

Title: De Leon vs. Hercules Agro Industrial Corporation and/or Jesus Chua and Rumi Rungis Milk [G.R. No. 87212, June 18, 2014]

Facts:

1. **Initial Contract:** Petitioner, Gregorio de Leon, doing business as G.D.L. Marketing, entered into a contract with respondent Hercules Agro Industrial Corporation, represented by Jesus Chua, and Rumi Rungis Milk.
2. **Breach of Contract Allegation:** Petitioner filed a complaint for breach of contract with damages and a prayer for a writ of preliminary attachment with the Regional Trial Court (RTC) in Manila (Civil Case No. 98-89938).
3. **RTC Decision:** On September 23, 2005, the RTC ruled in favor of the petitioner against Rumi Rungis Milk and awarded \$142,080 with the conversion rate of P26.41 to a dollar plus legal interest, P100,000 in attorney's fees, P477,622 for customs duties and taxes, and P6358.40 for analysis fees. However, claims against Hercules Agro Industrial Corporation and Jesus Chua were dismissed due to lack of evidence.
4. **Motion for Time:** On October 19, 2005, petitioner requested an extension of 10 days to file a motion for reconsideration. The RTC denied the motion as the period for filing a motion for reconsideration is non-extendible.
5. **Motion for Reconsideration:** Subsequently, on October 24, 2005, the petitioner filed his motion for partial reconsideration of the RTC's September 23 decision. This was denied by the RTC on October 27, 2005.
6. **Respondent's Motion for Reconsideration:** On November 2, 2005, respondent Rumi Rungis Milk filed a motion for reconsideration asserting lack of jurisdiction, which was denied by the RTC on January 9, 2006.
7. **Notice of Appeal:** On February 13, 2006, petitioner filed a notice of partial appeal from the RTC's January 9, 2006 order, but the RTC on February 15, 2006 denied due course to this notice, citing it was filed out of time.
8. **Motion for Execution:** On February 13, 2006, the petitioner moved for partial execution of the RTC's decision, which was denied since the decision against Rumi Rungis Milk was not final and executory.
9. **Appeals to the CA:** Both parties filed motions with the Court of Appeals (CA). The CA ordered petitioner's brief stricken off due to late filing and reaffirmed the struck-off status in subsequent resolutions.
10. **Supreme Court Appeal:** Petitioner contested the CA's decision to the Supreme Court.

Issues:

1. **Extension of Time for Filing Motion for Reconsideration:** Whether the petitioner could legally extend the non-extendible period for filing a motion for reconsideration.
2. **Validity of Petitioner's Notice of Appeal:** Whether the petitioner's notice of appeal was filed within the reglementary period and if it tolled the prescriptive period.
3. **Finality of RTC Decision:** Whether the RTC decision on September 23, 2005, had become final and executory in relation to the petitioner.
4. **Procedural Compliance and Liberal Application of Rules:** Whether procedural rules can be liberally interpreted favoring the petitioner.

Court's Decision:

1. **Non-Extendibility of Motion for Reconsideration:** The Supreme Court upheld the CA's decision rejecting the petitioner's motion for extension as the rules explicitly state such periods are non-extendible (citing *Habaluyas Enterprises v. Japson*).
2. **Finality of RTC Decision:** The RTC's decision dated September 23, 2005, became final as the petitioner failed to file an appeal within the prescribed period and the motion for extension did not toll the appeal period.
3. **Procedural Compliance:** The filing of an appeal within the prescribed period is both a mandatory and jurisdictional requirement. Since the petitioner did not perfect the appeal in the proper time frame, the decision against him became final and executory.
4. **No Relaxation of Procedural Rules:** The Court determined that there were no exceptional circumstances to justify relaxing procedural rules in this case.

Doctrine:

- **Strict Compliance with Procedural Rules:** The right to appeal is statutory and must comply strictly with procedural rules. Failure to adhere to these rules results in the judgment becoming final and executory.
- **Non-Extendibility of Appeal Periods:** Under the 1997 Rules of Civil Procedure, motions for extension of time to file a motion for reconsideration are not allowed in appeals from municipal trial courts or regional trial courts.

Class Notes:

- **Key Elements:** Importance of adhering to procedural deadlines, statutory rights associated with appeals, jurisdictional nature of compliance with prescribed periods.
- **Crucial Statutes:** Section 2, Rule 40 and Section 3, Rule 41 of the 1997 Rules of Civil Procedure. *Habaluyas Enterprises Inc. v. Japson* (226 Phil. 144).
- **Interpretation:** Strict application of procedural periods to maintain orderliness and avoid ambiguity.

****Historical Background:****

This case emphasizes the importance of procedural rules in the Philippine judicial system. The administration of justice relies on these rules to ensure timely and orderly resolution of disputes. Relaxation of these rules is tightly controlled to prevent misuse and ensure the smooth functioning of the legal process.