

### Title:

**Hacienda Bino, et al. v. Cuenca, et al.**

### Facts:

Hacienda Bino, a 236-hectare sugar plantation in Negros Occidental, operated by Hortencia L. Starke, involved 76 respondent workers performing various agricultural tasks. During the off-milling season on July 18, 1996, Starke issued an order stating that only employees who did not sign in favor of the Comprehensive Agrarian Reform Program (CARP) would continue to be employed. The respondents, perceiving this as a termination of their employment, filed a complaint for illegal dismissal and other monetary claims before the National Labor Relations Commission (NLRC) Regional Arbitration Branch No. VI.

**Procedural Posture:**

1. **Regional Arbitration Branch No. VI:** Respondents filed a complaint for illegal dismissal and other claims on September 17, 1996. Labor Arbiter Ray Allan T. Drilon found the notice issued by Starke on July 18, 1996, to be tantamount to illegal dismissal.

- **Decision** (Oct 6, 1997): Ordered reinstatement and monetary compensation totaling P545,437.99.

2. **NLRC:** Both parties appealed.

- **Decision** (July 24, 1998): Affirmed the Arbiter's decision with modifications, including the addition of holiday pay for listed complainants.

3. **Court of Appeals (CA):** Respondents appealed.

- **Decision** (July 31, 2001): Modified NLRC decision by deleting the award for holiday pay and premium pay for holidays but affirmed the rest.

- **Motion for Reconsideration:** Denied due to failure to indicate the date of receipt of the decision.

### Issues:

1. Did the CA err in not applying the principle of stare decisis regarding the status of sugar workers as seasonal employees, as held in Mercado, Sr. v. NLRC?

2. Did the CA commit an error in denying the motion for reconsideration due to procedural lapse?

### Court's Decision:

1. **Doctrinal Applicability:**

- **Stare Decisis and Regular Employment:**

- The CA found that the facts differed materially from those in Mercado, Sr. v. NLRC. In Mercado, workers were determined to be project employees serving multiple employers. The 236-hectare size of Hacienda Bino implied year-round work for consistent tasks, thus supporting the classification of the workers as regular employees.

2. **Procedural Issue:**

- **Motions for Reconsideration:**

- The CA's refusal to reconsider the petitioners' motion based on procedural grounds was deemed moot, as the arguments presented were addressed in the review.

**Doctrine:**

- **Regular Employment Doctrine:** The nature of employment, not seasonal tasks alone, determines regular employment status. Employees performing necessary and desirable work in an employer's usual course of business, who are not limited to a specific duration or season, qualify as regular employees (Art. 280, Labor Code of the Philippines).

- **Stare Decisis Limitation:** The principle of stare decisis applies only when the facts are substantially similar between cases. A factual variance renders stare decisis inapplicable.

**Class Notes:**

1. **Regular Employment:**

- Under Art. 280 of the Labor Code, employees performing tasks that are necessary and desirable for the regular business of the employer beyond a specific season or duration are deemed regular employees.

- **Case Application:** Hacienda Bino workers were found to be regular employees due to their year-round involvement in agricultural activities necessary for the plantation's operations.

2. **Stare Decisis:**

- Not applicable when facts materially differ between cases. Application depends on the similarity of circumstances and issues.

3. **Procedural Compliance:**

- Motions for reconsideration must indicate the receipt date of decisions to ascertain timeliness—failure to do so can result in denial.

**Historical Background:**

This case emerged in the context of the Comprehensive Agrarian Reform Program (CARP) in the Philippines, which aims to redistribute agricultural land to farmers and regularize their

employment status. The differentiation between regular and seasonal workers in agricultural settings, influenced by precedent cases such as Mercado, reflects ongoing legal debates critical for the agrarian reform movement.