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CITY COURTS' JURISDICTIONAL BORDERS*

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Jurisdiction, in a measure greater than any other attribute, constitutes the life-blood of every court of justice. Possibly, a court can exist without a judge, and a judge without a court. But, without jurisdiction to hear and determine matters presented to it, a court is utterly inconceivable. Its competence to act at all and the validity and binding force of its determinations in the exercise of judicial power are coextensive only with the limits of the jurisdictional borders that have been allotted to it. So it is that when a court decides a controversy without jurisdiction over the subject-matter, it acts *coram non iudice*, and its judgment is void.¹

Understandably, then, jurisdiction in all its varied aspects has time and again, been a fertile ground for spirited debate. The dockets of the Court of Appeals and the Supreme Court are witness to the fact that at the vortex of a good number of the special civil actions instituted before them is the issue of jurisdiction of the lower courts. This is but to be expected. Each court, having as it does the prerogative in the first instance to pass upon its own jurisdiction, oftentimes yield to the temptation of asserting its primacy, if only to provoke the elevation of the case to the highest tribunal for final and authoritative adjudication.

The importance with which jurisdictional issues are regarded is no better reflected than by the fact that no less than the fundamental law has reserved to the Supreme Court the power to be the final arbiter of questions on this matter.² Unfortunately enough,

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¹ *Banco Español-Filipino vs. Palanca*, 37 Phil., 921, 949; *Lipana vs. CFI of Cavite*, 74 Phil., 18; *Gomez vs. Concepcion, et al.*, 47 Phil., 717, 722; *Anuran vs. Aquino, et al.*, 38 Phil., 29, 36.

² Section 2, par. (3), Article VIII, Constitution.

rulings on the jurisdictional area have suffered changes, perhaps in obedience to personal views of jurists at the time of the judicial pronouncement.³ This vital, yet troubled, field has always held out an irresistible invitation for exploration. Perhaps, at no other time than now is it more propitious to do so in some detail as far as the City Courts are concerned.

The Congress of the Philippines, in whom the creation of inferior courts⁴ and, subject to specific restrictions, the allocation and apportionment of the jurisdiction of various courts⁵ are constitutionally vested, has of late accorded the City Courts special treatment. In the judicial hierarchy, City Courts rank no higher than the Justice of the Peace Courts which have since been called "Municipal Courts".⁶ They have all been lumped together under the category of "inferior courts".⁷ Not usually courts of record, they are of limited competence⁸ and occupy the base of the judicial pyramid.⁹ In point of jurisdiction, however, City Courts have always enjoyed greater competence than their counterparts in the municipal level. Even before the enactment of the Judiciary Act of 1948, by force of their respective charters,¹⁰ Municipal Courts of chartered cities had concurrent jurisdiction with Courts of First Instance over a considerable array of criminal cases which were beyond the reach of Justice of the Peace Courts. This disparity was not without justification. Time was when Justices of the Peace need not be lawyers¹¹—Judges of Municipal Courts have always been recruited from the

³E.G.: Compare *Breslin et al. vs. Luzon Stevedoring Co., et al.*, 84 Phil., 618 and *J. M. Tuason & Co., Inc., et al. vs. Court of Appeals, et al.*, G.R. No. L-18128, December 26, 1961. See also: *J. M. Tuason & Co., Inc., et al. vs. Sanvictores, G.R. No. L-16836*, January 30, 1962.

⁴Section 1, Article VIII, Constitution.

⁵Section 2, Article VIII, Constitution.

⁶Section 8, Republic Act 3828.

⁷Section 1, Rule 5, Rules of Court, as amended by Resolution of December 23, 1963.

⁸*Elumbaring vs. Elumbaring*, 12 Phil., 384; *Tuason vs. Crossfield*, 30 Phil., 543; *Africa vs. Gronke*, 34 Phil., 501; *Romey vs. Roxas, et al.*, 70 Phil., 408.

