

**\*\*Title: Pantaleon et al. v. Metro Manila Development Authority\*\***

**\*\*Facts:\*\***

This case involves a legal battle initiated by public utility bus drivers against the Metro Manila Development Authority (MMDA) regarding the enforcement of a number coding scheme on public utility buses. The scheme aimed at reducing traffic congestion in Metropolitan Manila by restricting buses from plying on specific days based on the last digit of their license plates.

The plaintiffs, Samson V. Pantaleon, Eduardo A. Tacoyo, Jr., Jesus S. Bautista, and Monico C. Agustin, seasoned bus drivers with routes covering significant portions of Metropolitan Manila, challenged the legality of MMDA Resolution No. 10-16 and Memorandum Circular No. 08, Series of 2010. These MMDA issuances sought to re-implement the number coding scheme for public utility buses on an experimental basis.

The litigation journey to the Supreme Court began on November 22, 2010, when the petitioners filed a Petition for Injunction, praying for the issuance of a temporary restraining order or status quo ante order against the implementation of the number coding scheme for public utility buses and eventually seeking to declare the aforementioned issuances null and void for going beyond the MMDA's legal authority. Respondent MMDA filed their comment on February 10, 2011, and the petitioners submitted their reply on April 14, 2011.

**\*\*Issues:\*\***

1. Whether the Supreme Court has original jurisdiction over the Petition.
2. Whether the MMDA or its Council has legal authority to issue and implement Resolution No. 10-16 and Memorandum Circular No. 08, Series of 2010.
3. Whether the MMDA issuances are invalid for encroaching upon the powers of the Land Transportation and Franchising Regulatory Board (LTFRB).
4. Whether petitioners are the real parties-in-interest.
5. Whether the challenged issuances violate the due process clause of the 1987 Constitution.

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

1. The Supreme Court recognized its prerogative but emphasized the importance of the principle of hierarchy of courts, typically necessitating that similar cases should first be filed in lower courts. Nevertheless, due to the transcendental importance and public welfare of the issues presented, the Supreme Court took cognizance of the case.

2. The Court upheld MMDA's power to regulate traffic, including the implementation of the number coding scheme, as within its mandated functions under Republic Act No. 7924. It stressed that MMDA's actions fell within its jurisdiction to address overarching concerns in Metropolitan Manila.

3. The Court ruled that the MMDA's implementation did not encroach upon the LTFRB's jurisdiction, distinguishing the nature and scope of the authority of both bodies under their respective governing laws.

4. The Court determined the petitioners had standing as the challenged issuances directly affected their livelihood.

5. The Court found no violation of the due process clause, noting that the rule-making authority exercised by the MMDA, in this case, was administrative in nature and not adjudicatory, exempting it from the requirements of prior notice and hearing.

**\*\*Doctrine:\*\***

Administrative issuances must conform to the law granting the issuing authority its powers and must not contradict broader statutory mandates. The MMDA, within its mandate under Republic Act 7924, possesses the authority to regulate traffic in Metropolitan Manila, including the implementation of schemes like the number coding system. The Supreme Court emphasized the balance between public welfare and individual interests, underscoring that regulation in the interest of the general welfare must be upheld even if it restricts individual freedoms or interests.

**\*\*Class Notes:\*\***

- Constitutional right to due process vis-à-vis administrative rule-making: Administrative rules and regulations that are legislative in nature do not require prior notice and hearing.
- Hierarchy of courts: Supreme Court emphasizes the importance of observing the hierarchy of courts but recognizes exceptions based on the transcendental importance of cases.
- Government regulatory power and public welfare: Restrictions imposed by the government through regulatory bodies like the MMDA are upheld when aimed at promoting public welfare and safety, even if such restrictions might affect individual livelihoods or interests.

**\*\*Historical Background:\*\***

The Metro Manila Development Authority (MMDA), established by Republic Act 7924, is tasked with managing and coordinating the delivery of metro-wide services in Metropolitan Manila, including traffic management. The challenge against its authority to implement traffic regulation measures reflects ongoing tensions between regulatory objectives aimed at public welfare and individual interests, within the continually evolving urban landscape of

Metropolitan Manila.