

Title: **\*\*A.L. Ang Network, Inc. vs. Emma Mondejar: A Case of Correct Remedy in Small Claims Proceedings\*\***

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

On March 23, 2011, A.L. Ang Network, Inc. (petitioner) filed a small claims case against Emma Mondejar (respondent) seeking to recover unpaid water bills amounting to P23,111.71 for the period of June 1, 2002, to September 30, 2005. The petitioner argued it was authorized to collect payments for water supplied to Regent Pearl Subdivision residents, including the respondent. The respondent countered that she had been paying a monthly flat rate in accordance with their agreement and that the petitioner unilaterally and unjustifiably adjusted this rate. After her water supply was disconnected for non-payment, the case was brought before the Municipal Trial Court in Cities of Bacolod City, Branch 4 (MTCC).

The MTCC's decision on June 10, 2011, found for the respondent, ruling that since the petitioner was only issued a Certificate of Public Convenience (CPC) by the National Water Resources Board (NWRB) on August 7, 2003, it could only charge the agreed flat rate before this date. Consequently, the petitioner's claim was substantially reduced.

Dissatisfied, the petitioner filed a petition for certiorari under Rule 65 to the Regional Trial Court (RTC) arguing that the MTCC committed grave abuse of discretion. The RTC dismissed the petition on November 23, 2011, deeming it an improper effort to circumvent the non-appealable nature of small claims cases. The petitioner then elevated the matter to the Supreme Court.

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

1. Whether or not the RTC erred in dismissing the petition for certiorari filed to challenge the MTCC's decision in a small claims case.
2. The proper recourse for challenging MTCC decisions in small claims cases.

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

The Supreme Court granted the petition, reversing the RTC decision and reinstating the petitioner's certiorari case. The Court clarified that while small claims decisions are final and non-appealable to ensure swift conclusion, an aggrieved party retains the right to a petition for certiorari under Rule 65 as an exceptional remedy. This is especially pertinent when there is no other plain, speedy, and adequate remedy in the ordinary course of law or when there's a clear exhibition of grave abuse of discretion by the lower court. The

Supreme Court found that the petitioner had correctly availed itself of this remedy, and the RTC erred in dismissing the petition on the assumption that it sought to circumvent procedural barriers against appealing small claims decisions.

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

The decision reiterated the doctrine that the prohibition on appeals in small claims cases does not preclude the filing of a petition for certiorari under Rule 65 when there is “no appeal, nor any plain, speedy, and adequate remedy in the course of law,” and emphasized the importance of respecting the hierarchy of courts.

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

- Small claims cases are final and non-appealable to ensure expeditious resolution.
- The prohibition against appeals does not remove the option for a petition for certiorari under Rule 65 in extraordinary circumstances, specifically where there is grave abuse of discretion or lack of jurisdiction.
- A petition for certiorari is an original action aimed solely at correcting errors of jurisdiction or grave abuse of discretion, not errors of judgment.
- Judicial hierarchy norms dictate that petitions against first-level courts’ decisions should be filed with the RTC.

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

The case underscores the judiciary’s efforts to strike a balance between the finality of small claims procedures, aimed at unclogging court dockets and providing swift justice for minor claims, and the preservation of legal recourse for parties aggrieved by jurisdictional errors or grave abuse of discretion in the adjudication process. The Philippine legal system’s evolution reflects an ongoing endeavor to refine procedural paths for redress while safeguarding the principles of fairness and justice amidst the practical exigencies of caseload management.