⁹*Barrameda vs. Moir, et al.*, 25 Phil., 44, 48.

¹⁰See: Section 41, Republic Act 409 (Manila); Section 2562-A, Revised Administrative Code, as amended by Republic 224 (Baguio); Section 32, Republic Act 537 (Quezon City); Section 21, Commonwealth Act No. 326 (Bacolod); Section 31, Republic Act 288 (Basilan); Section 78, Republic Act 328 (Calbayog City); Section 76, Commonwealth Act 547 (Cavite City); Section 40, Commonwealth Act 58 (Cebu City); Section 77, Republic Act 170 (Dagupan City); Section 18, Commonwealth Act 51 (Davao City); Section 77, Republic Act 327 (Dumaguete City); Section 56, Commonwealth Act 158 (Iloilo City); Section 77, Republic Act 306 (Legaspi City); Section 77, Republic Act 162 (Lipa City); Section 77, Republic Act 305 (Naga City); Section 77, Republic Act 179 (Ormoc City); Section 77, Republic Act 321 (Ozamis City); Section 77, Commonwealth Act 520 (San Pablo); and others.

¹¹Section 207, Revised Administrative Code.

ranks, and tested in the practice, of the legal profession.¹² That there must have been some reluctance on the part of the legislature to vest in the non-lawyer Justices of the Peace no more than a minimum of judicial competence is easily understandable. Besides, early enough was judicial notice taken of the ease with which the official authority of Justices of the Peace could lend itself to the creation of local bosses exercising oppressive control over ignorant neighborhoods.¹³ So much so that, perhaps, denial to them of too much authority was regarded as among the effective deterrents to the abuse of their offices. This, of course, was never a problem with City Courts. Not only are they presided by competent and upright judges but also they exercise their powers in cities whose inhabitants are predominantly intellectuals not quite as susceptible as their brethren in rural areas to the unjust impositions of authority. All these justified the conferment upon them of jurisdiction wider in scope.

Changed conditions were later to erase the bases for these distinctions. The fundamental law has since exacted admission to the practice of law in the Philippines as a minimum qualification for appointments to judgeship in all levels.¹⁴ Gradually, then, the non-lawyer incumbents in the inferior courts had to give way to their better qualified successors. Widespread illiteracy and ignorance in the rural areas soon began to yield to the enlightening influences of education and the degree of civilization took an unprecedented upsurge. No longer were the dangers of local bossism to be feared. The judges in the lowest echelon had since been ready to assume a wider range of competence. So it is that, in the Judiciary Act of 1948, which was calculated amongst others to upgrade the jurisdiction of the Justices of the Peace,¹⁵ radical changes were effected. Sections 86, 87 and 88 of the Judiciary Act put Justices of the Peace on the same level as Judges of the Municipal Courts of chartered cities by giving them the same jurisdiction in both criminal and civil cases.¹⁶ In fact, Justices of the Peace in the capitals of provinces were invested, upon assignment by the respective District Judge in each case, with like jurisdiction as the Court of First Instance to try parties charged with an offense committed within the province in which the penalty provided by law does not exceed imprisonment for two years and four months, or a fine of two thousand pesos, or

¹²Section 207, Revised Administrative Code; Section 71, Judiciary Act of 1948, as amended by Section 5, R.A. 3749.

¹³*Alberto vs. Nicolas*, 279 U.S., 139, 147, 73 L. ed., 642 645.

¹⁴Section 8, Article VIII, Constitution.

¹⁵*Natividad vs. Robles, G.R. No. L-3612*, December 29, 1950.

