

Title: Lucio C. Libarnes vs. The Hon. Executive Secretary, Mayor Tomas Ferrer, and Major Miguel Apostol

Facts:

1. On January 29, 1959, Lucio C. Libarnes was nominated by the President of the Philippines for the office of Chief of Police of Zamboanga City.
2. His nomination was confirmed by the Commission on Appointments on February 25, 1959.
3. Libarnes assumed office on March 11, 1959, and continued in his duties until May 16, 1963.
4. On May 16, 1963, the President designated Miguel Apostol as Acting Chief of Police of Zamboanga City.
5. Apostol took his oath of office on May 18, 1963, before the Speaker of the House of Representatives.
6. On May 23, 1963, Mayor Tomas Ferrer conveyed a letter from the Acting Assistant Executive Secretary terminating Libarnes's services and requesting him to turn over his office to Major Apostol.
7. Libarnes refused to vacate his office, leading to a showdown over the position.
8. On July 5, 1963, Libarnes initiated a quo warranto and injunction action to nullify Apostol's designation and prevent interference with his tenure.

Procedural Posture:

1. Libarnes filed a petition for quo warranto and injunction against the respondents, aiming to protect his position as Chief of Police and contest Apostol's appointment.
2. The case reached the Philippine Supreme Court for resolution on whether the President had the authority to terminate his services at pleasure or if the protections under Republic Act No. 2259 and Civil Service Law (Republic Act No. 2260) applied.

Issues:

1. Whether the President had the authority to terminate Libarnes's services as Chief of Police of Zamboanga City at pleasure under Section 34 of the City Charter.
2. Whether Republic Acts 2259 and 2260 repealed or amended the provisions allowing removal at pleasure.
3. Whether Section 5 of Republic Act No. 2259 is constitutional under the "one subject-one title" rule in the Constitution.
4. Whether the provisions of Republic Act No. 2259 apply to Libarnes, making him removable only for cause and after due process.

Court's Decision:

1. The Court ruled that Section 34 of the City Charter (Commonwealth Act No. 39) was inconsistent with Sections 5 and 33 of Republic Acts 2259 and 2260.
2. Section 5 of Republic Act No. 2259 explicitly states that city officials appointed by the President may not be removed except for cause, thus superseding the "remove at pleasure" provision of the City Charter.
3. The Court deemed Section 5 of Republic Act No. 2259 constitutional, asserting that it was germane to the Act's purpose and adequately debated in Congress.
4. The Court concluded that Libarnes, as a member of the civil service, enjoyed protection from removal without cause and due process. As such, the attempt to terminate his services was invalid.

Doctrine:

1. The protection of civil service officials from removal without cause and due process is reinforced under Republic Acts 2259 and 2260.
2. Special laws inconsistent with later general laws may be considered implicitly repealed or amended by the latter.
3. Legislative intent is crucial in determining the applicability and effect of new laws over existing ones.

Class Notes:

1. **Civil Service Tenure Protection**: Officials under the civil service are protected from arbitrary removal, requiring "cause" and "due process" (Republic Act No. 2260, Section 33).
2. **Legislative Repeal**: New legislation can implicitly repeal older, inconsistent laws, emphasizing the need to harmonize legal provisions.
3. **Constitutional Directive on Legislation**: The "one subject-one title" rule requires that the bill's content be related to its title, providing transparency and focus in law-making (Philippine Constitution).

Historical Background:

- The case arose in a period when the Philippine government sought to regularize and protect the employment of civil servants.
- The decision underscores the Philippine judiciary's role in upholding civil service protections and ensuring that legislative reforms are properly implemented and respected, reflecting broader efforts to professionalize the civil service and insulate it from political influence.