

Title: Amadora vs. Court of Appeals

Facts:

On April 13, 1972, Alfredo Amadora, a 17-year-old high school student at Colegio de San Jose-Recoletos, was in the school's auditorium when he was fatally shot by his classmate, Pablito Daffon. This event occurred mere days before the commencement exercises scheduled for April 16, 1972, where Alfredo was to receive his diploma.

Following Daffon's conviction for homicide through reckless imprudence, Alfredo's parents filed a civil action for damages under Article 2180 of the Civil Code against the Colegio de San Jose-Recoletos, its key administrative staff, along with Daffon and two other students (who were later dropped from the case). The Court of First Instance of Cebu ruled in favor of the plaintiffs, awarding P294,984.00 in damages. However, the decision was reversed by the Court of Appeals, which absolved all defendants, ruling that Article 2180 did not apply as the school was not a school of arts and trades and the incident occurred after the semester had ended.

The plaintiffs then petitioned for certiorari under Rule 45 of the Rules of Court, arguing that Alfredo was in the school's custody for a legitimate purpose connected with his academic requirements, thus the school personnel were liable for his death.

Issues:

1. Whether Article 2180 applies to academic institutions, not just schools of arts and trades.
2. The determination of the "custody" requirement under Article 2180, specifically whether it applies beyond regular school hours or semester.
3. The extent of responsibility of a teacher-in-charge under said article.
4. The direct liability of schools under Article 2180.
5. The duty of the defendant to prove observance of the diligence of a good father of a family.

Court's Decision:

The Supreme Court, in examining Article 2180, extended its applicability to all schools, not just those categorized as arts and trades. It stated that while academic teachers are liable for their students' acts, heads of non-academic schools are held responsible in a different capacity due to historical differences in the type of supervision. Moreover, the Court clarified that the custody in which the school must be in charge of its students goes beyond the actual school semester and includes any time the student is on school premises for a

legitimate purpose.

However, the court found that while Alfredo was under the school's custody at the time of the shooting, there was insufficient evidence to establish negligence on the part of the teacher-in-charge, the dean of boys, or any specific administrator at Colegio de San Jose-Recoletos. It was undetermined who the actual teacher-in-charge was, and thus directly liable. Consequently, the Court determined that none of the respondents could be held liable for the injury as there was no breach of their duty that could be directly associated with the injury sustained by Alfredo Amadora.

Doctrine:

This case has elucidated that Article 2180 of the Civil Code applies to all educational institutions and that the "custody" requirement under the law extends beyond formal class hours to any legitimate instance when the student is within the premises and under the school's authority. Additionally, teachers in general and not just those in schools of arts and trades are accountable for the acts of their students. The determination of direct liability under Article 2180 requires identifying the teacher-in-charge exercising supervision over the offending student at the time of the act.

Class Notes:

- Article 2180 encompasses all schools, not just arts and trades.
- Direct liability attaches to teachers or heads of schools based on student custody.
- Custody requires that the student be within control/influence of school authorities and within school premises, including any time for legitimate school purposes.
- The defense of observing the diligence of a good father of a family ("bonus paterfamilias") is available to respondents (teachers, heads of schools).
- The assumption of "teacher-in-charge" carries a focus on a specific teacher having direct influence and supervision over a student at that time rather than any teacher in general.

Historical Background:

In the evolution of Article 2180 from the older Civil Code to its application in modern educational contexts, the Philippines' Supreme Court has progressively interpreted the provision to fit contemporary schooling environments, despite its earlier historical context where apprenticeship and close supervision by masters were prevalent. The law's adjudication has expanded to hold various school authorities accountable under scaled responsibility and due diligence, reflecting the evolving legal view on educational institution liabilities regarding student conduct under their custody or influence.