¹⁶*People vs. Palmon*, 47 O.G., No. 12 Supp., 29, 32-33.

both such imprisonment and fine, and, in the absence of the District Judge, like jurisdiction within the province as the Court of First Instance to hear applications for bail;¹⁷ and, in civil cases, they have been conferred interlocutory jurisdiction¹⁸ as the Court of First Instance, in the absence of the District Judge,¹⁹ as well as as concurrent jurisdiction with the Courts of First Instance to appoint guardians.²⁰

But, the City Courts were not to lose their preeminent position over the Justice of the Peace Courts for long. With the advent in August, 1959 of Republic Act 2613, which introduced amendments to the Judiciary Act of 1948, City Courts — as well as the Justice of the Peace courts in the capitals — were given a boost to resume their lead. In criminal cases, they have been conferred — in their own right and no longer merely by assignment of the District Judge — “like jurisdiction” as the Court of First Instance to try parties charged with an offense committed within the province in which the penalty provided by law does not exceed *prision correccional* or imprisonment for not more than six years or fine not exceeding three thousand pesos or both.²¹ This was a definite enlargement of the jurisdiction of the City Courts which, like the Justice of the Peace Courts, ordinarily are competent to take original cognizance only of offenses, other than election offenses, the penalty of which is imprisonment for not more than six months, or a fine of not more than two hundred pesos, or both such fine and imprisonment²² excepting, of course, the specific offenses enumerated in paragraph (b) of Section 87 aforesaid where the penalty exceeds the limits of their original exclusive jurisdiction²³ in which they all have concurrent original jurisdiction with the Courts of First Instance. More than this, in reference to those cases over which the City Courts were given “like jurisdiction” as the Courts of First Instance, the former have expressly been elevated to the category of Courts of First Instance by the requirement that proceedings taken therein be recorded. And to top it all, their decisions on the merits thereon are appealable direct to the Court of Appeals or the Supreme Court

¹⁷ Section 87, last paragraph, Judiciary Act of 1948.

¹⁸ Including the hearing all of motions for the appointment of a receiver, for temporary injunctions, and for all other orders of the court which are not final in their character and do not involve a decision of the case on its merits.

¹⁹ Section 88, last paragraph, Judiciary Act of 1948.

²⁰ Sections 86-(c) and 90, Judiciary Act of 1948.

²¹ Section 87, penultimate paragraph, Judiciary Act of 1948, as amended by Republic Act 2613.

²² Section 87, paragraph (c), Judiciary Act of 1948, as amended by Republic Act 2613.

²³ *People vs. Palmon*, supra; *People vs. Colicio*, G.R. No. L-2885, February 26, 1951.

as the case may be.²⁴ The same trend was no less evident in civil cases. The jurisdictional amount for cases triable by the inferior courts was, under the amendatory law, pegged at five thousand pesos, exclusive of interest and costs²⁵ — a marked increase from the two hundred-peso limit before the Judiciary Act of 1948,²⁶ and the two thousand-peso maximum under the original provisions of said Judiciary Act.²⁷

True to the saying that nothing is permanent but change, in barely four short years, change the Judiciary Act did. Came Republic Act 3828 on June 22, 1963. Original jurisdiction to try criminal cases by the Municipal Courts and City Courts now include all offenses, except violations of election laws, in which the penalty provided by law is imprisonment for not more than three years, or a fine of not more than three thousand pesos, or both such fine and imprisonment²⁸ and the original nine (9) categories of cases over which these courts had concurrent jurisdiction with the Court of First Instance have now been increased to eleven (11), with the addition thereto of illegal use of aliases and concealment of deadly weapons.²⁹ And, the City Courts, as do the justice of the peace courts of capitals, already have “like jurisdiction” as the Courts of First Instance over offenses in which the penalty provided does not exceed *prision correccional* or imprisonment for not more than six years or fine not exceeding six thousand pesos or both, instead of only three thousand pesos fine prior to the amendment.³⁰ In civil cases, upon the other hand, the jurisdictional limit has been extended over cases where the value of the subject matter or amount of the demand does not exceed ten thousand pesos, exclusive of interest and costs.³¹ Jurisdictionwise, the inferior courts of today are a far cry from their predecessors of only a few years back.

