

**\*\*Title:\*\*** Jose Domingding and David Arañas vs. Trinidad Ng and Chee Ng

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

- On May 25, 1953, Trinidad Ng purchased mangoes from Jose Domingding's store managed by David Arañas. Ng and Domingding disputed the quantity: Trinidad claimed 150 baskets, while Domingding insisted on 400 baskets.
- An invoice presented by Domingding showed 400 baskets but lacked the purchaser's signature.
- Trinidad Ng visited the store again the same evening, looking for her brother-in-law. Arañas offered to accompany her home in a taxi when he realized her brother-in-law was not there.
- Arañas then allegedly assaulted Trinidad in the taxi by embracing, kissing, and attempting to remove her undergarments against her will.
- Trinidad contacted her husband immediately after the incident, who urged her to file a complaint. She did so three days later, but the case of lasciviousness was dropped on September 28, 1953.
- Domingding and Arañas filed a lawsuit against Trinidad Ng and Chee Ng to recover the value of 400 mango baskets, claiming the payment was due the next day which failed.
- Trinidad Ng counterclaimed, seeking P50,000 in moral damages for the assault by Arañas, alongside exemplary damages and attorney's fees.

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

1. Whether defendants should pay for 400 baskets of mangoes as claimed by plaintiffs.
2. Whether David Arañas should be liable for moral and exemplary damages due to the lascivious acts he allegedly committed against Trinidad Ng.

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

- The trial court ruled that the defendants must pay for 150 baskets of mangoes, not 400.
- The court ordered Arañas to pay P50,000 in moral damages and P1,000 in attorney's fees to Trinidad Ng. Arañas appealed.
- The Supreme Court scrutinized the awarding of P50,000 moral damages and P1,000 attorney's fees to Trinidad Ng, finding the trial court failed to justify the amount adequately.

**\*\*Analysis:\*\***

1. **\*\*Compensation for Mangoes\*\***:
  - Defendants were liable only for 150 baskets as per their admission and the bill of lading.

2. **Moral and Exemplary Damages**:

- Moral damages are assessed based on mental anguish, besmirched reputation, and social humiliation caused by the actions of another.
- The trial judge did not specify the considerations that led to the P50,000 award. Given the lack of substantiation, the Supreme Court reassessed the situation by considering the social and financial status of both the plaintiff and the defendant.
- It noted that Trinidad Ng did not have substantial means as she paid for goods only after their sale and Arañas, being a store manager, did not command significant financial resources.
- The Court concluded that P1,000 in moral damages was sufficient and complemented this with P2,000 in punitive damages owing to Arañas' indecent conduct.

**Doctrine:**

- The fixing of moral damages is subject to the discretion of the judge considering factors such as the severity of the wrong, the nature of damages, and the socio-economic conditions of the parties.
- Exemplary damages can be awarded in addition to moral damages if the wrongdoer acted with evident bad faith or gross negligence.

**Class Notes:**

1. **Elements of Moral Damages** (Article 2217, Civil Code):

- Mental anguish
- Besmirched reputation
- Wounded feelings
- Moral shock
- Social humiliation

2. **Factors for Fixing Moral Damages**:

- Offender's and offended party's social/financial status
- Circumstances and impact of the wrongdoing

3. **Exemplary Damages**:

- Need for wanton, fraudulent, or oppressive conduct (Article 2229, Civil Code)
- Purpose is to set a public example and deter wrongful conduct

**Historical Background:**

- During the 1950s, the Philippines was undergoing significant socio-economic

transformations. The case reflects the growing attention to personal rights and the judiciary's role in upholding moral and exemplary damages amid evolving societal norms. The prominent issue was ensuring damages were proportionate to the inflicted injury, thus shaping modern views on compensations and legal redress.