

****Title:**** National Power Corporation vs. Hon. Ramon G. Codilla, Jr., et al.

****Facts:****

On 20 April 1996, a collision incident occurred involving the M/V Dibena Win, owned and operated by Bangpai Shipping Co., which allegedly damaged the National Power Corporation's (NPC) Power Barge 209 moored at the Cebu International Port. Subsequently, on 26 April 1996, the NPC filed a damages complaint against Bangpai Shipping Co. in the Regional Trial Court (RTC) of Cebu, Branch 19. The NPC later included Wallem Shipping, Inc. in the complaint as an additional defendant, identifying Wallem Shipping as Bangpai Shipping's agent. Motions to Dismiss from both defendants were denied by the RTC.

During the trial, the NPC offered several documents as evidence, identified as Exhibits "A" to "V," including sub-marked portions. However, both defendants challenged the admissibility of these documents, primarily on the grounds that they were photocopies and not original documents. The RTC ruled in favor of excluding these documents from the record, prompting the NPC to file a Motion for Reconsideration, which was denied.

NPC escalated the matter to the Court of Appeals via a Petition for Certiorari, insisting the RTC erred by denying the admission of its exhibits. The Court of Appeals dismissed the petition, maintaining that the RTC did not act with grave abuse of discretion. This led the NPC to file a Petition for Review on Certiorari under Rule 45 of the Rules of Civil Procedure with the Supreme Court.

****Issues:****

1. Whether photocopies of documents can be considered as equivalent to their originals under the Rules on Electronic Evidence.
2. Whether the RTC and the Court of Appeals erred in excluding the photocopies of documents offered as evidence by the NPC.

****Court's Decision:****

The Supreme Court denied the petition, affirming the decision of the Court of Appeals. The Court clarified that the photocopies offered by the NPC do not constitute electronic documents as defined under the Rules on Electronic Evidence and the Electronic Commerce Act. The Court emphasized that an "electronic document" pertains to information processed electronically, which does not include manually signed documents or those that contain

handwritten notations merely reproduced electronically. Furthermore, the Court found no abuse of discretion on the part of the RTC for excluding the photocopies based on the best evidence rule, stressing that the NPC failed to prove the exceptions under the rule that would justify the admission of secondary evidence when the originals are unavailable.

****Doctrine:****

- The Supreme Court reiterated the definition and scope of “electronic documents” under the Rules on Electronic Evidence and the Electronic Commerce Act, clarifying that photocopies of manually signed documents and those with handwritten notations do not fall within this definition.
- The Court also underscored the application of the best evidence rule, elaborating on the conditions under which secondary evidence, such as photocopies, can be admitted when the original documents are lost or otherwise unavailable.

****Class Notes:****

- ****Electronic Documents:**** Refers to information processed electronically, excluding manually signed or handwritten documents merely reproduced through electronic means.
- ****Best Evidence Rule (Rule 130, Sec. 2 of the Rules of Court):**** Original document must be produced; exceptions include loss, destruction, or unavailability of the original without bad faith on the offeror’s part. Secondary evidence can only be admitted upon proving these predicates.
- ****Secondary Evidence:**** Can be admissible if the original document is proven to be lost, destroyed, or cannot be produced in court, without bad faith on the offeror’s part, and after a diligent search has been made.

****Historical Background:****

This case underscores the nuances and challenges involved in adapting traditional legal principles, such as the best evidence rule, to the evolving landscape of digital information and electronic documents. It highlights the judiciary’s role in interpreting and applying laws in the context of technological advancements, ensuring that legal frameworks remain relevant and effective in addressing contemporary issues.