

****Title:** *Alinsugay v. Cagampang: The Mandate of the Katarungang Pambarangay Law in Dispute Resolution***

****Facts:****

The case originated when Servillano Alinsugay, the petitioner, filed an action for the annulment of title and recovery of possession and ownership of a parcel of land in Barangay Dologon, Maramag, Bukidnon, against Esther G. Cajes and Ricardo M. Cajes, the respondents, on October 19, 1984, at the Regional Trial Court of Bukidnon, Malaybalay branch. The respondents moved to dismiss the case on multiple grounds, including the failure of the petitioner to bring the dispute for amicable settlement before the barangay, as mandated by Presidential Decree No. 1508, also known as the Katarungang Pambarangay Law.

Despite the issuance of a “certification to file action” by the Punong Barangay on July 31, 1983, due to Esther Cajes’ failure to obey summons or appear for the hearing, respondent Judge Perfecto M. Cagampang, Jr. dismissed the complaint without prejudice, citing non-compliance with PD 1508. The dispute between the parties had been docketed as Barangay Case No. 26 but faltered when Esther Cajes did not appear for the barangay proceedings. This procedural journey found its way to the Supreme Court through a special civil action for certiorari filed by Alinsugay, challenging the trial court’s dismissal.

****Issues:****

1. Whether the referral to the Pangkat ng Tagapagkasundo under Presidential Decree No. 1508 is mandatory even when conciliation fails due to the non-appearance of one party.
2. Whether the issuance of a “certification to file action” by the Punong Barangay without proceeding to the Pangkat ng Tagapagkasundo is valid.

****Court’s Decision:****

The Supreme Court held in favor of the petitioner, Servillano Alinsugay, setting aside the order of dismissal by Judge Cagampang and directing the trial court to proceed with the hearing on merits. The Court clarified that the Katarungang Pambarangay Law’s primary intent is to prevent litigation and enhance the chance of an amicable settlement. In scenarios where a party willfully fails or refuses to appear despite due notice, issuing a certification to file action is justified as it represents a failure in the barangay level conciliation process, despite earnest efforts. It was emphasized that convening the Pangkat ng Tagapagkasundo, a conciliation panel, becomes moot and academic in cases of unexplained non-appearance by any party.

****Doctrine:****

The decision reiterated that the non-compliance of one party to appear for barangay conciliation as mandated by PD 1508 is a valid ground for the issuance of a “certification to file action,” allowing the aggrieved party to pursue formal litigation.

****Class Notes:****

- *Katarungang Pambarangay Law (PD 1508)* mandates preliminary barangay conciliation proceedings before a dispute can be filed in court.
- A “certification to file action” can be issued by the Punong Barangay if a party willfully fails to appear for the barangay level conciliation efforts, streamlining the move towards judicial resolution.
- The Court underscored the principle that judicial recourse should be the last resort, advocating for community-level resolution mechanisms as a first step in addressing disputes.

****Historical Background:****

This case, decided against the backdrop of the Katarungang Pambarangay Law, serves as a pivotal reminder of Philippine legal culture’s emphasis on local, amicable dispute resolutions before engaging the formal judicial system. Enacted to embody the traditional Filipino value of “pakikipagkapwa-tao” or mutual respect and civility, PD 1508 seeks to reduce court dockets and foster community harmony by mandating barangay-level conciliation as a prerequisite for litigation. The *Alinsugay v. Cagampang* decision further solidified this norm by upholding the spirit of PD 1508, ensuring that bypassing the barangay conciliation process could not be easily maneuvered even with the non-cooperation of one party.