The trend is thus unmistakable. As clearly evident is the legislative policy progressively aimed at expanding their competence³² and at the same time relieving the Courts of First Instance of much of their jurisdictional burdens. This may perhaps be attributable to

²⁴ Section 87, last paragraph, Judiciary Act of 1948, as amended by Republic Act 2613.

²⁵ Section 88, *idem*.

²⁶ Section 68, Act 136.

²⁷ Section 88, Judiciary Act of 1948.

²⁸ Section 87, paragraph (c), Judiciary Act of 1948, as amended by Republic Act 3828.

²⁹ Section 87, paragraph (b), *idem*.

³⁰ Section 87, penultimate paragraph, *idem*.

³¹ Section 88, *idem*.

³² *Batangas Transportation Co., et al. vs. Arguelles, et al.*, 59 O.G., No. 45, pp. 7769, 7771.

a plethora of influencing factors. But, we prefer to believe that much is due to the marked capacity and ability which those who man the inferior courts, City Courts included, have demonstrated for the assumption of more authority.

These jurisdictional developments have not, however, been without their share of growing pains. It is not always easy to anticipate all possible situations. Thus it is that certain areas in the law as it now stands are still given to disturbing conflict of views.

The grant of like jurisdiction as the Courts of First Instance in cases punishable with *prision correccional* or imprisonment of not more than six years or fine not exceeding six thousand pesos, or both, under the penultimate paragraph of Section 87, Judiciary Act of 1948, as amended, opens up some uncertainties in the law. Standing by itself, this provision appears to be innocuous. But, taken in context, it is pregnant with seeds of ambiguity.

It will be noted that in the grant of *like jurisdiction* aforesaid, only the maximum limit is fixed—no minimum is indicated. City Courts, like other inferior courts, already have original jurisdiction over offenses punished by imprisonment for not more than three years or a fine of not more than three thousand pesos, or both. And, even before the introduction of the “like jurisdiction” authority above stated, they were already conceded original concurrent jurisdiction with the Courts of First Instance in those cases specifically enumerated in paragraph (b) of Section 87 of the Judiciary Act aforesaid whenever the penalty prescribed for the specific offense exceeds the limits of their exclusive original jurisdiction of not more than three years, or a fine of not more than three thousand pesos or both. However, a procedural difference exists. In the exercise of the like jurisdiction granted by the amendatory law, the City Courts are to keep a record of their proceedings and their decisions on the merits are directly appealable to the Court of Appeals or to the Supreme Court as the case may be. In other cases, whether within their exclusive original jurisdiction or their concurrent jurisdiction with the Courts of First Instance, the cases are disposed of in the usual manner of a court not of record and their judgments are reviewable by the Courts of First Instance.³³ Inasmuch as the grant of jurisdiction aforesaid did not set a minimum as to the penalty included therein and considering that a penalty within the range of the City Courts’ original exclusive jurisdiction or their original concurrent jurisdiction is below the maximum, it is within the realm

³³ Section 45, Judiciary Act of 1948, as amended by Republic Act 2613.

of speculation to say that those cases are within the coverage of the term “like jurisdiction”. It is because of this that the question as to when the proceedings should be recorded and when the decision will be appealable to the Court of Appeals or to the Supreme Court inevitably projects itself into the fore.

The views on this score are divergent. One school of thought holds that the grant of “like jurisdiction” embraces only cases not otherwise included in the original exclusive or original concurrent jurisdiction of the City Courts. The other extreme takes the broad view and submits that as long as the case involves an offense punishable with a penalty of not more than *prision correccional* or imprisonment for not more than six years or a fine of not exceeding six thousand pesos or both, the matter must be decided according to the last paragraph of Section 87 of the Judiciary Act, as amended, that is, the proceedings recorded and appeal therefrom taken direct to the Court of Appeals or to the Supreme Court. It is asserted in this connection that, if the intent of legislature is to enlarge the competence of City Courts as well as to give greater force to their determinations, the spirit of the law recommends such an interpretation.

