

****Title:****

Añonuevo v. Hon. Court of Appeals and Jerome Villagracia

****Facts:****

Jonas Añonuevo (Petitioner) was involved in a car collision with Jerome Villagracia (Respondent), a cyclist, on the evening of February 8, 1989, at the intersection of Boni Avenue and Barangka Drive, Mandaluyong City. The collision resulted in severe injuries for Villagracia, necessitating multiple surgeries. Subsequently, Villagracia filed a damages suit against Añonuevo and Procter and Gamble Phils., Inc., where Añonuevo's brother was employed and the car was registered. The Regional Trial Court (RTC) found Añonuevo liable and awarded damages to Villagracia. Añonuevo appealed to the Court of Appeals, which affirmed the RTC's decision. Unsatisfied, Añonuevo petitioned the Supreme Court, focusing on whether the presumption of negligence applied to non-motorized vehicles under Article 2185 of the New Civil Code due to Villagracia's failure to have safety devices on his bicycle.

****Issues:****

1. Does Article 2185 of the New Civil Code, attributing presumption of negligence to drivers of motor vehicles violating traffic regulations at the time of mishap, apply by analogy to cyclists or non-motorized vehicles?
2. Was Añonuevo's negligence the proximate cause of the accident?
3. Can Villagracia's non-compliance with local traffic ordinances for bicycle safety exculpate Añonuevo from liability or diminish Villagracia's claim for damages under the doctrine of negligence per se?

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

The Supreme Court upheld the decisions of the lower courts, emphasizing that Article 2185 of the New Civil Code exclusively pertains to motorized vehicles and cannot, by extension or analogy, impose a similar presumption of negligence on operators of non-motorized vehicles like bicycles. The Court further clarified that the mere violation of a municipal ordinance regarding bicycle registration and safety equipment does not automatically attribute negligence per se to Villagracia, especially without establishing a direct causal link between these lapses and the accident. Ultimately, Añonuevo's negligence was affirmed as the proximate cause of the collision and Villagracia's injuries.

****Doctrine:****

The Supreme Court reiterated that the presumption of negligence under Article 2185 of the New Civil Code applies strictly to operators of motorized vehicles violating traffic

regulations at the time of an incident. Furthermore, the doctrine of negligence per se requires a clear causal connection between the statutory violation and the injury incurred for it to preclude or diminish a claimant's recovery of damages.

****Class Notes:****

- ****Article 2185**** of the New Civil Code specifically pertains to the presumption of negligence for motorized vehicles.
- ****Negligence Per Se:**** The violation of a statutory duty constitutes negligence, but a direct causal connection must be proven between the violation and the resulting injury.
- ****Proximate Cause:**** The negligence proven to be the immediate and direct cause of the injury.
- ****Contributory Negligence:**** Must be proven with a causal link to the incident, albeit not proximately, that the claimant's actions had contributed to their injury.

****Historical Background:****

At the time Article 2185 was formulated, a wide array of non-motorized vehicles was common, yet the specific mention of "motor vehicles" in the law underscores a deliberate legislative intent to limit its applicability. The distinction reflects a well-established legal principle regarding the heightened potential for harm associated with motorized vehicles compared to their non-motorized counterparts, necessitating stricter liability standards.