

Title: Angelina Chua and Heirs of Jose Ma. Cheng Sing Phuan vs. Spouses Santiago Cheng and Avelina Sihiyon

Facts:

- **Ownership of Lands:** Jose Ma. Cheng Sing Phuan (Jose), Santiago Cheng (Santiago), and Petra Cheng Sing (Petra) were co-owners of two parcels of land in Iloilo City, containing a rice mill and equipment (the Disputed Properties).
- **Demands for Partition:** Santiago and his wife, Avelina Sihiyon (respondents), demanded the physical partition of these lands and assets from Jose and his wife, Angelina Chua (petitioners), but received no compliance.
- **Filing of Complaint:** Respondents filed a complaint for partition and damages against Jose and Angelina at the Regional Trial Court (RTC) of Iloilo City.
- **Answer:** Jose and Angelina claimed they financed the acquisition of the Disputed Properties and that Santiago and Petra did not reimburse them for their shares; thus, they argued, petitioners had no right to partition.
- **Pre-Trial:** A Pre-Trial Order was issued, limiting the evidence to what was listed, which included the testimonies of Jose and Petra.
- **Death of Jose:** After Jose's testimony and before his cross-examination, Jose died. His counsel arranged a substitution of parties and eventually withdrew.
- **Motion to Strike Testimony:** Respondents moved to strike Jose's testimony due to his death before cross-examination; the motion was denied.
- **Oral Motion for Additional Witnesses:** Petitioners requested to present six additional witnesses not listed in the Pre-Trial Order; this motion was denied by Judge Victorino O. Maniba.

Procedural Posture:

- **Regional Trial Court (RTC):** Denied the motion to present additional witnesses and the motion for reconsideration.
- **Court of Appeals (CA):** Dismissed petitioners' petition for certiorari asserting grave abuse of discretion by the RTC.
- **Supreme Court (SC):** Petitioners filed a petition for review on certiorari against the CA decision and resolution affirming the RTC orders.

Issues:

- Whether the Court of Appeals erred in affirming the RTC Resolution and Order that denied petitioners' oral motion to present witnesses not listed in the Pre-Trial Order.

Court's Decision:

- **Adherence to Pre-Trial Order:** The Court found no error with the CA ruling, emphasizing the importance of the Pre-Trial Order as binding for effective court management. The Pre-Trial Guidelines require specific listing of witnesses.
- **Unsupported Claims:** Petitioners did not provide judicial affidavits or substantial details about additional witnesses' testimonies to prove their necessity or importance to the case.
- **No Good Cause:** Petitioners failed to demonstrate any compelling reason or good cause to amend the Pre-Trial Order to present additional witnesses.

The petition for review was denied, as the RTC properly enforced pre-trial rules without curtailing justice.

Doctrine:

- **Pre-Trial Importance:** Strict adherence to the rules of pre-trial is essential for judicial efficiency and proper case management. However, exceptions can be made in compelling circumstances to ensure justice.
- **Binding Nature:** Pre-Trial Orders are binding, and failure to follow through with necessary corrections or reservations results in the pre-trial bounds being enforced.

Class Notes:

1. **Pre-Trial Orders:** Critical for managing civil cases effectively, setting limits on evidence and witnesses to streamline the court process.
2. **Rule on Amendments:** Amendments to the Pre-Trial Order must be timely made and justified by compelling reasons to allow exceptions.
3. **Rule 45 - Petition for Review:** Addresses errors of law, not facts, highlighting the procedural posture necessary in questioning lower court decisions.
4. **A.M. No. 03-1-09-SC:** Specifies guidelines for pre-trial conduct, particularly rules on submission and limitations of evidence.

Historical Background:

- **Rule Emphasis:** The necessity of pre-trial engagement in legal proceedings dates back to reforms aimed at decongesting court dockets and optimizing case flow. The rules applied in this case reflect long-standing judicial emphasis on pre-trial procedures to simplify litigations and minimize trials.

Through this decision, the Supreme Court reinforced the importance of strict compliance

with pre-trial procedures and the binding nature of Pre-Trial Orders unless compelling reasons justify deviation for the ends of justice.