To our mind, the phrase “like jurisdiction as the court of first instance to try” — not alone to investigate — is the key to the problem. The accent is on the words “to try”. Concededly, the intent to expand the jurisdictional borders of the City Courts is beyond doubt. The enlargement clearly consists in the conferment of “like jurisdiction.” Certainly, this could not refer to cases already within the jurisdiction of the City Courts — otherwise, there would be no enlargement to speak of. It could cover only cases formerly within the exclusive jurisdiction of the Courts of First Instance and not otherwise within the competence of the said City Courts.

Had the intention of Congress been to cover cases which fall within the original jurisdiction of the City Courts, it would not have gone into the elaborate process of employing two paragraphs for the purpose. It would have just said in one stroke that all cases tried by the City Courts in which the penalty does not exceed *prision correccional* or imprisonment of not more than six years or a fine not exceeding six thousand pesos or both shall be appealable to the Court of Appeals or to the Supreme Court. There would have been no necessity for Congress to repeat in the last paragraph that cases filed under the preceding paragraph “shall be tried and decided on the merits”, unless it was referring to cases over which the Municipal Court did not have original jurisdiction and could not normally do anything except to hold a preliminary investigation. Indeed, a contrary interpretation would render superfluous and nugatory the inclusion of the “municipal courts of chartered cities” in the grant

of original jurisdiction in the first paragraph, sub-paragraphs (a), (b) and (c) of Section 87 of the Judiciary Act. Otherwise stated, the last two paragraphs of Section 87 aforesaid must necessarily refer to cases not within the original exclusive and original concurrent jurisdiction of the City Courts.³⁴

This position does no violence to the spirit behind the law. Reference to the spirit, it must be remembered, is warranted only when ambiguity exists in the letter of the law. Here, the letter is clear. It controls. City Courts, like other inferior courts, are of special and limited jurisdiction. They cannot have any authority except those which are expressly granted to them by law³⁵ And, any grant of this nature must be strictly construed and may not, by construction or implication, be extended beyond the clear import of the grant.³⁶

Nor can it be said in this connection that the proposed construction will unduly constrict the scope of the grant considering, as it is intimated, that only very few cases would then come within its purview. This, too, is of little consequence. A cursory perusal of the provisions of the Revised Penal Code, not to mention those of special laws, will readily reveal that there is actually a sizable array of offenses in which the penalty prescribed by law is from more than three years imprisonment or three thousand pesos fine to not more than *prision correccional* or six years imprisonment or six thousand pesos fine.³⁷

³⁴ People vs. De Jesus, CA—G.R. No. 03874-CR, June 29, 1963.

³⁵ Elumbaring vs. Elumbaring, supra.

³⁶ Narcida vs. Bowen, 22 Phil., 365, 366-367; Tuason vs. Crossfield, supra; Africa vs. Gronke, supra; People vs. Yancha, 53 O.G., No. 22, pp. 8150, 8154.

³⁷ E.g.: *Prision correccional* maximum (4 years, 2 months and 1 day to 6 years) is prescribed in Art. 136—Conspiracy to commit rebellion; Art. 140, par. 2—Member in sedition; Art. 142—Inciting to sedition; Art. 157—Evasion of service of sentence if made thru unlawful entry, by use of picklocks, or thru connivance; Art. 170—Falsification of legislative documents; *prision correccional* medium and maximum (2 years, 4 months and 1 day to 6 years) is prescribed in Art. 124, par. 2—Arbitrary detention for more than three but not more than 15 days; Art. 128 par. 2—Violation of domicile committed at night time; Art. 130—Searching domicile without witnesses; Art. 132, par. 2—Interruption of religious worship committed with violence or threats; Art. 148—Direct assaults; Art. 157—Evasion of service of sentence; Art. 167—Counterfeiting, importing and uttering instruments payable to bearer; Art. 172—Falsification by private individuals and use of falsified documents; Art. 173—Falsification of wireless, cable, telegraph and telephone messages, and use of said falsified messages; Art. 176—Manufacturing and possession of instruments or implements for falsification; Art. 192—Importation and sale of prohibited drugs; Art. 217, No. 1—Malversation of less than P200 (as amended by Rep. Act No. 1060); Art. 223, par. 1—Conniving with or consenting to evasion of fugitive sentenced by final judgment; Art. 229—Revelation of secrets by an officer; Art. 245—Abuses against chastity; Art. 251 par. 2—Death caused in a tumultuous affray if it cannot be determined who inflicted the serious physical injuries; Art. 255, par. 2—Infanticide, if committed by the mother of the child to conceal

