

Title: Robles v. Sanz

Facts: Servilio Robles, the plaintiff and appellant, instituted a declarative action against Juan Sanz, the defendant and appellee, aiming to recover compensation for services rendered as an employee in Sanz's store in Manila from January 9, 1886, to March 12, 1895. A fundamental contention during the case was whether Robles had actually received any payments from Sanz for his services. Robles claimed he had not been paid, whereas Sanz argued the contrary, citing entries in his commercial books of accounts indicating payments made on specific dates. The trial involved an examination of Sanz's commercial books, which, according to the court's review, showed properly stamped entries with no indications of alterations or erasures that recorded payments to Robles. Robles, not present at the examination, later argued that these entries appeared to have been made retroactively, after the books were closed, thus questioning the validity of the evidence presented by Sanz.

Issues:

1. Whether the court's process in examining the commercial books was conducted properly given that the appellant was not present.
2. Whether the court was required to report whether the entries were made after the official closing of the books, despite no specific request for such an investigation by the appellant.

Court's Decision:

The Supreme Court denied Robles' petition for taking evidence at second instance, asserting that the trial court was not obligated to examine features of the books beyond what was explicitly designated by the plaintiff as evidence. It held that the plaintiff should have, at the appropriate time, requested the court to establish and report whether the entries were made post-closure. Since Robles did not make such a request, he could not object that the court's failure to examine and report this circumstance invalidated the procedure. The Court reasoned that, even if the entries were made after books were closed, this fact would not impact the procedural aspects of the case at hand, as the determination of procedural validity is independent of the substantive evidence of the entries. The Court affirmed the judgment of the lower court with costs to the appellant.

Doctrine:

The doctrine established or reiterated in Robles v. Sanz concerns the specificity required by a party when designating evidence for examination by the court. If a party wishes for a court to note specific circumstances or conditions related to evidence during its examination, such a request must be made explicitly and timely. The procedural validity of

the court's examination depends on the adherence to the requests made by the party designating the evidence, not on the substantive quality or character of the evidence itself unless a specific concern has been appropriately raised.

**Historical Background:**

The case occurred during a time when the Philippine legal system was largely influenced by Spanish laws, such as the Code of Commerce mentioned in the decision. It reflects the early post-colonial period dynamics of commerce and the implementation of legal principles inherited from Spanish jurisprudence. The decision underscores the transition in legal practices and the establishment of procedural norms in Philippine courts during a period when the country was evolving its distinct legal identity following the Spanish influence. The case is a demonstration of the courts' inclination toward upholding procedural exactitude to ensure fairness in legal proceedings and the importance of explicit communications from the parties to a lawsuit regarding the nature of the evidence and the precise points to be proved or established in court.