

Title: Nogales v. Capitol Medical Center, et al.

Facts:

Corazon Nogales, pregnant with her fourth child, was under the exclusive prenatal care of Dr. Oscar Estrada since her fourth month of pregnancy in December 1975. During Corazon's last trimester, she developed preeclampsia. In late May 1976, Corazon began experiencing labor pains and was admitted to Capitol Medical Center (CMC) upon Dr. Estrada's advice. Throughout her delivery process, a series of medical interventions were made by Dr. Estrada and assisted by Dr. Ely Villaflor. Corazon experienced complications leading to convulsions, cervical tissue tear, and significant loss of blood. Despite various interventions, Corazon died from post-partum hemorrhage.

A complaint for damages was filed at the Regional Trial Court of Manila against CMC, Dr. Estrada, and other involved medical practitioners. Dr. Estrada, Dr. Enriquez, and Nurse Dumlao were declared in default for failing to file their answer. The others filed their respective answers denying the allegations. After more than 11 years of trial, the court found Dr. Estrada solely liable for damages, absolving the rest. The decision was affirmed by the Court of Appeals and escalated to the Supreme Court.

Issues:

1. Whether Capitol Medical Center (CMC) is vicariously liable for the negligence of Dr. Oscar Estrada, considering the relationship between the hospital and the independent contractor-physician.
2. The extent of the liability of the other medical practitioners involved in the treatment and care of Corazon Nogales.

Court's Decision:

The Supreme Court partly granted the petition. It found CMC vicariously liable for Dr. Estrada's negligence, applying the doctrine of apparent authority. The Court held that CMC, through its actions, led the Spouses Nogales to believe that Dr. Estrada was an employee or agent of CMC. There was no sufficient evidence to prove the liabilities of the other medical practitioners; thus, the rest of the decision of the Court of Appeals was affirmed. The Court also imposed legal interest on damages awarded.

Doctrine:

1. ****Doctrine of Apparent Authority****: A hospital can be held vicariously liable for the negligent acts of a physician acting within the scope of apparent authority if the hospital

acted in a manner that would lead a reasonable person to conclude that the physician was an employee or agent of the hospital.

Class Notes:

1. ****Vicarious Liability in Medical Settings****: Hospitals may be held vicariously liable for the negligence of their apparent agents or employees, even if such agents or employees are independent contractors, under the doctrine of apparent authority.
2. ****Essentials of Establishing Apparent Authority****:
 - Hospital's manifestation leading a reasonable person to conclude the physician is an employee/agent.
 - Hospital's knowledge and acquiescence in the acts creating the appearance of authority.
 - Plaintiff's reliance on the conduct of the hospital or its agent, consistent with ordinary care and prudence.
3. ****Doctrine of Apparent Authority in the Philippine Legal Context****: This principle is applicable when assessing the liability of hospitals for the acts of healthcare providers who have been implicitly presented to patients as being hospital employees or agents, despite being independent contractors.

Historical Background:

This case underscores the evolving principles of liability within healthcare settings, specifically the applicability of the doctrine of apparent authority in establishing hospital liability for the negligence of independent contractor-physicians. It reflects a growing recognition of the hospital's role in patient care and the expectations of patients regarding the accountability of healthcare institutions for the actions of medical professionals practicing within their facilities.