

****Title:****

Re: Letter Complaint of Merlita B. Fabiana Against Presiding Justice Andres B. Reyes, Jr., Associate Justices Isaias P. Dicdican and Stephen C. Cruz

****Facts:****

Merlita B. Fabiana, the widow of the late Marlon Fabiana, filed a letter complaint against CA Presiding Justice Andres B. Reyes, Jr., Associate Justice Isaias P. Dicdican, and Associate Justice Stephen C. Cruz. The complaint hinged on an alleged defiance of a Supreme Court resolution dated January 13, 2010, relating to a claim for death benefits following the passing of Marlon Fabiana.

The Fabiana heirs were awarded various monetary claims by a Labor Arbiter decision dated December 19, 2007, stemming from Marlon's death. The NLRC modified this decision on December 10, 2008, reducing moral and exemplary damages. Multiple petitions for certiorari arose, specifically C.A.-G.R. SP No. 109382 and C.A.-G.R. SP No. 109699, with the former calling into question the NLRC's jurisdiction and seeking the reinstatement of damages, and the latter contesting the monetary awards.

The CA issued decisions on these petitions, with the CA's First Division yielding the resolution on September 29, 2009, in C.A.-G.R. No. 109382, and the Sixth Division dismissing C.A.-G.R. SP No. 109699 on September 16, 2011. Fabiana's complaint argued these actions went against the finality of the Supreme Court's decision in G.R. No. 189726.

****Issues:****

1. Did the respondent CA Justices willfully disobey the Supreme Court's resolution dated January 13, 2010, fixing the complainant's claims arising from the death of her husband?
2. Was the corrective action taken by the CA Justices, stipulated in their June 4, 2010 resolution, a proper exercise of judicial discretion?
3. Were administrative remedies properly sought against the CA Justices?

****Court's Decision:****

1. The Supreme Court found that the complaint against the CA Justices lacked merit, as the issues in the first petition (C.A.-G.R. No. 109382) were limited, differing from the issues raised in the second petition (C.A.-G.R. SP No. 109699). The resolution of the Supreme Court did not impact the CA's jurisdiction to entertain the second petition.
2. The explanation provided by the CA Justices in their June 4, 2010 resolution was an exercise of judicial discretion. Any error deemed by the complainant would not rise to willful

disobedience without substantial proof, as they were still executing their judicial function.

3. Administrative remedies were not appropriate substitutes for judicial remedies. In case of disagreement with a judicial determination, the proper avenue was to seek judicial remedies to correct or appeal the decision, not to file administrative or disciplinary actions against judges or justices.

****Doctrine:****

- In administrative proceedings, the complainant bears the burden of proving the charges by substantial evidence.
- Judges and justices are not administratively liable for their judicial determinations absent proof of gross errors, deliberate malice, bad faith, or when the decisions are contrary to applicable law and jurisprudence.
- Administrative or disciplinary remedies cannot be pursued as substitutes for judicial remedies where such remedies are available and must wait on their outcome.
- The CA must ensure strict compliance with its internal rules especially concerning the mandatory consolidation of cases with related facts or parties.

****Class Notes:****

- A judge's or justice's judicial determinations do not raise administrative liability unless these errors are gross, intentional, and demonstrated with evident bad faith.
- Administrative or disciplinary actions against judges or justices are not appropriate if legitimate judicial remedies to address perceived errors are available and not yet exhausted.
- The judicial function must balance the review for correctness and the institution's role in the progressive development of the law.
- Mandatory consolidation of related cases at the appellate level is key for consistent adjudication and is not at the discretion of the parties.
- Attorneys initiating proceedings have a duty to inform the court of related actions pending elsewhere and to move for consolidation where appropriate.

****Historical Context:****

The case exemplifies the tension between the administrative and judicial functions within the Philippine Judiciary and highlights the limits of administrative recourse against judicial officers. It underscores principles relating to judicial discretion, the appellate review system, and the seriousness with which the Philippine Supreme Court protects judicial independence against baseless administrative complaints. Such disputes occur against the background of a complex legal landscape, where parties sometimes confuse or conflate judicial error with misconduct, illustrating the importance of maintaining a strict separation

between determining the facts and law in a legal dispute and pursuing disciplinary action against adjudicators. This case reaffirms these principles and provides guidance to ensure a more coherent approach in related cases moving forward.