

### Title:

**\*\*Carmen Castro, et al., vs. Francisca Sagales: Jurisdiction Over Worker's Compensation Claims\*\***

### Facts:

The case centers around the tragic accident that resulted in the death of Dioscoro Cruz, husband of plaintiff Carmen Cruz, in January 1952. Following this unfortunate event, Carmen Cruz and other plaintiffs filed a complaint for workmen's compensation in the Court of First Instance of Bulacan in August 1952. The legal question that arose was whether the Court of First Instance or the Workmen's Compensation Commission had the jurisdiction to hear the case, especially considering the enactment of Republic Act No. 772 on June 20, 1952. This Act bestowed "exclusive jurisdiction" upon the Workmen's Compensation Commissioner to hear and decide claims for compensation under the Workmen's Compensation Act, a jurisdiction previously held by regular courts.

### Issues:

1. Whether the jurisdiction to hear workers' compensation claims resides with the courts or the Workmen's Compensation Commission post-enactment of Republic Act No. 772.
2. Whether the enactment of Republic Act No. 772 operates retroactively, impacting claims for accidents that occurred before its effectiveness.

### Court's Decision:

The Supreme Court affirmed the order of dismissal by the Court of First Instance of Bulacan, holding that after June 20, 1952, all claims for compensation shall be decided exclusively by the Workmen's Compensation Commissioner, subject to appeal to the Supreme Court. The Court emphasized that the jurisdiction conferred upon the Commission by Republic Act No. 772 does not operate retroactively as it applies only to claims filed after the law's approval. The Court distinguished between the retroactive application of laws affecting substantive rights and laws relating to procedural changes or jurisdictional authority, the latter of which the Legislature has the power to establish and modify without violating vested rights.

### Doctrine:

The pivotal legal doctrine established in this case is the non-retroactive application of jurisdictional and procedural statutory changes to ensure they do not impair vested rights or impose new obligations on actions already past. This doctrine also highlights the legislative power to designate or modify jurisdictional authority of courts or commissions

without infringing upon vested rights, especially concerning where claims or disputes should be heard and decided.

**### Class Notes:**

- **\*\*Jurisdiction and Legislative Power\*\***: Legislatures have the authority to modify jurisdictional statutes without retroactively impacting pre-existing claims, provided these changes do not affect substantive rights.
- **\*\*Procedural vs. Substantive Law Changes\*\***: Changes related to procedural matters or jurisdiction can be applied to future actions without breaching the principle against retroactive laws, while changes to substantive rights require more caution to avoid impairing vested rights.
- **\*\*Republic Act No. 772\*\***: Specifically shifted the jurisdiction from courts to the Workmen's Compensation Commissioner for worker's compensation claims post-enactment (effective June 20, 1952), signifying an example of legislative power to redistribute jurisdictional authority for efficiency or policy reasons.

**### Historical Background:**

The decision in this case reflects a legislative and judicial response to the needs for a specialized forum to adjudicate workers' compensation claims more efficiently. Before the passage of Republic Act No. 772, such claims were within the purview of regular courts, which could potentially lead to inconsistencies and longer resolution times. The law's enactment and the Supreme Court's affirmation of its jurisdictional authority underscore a shift towards specialized administrative adjudication in labor disputes in the Philippines, marking a significant development in labor law and administrative justice.