Still another jurisdictional penumbra was ushered in by the latest amendment to the Judiciary Act.³⁸ As aforesaid, by paragraph (c) of Section 87 thereof, the original exclusive jurisdiction of inferior courts has been expanded to cover offenses, except violations of election laws, in which the penalty provided by law is imprisonment for not more than three years, or a fine of not more than three thousand pesos, or both. Surprisingly, thru oversight perhaps, the minimum limit of the original jurisdiction of the Courts of First Instance has been left unamended and still stands over cases where the penalty provided by law is imprisonment for more than six months or a fine of more than two hundred pesos.³⁹ There is thus an area over which the respective jurisdictions of the inferior courts and the Courts of First Instance overlap, that is, over cases the penalty of which is more than six months or a fine of more than two hundred pesos and not more than three years or a fine of not more than three thousand pesos or both. Doubt then exists as to whether there was an implied amendment of Section 44 (f) to raise the minimum of the jurisdictional bounds of the Courts of First Instance or else whether it was intended to give concurrent jurisdiction in both courts to cases coming within that debatable field.

There is, of course, much to the theory that said failure to amend Section 44-(f) aforesaid must be presumed to have been intentional and that the only rational conclusion deducible therefrom is the intent to allow the Courts of First Instance to continue having competence to take cognizance of cases mentioned therein notwithstanding the increase of the jurisdictional limits of the inferior courts. For one thing, implied repeals or amendments are not favored. And, in the matter at hand, no irreconcilable conflict between

her dishonor; Art. 256, par. 3—Intention abortion, if the woman shall have consented; Art. 258, par. 1—Abortion practiced by the woman herself or by her parents; Art. 258, par. 3—Abortion committed by parents of the pregnant woman; Art. 263, par. 2—Serious physical injuries, if victim has lost an important part of body or its use; Art. 276 par. 2—Abandoning a minor who died as a result of such abandonment; Art. 280, par. 2—Qualified trespass to dwelling, if committed with violence or intimidation; Art. 302—Robbery in an uninhabited place or in a private building; Art. 304, par. 2—Possession of picklocks or similar tools, if offender be a locksmith; Art. 309, par. 2—Theft, if value exceeds P6,000.00 but not more than P12,000; Art. 321, par. 6—Other forms of arson, if damage does not exceed P6,000 but over P200; Art. 322, par. 4—Other cases of arson if damage is over P1,000; Art. 330, par. 1—Damages and obstruction to means of communication, such as railway, telegraph or telephone lines; Art. 333—Adultery; Art. 341—White slave trade; Art. 348, last part—Usurpation of civil status, if the purpose is to defraud offended party, Art. 350—Marriage contracted against provisions of laws.

³⁸ Republic Act 3828.

³⁹ Section 44-(f), Judiciary Act of 1948, as amended.

the two jurisdictions exists inasmuch as it has heretofore been held that there is no objection to the legislature's act in vesting concurrent jurisdiction in two courts over the same offenses.⁴⁰

Nor is the use of the words "Original jurisdiction" in the epigraph of Section 87 of any moment since there is no indication therein that the same is exclusive. In fact, the established rule is that over the cases mentioned in paragraph (b) thereof, the inferior courts and the Courts of First Instance have concurrent jurisdiction where the penalty exceeds the maximum limits of the inferior courts—and this, notwithstanding the use of the words "original jurisdiction" aforesaid.

