

Title: National Federation of Labor v. The Honorable Carlito A. Eisma, et al.

Facts:

The case involves the National Federation of Labor and Zambowood Monthly Employees Union, petitioners, versus The Honorable Carlito A. Eisma, Lt. Col. Jacob Caruncho, Commanding Officer, Zamboanga District Command, PC, AFP, and Zamboanga Wood Products, respondents. The core of the dispute originated from a series of labor-related incidents starting on March 5, 1982, when the petitioners filed a petition for direct certification as the sole and exclusive collective bargaining representative for the monthly paid employees of respondent Zamboanga Wood Products Inc., at its manufacturing plant in Lumbayao, Zamboanga City. This was followed by a charge against the respondent firm for underpayment of monthly living allowances on April 17, 1982, a notice of strike on May 3, 1982, for various labor disputes including the illegal termination of a union president and nonpayment of living allowances, and eventually, a strike commenced on May 23, 1982.

In response to these actions, particularly the blockade of the road leading to its manufacturing division by the petitioners, Zamboanga Wood Products filed a complaint for damages with a prayer for a preliminary injunction and/or restraining order on July 9, 1982, in the court of respondent Judge Carlito A. Eisma. The petitioners then filed a motion to dismiss, contending the exclusive jurisdiction of the case lies with the labor arbiter pursuant to Batas Pambansa Blg. 227, a motion which was subsequently denied by the court. This led to the filing of the current certiorari and prohibition proceeding.

Issues:

1. Whether a court of first instance (now Regional Trial Court) or a labor arbiter has jurisdiction to pass upon a suit for damages filed by the employer arising from picketing and a strike conducted by a union.
2. Whether the actions of the petitioners in obstructing the road to respondent's manufacturing division fall within the ambit of lawful picketing.

Court's Decision:

The Supreme Court granted the writ of certiorari, nullifying and setting aside the order issued by respondent Judge Carlito A. Eisma, dated July 20, 1982. It held that the jurisdiction to entertain suits for damages arising from picketing and strike actions lies exclusively with the labor arbiter, as explicitly provided under Article 217 of the Labor Code, as amended by Presidential Decree No. 1691 and further by Batas Pambansa Blg. 130. The Court emphasized the principle that jurisdiction over the subject matter is

determined by law and that a court of first instance, or Regional Trial Court, overreaches its authority when it entertains actions which fall under the exclusive and original jurisdiction of labor arbiters. Therefore, the writ of prohibition was also granted, enjoining respondent Judge or any other acting in his stead from taking further action on the civil case, except for its dismissal.

Doctrine:

The Supreme Court reiterated that under Article 217 of the Labor Code, as amended, claims for damages arising from employer-employee relations, including those stemming from strikes and picketing, fall under the original and exclusive jurisdiction of labor arbiters. It underscored that jurisdiction over the subject matter is conferred entirely by law and must be explicit, leaving no room for judicial assumption of authority not granted by statute.

Class Notes:

- Jurisdiction over labor disputes, specifically those involving claims for damages arising out of strikes, is vested exclusively in labor arbiters as per Article 217 of the Labor Code, not in civil courts.
- Legal principles involved:
 - Separation of jurisdiction: clear delineation of cases that can be heard by the judiciary versus those that fall under quasi-judicial bodies like the National Labor Relations Commission (NLRC).
 - Application of law over construction: when the law is clear, it must be applied directly without need for judicial interpretation.
 - This case reinforces the legal framework distinguishing the competencies between judicial courts and administrative or quasi-judicial bodies in handling labor disputes in the Philippines.

Historical Background:

The case presents a continuation of a series of legal battles over jurisdictional authority between courts and labor arbiters concerning labor disputes, following amendments to the Labor Code. The frequent modifications to the Labor Code, aimed at clearly defining the scope of jurisdiction between administrative bodies and the judiciary, have been part of a broader legislative and judicial effort to streamline labor dispute resolutions. This case, decided against the backdrop of these changes, underscores the evolving legal landscape in addressing labor relations in the Philippines and affirms the principle of statutory jurisdiction in labor matters.