



Francisco C. De La Rama v. The People's Court

G.R. No. L-982

Country: Philippines

Region: Asia

Year: 1946

Court: Supreme Court

Health Topics: Chronic and noncommunicable diseases, Health care and health services, Infectious diseases, Medicines, Poverty, Prisons

Human Rights: Right to liberty and security of person

Facts

The Petitioner was an accused seeking bail on the grounds of ill health. In the meantime, he had filed a motion asking for permission to be confined and treated in a hospital while the bail petition was being considered. The People's Court ordered that the Petitioner be temporarily confined and treated in the Quezon Institute, a hospital. The Petitioner's bail application was eventually rejected.

During the Petitioner's stay in the hospital, the Medical Director of the Quezon Institute submitted a report to the People's Court (the Report) that stated that the Petitioner suffered from a "minimal, early, unstable type of pulmonary tuberculosis, and chronic granular pharyngitis." The Report went on to state that the Quezon Institute had "seen many similar cases later progressing into advanced stages when treatment and medicine are no longer of any avail," and recommended that the Petitioner "continue his stay in the sanatorium for purposes of proper management, treatment and regular periodic radiographic check-up."

As a result of the Report, the Petitioner re-applied for bail on the grounds of ill health, claiming that it was necessary for him to be released on bail in order for him to receive effective and affordable treatment. His petition for bail was again rejected, with the People's Court instead ordering that the Petitioner be further treated at the Quezon Institute, and that the Medical Director of the Quezon Institute submit monthly reports on the Petitioner's condition. The Petitioner sought judicial review of this decision before the Supreme Court.

Decision and Reasoning

The Court held that the People's Court had acted with grave abuse of discretion by refusing to release the Petitioner on bail. Given the findings in the Report, continued confinement would be injurious to the Petitioner's health.

The Court emphasized that the People's Court had in many previous cases applied the well-established doctrine that defendants had the right to be released on bail when their imprisonment might cause serious health concerns. These cases included the cases against Pio Duran (case no. 3324) and Benigno Aquino (case no. 3527) in which the defendants were released on bail on the ground that they were ill and their continued confinement in prison would be injurious to their health or endanger their life.

It accordingly set aside the order of the People's Court that denied bail to the Petitioner, and ordered the People's Court to render a new decision.

Decision Excerpts

"The fact that the denial by the People's Court of the petitioner for bail is accompanied by the above-quoted order of confinement of the petitioner in the Quezon Institute for treatment without the latter's consent, does not in any way modify or qualify the denial so as to meet or accomplish the humanitarian purpose or reason underlying the doctrine adopted by modern trend of court's decisions which permit bail to prisoners, irrespective of the nature and merits of the charge against them, if their continuous confinement during the pendency of their case would be injurious to their health or endanger their life." Page 5.

"...taking into consideration that the petitioner's previous petition for bail was denied by the People's Court on the ground that the petitioner was suffering from quiescent and not active tuberculosis, and the implied purpose of the People's Court in sending the petitioner to the Quezon Institute for clinical examination and

diagnosis of the actual condition of his lungs, was evidently to verify whether the petitioner is suffering from active tuberculosis, in order to act accordingly in deciding his petition for bail; and considering further that the said People's Court has adopted and applied the well-established doctrine cited in our above-quoted resolution, in several cases, among them, the cases against Pio Duran (case No. 3324) and Benigno Aquino (case No. 3527), in which the said defendants were released on bail on the ground that they were ill and their continued confinement in New Bilibid Prison would be injurious to their health or endanger their life; it is evident and we consequently hold that the People's Court acted with grave abuse of discretion in refusing to release the petitioner on bail." Page 5.

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