

Title: Andres Santos and Felipe Santos vs. Numeriano G. Estenzo, et al. (G.R. No. L-13277)

Facts:

1. **Event Leading to the Case:**

- On October 26, 1952, Felipe Cabalde, a driver for the People's Land Transportation Company under the management of Andres Santos and Felipe Santos, died due to injuries he sustained when a strong current from the flooded Bao river washed away his vehicle during a typhoon in Cananga, Leyte.

2. **Initial Claim:**

- Following Cabalde's death, his widow, Gloria Montederamos, filed a claim for compensation with the Department of Labor on behalf of herself and her four minor children.

- The claim was unopposed by the Santos', and on August 4, 1953, the Workmen's Compensation Commission awarded the claimants P3,494.40 plus burial expenses not exceeding P200.00.

3. **Court Proceedings:**

- No appeal was made against the award.

- On October 21, 1954, Cabalde's mother, Manuela H. de Cabalde (in representation of the minors under her custody), filed a petition to enforce the award—Civil Case No. 18-0—in the Court of First Instance of Leyte.

- Petitioners contested this petition on various grounds.

- The case was delayed for a hearing until July 21, 1958.

4. **Hearing and Decision:**

- Petitioners moved to postpone the hearing on July 17, 1958, citing counsel commitments, but this motion was denied on July 19, 1958.

- Neither petitioners nor their counsel appeared for the hearing on July 21, 1958.

- The court, presided over by Judge Numeriano G. Estenzo, proceeded to hear the case and rendered a decision ordering the petitioners to pay the heirs the compensatory amounts with interest and additional P500 in attorney's fees.

5. **Subsequent Motions:**

- Petitioners' motion for reconsideration was denied.

- Petitioners filed a "Notice of Appeal by Certiorari" to the Supreme Court but subsequently

initiated a certiorari action claiming the lower court had overstepped its jurisdiction and acted with grave abuse of discretion.

****Issues:****

1. ****Jurisdiction of the Lower Court:****

- Whether the Court of First Instance had jurisdiction to enforce the Workmen's Compensation Commission's award given the procedural rule granting enforcement authority to the Commission itself.

2. ****Award of Attorney's Fees:****

- Whether the lower court acted with grave abuse of discretion in awarding P500 by way of attorney's fees beyond the standard set by the Workmen's Compensation Commission rules.

****Court's Decision:****

1. ****Jurisdiction Issue:****

- ****Resolved in favor of Jurisdiction:**** The Supreme Court held that the lower court retained jurisdiction to enforce the award. This was based on Section 51 of Republic Act No. 772, which permits a party in interest to file a certified copy of the compensation award in any court of record within the jurisdiction of the accident, thus mandating the court to render a decree or judgment accordingly. The procedural rule of the Commission does not amend legislative authority.

2. ****Attorney's Fees:****

- ****Award Upheld:**** The Supreme Court ruled that the P500 awarded by the lower court as attorney's fees did not violate the Commission's rule since the rule only sets limits for fees within the Commission or on appeal to the Supreme Court and does not apply to execution proceedings in courts of justice.

****Doctrine:****

- ****Authority to Enforce Compensation Awards:**** Courts of record have jurisdiction to enforce awards from the Workmen's Compensation Commission per legislative mandate (Sec. 51, Republic Act No. 772), notwithstanding procedural rules of the Commission.

- ****Scope of Attorney's Fee Regulations:**** Limits on attorney's fees set by the Workmen's Compensation Commission apply solely within the Commission's proceedings and do not govern fees decided in judicial enforcement actions.

****Class Notes:****

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

- Jurisdiction of Courts: Authority derived from statutes (Sec. 51, Republic Act No. 772).
- Procedural Rules vs. Legislative Mandates: Procedural rules cannot override legislative provisions.
- Finality and Enforcement of Administrative Decisions: Courts can enforce final administrative awards where jurisdiction is legislatively conferred.
- **Statutory Provisions:**
 - Republic Act No. 772, Section 51: Details the process of enforcing Workmen's Compensation Commission awards in courts.
 - Workmen's Compensation Commission Rules: Authority procedures are retained within the Commission but do not override existing statutory provisions regarding enforcement through the judiciary.

Historical Background:

- **Workmen's Compensation Policy Evolution:** The case underscores post-war Philippine judicial processes aimed at empowering courts to enforce administrative compensation awards, reflecting shifts towards securing just compensation for labor-related injuries without procedural encumbrances. This era marked significant judicial interpretations of statutory rights vis-a-vis procedural commissions.