

Title:

Lagon v. Velasco: A Case on the Constitutionality of Judicial Affidavit Rule in Civil Procedure

Facts:

Armando Lagon obtained a PHP 300,000.00 loan from Gabriel Dizon in December 2000, and issued a postdated check which was dishonored due to insufficient funds. Dizon sent demand letters for repayment, but Lagon refused to settle the debt. Dizon then filed a Complaint for Sum of Money, Damages, and Attorney's Fees on June 6, 2011. Lagon responded with a Motion to Dismiss based on prescription, and Dizon filed an Opposition with a Motion to Amend Complaint.

After Lagon's Answer claiming full payment of the loan, a preliminary conference was held where parties were directed to submit pre-trial briefs. On June 6, 2013, both parties failed to submit judicial affidavits at the initial trial, leading Judge Velasco to issue an order requiring submission five days before future trial dates, which Lagon received on June 26, 2013. Lagon filed a Motion for Partial Reconsideration, arguing Section 2 of the Judicial Affidavit Rule violated his right to due process, which Judge Velasco subsequently denied on July 10, 2013.

Issues:

The sole legal issue is whether Section 2 of the Judicial Affidavit Rule requiring a defendant to submit judicial affidavits and documentary evidence before pre-trial or preliminary conference infringes upon the defendant's right to due process.

Court's Decision:

The Supreme Court affirmed the lower court's decision, holding that there was no grave abuse of discretion on Judge Velasco's part in enforcing the Judicial Affidavit Rule. The Court concluded the rule aligns with efficient trial procedure and does not conflict with the right to file a demurrer to evidence. Furthermore, the requirement to submit judicial affidavits prior to trial facilitates preparation and strategy, which reinforces the defendant's case rather than hinders it. Hence, the petition was denied due to a lack of merit.

Doctrine:

The Judicial Affidavit Rule does not violate due process rights and is designed to expedite trial proceedings. The rule does not prevent a defendant from exercising the option to file a demurrer to evidence should they deem the plaintiff has not provided sufficient proof of their claim.

Class Notes:

- Due Process: Requires notice and an opportunity to be heard before judgment.
- Judicial Affidavit Rule: A procedural tool to expedite trials by substituting direct testimonies with judicial affidavits.
- Demurrer to Evidence: Allows a defendant to request case dismissal if plaintiff's evidence is deemed insufficient without presenting a defense.
- Abuse of Discretion: Requires a showing that the lower court's decision was capricious, arbitrary, or whimsical, not just a reversible error.

Historical Background:

The Judicial Affidavit Rule was instituted as a response to address the chronic problem of case congestion and trial delays in Philippine courts. It demonstrates the judicial reform towards efficiency and expediency in the resolution of cases.