

Title: **Rafael Reyes Trucking Corporation vs. People of the Philippines and Rosario P. Dy**

**### Facts:**

1. **Accident Occurrence**:

- On June 20, 1989, the trailer truck driven by Romeo Dunca, an employee of Rafael Reyes Trucking Corporation, collided with a Nissan pick-up driven by Feliciano Balcita and carrying Francisco Dy, Jr. in Barangay Tagaran, Cauayan, Isabela, causing the deaths of Balcita and Dy as well as damage to properties.

2. **Criminal Charges**:

- On October 10, 1989, the Provincial Prosecutor of Isabela filed an amended information charging Romeo Dunca with reckless imprudence resulting in double homicide and damage to property.

3. **Arraignment**:

- On October 23, 1989, Dunca pleaded not guilty. On the same date, the offended parties (Rosario P. Dy and Angelina M. Balcita) reserved their right to file a separate civil action.

4. **Civil Cases**:

- On November 29, 1989, Rosario P. Dy filed a separate civil action for quasi-delict against Rafael Reyes Trucking Corporation.

- On December 15, 1989, Rosario Dy withdrew their reservation for a separate civil action in the criminal case but did not withdraw the civil case based on quasi-delict.

5. **Consolidated Proceedings**:

- Both the criminal and civil cases were consolidated for joint trial.

6. **Trial Court Decisions**:

- On June 6, 1992, the Regional Trial Court found Romeo Dunca guilty of double homicide through reckless imprudence and awarded damages to the heirs of Francisco Dy, Jr.

- Upon motion, the trial court issued a supplemental decision on October 26, 1992, holding Rafael Reyes Trucking Corporation subsidiarily liable for the damages.

7. **Appeals**:

- Both accused Dunca and petitioner filed notices of appeal, and during the pendency, Dunca jumped bail.

- On December 29, 1994, the Court of Appeals dismissed Dunca's appeal due to his absconding.

- The Court of Appeals affirmed the trial court's decisions.

8. **Petition for Review**:

- Rafael Reyes Trucking Corporation filed a petition for review, contesting its subsidiary liability and the award of damages exceeding those alleged.

**Issues:**

1. **Subsidiary Liability**:

- Whether Rafael Reyes Trucking Corporation may be held subsidiarily liable for the damages awarded in the criminal action despite the separate civil action for quasi-delict.

2. **Damages Award**:

- Whether the court can award damages in the criminal case when a separate civil action was filed and if the award could exceed the amounts alleged in the information for reckless imprudence.

**Court's Decision:**

1. **Subsidiary Liability**:

- The Supreme Court held that Rafael Reyes Trucking Corporation cannot be held subsidiarily liable in the criminal case because the private respondents elected to file a separate civil action based on quasi-delict, thereby waiving other civil actions arising from the same act or omission.

- Therefore, the liabilities under the Revised Penal Code and Civil Code provisions could not be enforced simultaneously.

2. **Damages Award**:

- The court ruled that the award of damages in the criminal case is invalid as the civil action for recovery of damages was already waived by filing the civil action against the employer.

- Thus, the trial court erred in awarding damages in the criminal case, and such award was rendered void due to the waiver.

**Doctrine:**

- **Waiver of Civil Actions**:

- When a civil action for damages arising from the same acts is filed separately, any other civil action (including one under the Revised Penal Code for ex delicto) is waived to avoid double recovery (Rule 111, Section 1, paragraph 3 of the 1985 Rules of Criminal Procedure).

**Class Notes:**

- **Key Concepts**:

1. **Subsidiary Liability**:

- Under Article 103 of the Revised Penal Code, an employer could be subsidiarily liable for crimes committed by employees provided no other civil action is effectively pursued.

2. **Quasi-Delict vs. Ex Delicto Civil Liability**:

- These liabilities are distinct. Filing one may waive the right to pursue the other.

3. **Finality and Waiver**:

- Actions taken during proceedings (like waiver of civil actions) have significant final effects on liabilities.

- **Statutes**:

1. Revised Penal Code, Article 103 - subsidiary liability of employers.

2. Civil Code Articles 2176 and 2180 - quasi-delict liabilities of employers.

3. Rule 111, Section 1, 1985 Rules of Criminal Procedure - institution and waiver of civil actions.

**Historical Background:**

- During the late 1980s and early 1990s, the Philippine legal landscape was evolving in terms of procedural rules and the distinct handling of civil and criminal liabilities, particularly involving corporate responsibilities and vicarious liabilities. This decision reflects the Court's endeavor to clarify procedural intersections and establish consistency in the application of substantive laws governing multiple forms of liability arising from a single negligent act.