

### Title:

\*\*Philippine Association of Free Labor Unions (PAFLU) vs. Judge Cloribel, Wellington Investment & Manufacturing Corp., and Metropolitan Bank & Trust Company (1966)\*\*

### Facts:

1. **Strike and Picketing:** PAFLU initiated a strike against Metropolitan Bank & Trust Company (METBANK), whose office is on the ground floor of the Wellington Building, Plaza Calderon, Binondo, Manila.
2. **Wellington's Complaint:** Wellington Investment & Manufacturing Corp., owning the building, complained about picketers obstructing the common passageway, inconveniencing Wellington and other tenants.
3. **Initial Injunction:** Judge Cloribel issued an ex parte order directing PAFLU to cease demonstration and picketing in front of Wellington Building's common passageway.
4. **Certiorari Petition:** PAFLU filed a petition for certiorari in the Supreme Court, alleging violation of Republic Act No. 875 (Industrial Peace Act) and lack of jurisdiction by Judge Cloribel.
5. **Supreme Court's Temporary Restraining Order (TRO):** Issued a TRO against Judge Cloribel's order, later extended, to specifically cover picketing restrictions at the passageway.
6. **Additional Injunction by Judge Cloribel:** A second injunction issued by Judge Cloribel in a related but separate case against the same picketing.
7. **Supplemental Petition:** PAFLU filed a supplemental petition claiming Judge Cloribel violated the Supreme Court's TRO and renewed injunctions.

### Issues:

1. **Applicability of Republic Act No. 875:** Whether the cases involved a labor dispute and required adherence to specific provisions under the Industrial Peace Act.
2. **Proper Issuance of Injunctions:** Whether the injunctions issued without compliance with procedural requirements (verification, bond filing) were valid.
3. **Legitimacy of Picketing Regulation:** Whether restricting PAFLU's picketing in the common passageway was justifiable.

### Court's Decision:

1. **Existence of Labor Dispute (Issue 1):**
  - **Court's Analysis:** The dispute was between PAFLU and METBANK, not involving Wellington or Galang. Hence, the case did not fall within the purview of Section 9 of the Industrial Peace Act.

- **Ruling:** Republic Act No. 875's provisions were not applicable. The matter was instead governed by Rule 58 (Injunctions) of the Rules of Court.

2. **Issuance of Injunctions (Issue 2):**

- **Court's Analysis:** The Court found deficiencies in Judge Cloribel's orders, including failure to require the mandatory bond before issuing preliminary injunctions.

- **Ruling:** The injunctions were annulled due to procedural lapses despite jurisdiction over the subject matter.

3. **Regulation of Picketing (Issue 3):**

- **Court's Analysis:** While right to picket is constitutionally protected, it can be regulated to protect third parties or "innocent bystanders" with no connection to the labor dispute.

- **Ruling:** Wellington and Galang, being innocent bystanders, had a right to be protected from indirect effects of the picketing.

**Doctrines:**

1. **Scope of Labor Disputes:** Labor disputes under Republic Act No. 875 are contingent on a direct employer-employee relationship or substantial connection.

2. **Regulation of Picketing Rights:** Picketing, while an element of free speech, can be locally confined by the court to prevent undue harm to unrelated third parties.

3. **Mandatory Bond for Injunctions:** Injunctions require compliance with all procedural mandates, including bond filing.

**Class Notes:**

- **Key Elements:**

- **Labor Dispute:** Direct connection between picketers and party being picketed.

- **Procedural Aspects of Injunction:** Verification, bond requirement, and jurisdiction.

- **Principles Related to Picketing:**

- Not absolute.

- Courts can regulate for third-party protection.

- **Statutory Provisions:**

- **Republic Act No. 875:**

- Section 9 (d): Specific requirements for labor injunctions.

- **Rule 58, Rules of Court:**

- Section 4: Verified complaint and bond requirements.

**Historical Background:**

- **Industrial Peace Act Context:** Republic Act No. 875 (enacted in 1953), aimed to minimize industrial conflicts, balancing the right to unionize, collective bargaining, and peaceable picketing against overarching economic interests.
- **Contemporary Labor Movements:** Post-WWII era saw a surge in labor movements emphasizing worker rights against a backdrop of economic rebuilding in the Philippines.

This brief provides a holistic overview of the case's facts, legal issues, the ruling, established doctrines, class notes for understanding core legal principles, and a historical context in relation to the labor dispute framework during the mid-20th century.