Title: Wang Laboratories, Inc. v. Hon. Rafael T. Mendoza, et al.

Facts:
Wang Laboratories, Inc. (petitioner), a US-based corporation, engaged EXXBYTE Technologies Corporation (EXXBYTE) as its exclusive distributor in the Philippines. On September 10, 1980, Angara Concepcion Regala & Cruz Law Offices (ACCRALAW), entered a contract with EXXBYTE for the purchase of a Wang 2200 US Integrated Information System, which was fulfilled in May 1981. Another contract was made for developing a data processing software program, which was never implemented.

ACCRALAW filed a complaint against Wang Laboratories for breach of contract with damages, replevin, and attachment in the Regional Trial Court (RTC) of Makati, Civil Case No. 7183. Wang filed a Motion to Dismiss based on improper service of summons, arguing the court lacked jurisdiction over its person as it wasn't conducting business in the Philippines nor served properly.

The RTC, under Judge Mendoza, denied the Motion to Dismiss, holding that Wang voluntarily submitted to the court's jurisdiction and granted ACCRALAW's motion for leave to effect extraterritorial service of summons. Wang Laboratories then filed this petition arguing the RTC had acted without jurisdiction or with grave abuse of discretion.

Issues:
1. Whether the RTC acted without or exceeded its jurisdiction in ruling Wang Laboratories had voluntarily submitted to the court's jurisdiction.
2. Whether ACCRALAW can serve summons on Wang Laboratories extraterritorially.
3. Whether the RTC erred in not finding the service of summons on Wang Laboratories improper.

Court's Decision:
The Supreme Court dismissed the petition, finding no merit in Wang Laboratories' arguments.

1. **Voluntary Submission to Jurisdiction**: The court determined Wang Laboratories waived the necessity of formal notice by its voluntary appearance, seeking several affirmative reliefs that required the court's jurisdiction.

2. **Extraterritorial Service of Summons**: The court noted Wang Laboratories indeed had a business presence in the Philippines through its exclusive distributor, EXXBYTE, and had

property interests such as trademarks registered in the country, qualifying for extraterritorial service of summons.

3. **Improper Service of Summons**: The court dismissed this claim, highlighting Wang Laboratories' actions that constituted a submission to the court's jurisdiction, negating any claim of improper service.

Doctrine:
– **Voluntary Appearance**: A voluntary appearance by a defendant is a waiver of the necessity of a formal notice. If such an appearance is for any purpose other than to object to jurisdiction, the defendant is deemed to have submitted himself to the jurisdiction of the court.

Class Notes:
– **Jurisdiction over Foreign Corporations**: A foreign corporation can be sued in Philippine courts for acts done against persons or entities in the Philippines, even if it claims not to be doing business in the country.
– **Service of Summons**: There are specific rules for serving summons on private foreign entities, including service to an authorized agent or through extraterritorial means under certain circumstances.
– **Engaging in Business**: The determination of what constitutes "doing business" in the Philippines is based on the specific facts of each case and involves a consideration of activities that indicate a foreign corporation's intent to engage in sustained business operations within the country.

Historical Background:
In the context of this decision, it's crucial to understand the evolving jurisprudence regarding the jurisdiction over foreign corporations not physically present but conducting some form of operational or business activities within the Philippines. Wang Laboratories, Inc. v. Hon. Rafael T. Mendoza et al. reaffirms the principle that foreign enterprises interacting with Philippine entities can't evade jurisdiction if their actions affect the interests of parties within the nation, thus balancing the rights of foreign corporations with the necessity to protect local parties' interests.