

Title: Julius R. Uson vs. PLDT Employees Credit Cooperative, et al.

Facts:

Julius R. Uson, the General Manager of PLDT Employees Credit Cooperative (PECCI), a cooperative registered with the Cooperative Development Authority (CDA), was dismissed from his position following a Board Resolution declaring all appointive positions, including his, vacant. The board majority approved this resolution, and shortly after, PECCI circulated a memorandum regarding new appointments which did not include Uson. Uson then filed a complaint for illegal dismissal before the Labor Arbiter.

The Labor Arbiter ruled Uson a regular employee and declared the dismissal illegal, granting him separation pay and backwages. PECCI appealed to the NLRC, which modified the monetary award but upheld Uson's claim as a regular employee. The Court of Appeals (CA), however, reversed the NLRC's decision on jurisdictional grounds, identifying the dispute as an intra-cooperative conflict under the cognizance of the CDA, not the labor tribunals.

Uson sought relief from the Supreme Court, maintaining he was a regular employee illegally dismissed.

Issues:

1. Whether the present case is an intra-cooperative dispute falling under the jurisdiction of the CDA or an ordinary legal dispute within the purview of labor tribunals.

Court's Decision:

The Supreme Court denied Uson's petition, affirming the CA's decision and holding that a complaint for illegal dismissal by a cooperative officer, such as Uson, constitutes an intra-cooperative dispute within the CDA's jurisdiction. The labor tribunals were found to have no jurisdiction over Uson's claims, rendering their decisions void, and Uson was ordered to return any monetary sums erroneously received.

Doctrine:

An intra-cooperative dispute involves members or officers of a cooperative and must be resolved within the dispute resolution mechanisms under the Cooperative Code, rendering it within the exclusive jurisdiction of the CDA.

Class Notes:

- "Officer" definition: Under the Cooperative Code, an officer includes board members,

general managers, secretaries, treasurers, and any positions defined by bylaws.

- “Employee” vs. “Officer”: An officer has a position created by the charter or bylaws of the cooperative and is elected or appointed by the board or shareholders. An employee’s role is usually not defined in the corporate charter or bylaws and is handled by the managing officer who determines their compensation.

- Intra-cooperative disputes: Require amicable settlement efforts through conciliation and mediation as embodied in the cooperative’s bylaws and applicable laws. Failing amicable resolution, voluntary arbitration through the CDA is mandated.

#### Historical Background:

The Supreme Court’s decision reaffirms a series of jurisprudence that clearly distinguishes between labor disputes involving ordinary employees and those involving corporate or cooperative officers, consistently holding the latter within the realm of intra-cooperative disputes mechanism, therefore, keeping their resolution under the CDA’s authority. The case reflects the continued application of the Cooperative Code provisions, as amended, and the recently enacted CDA Charter, reinforcing the autonomy and specialized channel for handling cooperative-specific issues.