

### Title:

Meco Manning & Crewing Services, Inc. and Capt. Igmedio G. Sorerra vs. Constantino R. Cuyos

### Facts:

The case revolved around an illegal dismissal complaint by Constantino R. Cuyos, the Second Marine Engineer of the vessel “M/V Crown Princess,” managed by Meco Manning & Crewing Services, Inc. (MECO) and captained by Igmedio G. Sorerra. Cuyos alleged mistreatment and unceremonious dismissal initiated by the ship’s Chief Engineer, Francisco G. Vera, Jr., and concurred by other vessel authorities without proper cause or process. The complaint, originally filed before the Regional Arbitration Branch of the NLRC in Cebu City, involved various pleadings, motions, and position papers by both parties through multiple legal forums. Each forum yielded different interpretations of the evidence presented, culminating in the Supreme Court’s review of the case following conflicting decisions from the Labor Arbiter, NLRC, and the Court of Appeals (CA) in Cebu City.

### Issues:

1. Whether the Court of Appeals erred in ruling Constantino R. Cuyos was illegally dismissed from employment.
2. Whether the petitioners proved Constantino’s dismissal was for just and valid causes.
3. Whether petitioners violated Constantino’s right to procedural due process.
4. The propriety of the monetary awards granted by the appellate court.

### Court’s Decision:

The Supreme Court upheld the decision of the Court of Appeals, finding Meco Manning & Crewing Services, Inc., International Crew Services, Ltd., and Captain Igmedio G. Sorerra jointly and severally liable for illegally dismissing Constantino R. Cuyos. The Court outlined that the petitioners failed to provide substantial evidence for a just cause of dismissal and breached procedures mandated for lawful termination. Importantly, the Court adjusted the monetary awards due to Cuyos based on the unexpired portion of his contract and additional benefits outlined in his employment terms, emphasizing the due process violations and the fundamentals of evidence in labor disputes.

### Doctrine:

The burden of proof rests upon the employer to demonstrate a dismissal’s legality through substantial evidence. Failure to provide such evidence deems the dismissal illegal. Additionally, in termination cases, adherence to procedural due process, involving a twin-

notice requirement, is critical. Overseas workers, including seafarers, illegally dismissed are entitled to salaries corresponding to the unexpired portion of their contracts among other guaranteed benefits.

### ### Class Notes:

#### \*\*Key Elements:\*\*

1. **\*\*Burden of Proof\*\***: Employer's responsibility to establish dismissal's legality with substantial evidence.
2. **\*\*Procedural Due Process\*\***: The necessity for twin-notice requirement before termination.
3. **\*\*Illegal Dismissal\*\***: Consequences involve monetary awards based on unexpired contracts and other benefits.
4. **\*\*Evidence Interpretation\*\***: The significance of substantial and reliable evidence in labor disputes.

#### \*\*Relevant Statutes:\*\*

- **\*\*Republic Act No. 8042\*\*** (Migrant Workers and Overseas Filipinos Act), as amended by **\*\*Republic Act No. 10022\*\***: Governs the employment and working conditions of overseas Filipino workers (OFWs), including seafarers, and outlines the liabilities for illegal dismissal.
- **\*\*POEA Standard Employment Contract (SEC)\*\***: Details the disciplinary procedures, rights, and obligations of seafarers and employers.

#### \*\*Application in Context:\*\*

The case reiterates the paramount importance of clear, reliable evidence in substantiating claims of just cause for termination and underscores the strict adherence to procedural due process rights for employees. The decision also highlights the protective legal framework for OFWs, ensuring their entitlement to full contract terms and fair treatment under Philippine law.

### ### Historical Background:

The evolving jurisprudence on labor law, particularly concerning the rights and protections afforded to overseas Filipino workers, grounds this case within a broader context of enhancing legal safeguards against wrongful dismissal and ensuring the welfare of OFWs. Cases like this underscore the challenges in balancing employer authority and employee protections in a globalized labor market.