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Title:

****Jesus G. Crisologo v. Judge Marivic Trabajo Daray****

Facts:

1. ****Initial Civil Cases Filing:****

- On May 23, 1995, Marina Crisologo, Jr. files Civil Case No. 3220 against Victor Callao and Rural Bank of Tagum, Inc.(RBTI) in RTC-Branch 19, Digos City.
- On September 10, 1996, Salvador Crisologo files Civil Case No. 3387 against Marina Jr. and RBTI, which is then consolidated with Case No. 3220.

2. ****Compromise Agreement:****

- On January 22, 2004, Marina, Jr., Salvador, Victor, and RBTI submit a Compromise Agreement to RTC-Branch 19, ceding full ownership of the disputed property to RBTI.

3. ****Motion for Intervention:****

- On February 13, 2004, complainant Jesus Crisologo and his sister file a motion to intervene in the consolidated civil cases, asserting co-ownership of the property.
- Respondent Judge acknowledged the new counsel for the complainant on May 17, 2004.
- On August 23, 2004, the Judge denies the motion for intervention citing undue delay in rights adjudication and other parties' decade-long litigation.

4. ****Motion for Reconsideration:****

- Complainant files a motion for reconsideration on September 15, 2004. This motion lacked a notice of hearing.
- Respondent Judge denies the motion on October 15, 2004.

5. ****Compromise Agreement Decision:****

- On October 27, 2004, the Judge approves the compromise agreement, effectively terminating the civil case.

6. ****Motion for Execution:****

- On November 3, 2004, RBTI files a motion for execution.
- Complainant learns about the motion for execution and prior decisions only on November 4, 2004.

7. ****Manifestation and Appeal:****

- On November 8, 2004, Complainant files an urgent manifestation, notice of appeal, and a

motion for the judge's voluntary inhibition.

- Judge voluntarily inhibits herself from the case on December 8, 2004.

8. **Petition with Court of Appeals:**

- On December 7, 2004, complainant files a petition for certiorari, prohibition, and mandamus with the Court of Appeals.

- On July 20, 2006, the Court of Appeals finds grave abuse of discretion and issues writs of certiorari and mandamus in favor of the complainant.

9. **Administrative Complaint:**

- Complainant files an administrative complaint against the respondent on September 1, 2006, alleging gross misconduct, undue delay, and gross ignorance of the law.

Issues:

1. **Gross Misconduct:** Whether Judge Daray committed gross misconduct by failing to notify the correct counsel and exhibiting supposed judicial bias.

2. **Undue Delay:** Whether Judge Daray unduly delayed decision-making processes affecting complainant's rights and case outcomes.

3. **Gross Ignorance of the Law:** Whether Judge Daray showed a gross misunderstanding or ignorance of procedural law, specifically regarding intervention.

Court's Decision:

1. **Gross Misconduct:**

- The Court held that the failure to furnish the correct counsel with updates was due to honest oversight and not malicious intent. Thus, Judge Daray was not liable for gross misconduct.

2. **Undue Delay:**

- The Court ruled the respondent was not responsible for delay as she lawfully inhibited herself from the case, delegating duties to the new presiding judge. As such, there was no undue delay attributable to her post-inhibition.

3. **Gross Ignorance of the Law:**

- The Court resolved that Judge Daray exercised proper judicial discretion in denying the motion for intervention. The compromise agreement being a decade-old case among original parties was justifiable under procedural rules.

Doctrine:

The decision reiterated:

- **Discretionary Judicial Acts:** Judges should not face administrative sanctions for discretionary judicial acts made in good faith.
- **Appeal Perfection:** Filing a notice of appeal and associated docket fees perfects the appeal without court approval.
- **Validity Considerations for Interventions:** Allowance or disallowance of interventions must consider potential delays and justice interests of original parties.

Class Notes:

- **Judicial Immunity:** Judges are generally immune from administrative complaints for acts done in good faith within their judicial capacity.
- **Basic Law Adherence:** Judges' failure to observe basic and elementary laws can lead to administrative liability.
- **Notice of Appeal Perfection:** An appeal is perfected upon timely filing of notice and payment of fees without needing court approval.

Historical Background:

The case reflects the judicial checks and balances in place within the Philippines' legal system, holding judges accountable for procedural missteps, while recognizing discretionary judicial decision-making boundaries. This case underscores the importance of judicial good faith and timely legal recourse for litigants affected by procedural decisions in complex litigation.