

**\*\*Title:\*\*** Vitarich Corporation vs. Femina R. Dagmil: A Reevaluation of Default Judgments

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

This case, brought before the Philippine Supreme Court, involves a sum of money dispute initiated by Vitarich Corporation against Femina Dagmil. The litigation commenced on January 15, 2010, when Vitarich Corporation filed the complaint with the Regional Trial Court (RTC) Branch 11 in Malolos City, designated as Civil Case No. 33-M-2010. Upon receiving the summons, Femina Dagmil's counsel sought dismissal based on improper venue, which the RTC eventually denied, directing Dagmil to file a responsive pleading. Failure to submit such a pleading led Vitarich to motion for a declaration of Dagmil in default. Subsequently, a change in Dagmil's legal representation and a belated motion to admit Dagmil's answer did not prevent the RTC from declaring her in default and favoring Vitarich's claims. Appeals and motions for reconsideration from Dagmil's side citing excusable negligence and a plea for new trials were continually denied by the RTC. However, upon reaching the Court of Appeals, the initial judgment was overturned, leading to the present petition for review by Vitarich Corporation.

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

The Supreme Court deliberated on the propriety of the RTC's order of default against Dagmil, especially in light of subsequent legal maneuvers aimed at remedying the default position, including issues surrounding the admission of Dagmil's belated answer, the impact of her previous counsel's excusable negligence, and the general inclination of legal procedures to afford parties substantial justice over technicalities.

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

The Supreme Court denied the petition, affirming the decision of the Court of Appeals to reverse the RTC's judgment by default. It reinforced that procedural rules are designed to facilitate justice, not obstruct it, and that the RTC and Vitarich had not sufficiently demonstrated that Dagmil's participation in the proceedings was intended towards delay or was prejudicial to Vitarich's position. The Supreme Court underscored principles favoring the liberal setting aside of orders of default to allow parties to fully present their case.

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

The case reiterates the doctrine that courts hold the discretion to set aside orders of default and admit belated responses if filed before a declaration of default and without prejudicing the plaintiff. This discretion aligns with the overarching principle of promoting substantive justice over adherence to technicalities.

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

- Orders of Default: Courts have the discretion to set aside orders of default to ensure cases are decided on their merits rather than procedural technicalities.
- Excusable Negligence: Circumstances such as health issues or clerical errors can be considered excusable neglect, warranting leniency in procedural deadlines.
- Substantive Justice Over Technicality: The legal system favors decisions that provide parties a fair chance to present their cases fully, underscoring the preference for resolving cases on substantive grounds rather than on procedural missteps.

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

The case underscores the evolving judiciary stance towards a more lenient and equitable interpretation of procedural rules to ensure fair trial opportunities. This direction is consistent with the broader goal of the legal system to adjudicate disputes by allowing parties to present their cases comprehensively, thus prioritizing substantive justice over procedural formalism. The Supreme Court's decision reflects this ethos, aiming to mitigate the strict adherence to procedural deadlines that may unduly prejudice a party's right to a fair hearing.