

Title: Manzano vs. Court of Appeals (and Melecia Madolaria/ New United Foundry Manufacturing Corporation)

Facts:

Angelita Manzano petitioned the Philippine Patent Office for cancellation of Letters Patent No. UM-4609 granted to Melecia Madolaria for an LPG gas burner design, which was later assigned to New United Foundry Manufacturing Corporation (UNITED FOUNDRY). Manzano contended that the utility model was not inventive, new, or useful, did not meet the requirements, and that Madolaria was not the true inventor. Furthermore, Manzano alleged the model had been previously known and used, and was for sale more than a year before the patent application.

Manzano submitted documentary evidence, including an affidavit of alleged existence of prior art and brochures from Manila Gas Corporation and Esso Standard Eastern, Inc. Additionally, Manzano and two witnesses testified regarding their claims, emphasizing the similarities of the patented model to other existing models.

In contrast, UNITED FOUNDRY presented one witness, Rolando Madolaria, who testified on behalf of the utility model's claimed originality and novelty.

Issues:

1. Whether the utility model covered by the Letters Patent No. UM-4609 was new and inventive or was anticipated by prior art.
2. Whether Letters Patent No. UM-4609 was obtained by fraud or misrepresentation.
3. Whether the Court of Appeals erred in affirming the decision of the Director of Patents which upheld the Letters Patent.

Court's Decision:

The Supreme Court upheld the decisions of both the Director of Patents and the Court of Appeals. It confirmed the presumption of the correctness of the Patent Office's actions, concluding that Manzano did not provide clear and convincing evidence to overcome the presumption that Madolaria was the original and true inventor.

The Supreme Court underscored that the novelty of an invention is a question of fact determined by the Patent Office and affirmed by substantial evidence. It further stressed that documentary evidence presented by Manzano was insufficient, as the brochures did not indicate dates and thus could not establish anticipation. Additionally, the Court found the oral testimonies of Manzano's witnesses unconvincing and uncorroborated.

Doctrine:

The doctrine established in this case is the presumption of correctness of the official actions of the Patent Office, and that findings of fact regarding the patentability of an invention, novelty, and usefulness are within the competence of the Patent Office. Doubts as to patentability are resolved in favor of the Office, and substantial evidence is required to overcome the presumption of patent validity.

Historical Background:

At the time, Republic Act No. 165 (as amended) governed patent law in the Philippines. This case reaffirms the principle that patents are presumed valid and that the burden of proving lack of novelty falls upon the individual challenging the patent. It also underscores the expertise of the Philippine Patent Office and the deference appellate courts afford to the Office's specialized knowledge in patent matters.