

Impeachment Saga: Law, Finality, and the Discipline of Restraint

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The Philippine Supreme Court’s ruling voiding the impeachment complaints against Vice President Sara Duterte for violating the one-year bar under Article XI, Section 3(5) of the 1987 Constitution¹ has become the latest flashpoint in the perennial tension between political passions and constitutional discipline. The decision was accompanied by the pronouncement that it was “immediately executory,”² prompting the Senate to archive the impeachment proceedings.³ Even as a motion for reconsideration was filed and entertained by the Court,⁴ the decision’s binding force was neither suspended nor diminished.

It is tempting, particularly in cases where the outcome cuts against one’s own political inclinations, to view legal technicalities as obstacles to the pursuit of justice as we see it. I may not agree with the pace or direction of the impeachment process in this case. But the discipline of the rule of law demands that law be stripped of the convenience of our personal emotions. It is not a tool for bending outcomes to match our preferences; it is a framework that restrains both the will of the majority and the impulses of the powerful.

The legal principles in play here are distinct but capable of coexistence. The “immediately executory” nature of a judgment speaks to its *enforceability* from the moment of promulgation, irrespective of pending post-judgment motions. A motion for reconsideration, by contrast, addresses *procedural review*, allowing the Court itself to revisit its own ruling within the reglementary period.⁵ These doctrines do not collide; they pass each other like parallel tracks serving the same constitutional journey.

Article VIII, Section 4(3) of the Constitution provides that any decision of the Supreme Court “shall be final,”⁶ a finality that means there is no higher tribunal to which the judgment can be appealed.⁷ This, however, does not preclude the Court from modifying or reversing its decision upon a timely motion for reconsideration.⁸ What the declaration of immediate executory effect adds is the command that the judgment be obeyed at once, without awaiting the expiry of the period for seeking such reconsideration. This discretion has been used before, as in *Lambino v. Commission on Elections*,⁹ to halt unconstitutional acts without delay, and in election cases under Section 6 of the Omnibus Election Code,¹⁰ where the stability of public office demands swift enforcement.

¹ CONST. (1987), art. XI, § 3(5).

² See Philippine Star, Supreme Court: VP Sara Impeachment Ruling Immediately Executory (Aug. 5, 2025).

³ Id.

⁴ See Manila Standard, *SC to Hear Motion for Reconsideration in Duterte Impeachment Ruling* (Aug. 6, 2025).

⁵ RULES OF COURT, Rule 52, § 1; Rule 56.

⁶ CONST. (1987), art. VIII, § 4(3).

⁷ See San Luis v. Court of Appeals, G.R. No. 130469, Feb. 3, 1999, 302 SCRA 192.

⁸ RULES OF COURT, Rule 52, § 1.

⁹ G.R. No. 174153, Oct. 25, 2006, 506 SCRA 1.

¹⁰ Omnibus Election Code, Batas Pambansa Blg. 881, § 6.

In our legal tradition, the mere filing of a motion for reconsideration does not suspend the enforceability of a judgment absent an order to that effect.¹¹ As the Court held in *De los Santos v. Metropolitan Bank & Trust Co.*,¹² post-judgment remedies interrupt finality for purposes of immutability, but do not stay execution unless a stay is expressly ordered. This preserves both the litigant's right to challenge a decision and the constitutional order's need for immediate compliance with authoritative rulings.

In this light, the Senate's archival of the impeachment case was not an act of political expediency but one of constitutional necessity. Once the Court, acting within its jurisdiction, declared the complaints void and its ruling immediately executory, the Senate was bound to comply. To proceed would have been to defy a binding judicial determination on jurisdiction — a step that would undermine the very constitutional order the impeachment process is supposed to protect. Archiving the case avoided the kind of institutional standoff that has historically strained our constitutional system, as in the aftermath of *Estrada v. Desierto*.¹³

One can debate endlessly whether the Court was right or wrong in its reading of the Constitution in this instance. That debate is not trivial, and it is part of the healthy friction of democratic governance. But in the hierarchy of constitutional imperatives, the immediate concern is not whether the decision aligns with our politics; it is whether we accept the discipline that, in a constitutional democracy, the Court's interpretation binds unless and until it is overturned by lawful means. The fundamentals — separation of powers, judicial supremacy in constitutional interpretation, and the stability of legal order — are more important than the perceived correctness of any single judgment.

The rule of law is at its most demanding when it requires us to abide by decisions we believe are mistaken. The genius of constitutional government is that it channels disagreement into lawful remedies: in this case, the motion for reconsideration. If the Court changes its mind, compliance with the earlier ruling will not have harmed the system. If the Court affirms its ruling, our fidelity to that ruling will have affirmed something greater than our political preferences — it will have affirmed our collective commitment to be governed by law, even when the law tells us “no.”

¹¹ RULES OF COURT, Rule 52, § 4.

¹² G.R. No. 153852, Oct. 25, 2005, 474 SCRA 114.

¹³ G.R. Nos. 146710-15, Mar. 2, 2001, 356 SCRA 108.