

### Title: Isaac Capayas vs. The Court of First Instance of Albay, et al.

### Facts:

Isaac Capayas, in a legal dispute, sought to file an amended third-party complaint against Isidora Lladoc, Fulgencio Lladoc, and Gregorio Navera, invoking Rule 12, Sections 1 and 2, of the Rules of Court, which discusses the procedure for filing claims against non-parties for relief in relation to the plaintiff's claim. However, the Court of First Instance of Albay declined to admit the complaint. Capayas contended this refusal was an unlawful neglect of duties, prompting him to seek a mandamus from the Supreme Court to compel the lower court to accept the third-party complaint.

### Issues:

1. Whether the Court of First Instance of Albay unlawfully neglected its duties by not admitting the third-party complaint.
2. Whether the facts stated in the third-party complaint warrant relief against the third-party defendants in respect of the plaintiff's claim.

### Court's Decision:

The Supreme Court denied the petition for several reasons:

- The process of admitting a third-party complaint is not a ministerial duty of the court but requires leave, implying it is discretionary based on the allegations' merits.
- The facts within the third-party complaint did not demonstrate that Capayas was entitled to indemnity from the Lladocs and Navera "in respect to plaintiff's claim."
- The third-party complaint did not arise from the same transaction as the plaintiff's claim nor was it connected with it, therefore making it ineligible as a third-party claim.
- The allegations against Capayas were for actions conducted in his personal capacity, not as an administrator of an estate, conflicting with the capacity in which he sought to file the third-party complaint.

### Doctrine:

- The discretion of admitting a third-party complaint lies with the court, based on whether the defendant's claim against the third-party defendant shows prima facie entitlement to relief "in respect of the plaintiff's claim."
- A third-party complaint must arise out of the same transaction upon which the plaintiff's claim is based or be connected with it.
- A defendant cannot file a third-party complaint in a different capacity from which they are being sued.

### Class Notes:

- **Rule 12, Sections 1 and 2, Rules of Court**: Specifies the process for filing a third-party complaint, requiring leave of court, highlighting the court's discretionary power in admitting third-party complaints.
- **Principle of Capacity**: In civil litigation, the capacity in which a party is sued is crucial in determining the procedural steps that party can take, including filing third-party complaints.
- **Indemnity Claims in Third-Party Complaints**: For a third-party complaint seeking indemnity to be admissible, it must be connected to the plaintiff's claim, either arising from the same transaction or being directly related.

### Historical Background:

This case reflects the judicial process and the interpretations of procedural laws in the Philippines. It emphasizes the discretion courts hold in the admission of third-party complaints and the importance of the connection between the defendant's claims against a third-party defendant and the plaintiff's original claims. The decision reinforces procedural requirements and the principle that allegations must demonstrate a prima facie entitlement to the relief sought within the specific framework established by the Rules of Court.