

****Title:**** Virgilio V. Dionisio vs. Judge Emilio V. Salas

****Facts:**** In April 1977, Virgilio V. Dionisio initiated Civil Case No. 26198 at the Court of First Instance of Rizal, which was assigned to Judge Emilio V. Salas. On September 10, 1977, Dionisio filed a motion for the reconsideration of the order that denied him the opportunity to amend his complaint. This motion was scheduled for a hearing on September 30, 1977, during which Judge Salas allowed the defendant's counsel three days from the notice to file opposition. Following this period, the motion was to be considered submitted for resolution. Notably, Judge Salas did not resolve this motion within the mandated ninety-day period subsequent to its submission.

On February 13, 1978, Dionisio filed an administrative complaint against Judge Salas, accusing him of falsification. Dionisio contended that Judge Salas falsely certified he had resolved all motions pending for ninety days or more, a certification required for receiving his January 1978 salary under the Judiciary Law. Dionisio suggested an audit could reveal more instances of similar misconduct and requested Judge Salas's suspension to prevent any potential manipulation of case records.

Judge Salas, in his response, acknowledged the failure to resolve the motion within the ninety-day period, citing a writ of preliminary injunction from the Court of Appeals dated January 6, 1978, which restrained him from proceeding with the hearing of Civil Case No. 26198, among other things.

****Issues:**** The primary legal issue concerns the alleged administrative misconduct of Judge Salas in falsely certifying the resolution of motions pending for ninety days or more, in violation of the Judiciary Law, to receive salary payment.

****Court's Decision:**** The Supreme Court dismissed the case due to a lack of merit and its moot nature, stemming from Judge Salas's passing on August 8, 1980. The Court considered Judge Salas's explanation regarding the preliminary injunction, which effectively prevented him from resolving the motion within the ninety-day frame, and thus, indirectly addressing the issue of falsification of judicial certification.

****Doctrine:**** The Judiciary Law dictates that judges must certify that they have decided on all motions and cases under submission for a period of ninety days or more before their salary can be released. This case underscores the importance of adherence to procedural timelines and the integrity of judicial certifications.

****Class Notes:****

- ****Judiciary Law Compliance:**** Judges must ensure all pending decisions or motions submitted for over ninety days are resolved before certifying for salary release.
- ****Administrative Accountability:**** Judicial officers are subject to administrative actions for misconduct, including falsification of official documents.
- ****Effect of Judicial Injunction:**** The issuance of a writ of preliminary injunction can impact judicial proceedings by pausing or altering the course of case resolution.
- ****Mootness Doctrine:**** Legal disputes may be dismissed if intervening events render them moot or irrelevant, such as the death of a party involved in a disciplinary proceeding.

****Historical Background:**** The case epitomizes the challenges in judicial administration, particularly in ensuring timely resolution of cases amidst unforeseeable procedural hurdles, such as injunctions from higher courts. It adds to the jurisprudence on judicial integrity, the procedural responsibilities of judges, and the effects of external legal interventions on case management. The mootness principle applied here also illustrates how the judiciary avoids expending resources on issues that, due to particular circumstances like the death of an involved party, no longer present a live controversy requiring resolution.