

Title:

Maranan v. Perez, 126 Phil. 786

Facts:

- On **October 18, 1960**, Rogelio Corachea was a passenger in a taxicab owned and operated by Pascual Perez.
- Corachea was stabbed and killed by the taxi driver, Simeon Valenzuela.
- Valenzuela was prosecuted for homicide in the **Court of First Instance (CFI) of Batangas**, found guilty, and sentenced to imprisonment and indemnification of P6,000 to the heirs of Corachea.
- Valenzuela appealed this conviction to the **Court of Appeals**.
- During the appellate process, on **December 6, 1961**, Antonia Maranan, Rogelio's mother, filed a civil action in the **CFI of Batangas** to recover damages from Perez and Valenzuela for the death of her son.
- Defendants claimed Corachea was the initial aggressor and argued self-defense and fortuitous event.
- The CFI dismissed the claim against Valenzuela but awarded Antonia Maranan P3,000 in damages against Perez.
- Both plaintiff Maranan and defendant Perez appealed:
 - Maranan appealed for a higher amount of damages.
 - Perez appealed on the ground of non-liability.
- The **Court of Appeals** affirmed Valenzuela's conviction, and on **May 19, 1964**, final judgment was entered.

Issues:

1. Was Pascual Perez, as a carrier, liable for the acts of his employee, Simeon Valenzuela?
2. Did Valenzuela's act constitute a fortuitous event exempting the carrier from liability?
3. Was the amount of damages awarded by the CFI appropriate?

Court's Decision:

Resolution of Issues:

1. **Carrier's Liability**:
 - The Philippine Supreme Court differentiated **Maranan v. Perez** from **Gillaco v. Manila Railroad Co.**. In Gillaco, the employee's act was outside the scope of duty. Here, Valenzuela was performing his duty when the assault occurred.
 - The Court applied **Article 1759 of the Civil Code of the Philippines**, holding carriers liable for the acts of their employees, whether negligent or willful, even if beyond authority.

- **Doctrine Applied**: The carrier's liability for its employees' actions occurring within the course of employment.

2. **Fortuitous Event Defense**:

- The act of stabbing by Valenzuela was not considered a fortuitous event under **Article 1174**, especially in light of **Article 1759**, removing the applicability of force majeure defense in such cases.

3. **Award of Damages**:

- The Court found the awarded damages in CFI as the minimum under **Article 1764** in connection with **Article 2206**, increased to P6,000.

- Moral damages of P3,000 were added under **Articles 2206 and 1764** for the family's mental anguish.

- Interest on these sums accrues from the date of filing the complaint until payment.

Decision:

- The Supreme Court modified the CFI's decision, increasing actual damages to **P6,000** and awarding **P3,000** for moral damages, along with legal interest.

Doctrine:

- **Common Carrier Liability**: Under **Article 1759**, common carriers are liable for passengers' death or injuries due to their employees' willful acts/negligence, irrespective of the employees' excess of authority or violation of the carrier's orders.

- **Absolute Liability for Acts Performed During Employment**: The carrier retains liability for acts within the course of the employee's duties.

Class Notes:

- **Article 1759**: Establishes the absolute liability of common carriers for acts of their employees.

- **Fortuitous Event (Article 1174)**: Excludes common carrier liability if the law explicitly states otherwise.

- **Damages (Articles 1764, 2206)**: A minimum of P6,000 for death due to transportation breaches, plus moral damages.

Historical Background:

The case highlights evolving interpretations of carrier liability in the Philippines, transitioning from Civil Code of 1889 principles to the provisions under the New Civil Code's stricter carrier responsibility. The decision aligns with the broader trend of

passenger protection, drawing from Anglo-American legal concepts to ensure higher safety standards against employee misconduct.