

**\*\*Title:\*\*** Estate of Felomina G. Macadandang vs. Lucia Gaviola, et al.

**\*\*Facts:\*\***

This case involves an action for Unlawful Detainer with Damages filed by Atty. Oswaldo Macadandang, as administrator of the Estate of Felomina G. Macadandang, against several respondents occupying portions of four parcels of land in Davao City by mere tolerance. The Municipal Trial Court in Cities (MTCC) ruled in favor of the petitioner, requiring the respondents to vacate the premises and compensate for their occupation. The respondents appealed, but their appeal was dismissed by the Regional Trial Court (RTC) for failure to file an appeal memorandum. A subsequent motion for reconsideration/new trial was filed by the respondents but was denied. They then sought review from the Court of Appeals, which eventually remanded the case to the RTC, opposing the dismissal based on technical grounds.

**\*\*Issues:\*\***

1. Whether the Court of Appeals erred in reversing the RTC's dismissal of the respondents' appeal for failure to file an appeal memorandum.
2. Whether respondents' motion for reconsideration/new trial filed with the RTC, an appellate court in this case, was a prohibited pleading under the Rules on Summary Procedure.
3. The applicability of the rules on the binding effect of a counsel's negligence to the client.

**\*\*Court's Decision:\*\***

The Supreme Court granted the petition, setting aside the decision and resolution of the Court of Appeals and reaffirmed the principles on the Rules of Summary Procedure and procedural technicalities. The Court clarified that the appeal from the MTCC to the RTC is not within the ambit of the Rules on Summary Procedure, and as such, the motion for reconsideration was not a prohibited pleading. The Court further stressed that clients are generally bound by their counsel's actions, even mistakes related to procedural techniques, except in situations where counsel's negligence is so gross as to deprive the client of due process. In this case, the Court found no gross negligence warranting an exemption.

**\*\*Doctrine:\*\***

The decision reaffirmed the doctrines:

1. Clients are bound by the acts, including mistakes, of their counsel in procedural matters. A departure from this principle is warranted only in cases of gross negligence resulting in the deprivation of due process.

2. The Rules on Summary Procedure aim to prevent undue delays in the disposition of cases, and motions for reconsideration are prohibited pleadings under this rule. However, it does not apply to proceedings before the RTC acting as an appellate court.

**\*\*Class Notes:\*\***

- Rules on Summary Procedure prohibit certain pleadings, including motions for reconsideration, to expedite the resolution of cases. This prohibition applies only before the appeal to the RTC.
- The role of appellate procedures: Appellants must adhere to procedural requirements (e.g., filing of memoranda) to pursue their appeals. Failure to comply can result in dismissal.
- Binding effect of counsel's actions on clients: Clients are generally bound by their counsel's actions or inactions, including procedural mistakes, unless such negligence is gross and implicates the client's right to due process.

**\*\*Historical Background:\*\***

This case reflects the Philippine judiciary's balance between procedural rigor and substantial justice. It underscores the importance of adhering to procedural rules to ensure orderly and efficient justice delivery, while also recognizing exceptions in cases of gross negligence by counsel that prejudice the client's rights. It exemplifies the Court's approach to technicalities not as ends in themselves but as means to the fair and just resolution of disputes.