

Title: ****Philippine Rabbit Bus Lines, Inc. v. Heirs of Eduardo Mangawang and People of the Philippines****

Facts:

Ernesto Ancheta, an employee of Philippine Rabbit Bus Lines, Inc. (PRBLI), was involved in a vehicular accident on November 23, 1992, resulting in the death of Eduardo Mangawang. Accordingly, an Information was filed charging Ancheta with reckless imprudence resulting in homicide. The case, filed at the RTC of Capas, Tarlac, resulted in a conviction on November 12, 1999, sentencing Ancheta to imprisonment and ordering him to indemnify the heirs of Mangawang.

Ancheta failed to file his appeal brief, leading to the dismissal of his appeal by the Court of Appeals (CA) on November 10, 2000. The decision became final, prompting the issuance of an arrest order for Ancheta. Subsequently, PRBLI filed a Notice of Appeal, which was initially denied due to the finality of the judgment but was later given due course after a Manifestation with Motion cited a relevant ruling. The CA, upon review, affirmed the RTC's decision with modifications on the awarded damages.

Issues:

1. Whether the legal representation of Ancheta by a counsel from PRBLI suffices as participation by PRBLI in the proceedings to protect its interests, thereby binding PRBLI to the decision on Ancheta's civil liability.
2. Whether the finality of the conviction against Ancheta also bars PRBLI from contesting the decision, especially its subsidiary liability for damages awarded to Mangawang's heirs.
3. Whether PRBLI was deprived of its right to due process when it was not furnished copies of the CA Resolution and the RTC's arrest order for Ancheta.
4. Whether PRBLI has the right to appeal the RTC's decision convicting Ancheta, particularly concerning its civil liability.

Court's Decision:

The Supreme Court denied PRBLI's petition for review for lack of merit, affirming the CA's decision to dismiss PRBLI's appeal due to the finality of the RTC's decision. The High Court ruled PRBLI, as the employer of the accused, had an interest in the case and should have ensured its participation in the defense. PRBLI's failure to be notified of developments was attributed to the negligence of its provided counsel, not to a deprivation of due process. The Court held that an employer's right to due process arises during the execution phase, especially during proceedings for the issuance of an alias writ of execution due to the

employee's insolvency.

Doctrine:

The finality of a decision convicting an employee of a crime is conclusive on the employer regarding both the existence and amount of civil liability, provided no collusion exists between the accused-employee and the private complainant. An employer's right to due process in relation to its subsidiary civil liability is exercised during proceedings for the issuance of an alias writ of execution due to the employee's insolvency.

Class Notes:

- ****Subsidiary Liability****: Enshrined in Articles 102 and 103 of the Revised Penal Code, it holds an employer liable for the civil damages resulting from crimes committed by employees in the discharge of their duties, contingent on the employee's insolvency.
- ****Finality of Judgment****: A judgment that has become final and executory, even if erroneous, cannot be modified or appealed.
- ****Employer's Participation in Criminal Cases****: Employers must take an active role in the defense of their employees to protect their interest, especially regarding civil liability.
- ****Due Process for Employers****: The right to due process for employers regarding their subsidiary liability arises during the execution phase, not at the conviction stage of the employee.

Historical Background:

This case underscores the implications of the doctrine of subsidiary liability under Philippine law, especially highlighting the responsibilities of employers in criminal cases involving their employees. It emphasizes the necessity for employers to actively participate in the defense of their employees to protect their interests and avoid being adversely bound by a final judgment.