The Court emphasized that even if the accused did not assert the right at every opportunity, such omission is not fatal where the delay is inordinate and largely attributable to the State and the judiciary.

These precedents reinforce the principle that the courts must remain vigilant in ensuring that delays in the criminal justice process do not prejudice the accused, particularly when such delays are rooted in institutional shortcomings or official neglect.

Here, to the Court's dismay, petitioners were subjected to an unduly prolonged criminal trial, spanning over 14 years, with the primary causes of delay attributable to the court, its agents—including the public prosecutors and presiding judge—and the broader inefficiencies in the administration of justice. This excessive delay is not only unreasonable but also constitutionally *impermissible*. It must be emphasized that the prosecution rested its case on November 23, 2017, upon the submission of its Formal Offer of Evidence. This inordinate lapse of time, attributable not to petitioners but to repeated procedural lapses, repeated absences of the key court officers, and poor case management, constitutes a clear violation of petitioners' right to a speedy trial as guaranteed under Article III, Section 14(2) of the 1987 Constitution, and reinforced by Section 7 of Republic Act No. 8493. Regrettably, to repeat, the prosecution took more than 14 years to prosecute the case. The unjust delay surely violated petitioners right to

a speedy trial.

To be sure, while the existence of a violation of the right to speedy trial is not determined solely by the sheer length of delay, the passage of an extraordinarily lengthy period, as in the case, inevitably demands heightened scrutiny by the courts. Indeed, such excessive delay cannot be viewed in isolation but must be weighed in conjunction with the reasons for the delay, the accused's assertion of their right, and the prejudice suffered as a result.[115] Absent such scrutiny, the Constitutional guarantee of speedy disposition of cases would be rendered hollow and illusory—an empty promise devoid of substantive protection.[116]

The Court cannot simply close this case without addressing the inordinate delay that have come to light. The nearly 17 years it took the trial court to resolve this criminal case is not a result of the complexity of the issues or the volume of evidence in the case, but the cumulative, persistent neglect and inefficiency of the very officers tasked to ensure the expeditious administration of justice.

The records reveal that the public prosecutors assigned to the case repeatedly failed to appear at scheduled hearings, neglected to secure the presence of prosecution witnesses despite due notice, and manifested unpreparedness on multiple occasions. It is evident that the laxity and indifference of the public prosecutors are inexcusable for they directly infringed petitioner's constitutional right to speedy trial and caused the delay of the resolution of the criminal case for 14 years, solely on account of the prosecution.

Equally troubling is the conduct of the PAO counsel for petitioners. The frequent absences of petitioners' counsel, whether due to other court engagements or official functions, repeatedly disrupted the continuity of trial. More gravely, the petitioners' counsel failed to timely invoke petitioners' right to a speedy trial despite the multiple and evident breaches of statutory time limits. Verily, the inaction of petitioners' counsel effectively allowed the delay to persist and prejudiced petitioners.

The Court stresses that the lapses are not minor procedural missteps but grave derelictions of duty that undermine public trust in the criminal justice system. The right to a speedy trial is a shared responsibility among the prosecution, the defense, and the courts. When those entrusted with upholding this constitutional right fail in their obligations—whether by repeated absence, lack of preparation, or disregard for statutory mandates—they not only violate the rights of the accused but also the public's trust and confidence on the administration of justice.

FOR THESE REASONS, the Petition for Review on *Certiorari* is **GRANTED**. The Decision dated July 13, 2022, and the Resolution dated January 16, 2023, of the Court of Appeals in CA-G.R. CR No. 44960 are **REVERSED** and **SET ASIDE**. Petitioners Randy Dela Cruz *y* Deguero and Ricky Vidanes *y* Osela are hereby **ACQUITTED** in Criminal Case No. 03-6050-M filed before Branch 80, Regional Trial Court, Morong, Rizal on the ground of violation of accused's right to speedy trial, without prejudice to any civil action which the private complainant/s may file against them. They are **ORDERED** immediately **RELEASED** from confinement unless they are being held

for some other legal grounds.

Further, the Court directs Hon. Ma. Teresa C. Cruz-San Gabriel and Hon. Sheila Marie A. Ignacio, former Presiding Judges of Branch 80, Regional Trial Court, Morong, Rizal; Fiscal Wilfredo G. Oca, Fiscal Beppo Jerome Diloy, Fiscal Ferdinand Arabit, and Fiscal Brend Virgilio Vergara, for the prosecution; and Atty. Michael Perocho, Atty. Allan Catmunan, Atty. Isidro Pedron, and Atty. Janine Prelle Dacanay, for the defense, to **SHOW CAUSE** why they should not be held administratively liable for the inordinate delay in the resolution of Criminal Case No. 03-6050-M.

