

### Title:

Bachrach Motor Co., Inc. vs. The Court of Industrial Relations and Rural Transit Employees Association (1966)

### Facts:

In 1958, a labor dispute arose between the Bachrach Motor Co., Inc. (operating the Rural Transit) and the Rural Transit Employees Association, leading to a strike by the latter. This dispute was brought to the Court of Industrial Relations (CIR) for compulsory arbitration, labeled as Case No. 22-IPA. An order was issued for strikers to return to work under pre-dispute conditions. Amidst this, in 1961, Bachrach sought CIR's permission to discharge driver Maximo Jacob for alleged Motor Vehicle Law violations, citing a recent accident. Jacob, defended by the union, argued the accident was due to a vehicle defect, not his error.

Despite a hearing in 1963 with testimonies and documents presented, the case saw delays mainly due to Bachrach's sole witness and General Manager Joseph Kaplin's absence owing to travel. By 1965, the union requested to dismiss Kaplin's testimony and reinstate Jacob with back wages. In 1966, following Bachrach's unsuccessful motion for reconsideration, the company appealed to the Supreme Court concerning the CIR's decisions, raising several legal and procedural issues.

### Issues:

1. Was it correct for the CIR to dismiss Bachrach's petition to discharge Maximo Jacob after striking Joseph Kaplin's testimony from the record?
2. Did the CIR err in how it admitted Bachrach's exhibits into evidence?
3. Was the order to reinstate Maximo Jacob and grant back wages justified without further evidence?
4. What is the appropriate duration and method for calculating back wages?

### Court's Decision:

1. Striking Off Testimony: The Supreme Court held no fault in the CIR's decision to strike off Kaplin's testimony due to his inability to be cross-examined, asserting the fundamental right to confront and cross-examine witnesses as part of due process.
2. Admission of Exhibits: The Court found no error in how the exhibits were admitted, noting they were correctly regarded as hearsay without Kaplin's testimony to substantiate their contents.
3. Reinstatement and Back Wages: The Court agreed with the CIR's directives for Jacob's

reinstatement without the need for further evidence, highlighting the company's burden of proof in justifying Jacob's suspension was unmet. On back wages, the Court diverged, setting a precedent for a reasonable period (three years) of back pay, avoiding prolonged litigation over such matters.

### ### Doctrine:

This case reinforces the principles of due process within administrative proceedings, particularly the inviolable right to cross-examine witnesses. It also elucidates the handling of hearsay evidence in quasi-judicial settings. Most notably, it establishes a guideline for limiting back wages to a reasonable period, aligning with broader judicial trends minimizing protracted post-judgement disputes.

### ### Class Notes:

- **\*\*Due Process in Administrative Proceedings\*\***: A party's right to confront and cross-examine opposing witnesses is fundamental and extends to civil, criminal, and administrative disputes.
- **\*\*Evidence Admission\*\***: Signatures on documents alone, without validating the contents or providing opportunity for cross-examination, do not suffice for substantive claims.
- **\*\*Back Wages Calculation\*\***: Judicial discretion can limit back wages to a reasonable period, exemplified here by the three-year limit, to balance the interests of employers and employees while avoiding extensive litigation.
- **\*\*Burden of Proof\*\***: The employer bears the burden of justifying disciplinary actions against employees; failure to meet this can result in mandatory reinstatement with compensation.

### ### Historical Context:

The case emerges during a period where labor disputes and the rights of unionized employees were becoming increasingly significant in the Philippines. It reflects the judiciary's evolving stance on labor relations, emphasizing fair procedures and equitable relief for workers unjustly penalized or dismissed. The decision subtly underscores the era's push towards more balanced and just industrial relations, highlighting the critical role of due process and evidence in adjudicating labor disputes.