

**\*\*Title:\*\*** \*Juanito Carlos vs. Antonio J. Villegas, et al.\* (Rights of Public Service Workers to Overtime Pay)

**\*\*Facts:\*\***

Juanito Carlos, representing himself and other members of the Uniformed Force Division of the Manila Fire Department (MFD), initiated a legal action against Antonio J. Villegas (Mayor of Manila), Eulogio Samio (Chief of the MFD), and Manuel Cudiamat (Treasurer of the City of Manila), through a petition for mandamus (Civil Case No. 53514) filed in the Court of First Instance of Manila. The petition sought compensation for overtime services rendered from January 1, 1962, enforcement of the 40-Hour a Week Law for MFD members, and damages for the failure to implement such laws. The case escalated to the Supreme Court on appeal following the lower court's decision to dismiss the petition. The case's procedure exemplified an exhaustive legal fight, involving submissions to various governmental bodies and tracking the adherence to overtime pay provisions.

**\*\*Issues:\*\***

1. Are the petitioner-appellant and other similarly situated firemen entitled to collect overtime pay for services rendered since January 1, 1962?
2. Do the provisions of the Revised Administrative Code (Sections 566 and 259) preclude the application of the 40-Hour a Week Law and the Eight-Hour Labor Law to Manila Fire Department personnel?

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

The Supreme Court, affirming the decision of the Court of First Instance, ruled that the petitioner and other MFD members were not entitled to overtime pay or to the coverage of the Forty-Hour a Week Work Law. The decision emphasized that civil service employees, like the MFD personnel, are governed by the provisions of the Revised Administrative Code rather than the Eight-Hour Labor Law, given the necessity for their constant readiness and the exigency of their services. Sections 566 and 259 of the Revised Administrative Code were determined to still be legally in force, and their application to civil service employees was not repealed or altered by subsequent laws like Republic Act 1880 or Commonwealth Act 444.

**\*\*Doctrine:\*\***

This case reaffirms the doctrine that civil service employees, especially those whose services require round-the-clock readiness like firemen, are governed by the Revised Administrative Code in matters of working hours and overtime pay, and are not covered by

laws applicable to regular laborers, such as the Eight-Hour Labor Law or the Forty-Hour a Week Work Law.

**\*\*Class Notes:\*\***

- **\*\*Revised Administrative Code (Sections 566 and 259):\*\*** Establishes the ability of public service heads to require employees to extend daily hours of labor or perform overtime work without additional compensation, save for exceptions provided by law.
- **\*\*Republic Act 1880 (Forty-Hour a Week Work Law):\*\*** Not applicable to civil service employees like firemen due to the nature of their duties and the exigencies of public service.
- **\*\*Commonwealth Act 444 (Eight-Hour Labor Law):\*\*** Explicitly stated not to apply to civil service employees who are governed by provisions of the Revised Administrative Code.

**\*\*Historical Background:\*\***

This case underscores the complex interface between public service requirements and labor laws. It highlights a period in Philippine legal history wherein the rights and compensations of public service workers, particularly those involved in crucial services like firefighting, were scrutinized through the lens of existing labor and administrative laws. The decision reflects a balancing act between the government's responsibility to ensure uninterrupted public services and the rights of workers to fair labor practices.