

Title:

Panfilo V. Villaruel, Jr. v. Reynaldo D. Fernando, Modesto Abarca, Jr., and Marilou M. Cleofas

Facts:

- **27 April 1995:** Panfilo V. Villaruel, Jr., Assistant Secretary of Air Transportation Office (ATO), issued a memorandum detailing Reynaldo D. Fernando, Modesto Abarca, Jr., and Marilou M. Cleofas to report to DOTC Undersecretary Primitivo C. Cal's office effective 2 May 1995.
- **29 April 1995:** Respondents requested reconsideration from DOTC Secretary Jesus B. Garcia and Undersecretary Josefina T. Lichauco but received no response.
- **7 May 1995:** Respondents complied and reported to Undersecretary Cal's office.
- **19 July 1995:** Villaruel suspended Abarca for 90 days without pay for alleged misconduct.
- **10 August 1995:** Respondents requested Secretary Garcia to lift the detail order and sought the Ombudsman's intervention.
- **9 November 1995:** Secretary Garcia ordered Villaruel to recall respondents.
- **24 January 1996:** Respondents filed a Petition for Mandamus and Damages with the Regional Trial Court (RTC) in Pasay City. They requested a writ of preliminary mandatory injunction, compelling Villaruel to reinstate them and sought damages.
- **23 February 1996:** RTC granted preliminary mandatory injunction.
- **12 April 1996:** After judicial re-raffle, RTC reaffirmed the decision ordering Villaruel to recall respondents.
- **28 May 1996:** RTC declared Villaruel in contempt for not complying with the preliminary injunction and issued a bench warrant.
- **11 July 1996:** RTC rendered a decision favoring respondents, awarding damages and making the writ of mandamus permanent.
- **Failed Appeals:** The OSG filed appeals but failed procedurally, leading to finality and execution of the RTC decision.
- **22 September 1997:** RTC issued a Writ of Execution; subsequent Sheriff's Sale notice was issued.
- **17 February 1998:** Villaruel filed motions to quash the Writ of Execution, arguing due process deprivation and invoking an Ombudsman ruling.
- **28 April 1998:** RTC denied Villaruel's motion for reconsideration, leading to a special civil action.
- **30 September 1998 & 3 December 1998:** The Court of Appeals denied Villaruel's

petition for certiorari and his motion for reconsideration. This prompted the current petition to the Supreme Court.

Issues:

1. **Legal Basis for Damages:** Whether the award of moral, exemplary, and temperate damages to respondents has legal basis.
2. **Due Process Violation:** Whether petitioner was denied due process by the lower courts.
3. **Negligence of OSG:** Whether the OSG's negligence can bind the petitioner and affect the finality of the trial court's decision.
4. **Impact of Ombudsman's Resolution:** Whether it rendered the execution of the RTC's decision unjust and inequitable.

Court's Decision:

The Supreme Court denied the petition and affirmed the Court of Appeals' decisions.

Legal Basis for Damages:

- Issue not discussed as the trial court's decision was final and executory.

Due Process Violation:

- The Court found no denial of due process. Petitioner had multiple opportunities to present his case but failed to do so. The negligence of the OSG, representing Villaruel, binds him.

Negligence of OSG:

- The Court upheld that the OSG's negligence binds the petitioner. Villaruel's failure to replace his negligent counsel or inquire about his appeal status also contributed to his predicament.

Impact of Ombudsman's Resolution:

- The resolution finding Abarca guilty did not supersede the trial court's decision as it was issued before the trial court's decision became final. Both actions addressed separate issues and were treated independently.

Doctrine:

- **Finality of Judgment:** Once a decision becomes final, it is immutable and unalterable unless clerical errors or certain exceptions apply.
- **Negligence of Counsel Binds the Client:** Clients are generally bound by their counsel's actions, particularly if no serious injustice results from such negligence.

- **Separate and Distinct Causes of Action:** Administrative penalties and civil liabilities are separate; findings in one forum do not necessarily affect the other.

Class Notes:

- **Negligence of Counsel:** Clients are bound by counsel's actions unless gross negligence is demonstrated.

- **Finality of Judgment:** Final judgments are immutable, except for clerical errors or specific exceptional circumstances.

- **Separate Actions:** Different legal actions (e.g., administrative and civil) with distinct causes should be pursued independently.

Historical Background:

This case exemplifies the procedural interplay between administrative rulings (Ombudsman) and judicial decisions (RTC) in the context of civil service operations in the Philippines. It underscores the responsibility of litigants to diligently manage their legal representation and actively follow-up on their legal matters.