

****Title:**** Executive Judge Henry B. Basilla vs. Judge Amado L. Becamon, Clerk of Court Lolita Delos Reyes, and Process Server Eddie Delos Reyes

****Facts:****

This administrative case involves a sworn letter-complaint filed by Executive Judge Henry B. Basilla against Judge Amado L. Becamon, Clerk of Court Lolita Delos Reyes, and Process Server Eddie Delos Reyes of the Municipal Circuit Trial Court (MCTC) of Placer-Esperanza-Cawayan, Masbate. The complaint charges the respondents with gross neglect of duty and/or grave misconduct, gross ignorance of the law, and violation of Canon 3 of the Code of Judicial Conduct. The controversy centers around Civil Case No. 288 (MCTC Case No. 263-C), entitled Visitacion Mahusay vda. de Du vs. Benjamin Du, et al., a land ownership and possession recovery case.

This administrative matter, A.M. No. MTJ-02-1404, is essentially a re-litigation of a prior case, A.M. No. MTJ-02-1438, in which Judge Becamon was fined P21,000 for gross ignorance of the law and procedure, and Delos Reyeses were each fined an amount equivalent to one month and one day of their respective salaries for simple neglect of duty. Both cases originated from the same set of facts and involved the same parties.

The procedural journey began when Executive Judge Basilla issued an order dismissing an appeal in Civil Case No. 288 for being frivolously filed and out of time. Moreover, he called for the respondents to explain why they should not be administratively dealt with for various infractions including extending the appeal period against the rules and delaying the release of the court's decisions.

Subsequent to this, and following a directive from then Court Administrator Alfredo L. Benipayo for a formal charge, Judge Basilla complied with a sworn letter-complaint citing the same facts and accusing the respondents of the aforementioned charges, leading to the initiation of A.M. No. MTJ-02-1404.

****Issues:****

1. Whether the principle of res judicata applies to bar the re-litigation of the administrative complaint in A.M. No. MTJ-02-1404, given that it involves the same parties, facts, and issues previously resolved in A.M. No. MTJ-02-1438.

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

The Supreme Court, applying the principle of res judicata, dismissed the instant administrative complaint in A.M. No. MTJ-02-1404. The Court found that both A.M. No.

MTJ-02-1438 and A.M. No. MTJ-02-1404 involved identical subject matter, cause of action, and were between the same parties. Since A.M. No. MTJ-02-1438 had already been resolved with finality, the Court held that re-litigating the same issues against the same parties over the same facts would violate the principle of res judicata, which aims to prevent the multiplicity of suits, stabilize rights, and promote the rule of law.

****Doctrine:****

The Supreme Court reiterated the doctrine of res judicata or bar by prior judgment, emphasizing that a matter once adjudicated by a competent court and resolved with finality cannot be litigated again in any subsequent case involving the same parties, facts, and issues.

****Class Notes:****

- ****Res judicata:**** A final judgment on the merits by a court of competent jurisdiction is conclusive of the rights of the parties and their privies in all later suits on points and matters determined in the former suit.
- ****Gross neglect of duty and/or grave misconduct:**** Actions or inactions by a judicial officer that significantly deviate from expected conduct and undermine the integrity and proper operation of the court.
- ****Gross ignorance of the law:**** Demonstrates a judicial officer's lack of fundamental legal principles or procedures, leading to miscarriage of justice.
- ****Violation of Canon 3 of the Code of Judicial Conduct:**** Pertains to failing to perform judicial duties efficiently, fairly, and with reasonable promptness.

****Historical Background:****

This case illustrates the administrative mechanisms in place within the Philippine Judicial System for addressing misconduct, inefficiency, or ignorance of the law among judges and court personnel. It underscores the importance of judicial accountability and the role of the Supreme Court in maintaining the integrity of the judicial process. Moreover, it highlights the principle of res judicata as a foundational legal doctrine ensuring finality of judgments and preventing unnecessary litigation, contributing to the efficient functioning of the judiciary.