

### Title: Negros Oriental Planters Association, Inc. vs. Hon. Presiding Judge of RTC-  
Negros Occidental, Branch 52, Bacolod City, and Aniceto Manojó Campos

### Facts:

Aniceto Manojó Campos filed a Complaint against the Negros Oriental Planters Association, Inc. (NOPA) for Breach of Contract with Damages on 17 March 1999, docketed as Civil Case No. 99-10773. The complaint was based on two Molasses Sales Agreements, asserting that although full payment was made, Campos received only a partial delivery due to a disagreement over the quality of molasses delivered.

More than six years after the lawsuit's initiation, NOPA filed a Motion to Dismiss, arguing Campos failed correctly to file the necessary docket fees by deliberately underestimating the damage amount. The Regional Trial Court (RTC) denied NOPA's motion, a decision upheld upon motion for reconsideration, prompting NOPA to seek certiorari from the Court of Appeals (CA), which dismissed NOPA's petition due to technical deficiencies. NOPA's subsequent motion for reconsideration, attaching an amended petition, was also denied by the CA, leading NOPA to elevate the matter to the Supreme Court on the grounds of procedural discrepancies.

### Issues:

1. Whether the Court of Appeals committed reversible error by dismissing NOPA's petition for not strictly complying with procedural requirements, specifically in relation to the verification of pleadings and attachment of necessary documents.

### Court's Decision:

The Supreme Court affirmed the CA's decision, holding that:

- NOPA's petition for certiorari was correctly dismissed due to technical deficiencies ranging from inadequate verification to the failure to include pertinent documents and the absence of counsel's IBP Official Receipt Number.
- The Court held the stricter verification requirement under the Rules of Court mandates that allegations in a pleading must be based on personal knowledge or authentic records, which NOPA failed to meet.
- The Supreme Court underscored the discretionary nature of allowing deficiencies in pleadings to be remedied, a discretion the CA did not abuse in refusing NOPA's amended petition.
- The Court further delineated the distinction between substantive rights and technical

procedural requirements, highlighting that the technicality raised by NOPA concerning docket fees did not impair any substantive right and that the liberal application of procedural rules, as argued by NOPA, could not serve to solely benefit one party over another.

### ### Doctrine:

The case reiterates the doctrine established in previous jurisprudence regarding the jurisdictional nature of docket fees and the principle that a pleading's deficiencies regarding verification may be treated as an unsigned pleading, subject to the court's discretion. It underscores the requirement for specificity in the verification of pleadings—that the allegations must be based on personal knowledge or authentic records. Furthermore, it provides an exemplar on when the liberal and strict applications of procedural rules apply, particularly in the context of payment of docket fees and intention to defraud the court.

### ### Class Notes:

- **\*\*Verification of Pleadings\*\***: It must be based on personal knowledge or authentic records; mere belief or knowledge is insufficient post-amendment in May 2000.
- **\*\*Docket Fees\*\***: Payment of docket fees is jurisdictional; however, the Supreme Court may allow for liberalism in procedural technicalities if there is no intent to defraud the court.
- **\*\*Technical Deficiencies\*\***: Can be grounds for dismissal of a petition if it lacks compliance with procedural requirements, such as proper verification and attachment of necessary documents.
- **\*\*Procedural Discretion\*\***: Courts have discretionary power in allowing deficiencies in pleadings to be remedied but are guided by considerations of equity and justice.

### ### Historical Background:

This case demonstrates the evolving strictness in procedural requirements laid out by the Philippine judicial system, aiming to balance strict adherence to procedural rules with substantive justice. It highlights the shift towards requiring precise adherence to procedural rules in filing pleas and the evolving nature of verification requirements in the context of Philippine jurisprudence, refining the balance between procedural technicalities and the merits of a case.