

University of the East v. Veronica M. Masangkay and Gertrudo R. Regondola

Title

University of the East and Dr. Ester Garcia vs. Veronica M. Masangkay and Gertrudo R. Regondola

Facts

* **Employment and Dismissal:**

* Veronica Masangkay and Gertrudo Regondola were regular faculty members and Associate Professors/Deans at the University of the East (UE), Caloocan Campus.

* They were dismissed on November 26, 2007, by UE's Board of Trustees for allegedly plagiarizing instructional manuals.

* **Plagiarism Allegations:**

* Masangkay and Regondola, along with co-author Adelia Rocamora, submitted three instructional manuals (Mechanics, Statics, and Dynamics) for temporary adoption, certifying under oath that the manuals were original and plagiarism-free.

* UE received complaints via email from Harry H. Chenoweth and Lucy Singer Block, claiming that the manuals included plagiarized content from their authored books.

* **UE Investigation:**

* UE conducted an investigation, where Masangkay and Regondola participated and defended their contributions.

* The investigation confirmed the plagiarism, leading to their dismissal.

* **Post-Dismissal Actions:**

* Rocamora sought reconsideration, which was denied, and eventually filed a case for illegal dismissal upheld by the Supreme Court.

* Masangkay and Regondola did not initially contest their dismissal and collected their benefits.

* **Complaint for Illegal Dismissal:**

* Nearly three years later, on July 20, 2010, Masangkay and Regondola filed a complaint for illegal dismissal with the National Labor Relations Commission (NLRC), seeking reinstatement and damages.

Procedural Posture

* **Labor Arbiter Decision (February 28, 2011):**

* Declared the dismissal illegal, ordering UE to reinstate Masangkay and Regondola with back wages and awarding a total of Php 4,623,873.34 in damages and attorney's fees.

* **NLRC Decision:**

* UE appealed, and the NLRC reversed the Labor Arbiter's ruling, finding the dismissal lawful. Respondents' motion for reconsideration was denied.

* **Court of Appeals Decision (February 19, 2016):**

* Reinstated the Labor Arbiter's decision, emphasizing the doctrine of stare decisis based on Rocamora's previously adjudicated case.

* **Supreme Court Petition:**

* UE filed a Petition for Review on Certiorari under Rule 45, challenging the CA's decisions.

Issues

1. **Validity of Misrepresentation and Plagiarism as Just Cause:**

* Whether the respondents' misrepresentation, dishonesty, and plagiarism constitute serious misconduct justifying their dismissal.

2. **Application of Stare Decisis:**

* Whether the CA erroneously applied the doctrine of stare decisis based on the Rocamora case.

3. **Entitlement to Reinstatement and Other Benefits:**

* Whether respondents are entitled to reinstatement and other monetary awards despite their dismissal for valid cause under the Labor Code.

4. **Award of Damages and Attorney's Fees:**

* Whether the award of damages and attorney's fees was based on factual and legal grounds.

Court's Decision

* **Misrepresentation and Plagiarism as Just Cause:**

* The Supreme Court found that respondents misrepresented the originality of the manuals and benefited financially from the sales. They knew of the plagiarized content and certified under oath that the work was original. This constituted serious misconduct justifying dismissal.

* **Application of Stare Decisis:**

* The Court ruled that Rocamora's case was not on all fours with the present case, noting significant differences—most notably the lack of an oath by Rocamora and the financial benefits accrued by the respondents. Therefore, the principles of stare decisis did not apply.

* **Reinstatement and Monetary Awards:**

* Since the dismissal was justified due to serious misconduct, respondents were not entitled to reinstatement and the monetary awards ordered by the Labor Arbiter.

* **Damages and Attorney's Fees:**

* The Court found no basis for the award of damages and attorney's fees because the dismissal was lawful.

Doctrine

* **Misconduct Justifying Dismissal:**

* Plagiarism and misrepresentation, particularly when certified under oath, constitute serious misconduct warranting dismissal.

* **Stare Decisis:**

* For the doctrine of stare decisis to apply, cases must be substantially identical in their facts and legal issues. Differences in factual contexts can exclude the applicability of prior rulings.

* **Waiver of Rights:**

* A waiver of rights (like not contesting dismissal) is valid if done voluntarily, with full understanding, and not against public policy or law.

Class Notes

* **Serious Misconduct in Labor Law:**

* Defined under Article 282 of the Labor Code of the Philippines, including acts of dishonesty and misrepresentation.

* **Stare Decisis:**

* Refer to established principles in prior decisions for adjudicating similar subsequent cases.

* **Waiver of Rights:**

* Codified in Article 6 of the Civil Code—rights can be waived if not contrary to law, public policy, deserving of full understanding, and fair consideration.

Historical Background

****Context:****

* The case illuminates critical aspects of academic integrity, the legal standards for employment termination based on serious misconduct, and the principles of judicial consistency and fairness in labor disputes. It also addresses procedural complexities in litigation over dismissal cases, which have long-standing impacts on academic institutions and their expectations from faculty members.