

### Title: Atty. Ramon P. Reyes vs. Atty. Victoriano T. Chiong Jr.

### Facts:

Atty. Ramon P. Reyes filed a Sworn Complaint against Atty. Victoriano T. Chiong Jr. for violating his lawyer's oath and Canon 8 of the Code of Professional Responsibility. The complaint stemmed from a dispute where Zonggi Xu, represented by Reyes, sought to recover an investment in a nonexistent fishball factory from Chia Hsien Pan, represented by Chiong. After Xu filed an estafa complaint against Pan, and Prosecutor Salanga proceeded with the criminal case, Chiong then filed a Civil Complaint against not only Xu but also Reyes and Salanga, alleging damages due to the estafa case.

The complaint journeyed through the judicial system to the Integrated Bar of the Philippines (IBP), which recommended Chiong's suspension from law practice for two years. This recommendation was due to Chiong's action of impleading Reyes and Salanga in a civil suit to obtain leverage over the estafa case, which was deemed as a misuse of legal processes and a violation of the lawyer's oath and professional conduct.

### Issues:

1. Whether Atty. Chiong's inclusion of Reyes and Salanga in the civil case constituted harassment and misapplication of legal procedure.
2. Whether Atty. Chiong violated his oath and the Code of Professional Responsibility by pursuing a groundless civil suit against professional colleagues.

### Court's Decision:

The Supreme Court affirmed the IBP's findings and recommendations. It held that Atty. Chiong indeed violated the Code of Professional Responsibility, specifically Canon 8, for his uncourteous, unfair, and undignified conduct towards his professional colleagues. His action of impleading Reyes and Salanga in the civil case without a justifiable cause was seen as an attempt to use the lawsuit as a leveraging tool against the estafa case, which constituted a misuse of legal procedures and harassment. The court underscored that lawyers must act with dignity, courtesy, and integrity, not only towards the court but also towards their peers, even in the face of client disputes.

### Doctrine:

The resolution reiterates the principle that lawyers are bound to conduct themselves

honorably towards their colleagues, avoiding harassment and misuse of legal processes for leverage or personal gain. It highlights the necessity of maintaining professional courtesy and dignity as mandated by the Code of Professional Responsibility, specifically Canon 8.

### Class Notes:

- **Canon 8 of the Code of Professional Responsibility**: Emphasizes the need for lawyers to conduct themselves with courtesy, dignity, and civility towards their colleagues.
- **Lawyer's Oath**: Obligates attorneys not to promote wrongful, false, or unlawful suits, nor give aid or consent to such.
- **Professional Conduct and Ethics**: The case illustrates the importance of lawyers maintaining ethical standards in their practice, especially in dealing with opposing counsels.
- **Misuse of Legal Procedures**: The case demonstrates how using legal procedures to harass or unjustly leverage against other parties is contrary to professional ethics.
- **Disciplinary Actions for Ethical Breaches**: Provides a clear instance where the Supreme Court enforces disciplinary measures against attorneys who violate the Code of Professional Responsibility.

### Historical Background:

This case reflects the judicial system's stance on reinforcing legal ethics and professional conduct among members of the Philippine Bar. It underscores the judiciary's role in self-regulation and disciplining of legal practitioners to uphold the integrity and trustworthiness of the legal profession. The decision aligns with the broader context of efforts to ensure that lawyers adhere to the highest ethical standards in their practice to foster public confidence in the legal system.