

Title:

NAPOLEON R. GONZAGA AND RICARDO R. GONZAGA vs. ATTORNEY EUGENIO V. VILLANUEVA, JR.

Facts:

The complainants, Napoleon R. Gonzaga and Ricardo R. Gonzaga, engaged in a dispute with respondent Atty. Eugenio V. Villanueva, Jr. following the murder of their parents in Forbes Park, Makati. Atty. Villanueva initially offered his legal services purportedly as a sympathetic relative. The complainants, overwhelmed by their loss and trusting the respondent's representation of their parents in previous cases, authorized Atty. Villanueva to represent them in the murder case.

Subsequently, on August 1, 1977, the complainants signed what they believed to be an authorization limited to representation in the criminal investigation, presented by Atty. Villanueva during the funeral preparations. However, Atty. Villanueva filed a separate petition for the administration of the estate of the complainants' parents—signed solely by himself and containing errors—without the complainants' consent and despite knowing of a similar petition filed by Atty. William Mirano, as commissioned by the complainants.

When confronted, Atty. Villanueva first blamed his secretary for misdrafting the document, later stating he predicted necessary steps ahead of time. The complainants, out of courtesy, clarified that his role would only include assistance until their appointment as co-special administrators of the estate. Despite their appointment and the termination of his authority, Atty. Villanueva continued to appear in the intestate proceedings, leading the complainants to file a motion for the termination of his services.

Issues:

1. Whether Atty. Villanueva employed deceit in procuring the complainants' signatures on the representation document.
2. Whether Atty. Villanueva's continued representation after termination was improper.

Court's Decision:

The Supreme Court resolved both issues affirmatively. It held that Atty. Villanueva had deceitfully obtained the authority to handle the intestate proceedings, evidenced by the hastily signed document amidst distressing circumstances and errors found in the respondent's petition. It also found that Atty. Villanueva's persistent appearances post-termination were improper. Despite public admission of his revocation, Atty. Villanueva did

not cease representation, thereby committing willful misconduct. Consequently, the Court suspended Atty. Villanueva from the practice of law for six months.

Doctrine:

An attorney-client relationship can be terminated by the client at any time with or without cause, and any continued representation by an attorney without authorization may constitute professional misconduct warranting disciplinary action.

Historical Background:

This 25-year-old case illustrates the strict standards of legal ethics and professional conduct required of attorneys. Even in complex emotional circumstances, such as family tragedy, the integrity of legal representation must not be compromised. The lengthy duration of the case was mainly due to delays, ill health of parties involved, and a lack of diligent pursuit from both complainants and respondent, showcasing the processes of the Philippine legal system in administering justice while being challenged with procedural obstacles.