

Title:

Luis Joseph vs. Hon. Crispin V. Bautista et al.

Facts:

****Background:****

- ****January 12, 1973:**** Luis Joseph (Petitioner) took a cargo truck owned by Patrocinio Perez (Respondent) from Dagupan City to Valenzuela, Bulacan, paying a fare of PHP 9.00.
- The cargo truck, while overtaking a tricycle on a national highway, was forced off the road by a pick-up truck driven by Lazaro Villanueva (Respondent), leading to a collision with a mango tree. As a result, Joseph sustained a fracture in one of his legs.

****Initial Legal Proceedings:****

- ****Complaint Filed:**** Joseph filed a damages suit (Civil Case No. 50-V-73) against Perez based on breach of contract of carriage and against Antonio Sioson and Villanueva based on quasi-delict.
- ****September 24, 1973:**** Unable to identify the actual owners of the vehicles, Joseph filed an amended complaint to include other possible owners, Rosario Vargas and Jacinto Pagarigan, as additional alternative defendants.
- ****Cross-Claim Filed:**** Perez filed an amended answer with a cross-claim for indemnity against her co-defendants and also impleaded Alberto Cardeno as an additional alternative defendant.
- ****September 27, 1974:**** Villanueva, Cardeno, Sioson, and Pagarigan, through their insurer, paid Joseph PHP 1,300 as settlement for his injuries.
- ****December 2, 1974:**** The same parties paid Perez PHP 7,420.61 for the damage to her cargo truck.

****Dismissal Motion:****

- Villanueva, Cardeno, Sioson, and Pagarigan filed a motion to exonerate and exclude themselves from the case, citing the settlements.

****Court Actions:****

- ****Respondent Perez's Counter Motion:**** Perez opposed the exoneration motion arguing that the settlement benefitted her as a solidary debtor, and moved to dismiss the entire case.
- ****July 8, 1975:**** The respondent Judge Crispin V. Bautista dismissed the complaint.
- ****August 22, 1975:**** Petitioner's motion for reconsideration was denied, prompting the appeal to the Supreme Court.

Issues:

1. **Whether only one cause of action exists for the same injury.**
2. **Whether the settlement with some of the solidary debtors extinguishes the liability of all other solidary debtors, including Patrocinio Perez.**
3. **Whether alleged agreements made during pre-trial conferences that contradict the legal position can be substantiated.**

Court's Decision:

Issue 1: Single Cause of Action

- The Supreme Court held that a single delict or wrongful act gives rise to a single cause of action, regardless of multiple correlative rights potentially violated. The injury to Joseph constituted a single cause of action despite being actionable under different legal theories (contract and quasi-delict).

Issue 2: Effect of Settlement

- Since the respondent parties were found to be solidarily liable, the Court ruled that the full payment made by some solidary debtors and the subsequent release of liability extended to all of them, including Perez.
- This follows the principle against unjust enrichment and the prohibitive stance against double recovery for the same act or omission.

Issue 3: Pre-trial Agreements

- The Court dismissed the contention of any pre-trial agreement that would lead to a different outcome since there was no substantial documentation (pre-trial orders, minutes, transcripts) to support this claim.

Conclusion:

- The Supreme Court affirmed the trial court's dismissal of the complaint based on the settled amount and the principle of solidary liability.

Doctrine:

1. **Single Cause of Action:** A single wrongful act resulting in one injury constitutes one cause of action even if it impacts multiple rights.
2. **Solidary Liability and Settlement:** Payment by one or more solidary debtors extinguishes the liability of all co-debtors.
3. **No Double Recovery:** The legal system prohibits double recovery for the same injury, reinforcing the principle against unjust enrichment.

Class Notes:

****Key Elements/Concepts:****

1. ****Solidary Liability:**** When multiple parties are jointly and severally liable, settlement by one impacts all.
2. ****Single Cause of Action:**** One wrongful act, one injury = one cause of action.
3. ****Preclusion from Double Recovery:**** Prevents claimant from receiving compensation more than once for the same harm.

****Statutory Provisions:****

- ****Civil Code, Philippines**** - Articles related to solidary obligations and quasi-delicts.
- ****Rule 16, Section 1(g) of the Rules of Court**** - Pertains to motions to dismiss based on release from liability.

Historical Background:

The decision comes within a legal context where the principles of solidary obligations and avoidance of unjust enrichment are critical. The case reiterates essential doctrines dealing with the consequences of settlements and the interpretation of multiple legal theories arising from a single cause of action. This is aligned with the jurisprudential trend to streamline judicial doctrines concerning liabilities and settlements to avoid multiplicity of suits and double recoveries.