

Title: Capital Shoes Factory, Ltd. vs. Traveler Kids, Inc.

Facts:

In 2000, Capital Shoes Factory Ltd. (CSFL), a foreign corporation, entered into an agreement with Traveler Kids, Inc. (TKI), a domestic corporation, to import shoes and sandals manufactured by CSFL. Following an initial successful payment routine, by 2004, TKI began defaulting on payments, leading to owing CSFL U.S. \$325,451.39 plus additional manufactured goods worth \$92,000.00 as of July 10, 2005. Despite demand letters from CSFL, TKI failed to settle the unpaid accounts, prompting CSFL to file a complaint for collection of sum of money and damages against TKI before the Regional Trial Court (RTC) of Malabon City.

During the trial, CSFL presented sales invoices and order slips as evidence of transactions with TKI, which TKI objected citing them as mere photocopies. TKI further objected to CSFL's evidence relating to attorney's fees. Despite TKI's objections, the RTC admitted all exhibits offered by CSFL. TKI's motion for reconsideration was denied by the RTC, leading to TKI filing a petition for certiorari with the Court of Appeals (CA), which in part granted TKI's petition, excluding certain exhibits deemed as mere photocopies.

CSFL then filed a motion for partial reconsideration with the CA, which was denied.

Issues:

1. Whether the CA correctly modified the RTC order admitting the exhibits offered by CSFL.
2. Whether the excluded documents are admissible as duplicate originals and not mere photocopies.

Court's Decision:

The Supreme Court found merit in CSFL's petition, citing Section 4(b), Rule 130 of the Rules of Court, considering that duplicate originals are equally regarded as originals. The witness, Ms. Susan Chiu, established that the disputed documents were duplicate originals, prepared in two copies for each transaction. The appellate court's decision not to admit these documents was reversed, and the RTC's May 13, 2011 Order was reinstated.

Doctrine:

The Supreme Court reiterates the admissibility of duplicate originals as evidence, stating that when a document has two or more copies executed at or about the same time with identical contents, all such copies are equally regarded as originals.

Class Notes:

- Rule 130, Section 4(b) of the Rules of Court clarifies the admissibility of duplicate originals.
- The hierarchy of evidence includes original documents, with duplicate originals being equally valid.
- In certiorari proceedings, the appellate court's review is limited to correcting errors of jurisdiction, not evaluating evidence.

Historical Background:

This case highlights the procedural complexities involved in commercial disputes, especially in the context of international business transactions. It underscores the Philippines' legal framework's adaptability concerning documentary evidence's admissibility and the challenges of enforcing foreign entities' claims within the local legal system.