

****Title:**** Ma. Imelda M. Manotoc vs. Honorable Court of Appeals and Agapita Trajano on Behalf of the Estate of Archimedes Trajano

****Facts:****

Agapita Trajano, representing the estate of deceased Archimedes Trajano, filed Civil Case No. 63337 against Ma. Imelda “Imee” Marcos-Manotoc for recognition and/or enforcement of a foreign judgment rendered by the US District Court of Honolulu, Hawaii, which found Manotoc liable for the wrongful death of Archimedes Trajano. The trial court issued summons to Manotoc, which were later served through substituted service to a caretaker, Macky de la Cruz, after attempts at personal service allegedly failed. Manotoc contested the service, claiming it was invalid due to various reasons including her non-residence at the stated address and her actual residence in Singapore. Her motion to dismiss on the grounds of lack of jurisdiction was denied by the trial court and subsequently by the Court of Appeals (CA), which maintained the validity of the substituted service.

****Procedural Posture:****

Manotoc filed a motion to dismiss in the trial court citing invalid service of summons, which was denied. Her subsequent petition for certiorari and prohibition with the CA also resulted in a dismissal, affirming the trial court’s jurisdiction over her based on the substituted service. Manotoc then filed a Petition for Review on Certiorari before the Philippine Supreme Court.

****Issues:****

1. Whether the substituted service of summons on Manotoc was valid, thereby conferring jurisdiction over her to the trial court.
2. The proper interpretation and application of the rules on substituted service of summons.

****Court’s Decision:****

The Supreme Court granted Manotoc’s petition, reversing the Court of Appeals and the trial court’s decisions. It ruled that the substituted service was invalid due to non-compliance with requirements, particularly the lack of detailed efforts to personally serve the summons and the questionable status of the person who received the summons on behalf of Manotoc. The Court emphasized the importance of strictly complying with the rules governing substituted service to uphold due process.

****Doctrine:****

The Philippine Supreme Court reiterated the doctrine that jurisdiction over a defendant in a

case strictly in personam is acquired either upon valid service of summons or the defendant's voluntary appearance in court. For substituted service to be valid, it must strictly comply with the prescribed rules, demonstrating impossibility of prompt personal service, specific details in the sheriff's return, service upon a person of suitable age and discretion, and, if at the defendant's office or regular place of business, to someone in charge there.

****Class Notes:****

- ****Jurisdiction Over the Defendant:**** Acquired via valid service of summons or voluntary appearance.
- ****Substituted Service:**** Can only be used when personal service is rendered impossible under specific circumstances outlined in the rules; must strictly comply with procedural requirements.
- ****Requirements for Valid Substituted Service:**** These include demonstration of impossibility for prompt personal service, detailed sheriff's return, service to an appropriate individual, and strict adherence to procedural rules.
- ****Impact of Invalid Service:**** Proceedings held without proper jurisdiction over a defendant are null and void.

****Historical Background:****

This case demonstrates the strict standards applied by the Philippine Supreme Court in matters of service of summons, especially in situations where international parties and foreign judgments are involved. It underscores the principle of due process and the necessity for courts to acquire jurisdiction over parties through valid means to ensure the enforceability and fairness of judicial proceedings.