

Title: Judge Rene B. Baculi vs. Atty. Melchor A. Battung

Facts:

The case originated from a complaint for disbarment filed by Judge Rene B. Baculi, Presiding Judge of the Municipal Trial Court in Cities, Branch 2, Tuguegarao City, against Atty. Melchor A. Battung, alleging violations of Canons 11 and 12 of the Code of Professional Responsibility. The complaint detailed incidents occurring during a hearing on July 24, 2008, for Civil Case No. 2502, where Atty. Battung, while arguing a motion for reconsideration, shouted at Judge Baculi despite warnings, leading to being cited for direct contempt. The encounters escalated with Atty. Battung further challenging Judge Baculi outside of the courtroom, disturbing court proceedings and displaying disrespectful behavior. Additionally, Judge Baculi accused Atty. Battung of filing dilatory pleadings in another case, Civil Case No. 2640, aimed at delaying justice. Atty. Battung defended himself by accusing Judge Baculi of disrespect and provocation. The case proceeded through the Integrated Bar of the Philippines (IBP) disciplinary process, where Commissioner Jose de la Rama, Jr. evaluated the evidences, including a courtroom tape, and found Atty. Battung guilty of disrespecting the judge and the court but not on charges relating to Canon 12. The IBP Board of Governors adopted the report, recommending a reprimand but modifying it from the initial suggestion of a six-month suspension.

Issues:

1. Whether Atty. Melchor A. Battung violated Canon 11, Rule 11.03 of the Code of Professional Responsibility by showing disrespect towards Judge Rene B. Baculi during court proceedings.
2. Whether Atty. Battung's actions constituted a violation of Canon 12 by filing alleged dilatory pleadings.

Court's Decision:

The Supreme Court, in agreement with the IBP's findings, held that Atty. Battung violated Canon 11, specifically Rule 11.03 of the Code of Professional Responsibility due to his actions of shouting and exhibiting disrespectful behavior towards Judge Baculi in the courtroom. The Court reasoned that such actions not only showed disrespect to the judge but also disrupted court proceedings and tainted the integrity of the judicial system. Regarding the accusation under Canon 12, the Court noted the IBP found insufficient evidence to support a judgment on misuse of judicial process or delaying the administration of justice.

Atty. Battung was thus suspended from the practice of law for one (1) year, emphasizing the

severity of his misconduct and warning against repetition.

Doctrine:

This case reinforces the principle that lawyers, as officers of the court, must uphold the dignity and respect due to the courts and judicial officers. Violations, particularly those involving scandalous, offensive, or menacing language or behavior, are serious offenses against the legal profession's ethical standards set forth in the Code of Professional Responsibility.

Class Notes:

- Canon 11 and Rule 11.03: Highlight the obligation of lawyers to respect judicial officers and abstain from offensive behavior.
- Importance of courtroom decorum: Recognize the role of lawyers in maintaining the solemnity and integrity of court proceedings.
- Disciplinary actions: Understand the disciplinary process within the legal profession for ethical breaches, including the roles of the IBP and the Supreme Court.

Historical Background:

This case illustrates the judiciary's ongoing efforts to maintain professional ethics within the Philippine legal system, ensuring that the behavior of lawyers aligns with the standards expected of officers of the court. It serves as a cautionary tale for legal practitioners on the consequences of disregarding such ethics, particularly in the courtroom.