

### Title: Dalisay v. Mauricio

### Facts:

The case revolves around Valeriana U. Dalisay, the complainant, who hired Atty. Melanio “Batas” Mauricio, Jr., the respondent, on October 13, 2001, to represent her in Civil Case No. 00-044 pending before the Municipal Trial Court, Branch 1, Binangonan, Rizal. Despite receiving documents and attorney’s fees totaling P56,000.00, Mauricio failed to perform any legal service for Dalisay. Consequently, Dalisay terminated the attorney-client relationship and demanded the return of her money and documents, which Mauricio refused.

The case escalated to the Integrated Bar of the Philippines (IBP), where Investigating Commissioner Lydia A. Navarro recommended Mauricio be required to refund the amount but suggested dismissing the complaint against him. The IBP Board of Governors adopted Navarro’s recommendation. Dissatisfied, the matter went to the Supreme Court, which, in its Decision dated April 22, 2005, found Mauricio guilty of malpractice and gross misconduct, suspending him from law practice for six months.

Mauricio filed a motion for reconsideration, claiming Dalisay did not recruit him for Civil Case No. 00-044 but for filing two new petitions. He also argued the case was already considered for decision before his engagement, that Dalisay refused to supply necessary documents, and alleged that Dalisay provided tampered evidence, leading him to file falsification charges against her.

### Issues:

1. Whether Mauricio was engaged by Dalisay for Civil Case No. 00-044 or for filing two new petitions.
2. Whether Mauricio is exempt from liability on grounds that Civil Case No. 00-044 was already submitted for decision upon his engagement.
3. Whether Mauricio’s inaction can be justified by Dalisay’s alleged refusal to provide documents.
4. Whether Dalisay’s purported offering of falsified evidence exonerates Mauricio’s failure to render legal services.

### Court’s Decision:

The Supreme Court denied Mauricio’s motion for reconsideration, reiterating its previous findings. The Court held that an attorney-client relationship was indeed established between Dalisay and Mauricio, and his acceptance of the P56,000.00 fee obligated him to act with

competence, diligence, and fidelity. The Court disapproved of Mauricio's inconsistent statements regarding his engagement and emphasized that changing his defense strategy at a later stage was both unjust and dishonest.

Furthermore, the Court found no merit in Mauricio's arguments. It pointed out that his duty to represent Dalisay with diligence was not negated by the case's status at the time of his hiring. The Court also dismissed Mauricio's claim about Dalisay's refusal to provide documents, noting his responsibility to obtain the necessary records for the case. Regarding the accusation against Dalisay for providing falsified evidence, the Court underscored that Mauricio learned about it after their attorney-client relationship ended, implying that it could not justify his earlier inaction.

### ### Doctrine:

This case reiterated the fundamental doctrine regarding the attorney-client relationship, emphasizing that upon accepting a client's fee, an attorney is bound by the duty of fidelity to the client's cause. This includes the obligations of competence and diligence in representation. Additionally, it underscores the concept that a lawyer cannot use subsequent knowledge of a client's wrongdoing as a justification for prior failures in duty.

### ### Class Notes:

- **Attorney-Client Relationship**: Established upon acceptance of a fee, creating obligations of fidelity, competence, and diligence.
- **Change of Defense Strategy**: A party cannot change their version of events or defense in the later stages of proceedings.
- **Duty of Diligence**: A lawyer must act with diligence from the moment they accept a case, regardless of its status or challenges in obtaining documents.
- **Handling Client Wrongdoing**: A lawyer aware of a client's fraud or wrongdoing should prompt rectification; failing which, they must terminate the relationship according to legal ethics.

### ### Historical Background:

This case highlights challenges in the legal profession and the rigorous standards lawyers are held to in the Philippines. It emphasizes the importance of integrity, honesty, and diligence in legal representation, reflecting the broader legal and ethical frameworks guiding the practice of law in the country. The Supreme Court's decision is a testament to the judiciary's commitment to uphold these values within the legal community.