

Title:

RCBC Bankard Services Corporation vs. Moises Oracion, Jr. and Emily L. Oracion

Facts:

The case originated when respondents Moises and Emily Oracion were issued a Bankard PESO Mastercard Platinum by the petitioner, RCBC Bankard Services Corporation, on December 2, 2010. They utilized the credit card for various purchases but failed to settle the accumulated total amount of P117,157.98, inclusive of charges and penalties. Despite receiving Statements of Account (SOAs) and a demand letter from the petitioner, the respondents did not fulfill their payment obligation. Consequently, the petitioner initiated a Complaint for Sum of Money on February 7, 2012, before the Metropolitan Trial Court (MeTC) of Pasig City. The MeTC, upon respondents' failure to submit their answer within the prescribed period, considered the case submitted for resolution. The MeTC dismissed the complaint for lack of preponderance of evidence, particularly because the submitted documents were deemed mere photocopies and not original evidence. The Regional Trial Court (RTC) affirmed the MeTC's decision upon appeal, highlighting that the documents submitted by the petitioner could not be considered as original documents. The petitioner then escalated the case to the Supreme Court via a petition for review on certiorari under Rule 45 of the Rules of Court.

Issues:

1. Whether the RTC erred in affirming the MeTC's decision that dismissed the petitioner's complaint due to the submission of "duplicate original copies" rather than original documents, and if the Rules on Electronic Evidence justify the petitioner's claims.
2. Whether, despite technicalities, substantial justice warrants giving the petitioner an opportunity to rectify the procedural mistake by presenting another set of documents.

Court's Decision:

The Supreme Court denied the petition, affirming the decisions of the RTC and MeTC. The Court elucidated that procedural rules bar the introduction of new theories on appeal not raised in lower courts. Thus, the petitioner's invocation of the Rules on Electronic Evidence on appeal without having raised such a theory before the RTC was procedurally flawed. Moreover, even considering the merits, the petitioner failed to authenticate the submitted electronic documents as required under the Rules on Electronic Evidence. The Court also addressed the petitioner's appeal for equity, underscoring that the petitioner did not present compelling reasons to circumvent established rules of evidence.

Doctrine:

The Best Evidence Rule necessitates the production of original documents in inquiries regarding their contents unless exceptions are validly proven. Photocopies or substitutionary evidence are considered inadmissible unless justifiably authenticated as accurate reproductions of an original document. Furthermore, procedural rules prohibit raising new legal theories on appeal that were not presented in the trial stage.

Class Notes:

- The Best Evidence Rule requires that the original document be presented as evidence when the document's contents are the subject of inquiry.
- Electronic documents are considered equivalent to original documents under the Best Evidence Rule if authenticated following the Rules on Electronic Evidence.
- Legal arguments or theories not raised during the trial cannot be introduced for the first time on appeal.
- Proper procedural steps and evidence authentication are pivotal in litigation to avoid dismissal based on technical grounds.

Historical Background:

This case underscores the critical nature of following procedural rules and the correct application of the Best Evidence Rule, including in the context of electronic documents. It highlights the evolving nature of legal evidence in the digital age and the necessity of adhering to prescribed processes for their authentication and admission in legal proceedings.