Let a copy of this Decision be furnished to the Director General of the Bureau of Corrections for immediate implementation. The Director General is directed to report the action he has taken to this Court within five days from receipt of this Decision.

Let entry of judgment be **ISSUED** immediately.

SO ORDERED.

Caguioa (Chairperson), Gaerlan, and *Dimaampao, JJ.,* concur.
Singh,[*] *J.,* on leave.

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[*] On leave.

[1] *Rollo*, pp. 13-30.

[2] *Id*. at 31-45. Penned by Associate Justice Gabriel F. Robeniol and concurred in by Associate Justices Mariene B. Gonzales-Sison and Michael P. Ong of the Seventh Division, Court of Appeals, Manila.

[3] RTC records, pp. 503-512. Penned by Presiding Judge Shiela Marie A. Ignacio.

[4] REV. PEN. CODE, art. 249 states:

> ARTICLE. *Homicide*. – Any person who, not falling within the provisions of article 246 shall kill another without the attendance of any of the circumstances enumerated in the next preceding article, shall be deemed guilty of homicide and be punished by reclusion temporal.

[5] *Id*. at 1-2.

[6] *Id*. at 1.

[7] *Id*. at 36.

[8] TSN, Abigail Garcia, January 25, 2006, pp. 3-4, 6-8, 10. *See also* TSN, Abigail Garcia, April 26, 2006, p. 3.

[9] TSN, Evangeline Versoza, February 16, 2006, pp. 4-6.

[10] TSN, Randy Dela Cruz *y* Deguero, October 14, 2019, pp. 4-5, 7-9, 15-16.

[11] *Id*. at 17.

[12] TSN, Ricky Vidanes *y* Osela, November 26, 2019, pp. 3-5.

[13] *Id*. at 7, 17-18, 20.

[14] RTC records, pp. 503-512.

[15] *Id*. at 512.

[16] *Id*. at 511.

[17] CA *rollo*, pp. 13-14. *See* Notice of Appeal dated March 4, 2020.

[18] *Id*. at 63-65.

[19] *Id*. at 65, 70-71.

[20] *Id*. at 71.

[21] *Id*. at 113-116, 120-121.

[22] *Rollo*, pp. 31-45.

[23] *Id*. at 44.

[24] *Id*. at 38.

[25] *Id*. at 42.

[26] CA *rollo*, pp. 172-175.

[27] *Rollo*, pp. 46-47.

[28] *Id*. at 21.

[29] *Id*. at 22.

[30] *Id*. at 22-26.

[31] *Id*. at 111-114. See Comment on the Petition.

[32] *Id*. at 114-116.

[33] *Id*. at 117-118.

[34] **Heirs of Teresita Villanueva v. Heirs of Petronila Syquia Mendoza**, 810 Phil. 172, 177 (2017).

[35] **Gatan v. Vinarao**, 820 Phil. 257, 266 (2017), *citing* **Diokno v. Hon. Cacdac**, 553 Phil. 405, 428 (2007).

[36] 930 Phil. 250 (2022).

[37] *Id*. at 263, *citing* **Visayan Electric Company v. Alfeche**, 821 Phil. 971, 982 (2017).

[38] **Sorongon v. People**, 904 Phil. 438, 445 (2021).

[39] **People v. Badillos**, 832 Phil. 572, 585 (2018), *citing* **People v. Esteban**, 735 Phil. 663, 670-671 (2014).

[40] CONST. (1987), art. III., sec. 14(2) states:

> SECTION 14. (1) ...
>
> (2) In all criminal prosecutions, the accused shall be presumed innocent until the contrary is proved, and shall enjoy the right to be heard by himself and counsel, to be informed of the nature and cause of the accusation against him, to have a speedy, impartial, and public trial, to meet the witnesses face to face, and to have compulsory process to secure the attendance of witnesses and the production of evidence in his behalf. However, after arraignment, trial may proceed notwithstanding the absence of the accused provided that he has been duly notified and his failure to appear is unjustifiable.

[41] **Magno v. People**, 828 Phil. 453, 462 (2018).

[42] **Almeda v. Office of the Sandiganbayan (Mindanao)**, 791 Phil. 129, 143 (2016).

[43] Titled, "AN ACT TO ENSURE A SPEEDY TRIAL OF ALL CRIMINAL CASES BEFORE THE SANDIGANBAYAN, REGIONAL TRIAL COURT, METROPOLITAN TRIAL COURT, MUNICIPAL TRIAL COURT, AND MUNICIPAL CIRCUIT TRIAL COURT, APPROPRIATING FUNDS THEREFOR, AND FOR OTHER PURPOSES," approved on February 12, 1998.

