

**\*\*Title:\*\***

Casino Labor Association v. Court of Appeals, Philippine Casino Operators Corporation, and Philippine Special Services Corporation

**\*\*Facts:\*\***

1. **\*\*Consolidated Cases:\*\*** The Casino Labor Association (petitioner) filed consolidated cases against Philippine Amusement and Gaming Corporation (PAGCOR), Philippine Casino Operators Corporation (PCOC), and Philippine Special Services Corporation (PSSC) with the Arbitration Branch of the National Labor Relations Commission (NLRC).
2. **\*\*Labor Arbiter's Order (July 20, 1987):\*\*** The Labor Arbiter dismissed the consolidated cases for lack of jurisdiction over the respondents.
3. **\*\*NLRC en banc Resolution (November 15, 1988):\*\*** The NLRC dismissed the petitioner's separate appeals on the ground that the NLRC had no jurisdiction over PAGCOR.
4. **\*\*Petition for Review on Certiorari (G.R. No. 85922):\*\*** The Casino Labor Association elevated the matter to the Supreme Court. The Third Division of the Court dismissed the petition, citing no grave abuse of discretion by the NLRC.
5. **\*\*Manifestation/Motion to NLRC:\*\*** Following the Supreme Court resolution suggesting that petitions against private companies should go to the appropriate agency of Labor and Employment, the petitioner prayed for the cases to be remanded back to the Arbitration Branch against PCOC and PSSC.
6. **\*\*NLRC First Division Order (June 30, 1989):\*\*** Granted the petitioner's motion and remanded the records to the Arbitration Branch for further proceedings.
7. **\*\*Motion for Reconsideration (July 22, 1994):\*\*** PCOC and PSSC filed for reconsideration, resulting in the NLRC setting aside the June 30, 1989 order and denying the petitioner's motion.
8. **\*\*Further Appeal:\*\*** Petitioned the Supreme Court, which referred the case to the Court of Appeals (CA) based on the ruling in *St. Martin Funeral Homes v. NLRC*.
9. **\*\*Court of Appeals Decision (June 22, 1999):\*\*** The CA dismissed the petition for certiorari, finding no grave abuse of discretion by the NLRC.
10. **\*\*CA Motion for Reconsideration (December 6, 1999):\*\*** The petitioner's motion for reconsideration was denied.

**\*\*Issues:\*\***

1. **\*\*Jurisdiction:\*\*** Whether the statement in the Supreme Court's resolution in G.R. No.

85922 mandated that the NLRC should assume jurisdiction over cases against PCOC and PSSC.

2. **Interpreting ‘Private Companies’:** Whether the Supreme Court’s reference to “private companies” meant PCOC and PSSC should fall under NLRC jurisdiction.
3. **Legal Mandate:** Whether the subsequent proceedings were consistent with the Supreme Court’s resolution or constituted grave abuse of discretion.

**Court’s Decision:**

1. **Interpretation of Supreme Court Resolution:** The phrase “private companies” in the Supreme Court’s resolution was not intended specifically to mandate the NLRC to adjudicate cases against PCOC and PSSC.
2. **Reading Judgments as a Whole:** The court held that judgments must be interpreted in their entirety. The preliminary ruling already declared NLRC’s lack of jurisdiction.
3. **Obiter Dictum:** The court noted the statement regarding petitions against private companies as obiter dictum—meaning it was not crucial to the decision.
4. **Petitioner’s Reliance on Misinterpretation:** The court found the petitioner’s argument relied on misunderstanding a single sentence taken out of context.
5. **Affirmation of Civil Service Commission’s Jurisdiction:** The court reaffirmed Civil Service Commission’s jurisdiction over disputes involving PAGCOR, PCOC, and PSSC.

**Doctrine:**

1. **Interpretation of Court Judgments:** Judgments should be construed to harmonize and give effect to all parts, and specific phrases should not be isolated to alter the intended meaning.
2. **NLRC vs. Civil Service Commission Jurisdiction:** Government corporations with original charters fall under the Civil Service Commission jurisdiction, not the NLRC, per constitutional and statutory provisions.

**Class Notes:**

1. **Jurisdiction Principles:** Determining jurisdiction involves constitutional provisions and classifications. Government entities created by original charters generally fall under the jurisdiction of the Civil Service Commission (Art. IX B, Sec. 2(1), Constitution).
2. **Case Interpretation:** Courts interpret judgments as cohesive documents; the intention is gleaned from the entire text.
3. **Administrative Law:** Differentiation between the roles of the NLRC and the Civil

Service Commission in handling labor disputes involving government entities.

**\*\*Historical Background:\*\***

- **\*\*Administrative and Judicial Structure:\*\*** Understanding the delineation of jurisdictions between the NLRC and the Civil Service Commission is central to labor law in the Philippines, influenced by constitutional developments, statutory laws, and administrative reforms.

- **\*\*PAGCOR's Legal Framework:\*\*** As part of its mission to regulate gaming, PAGCOR and its associated entities were shielded from regular labor codes but had their employees' right to unionize recognized subject to Civil Service regulations.