

****Title:****

German Wenceslao Cruz, Jr. vs. Judge Daniel C. Joven, Municipal Circuit Trial Court,
Sipocot, Camarines Sur

****Facts:****

The case revolves around an administrative complaint filed by German Wenceslao Cruz Jr. against Judge Daniel C. Joven of the Second Municipal Circuit Trial Court, Sipocot-Lupi, Sipocot, Camarines Sur, for gross negligence, abuse of authority, dereliction of duty, and failure to render a decision within thirty days as prescribed by the rules on summary procedure.

1. ****Initiation of Unlawful Detainer Case:****

- On 22 February 1996, Cruz, representing the plaintiff estate, filed Civil Case No. 548 for unlawful detainer against Gregorio Batalla.
- Summons and a copy of the complaint were served on Batalla on 28 February 1996, but no answer was filed within the reglementary period.

2. ****Defendant's Actions:****

- Instead of an answer, Batalla's counsel filed a motion for extension of time to answer the complaint and for Judge Joven's inhibition, citing a complaint filed by Batalla before the Ombudsman against the judge.

3. ****Judge Joven's Initial Orders:****

- On 08 March 1996, Judge Joven denied the extension for being a prohibited pleading under the Revised Rules on Summary Procedure.
- However, he granted the motion for inhibition to ensure the impartiality of the court.
- This inhibition was later denied by Executive Judge Salvador G. Cajot, who directed Judge Joven to proceed with the case.

4. ****Complainant's Multiple Motions:****

- Cruz filed various motions, such as for judgment on the pleadings and to present evidence, all of which remained unresolved by Judge Joven.

5. ****Judge Joven's Subsequent Orders:****

- On 26 March 1997, Judge Joven assured that judgment would be rendered within thirty days as per the rules.
- Yet, he again issued an order on 22 April 1997 to inhibit himself after being informed of potential impartiality concerns due to allegations of closeness with the complainant's family.

6. **Administrative Complaint:**

- Cruz lodged a complaint against Judge Joven, who admitted to oversight in resolving the motion to present evidence and justified his inhibition orders to maintain impartiality.

7. **Office of the Court Administrator (OCA) Recommendation:**

- The OCA found merit in the complaint and recommended re-docketing it as an administrative case.

8. **Supreme Court Proceedings:**

- On 29 March 2000, the Supreme Court approved OCA's recommendation, asking the parties if they wished to resolve the case based on existing pleadings and records.

- The complainant responded affirmatively; the respondent judge did not comply with the Court's resolution.

Issues:

1. **Was Judge Joven negligent and did he abuse his authority or derelict his duties by failing to resolve the motions filed in the summary procedure case?**

2. **Was Judge Joven justified in inhibiting himself twice from presiding over the case due to impartiality concerns raised by the defendant's complaint against him?**

3. **Did Judge Joven's actions constitute a violation of the prescribed thirty-day period for rendering decisions in summary procedure cases?**

Court's Decision:

1. **Negligence and Dereliction of Duty:**

- The Supreme Court found that Judge Joven was indeed grossly negligent and derelict in his duties by allowing the case filed in 1996 to drag on without resolution. This negligence ignored the imperative duty of courts to provide a speedy and just resolution to litigants.

2. **Inhibition Justification:**

- The Court ruled that merely being charged in an administrative case by a defendant is insufficient ground for a judge to inhibit himself. Judge Joven's inhibition order should not have been issued as it contravened Executive Judge Cajot's directive and previous judicial precedent established in *People vs. Serrano*.

3. **Failure to Decide Within Prescribed Period:**

- The Supreme Court emphasized that Judge Joven's failure to render a decision within thirty days as mandated by Section 10 of the Revised Rule on Summary Procedure represented a clear dereliction of duty.

****Doctrine:****

1. ****Summary Procedure Timeline:****

- Judges are mandated to render decisions within thirty days in summary procedure cases. Failure to comply is a ground for administrative accountability.

2. ****Impartiality and Inhibition:****

- A judge should not inhibit themselves merely due to administrative charges filed by a party unless there is substantial evidence to suggest actual bias or partiality.

****Class Notes:****

- ****Key Elements:****

- Timelines in summary procedure cases (30 days for decision).
- Reasons for judicial inhibition must be substantiated by more than just allegations.
- Administrative remedies and judge's duties (prompt resolution and impartiality).

- ****Statutory Provision:****

- Section 10, Revised Rule on Summary Procedure: Mandates decisions in summary procedure cases within thirty days.
- The doctrine against inhibition based on administrative complaints unless proven partiality.

****Historical Background:****

Historically, this case serves as a reminder of the judiciary's need for timely and impartial decisions. It reflects ongoing efforts in the Philippine legal system to enhance judicial accountability and efficiency. The ruling is significant in reinforcing the standards judges must uphold to maintain public confidence in the judicial process.