[44] Republic Act No. 8493 (1998), sec. 7 states:

> SECTION 7. *Time Limit Between Filing of Information and Arraignment and Between Arraignment and Trial*. – The arraignment of an accused shall be held within thirty (30) days from the filing of the information, or from the date the accused has appeared before the justice, judge or court in which the charge is pending, whichever date last occurs. Thereafter, where a plea of not guilty is entered, the accused shall have at least fifteen (15) days to prepare for trial. Trial shall commence within thirty (30) days from arraignment as fixed by the court.
>
> If the accused pleads not guilty to the crime charged, he/she shall state whether he/she interposes a negative or affirmative defense. A negative defense shall require the prosecution to prove the guilt of the accused beyond reasonable doubt, while an affirmative defense may modify the order of trial and require the accused to prove such defense by clear and convincing evidence.

[45] Promulgated April 25, 2017 and took effect on September 1, 2017.

[46] *See* **Licaros v. Sandiganbayan**, 421 Phil. 1075, 1093 (2001), *citing* **Dela Peña v. Sandiganbayan**, 412 Phil. 921, (2001).

[47] **Villareal v. People**, 680 Phil. 527, 552 (2012), *citing* **People v. Tampal**, 314 Phil. 35 (1995).

[48] **Cagang v. Sandiganbayan**, 837 Phil. 815, 855 (2018).

[49] RTC records, p. 101, Order dated February 18, 2004.

[50] *Id*. at 128, Order dated July 5, 2004.

[51] *Id*. at 130.

[52] *Id*. at 135.

[53] *Id*. at 141.

[54] *Id*. at 148.

[55] *Id*. at 168.

[56] *Id*. at 178.

[57] *Id*. at 186.

[58] *Id*. at 201.

[59] *Id*. at 226.

[60] *Id*. at 241.

[61] *Id*. at 246.

[62] *Id*. at 254.

[63] *Id*. at 259.

[64] *Id*. at 260.

[65] *Id*. at 263.

[66] *Id*. at 267.

[67] *Id*. at 270.

[68] *Id*. at 273.

[69] *Id*. at 279.

[70] *Id*. at 281.

[71] *Id*. at 288.

[72] *Id*. at 292.

[73] *Id*. at 293.

[74] *Id*. at 295.

[75] *Id*. at 301.

[76] *Id*. at 307.

[77] *Id*. at 312.

[78] *Id*. at 317.

[79] *Id*. at 324.

[80] *Id*. at 331.

[81] *Id*. at 341.

[82] *Id*. at 350.

[83] *Id*. at 358.

[84] *Id*. at 367.

[85] *Id*. at 377.

[86] *Id*. at 360.

[87] *Id*. at 391.

[88] *Id*. at 397.

[89] *Id*. at 403.

[90] *Id*. at 416.

[91] *Id*. at 428.

[92] *Id*. at 431.

[93] *Id*. at 437.

[94] *Id*. at 447.

[95] *Id*. at 453.

[96] *Id*. at 468.

[97] *Id*. at 475.

[98] *Id*. at 477.

[99] *Id*. at 489.

[100] *Id*. at 495.

[101] *Id*. at 497.

[102] *Id*. at 503-511.

[103] **Chingkoe v. Sandiganbayan**, 931 Phil. 62, 78 (2022), *citing* **Cagang v. Sandiganbayan**, *supra* note 48, at 880-882.

[104] *Id*.

[105] *Rollo*, p. 19.

[106] **B.E. San Diego, Inc. v. Bernardo**, 844 Phil. 980, 985 (2018).

[107] **Air Phils. Corp. v. Int'l. Business Aviation Services Phils., Inc.**, 481 Phil. 366, 381 (2004).

[108] **Estrella v. SM Prime Holdings, Inc.**, 936 Phil. 388, 408 (2023), *citing* **Multi-Trans Agency Phils., Inc. v. Oriental Assurance Corp.**, 608 Phil. 478, 494 (2009).

[108] 517 Phil. 588 (2006).

[109] *Id*. at 598-604.

[110] *Id*. at 598.

[111] 931 Phil. 681 (2022).

[112] *Id*. at 687.

[113] *Id*. at 693-694.

[114] 951 Phil. 316 (2024).

[115] **Alarilla v. Sandiganbayan**, 895 Phil. 542 (2021). *See also* **Cagang v. Sandiganbayan**, *supra* note 48.

[116] **Alarilla v. Sandiganbayan**, *id*.

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