

Title: Floresca v. Philex Mining Corporation

Facts:

- **June 28, 1967:** A catastrophic cave-in occurs at Philex Mining Corporation's copper mines in Tuba, Benguet, trapping and eventually killing 21 miners.
- **1967 to 1968:** Heirs of the deceased miners file for compensation with the Regional Office No. 1 of the Department of Labor based on the Workmen's Compensation Act (Act 3428, as amended by RA 772).
- **May 14, 1968:** Philex files a motion to dismiss the heirs' complaint for damages on the ground that it falls under the exclusive jurisdiction of the Workmen's Compensation Commission.
- **May 27, 1968:** The heirs oppose the motion, arguing that their claims are based on the Civil Code provisions for damages due to gross and reckless negligence and not under the Workmen's Compensation Act.
- **June 27, 1968:** The Court of First Instance (CFI) of Manila dismisses the case for lack of jurisdiction, stating that the Workmen's Compensation Commission has exclusive jurisdiction over such claims.
- **September 23, 1968:** On reconsideration, the CFI sets aside its June 27, 1968 order and allows Philex to answer the complaint.
- **December 16, 1968:** The CFI again dismisses the case, asserting the exclusive original jurisdiction of the Workmen's Compensation Commission.
- **Present Petition to Supreme Court:** Filed to review the dismissal order of the CFI.

Issues:

1. **Jurisdiction:** Whether the CFI has jurisdiction over the heirs' complaint for damages based on the Civil Code or if the Workmen's Compensation Commission has exclusive jurisdiction.
2. **Distinction Between Claims:** Whether there exists a distinction between claims for compensation under the Workmen's Compensation Act and claims for damages under the Civil Code.

3. **Elective or Cumulative Remedies:** Whether the heirs can pursue both compensation under the Workmen's Compensation Act and damages under the Civil Code simultaneously or sequentially.

Court's Decision:

1. **Jurisdiction:**

- The Supreme Court held that the CFI does have jurisdiction to try cases for damages under the Civil Code when gross negligence resulting in a workman's death is alleged. The cause of action as alleged in the complaint was based on employer negligence, not merely seeking compensation under the Workmen's Compensation Act.

2. **Distinction Between Claims:**

- The Court acknowledged a clear distinction between the statutory right to compensation for work-connected injury or death (under the Workmen's Compensation Act) and a tort action for damages predicated on the employer's negligence (under the Civil Code).

3. **Elective or Cumulative Remedies:**

- The Court ruled that the heirs have an electoral right, choosing to either pursue a claim under the Workmen's Compensation Act or suing for higher damages under the Civil Code but not both simultaneously. However, if the heirs had accepted compensation under the Workmen's Compensation Act out of ignorance of the employer's gross negligence, they could still pursue damages under the Civil Code. Payments made under the Workmen's Compensation Act should be deducted from any damages awarded under the Civil Code.

Doctrine:

- **Choice of Remedy:** An injured employee or his heirs can decide between recovering limited compensation under the Workmen's Compensation Act or suing for damages under the Civil Code for employer negligence, but such remedies cannot be pursued concurrently.

- **Jurisdiction:** When a complaint for damages due to gross negligence is brought under the provisions of the Civil Code, regular courts hold jurisdiction, not the Workmen's Compensation Commission.

Class Notes:

1. **Key Elements of a Tort Claim (Negligence):**

- Duty of care by the defendant.

- Breach of said duty.
- Causation (link between breach and injury).
- Damages (actual loss or injury).

2. **Workmen's Compensation:**

- Payment regardless of fault.
- Exclusive remedy if pursued, barring other civil remedies.

3. **Civil Code Provisions Referenced:**

- Article 2176: Quasi-delict or tort.
- Article 1173: Negligence defined.
- Article 2201: Damages for breach.
- Article 2231: Exemplary damages for gross negligence.

Application: Understanding the distinctions ensures proper jurisdiction and complements the legislative intent, aiming for swift compensation for industrial accidents while preserving the right to seek full redress for gross negligence.

Historical Background:

Workmen's Compensation Evolution:

- Internationally, workmen's compensation acts were established to mitigate harsh and extensive litigation for industrial accidents, simplifying claims and reducing employer burden.

Philippine Context:

- The Philippine Workmen's Compensation Act reflects socio-economic policies aimed at protecting labor, emphasizing the emphasis on occupational safety and guaranteeing means of redress against gross employer negligence.

Social Justice Principle:

- The ruling integrates socio-economic justice mandated by the 1935 Constitution, ensuring humane conditions and safeguarding worker rights through appropriate legal remedies.

This case elucidates the dual pathways available under Philippine law for compensating injured workers or their heirs and underscores the judiciary's role in upholding constitutional guarantees for social justice within legislative frameworks.