

Title:

Ma. Teresita C. Caballes and Vladimir Ruidera vs. Drs. Primitiva Perez-Sison et al.

Facts:

On December 1, 1994, Charlie L. Ho, representing the Samahan ng Mga Optometrist sa Pilipinas (SOP), filed a complaint with the Professional Regulation Commission's (PRC) Board of Optometry against several employees of Vision Express Philippines, Inc. (VEPI), alleging unethical and/or unprofessional conduct under the Code of Ethics for Optometrists. The complaint was supported by affidavits, and despite admissions of employment with VEPI, the respondents denied engaging in the practice of optometry through their counter-affidavit. Subsequent pleadings throughout 1995 saw the respondents challenging the complaint's merit and seeking its dismissal for lack of a cause of action, which the Board denied.

Discontent with the Board's decision, petitioners sought relief from the Court of Appeals through a petition for certiorari, which was dismissed, affirming the Board's stance. The dismissal was based on both the procedural aspect—the order being interlocutory—and the substantive aspect—the presumed hypothetical admission of the complaint's allegations through the procedure to dismiss for failure to state a cause of action.

Issues:

1. Whether the complaint filed against the petitioners failed to state a cause of action, thus warranting its dismissal.
2. Whether the Court of Appeals erred in dismissing the petition for certiorari based on the procedural principle relating to interlocutory orders.
3. Whether employment with a corporation by optometrists, without more, constitutes unethical or unprofessional conduct pursuant to the Code of Ethics for Optometrists.

Court's Decision:

The Supreme Court dismissed the petition, affirming the decisions of the Court of Appeals and the Board of Optometry in toto. It held that the Board of Optometry did not commit grave abuse of discretion in denying the motion to dismiss and that the petition stems from an interlocutory order that is not appealable or subject to a petition for certiorari. The Court reinforced the principle that administrative bodies should be allowed to perform their functions without premature interference from the courts, emphasizing the doctrine of exhaustion of administrative remedies. It also clarified that certain situations warranting deviation from this principle did not apply in this case.

Doctrine:

1. **Exhaustion of Administrative Remedies**: Before resorting to judicial review, parties must exhaust all remedies available within the administrative framework, allowing specialized agencies to address issues within their purview.
2. **Interlocutory Orders**: Orders denying motions to dismiss for failure to state a cause of action, being interlocutory, are not immediately appealable. Recourse in such situations follows through the trial and then appeal in the usual course.

Class Notes:

- **Cause of Action**: To challenge a complaint for its lack of a cause of action, it is presumed that the allegations within the complaint are hypothetically admitted. The adequacy of a complaint is generally determined from the complaint itself.
- **Motion to Dismiss and Interlocutory Orders**: A motion to dismiss based on the failure to state a cause of action examines only the sufficiency of the complaint's allegations. Orders denying these motions are interlocutory and not subject to immediate review unless exceptional circumstances are present.
- **Administrative Procedure**: Administrative bodies have the prerogative to decide on matters within their competence. Judicial review premised on certiorari requires showing that the body acted with grave abuse of discretion or lacked jurisdiction.

Historical Background:

This case reflects the procedural and jurisdictional boundaries between administrative boards, such as the Board of Optometry within the PRC, and judicial courts in the context of professional regulation. It emphasizes the deference courts give to administrative expertise and the procedural pathway for disputes stemming from administrative complaints, highlighting the principle of non-interference in administrative matters unless absolutely necessary.