

Title:

Roberto L. Del Rosario vs. Court of Appeals and Janito Corporation: A Landmark Philippine Copyright Infringement Case on the Karaoke System

Facts:

Roberto L. Del Rosario filed a complaint for patent infringement against Janito Corporation on January 18, 1993. He claimed to be the patentee of an audio equipment commonly known as the sing-along system or karaoke under Letters Patent Nos. UM-5269 and UM-6237 issued on June 2, 1983, and November 14, 1986, respectively, by the Director of Patents. Del Rosario learned in early 1990 that Janito Corporation was manufacturing a similar sing-along system under the trademark of Miyata or Miyata Karaoke. Consequently, he sought a writ of preliminary injunction to enjoin Janito Corporation from using, selling, and advertising their product, also seeking damages.

The Regional Trial Court of Makati temporarily restrained Janito Corporation in February 1993, and later issued a writ of preliminary injunction based on del Rosario being the holder of a utility model patent and the alleged substantial similarity between his patented model and Janito Corporation's product.

Janito Corporation petitioned the Court of Appeals, which set aside the trial court's order, reasoning that manufacturing the Miyata Karaoke alone did not constitute infringement and that the karaoke system was a globally recognized product before del Rosario's patents were issued. Del Rosario sought review from the Philippine Supreme Court, raising issues related to the appellate court's handling of facts and its decision to grant a writ of preliminary injunction to Janito Corporation.

Issues:

1. Whether the Court of Appeals erred in setting aside the order of the Regional Trial Court granting the writ of preliminary injunction in favor of del Rosario.
2. Whether the manufacturing of Miyata Karaoke by Janito Corporation constitutes an infringement of del Rosario's patents.

Court's Decision:

The Philippine Supreme Court reversed the decision of the Court of Appeals and reinstated the order of the trial court granting del Rosario the writ of injunction. The Court ruled that del Rosario, as the patent holder of the utility models for his sing-along system, had sufficiently established a prima facie case of violation of his rights which justified the

issuance of a writ of preliminary injunction. The Court found that the products of del Rosario and Janito Corporation involved substantially similar modes of operation and achieved substantially the same results, highlighting that an infringement occurs when the essential or substantial features of the patented invention are appropriated.

Doctrine:

1. Patent Infringement: The substantial similarity between patented models and an accused product, in terms of functionality and resultant outputs, can constitute patent infringement.
2. Preliminary Injunction: A writ of preliminary injunction can be warranted to protect the rights of the patent holder based on prima facie evidence of infringement pending a full trial.

Class Notes:

- **Essential Elements of Patent Infringement**: For an infringement to occur, there must be a substantial imitation or copying of the patented design or utility model that results in the performance of the same function or achievement of the same result by substantially identical means or mode of operation.
- **Prerequisites for Preliminary Injunction**: The existence of a clear right to be protected and evidence showing that the acts against which the injunction is directed violate such right.

Historical Background:

This case underscores the complexities of intellectual property rights, especially in regards to patents for utility models, within the Philippine legal system. It highlights the challenges patent holders face in protecting their innovations from infringement and the judiciary's role in interpreting and applying the law to such disputes. Del Rosario's patents on the karaoke system, a culturally significant invention in the Philippines, represent a notable example of legal battles over technology and innovation rights within the country's evolving intellectual property landscape.