

****Title:****

Medardo Ag. Cadiente vs. Bithuel Macas, G.R. No. 160709

****Facts:****

On July 19, 1994, at about 4:00 p.m., 15-year-old Bithuel Macas was standing on the shoulder of the intersection of Buhangin and San Vicente Streets in Davao City. Eyewitness Rosalinda Palero, who was about two and a half meters away from Macas, witnessed him being bumped and run over by a Ford Fiera driven by Chona C. Cimafranca. Cimafranca took Macas to the Davao Medical Center, where he underwent amputation of both legs due to severe injuries.

The Ford Fiera involved was registered to Atty. Medardo Ag. Cadiente but he claimed it was sold to Engr. Rogelio Jalipa on March 28, 1994, who in turn claimed to have sold it to Abraham Abubakar on June 20, 1994. The victim's father, Samuel Macas, filed a torts and damages complaint against Cimafranca and Cadiente. Cadiente then filed a third-party complaint against Jalipa, who also filed a fourth-party complaint against Abubakar.

The Regional Trial Court (RTC) ruled in favor of the plaintiff, holding Cadiente and Jalipa jointly and severally liable for damages amounting to P498,982.85. The Court of Appeals affirmed this decision, leading Cadiente to elevate the matter to the Supreme Court.

****Issues:****

1. Whether there was contributory negligence on the part of the victim, Bithuel Macas.
2. Whether Medardo Ag. Cadiente and Rogelio Jalipa are jointly and severally liable for damages.
3. Whether the sale of the vehicle negates Cadiente's liability as the registered owner.

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

The Supreme Court ruled as follows:

****1. Contributory Negligence:****

The Court found no contributory negligence on the part of Bithuel Macas. The evidence established that he was standing on the shoulder of the road, a designated pedestrian area, when the Ford Fiera swerved and hit him. The reckless driving of the vehicle was identified as the immediate cause of the injury.

****2. Joint and Several Liability:****

The Court upheld the decision of the lower courts that both Cadiente and Jalipa are jointly

and severally liable for damages. While Cadiente claimed the vehicle was sold to Jalipa, the petitioner did not ensure that the registration was transferred, thus failing to negate his liability as the registered owner.

****3. Liability of the Registered Owner:****

Citing prior jurisprudence, the Court reiterated that the registered owner of a vehicle remains primarily responsible for damages caused, irrespective of any subsequent sale that was not reflected in the official records. The policy ensures clear identification of liable parties in vehicular accidents to prevent evasion of responsibility through unregistered transfers.

****Doctrine:****

The doctrine established is that the registered owner of a vehicle is primarily liable for damages caused by the vehicle, even if it was sold to another person and such sale was not registered. This principle aims to enhance the accountability and ease the identification of the responsible party in road accidents.

****Class Notes:****

- ****Negligence:**** No contributory negligence on the victim's part if they were in a designated safe area and the accident resulted from the defendant's reckless behavior.
- ****Joint and Several Liability:**** Multiple parties can be held jointly and severally liable for damages in tort cases.
- ****Registered Owner Liability:**** The registered owner remains liable for damages unless and until an official transfer of ownership is recorded (Doctrine: Erez v. Jepte).
- ****Proximate Cause:**** In negligence cases, the immediate and proximate cause of injury is crucial to determining liability (Civil Code Article 2179).

****Historical Background:****

In the Philippines, assigning liability in vehicular accident cases where ownership transfer is disputed was complicated prior to this case. The case reinforces the policy that vehicle registration should be consistent with the actual ownership to avoid ambiguities, thereby protecting the public and ensuring that victims of vehicular accidents can reliably seek redress from identifiable and accountable parties. This jurisprudential stance reflects an adherence to procedural clarity and public safety standards established in prior landmark rulings.