

Title: ****Oliveros & Sanchez v. Court of Appeals, FLECO, et al. | G.R. No. 885 Phil. 649****

****Facts:****

1. Petitioners Ruben O. Oliveros and Homer Henry S. Sanchez worked as a distribution system analyst and system planning and design engineer, respectively, at First Laguna Electric Cooperative (FLECO).
2. An anonymous text message received by FLECO claimed that Oliveros and Sanchez owned an entity, Sergio Paulo Contractor Services (Sergio Paulo), constituting a conflict of interest with FLECO.
3. On April 30, 2015, Ramil F. De Jesus, FLECO's Officer-in-Charge, issued a memorandum to the petitioners regarding the conflict of interest allegations, attaching documents such as Sergio Paulo's Organizational Chart and project accomplishments.
4. Petitioners, in their second explanation letter, argued lack of due process, citing FLECO's Code of Ethics which required a sworn written complaint rather than an anonymous text.
5. On May 27, 2015, FLECO sent another memorandum with sworn statements from its managers corroborating the claims about petitioners' business interests in Sergio Paulo.
6. Petitioners refuted these claims and questioned the hearsay nature of the evidence. They denied any conflict of interest or ownership in Sergio Paulo, asserting that they never misused FLECO's time.
7. Despite their explanations, FLECO's Grievance Committee recommended terminating the petitioners, effective July 31, 2015.
8. Petitioners filed an illegal dismissal case and money claims against FLECO and members of the Grievance Committee.

****Procedural Posture:****

1. The Labor Arbiter (LA) on December 8, 2015, declared the termination illegal and ordered reinstatement with full back wages and damages.
2. FLECO appealed to the National Labor Relations Commission (NLRC), which reversed the LA decision, finding that petitioners were given due process and had a conflict of interest.
3. Petitioners' motion for reconsideration was denied by the NLRC, prompting them to file a Petition for Certiorari with the Court of Appeals (CA).
4. The CA, through a resolution dated October 27, 2017, dismissed the petition for several procedural defects, including failure to submit required annexes. Petitioners were directed to comply but failed to do so adequately.
5. On April 13, 2018, the CA denied the petitioners' Motion for Reconsideration.
6. Petitioners then lodged a Petition for Certiorari with the Supreme Court, questioning the CA's dismissal.

****Issues:****

1. Did the CA commit grave abuse of discretion by dismissing the petitioner's Petition for Certiorari despite their argument that the required documents were irrelevant?
2. Was the Petition for Certiorari the correct remedy for challenging the CA's resolutions?

****Court's Decision:****

1. ****Issue on Grave Abuse of Discretion:****

- The Supreme Court found no grave abuse of discretion on the CA's part. The documents were deemed material as they were essential in determining the validity of the NLRC's findings against the petitioners. The petitioners' failure to submit these documents justified the CA's dismissal.

2. ****On the Proper Remedy:****

- The Supreme Court ruled that the proper remedy to challenge the CA's resolution was through an appeal under Rule 45, not through certiorari under Rule 65. Since the CA's issuances were final, the petitioners should have utilized Rule 45's appeal mechanism.

****Doctrine:****

1. ****Rule on Certiorari (Rule 65)**:** Certiorari cannot be a substitute for a lost appeal, emphasizing the prioritization of a proper appeal under Rule 45 when applicable.
2. ****Adherence to Procedural Rules**:** Strict compliance with procedural rules is essential to ensure justice and administrative efficiency.

****Class Notes:****

1. ****Rule 45 of the Rules of Court**:** A verified petition for review on certiorari is required to appeal a judgment or final order/resolution of the CA.
 - ****Section 1, Rule 45**:** Explicit on filing petitions with the Supreme Court.
2. ****Rule 65 of the Rules of Court**:** Used for petitions of certiorari addressing grave abuse of discretion.
 - ****Section 1, Rule 65**:** Defines requisites and limitations for certiorari petitions.
3. ****Doctrine of Exhaustion of Administrative Remedies**:** Exhausting all proper remedies before advancing to certiorari or appeals must be adhered to.
4. ****Grave Abuse of Discretion**:** Must involve acts that are capricious, whimsical, arbitrary, or amount to an evasion of positive duty.

****Historical Background:****

- The case underscores the interplay between procedural rigor and substantive justice within Philippine labor adjudication. Rooted in early labor law reforms, such cases reflect

ongoing efforts to strike a balance between workers' rights and employers' prerogatives.

- The case also emphasizes the restrictive and procedural nature of certiorari under Philippine judicial practice, showcasing evolving interpretations around procedural diligence.