

****Aguila and Reyes vs. Baldovizo: Interpreting Finality of Judgment and Liability in Quasi-Delicts****

****Facts:****

On April 19, 1993, Marlun Lisbos, while driving a van registered under Danilo D. Reyes and operated by Emerlito F. Aguila, sideswiped Fausto T. Baldovizo, leading to injuries that resulted in Baldovizo's death. This incident led to a criminal charge against Lisbos and a separate complaint for damages filed by Baldovizo's family against Lisbos, Reyes, Aguila, and the insurer of the van. Throughout the legal proceedings, various motions, petitions for relief from judgment, and attempts for reconsideration were made by the petitioners (Aguila and Reyes).

Lisbos was never located to be served summons. The trial court declared the insurer in default, and the petitioners failed to present their evidence, effectively waiving their right. The Regional Trial Court (RTC) of Quezon City rendered a decision on March 7, 2000, holding the defendants jointly and severally liable. The petitioners' subsequent attempts to appeal or vacate the decision were unsuccessful, and their petition for relief was denied. An Amended Decision was issued on August 13, 2001, by the RTC upon realizing that Lisbos had been erroneously included in the original decision.

****Issues:****

1. Whether the petitioners have a right to appeal the Amended Decision after the original decision had become final and executory.
2. The application and interpretation of the immutability of final judgment principle.
3. The liability of employer and registered owner in quasi-delicts involving motor vehicles.

****Court's Decision:****

The Supreme Court denied the petition for lack of merit, reinstating the RTC's original decision dated March 7, 2000. The court held that a judgment or final order becomes final and executory if no appeal or motion for a new trial or reconsideration was filed within the period provided by the Rules. The Amended Decision did not grant a fresh period for appeal since the original decision had already become final and executory.

Furthermore, the court clarified the liability in quasi-delicts, affirming that employers are directly and primarily responsible, subject to the defense of due diligence in the selection and supervision of employees. It was deemed unnecessary to amend the decision to exclude Lisbos since the employers (Aguila and Reyes) could be held directly and primarily liable

under Articles 2180, 2184, and 2194 of the Civil Code.

****Doctrine:****

1. Principle of Immutability of Final Judgment: Once a judgment becomes final and executory, the court loses jurisdiction to amend, modify, or alter the same, except under specific circumstances which were not present in this case.
2. Employer Liability in Quasi-Delicts: Employers are directly and primarily liable for damages caused by their employees acting within the scope of their assigned tasks.

****Class Notes:****

- Immutability of judgment requires understanding the conditions under which a judgment can become final and the narrow exceptions to altering a judgment post finality.
- Essential principles in cases of quasi-delicts involving motor vehicles include:
 - Employers are directly and primarily responsible for damages caused by their employees (Art. 2180 of the Civil Code).
 - The solidary liability of vehicle owners with their drivers (Art. 2184).
 - Solidary liability in quasi-delicts (Art. 2194).

****Historical Background:****

This case epitomizes the legal challenges surrounding the finality of court decisions and the complexities of liability in quasi-delicts, especially in vehicular accidents. It underscores the importance of procedural timeliness and the consequences of failing to adhere to judicial processes, as well as reaffirms the established principles of employer liability in the context of Philippine law.