The compelling force of the foregoing ratiocinations, notwithstanding, opinion is not wanting that here the spirit, rather than the letter of the law, should prevail. The amendment aforesaid was precisely intended to enlarge the jurisdiction of the inferior courts in order, amongst others, to leave the Courts of First Instance unencumbered with minor cases, the adjudication of which the inferior courts have demonstrated their competency and ability to justly assume. Hence, it is desirable that with the amendment of Section 87, the corresponding adjustment of the limits set forth in Section 44 (f) of the Judiciary Act should be enacted so that the cases cognizable by the Courts of First Instance should begin with those punished by more than three years imprisonment or a fine of more than three thousand pesos or both.

In civil cases, jurisdiction has been relatively untroubled in so far as the City Courts and other inferior courts are concerned. The limits of their competence have invariably been spelled out in unequivocal terms and disputes, if any, were confined to the determination of the jurisdictional amount particularly in those instances where more than one claim or cause of action is asserted in a single action. Even here, the matter was early put at ease by jurisprudence. And, in fact, in the provisions of Republic Act 3828 heretofore adverted to, the tests therefor established by jurisprudence have been incorporated as definite provisions of the Judiciary Act.⁴¹ Not to be outdone, the Supreme Court has followed suit when it promulgated the new Rules of Court.⁴² Lesser cause for dispute in this area may now be expected—all to the interest of a more orderly and speedy administration of justice.

⁴⁰ People vs. Palmon, supra.

⁴¹ Section 88, Judiciary Act of 1948, as amended by Republic Act 3828.

⁴² Section 5, Rule 2, Rules of Court.

In this modest exposition, we have sought to trace along general lines the movements that have thus far been undertaken in the ever expanding jurisdictional borders of the City Courts. It is gratifying to note that the trend has been consistently towards investing said courts with wider competence and according to their determinations greater respect and binding force. But, we have also observed that the improvements have left out pockets of uncertainty which still cry for authoritative clarification. We are convinced that if we are to have a truly orderly and speedy administration of justice, the eradication of the causes of uncertainty which invariably and quite unnecessarily bring about delays, should be the order of the day. To this end, we feel the following guidelines should be adopted—

1.—City Courts have original exclusive jurisdiction over offenses, except violations of election laws, in which the penalty provided by law is imprisonment for not more than three years, or a fine of not more than three thousand pesos, or both such fine and imprisonment;

2.—City Courts likewise have original jurisdiction over the cases enumerated in paragraph (b), Section 87 of the Judiciary Act of 1948 as amended, which jurisdiction shall be exclusive if the penalty prescribed therefor does not exceed three years imprisonment or a fine of not more than three thousand pesos or both and shall be concurrent with the Courts of First Instance where the penalty, prescribed exceeds said limits;

3.—City Courts have original concurrent jurisdiction with Courts of First Instance over all other offenses in which the penalty prescribed by law exceeds three years imprisonment or a fine of three thousand pesos or both but not more than *prision correccional* or imprisonment for not more than six years or a fine of not more than six thousand pesos or both such fine and imprisonment, in which instances their proceedings shall be recorded and appeal from their decisions thereon shall be taken direct to the Court of Appeals or to the Supreme Court as the case may be;

4.—The original jurisdiction of Courts of First Instance under Section 44 (f) of the Judiciary Act as amended should be understood to have been changed to cover offenses in which the penalty provided by law is more than three years of imprisonment or a fine of more than three thousand pesos or both.

The foregoing guideposts are presented before you, not in an attempt to lay down an authoritative delineation of jurisdictional boundaries, but merely with the hope that they will provide food for thought. For, if only to arouse interest in and provoke intelligent discussion of the jurisdictional problems in the City Courts, I feel that my trip will not have been in vain.