

The Right of Confrontation in the Philippines
Since 1900: *Savory Luncheonette v. Lakas ng
Manggagawang Pilipino*: A Precedent?

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21 *ATENEO L. J.* 44 (1976)

SUBJECT: CRIMINAL PROCEDURE

KEYWORDS: INDUSTRIAL PEACE ACT

The Article discusses the implications brought about by the decision of the Supreme Court in *Savory Luncheonette v. Lakas ng Manggagawang Pilipino*, 62 SCRA 285 (1975), regarding certain violations of Republic Act (R.A.) No. 875, or the Industrial Peace Act. The main issue in the case was centered on Article IV, Section 19 of the New Constitution (1973) and Rule 115, Section 1 (f) of the New Rules of Court. The Author notes how the Court ruled on the right of confrontation guaranteed in criminal cases and how this should be made to apply to non-criminal cases, which necessarily included administrative proceedings before tribunals with quasi-judicial powers. The flaw, as mentioned by the Author, was a result of the improper use of a former criminal case to resolve the present *Savory* case which centered on a labor dispute. Due to the ruling of the case, the unnecessary expansion of the scope of applying the right to confrontation resulted.