

****Title:**** Ramiro Lim & Sons Agricultural Co., Inc., Sirna Real Estate Development, Inc., and Ramiro Lim vs. Armando Guilaran et al.

****Facts:**** This case stems from complaints filed by several agricultural workers (respondents) for illegal dismissal, underpayment of wages, non-payment of various statutory benefits, and for moral and exemplary damages against Ramiro Lim & Sons Agricultural Co., Inc., Sirna Real Estate Development, Inc., and Ramiro Lim (petitioners). The respondents claimed they were employed in various agricultural tasks on an 84-hectare hacienda owned by petitioners, paid on a mixed pakyaw and daily basis, and were illegally dismissed after demanding payment based on rates prescribed by the prevailing Wage Order. In contrast, petitioners contended that except for one, the workers were pakyaw laborers and were considered to have abandoned their jobs following a work stoppage and non-compliance with return-to-work notices.

Both the Labor Arbiter and the NLRC initially ruled in favor of the petitioners, finding abandonment. However, the Court of Appeals (CA) later reversed these rulings, reinstating the Labor Arbiter's initial order for reinstatement and back wages, citing insufficient evidence of abandonment and irregularities in the payroll records presented by the petitioners.

****Procedural Posture:**** The case progressed from the Labor Arbiter to the NLRC, and upon petition for certiorari, to the CA. Petitioners then elevated the case to the Supreme Court, seeking a review of the CA's decision.

****Issues:**** The Supreme Court was asked to determine whether:

1. The CA erred in disregarding the payrolls submitted by petitioners;
2. The CA erred in applying social justice in favor of respondents;
3. CA committed error in reversing the NLRC decision without finding grave abuse of discretion.

****Court's Decision:**** The Supreme Court denied the petition, affirming the CA's decision to reinstate the Labor Arbiter's order for reinstatement and back wages. The Court found that:

1. The CA correctly scrutinized the payroll records, identifying inconsistencies that cast doubt on their reliability and authenticity.
2. The status of respondents as regular seasonal workers entitled to back wages was correctly determined based on seasonality of work, despite the irregular nature of their employment.

3. The CA's reversal of the NLRC's computation of back wages was justified, given the baseless assumptions and questionable payroll records used by the NLRC.

****Doctrine:**** This case reiterates the principle that payroll records, while presumptively regular as business entries, can be challenged and overcome by clear and convincing evidence to the contrary. It also emphasizes the protection afforded to regular seasonal workers, who are entitled to back wages even if they do not work continuously throughout the year but perform tasks necessary and desirable to the employer's business.

****Class Notes:****

- ****Principle of Regular Seasonal Employment:**** Workers employed for recurrent seasons are considered regular employees for the duration of each season.
- ****Payroll Records as Evidence:**** The presumption of regularity of payroll records as entries in the course of business can be rebutted by clear evidence showing inconsistencies or discrepancies.
- ****Back Wages Determination for Pakyaw Workers:**** The Court underscores the need for accurate computation of back wages based on actual work done or the applicable season of employment, especially for workers paid on a task or piece-rate basis.
- ****Legal Interest on Monetary Awards:**** The imposition of legal interest on monetary awards from the finality of judgment until satisfaction, following *Nacar v. Gallery Frames*.

****Historical Background:**** This decision further clarifies and enforces labor standards and protections under Philippine law, particularly for agricultural workers and those employed on a piece-rate or task basis. It highlights the judiciary's role in scrutinizing employment records and ensuring fair compensation, even in industries marked by seasonal or irregular work patterns.