

Title: Rizal Empire Insurance Group vs. Coria, G.R. No. L-70789

Facts:

In August 1977, Rogelio R. Coria was hired by Rizal Empire Insurance Group as a casual employee with a daily wage of PHP 10.00. On January 1, 1978, Coria was made a regular employee, assigned the position of clerk-typist with a monthly salary of PHP 300.00. As a permanent employee, Coria received a copy of the company's "General Information, Office Behavior and Other Rules and Regulations." By the same year, Coria was transferred to the Claims Department with an increased salary of PHP 450.00 per month.

In 1980, Coria was transferred to the Underwriting Department, with his salary increased to PHP 580.00 per month plus a cost of living allowance. Later, he was transferred to the Fire Department as a filing clerk. In July 1983, Coria was promoted to inspector of the Fire Division, with a salary of PHP 685.00 per month plus allowances and other benefits.

On October 15, 1983, Coria was dismissed for alleged tardiness and unexcused absences. Coria contested his dismissal by filing a complaint with the Ministry of Labor and Employment (MOLE). On March 14, 1985, Labor Arbiter Teodorico L. Ruiz issued a decision reinstating Coria with back wages. Rizal Empire Insurance Group appealed to the National Labor Relations Commission (NLRC), which dismissed the appeal on November 15, 1985, citing that it was filed out of time. Hence, Rizal Empire Insurance Group and Sergio Corpus (petitioners) filed the instant petition for review to the Supreme Court.

Issues:

1. **Whether the NLRC's denial of the petitioners' appeal due to late filing was justified.**
2. **Whether Coria's dismissal was lawful based on the grounds of tardiness and unexcused absences.**

Court's Decision:

Issue 1: The Court considered whether it had jurisdiction to review the NLRC's denial based on the timeliness of the appeal. The Revised Rules of the National Labor Relations Commission, Rule VIII, Section 1(a), states that decisions of a Labor Arbiter must be appealed within ten (10) calendar days from receipt of notice. Section 6 strictly prohibits any extension of this period. The petitioners received the decision on April 1, 1985, and filed their motion for extension and memorandum of appeal on April 11 and April 22, 1985, respectively. The NLRC denied the request for extension and dismissed the appeal for being out of time. The Supreme Court affirmed this ruling, emphasizing that administrative rules

have the force of law and must be respected.

Issue 2: Assuming jurisdiction, the Supreme Court evaluated the merits of the illegality of Coria's dismissal. Considering Coria's consistent promotions and salary increases, the Court inferred that Coria was an efficient employee, likely maintaining good performance despite minor attendance issues. It found that occasional lapses in punctuality and attendance did not justify dismissal, reinforcing the concept that labor laws should be interpreted to give benefits to labor.

Doctrine:

The case reiterates the principle that administrative rules and regulations, such as those promulgated by the NLRC, have the force of law and should be strictly enforced. The finality of administrative decisions when appeals are not timely perfected underscores the importance of adhering to procedural rules.

Class Notes:

- **Key Elements:**
- **Timeliness of Appeal:** All administrative rulings must be appealed within specified periods.
- **Just Cause for Termination:** Performance factors and employment history may influence the adjudication of unlawful dismissal cases.
- **Statutory Provisions:**
- **Rule VIII, Section 1(a), and Section 6 of the Revised Rules of the NLRC:**
- Timeframe for filing appeals within ten days.
- Absoluteness of no extension for appeal periods.
- The Supreme Court underscores that procedural rules are critical and not subject to flexible interpretation.
- **Application:** The rules serve as a check ensuring both employers and employees adhere to expected procedural standards while ensuring fairness and respect for established regulations.

Historical Background:

This case reflects the Philippine labor jurisprudence landscape during the 1980s, emphasizing procedural rigor and reinforcing the notion of fair labor practices. The period was characterized by heightened enforcement of labor rights and improving the mechanisms for dispute resolution within the labor sector. The decision underscored procedural adherence and promoted substantial justice within the confines of existing

regulations.