

****Title:****

Jose John C. Guerrero vs. Philippine Transmarine Carriers, Inc., Celebrity Cruises, and Carlos C. Salinas, G.R. No. 222646, October 3, 2018

****Facts:****

1. ****Employment and Incident:**** Jose John C. Guerrero was employed by Philippine Transmarine Carriers Inc. (PTCI) as a Casino Dealer on board the GTS Constellation for a six-month contract starting from October 12, 2011. His duties included operating various casino games and ensuring casino regulations.
2. ****Issue Occurrence:**** In January 2012, Guerrero claimed he injured his back during a gastro-intestinal outbreak on the ship while assisting elderly passengers with wheelchairs.
3. ****Medical Repatriation:**** On March 26, 2012, after an MRI revealed lumbar spondylosis, he was repatriated for treatment. He underwent surgery and continued medical treatment in Manila.
4. ****Disability Claim:**** Guerrero filed a complaint for permanent and total disability benefits, alleging that he was declared unfit for sea service by Dr. Cesar Garcia after his surgery and continuing pain and that the company failed to compensate him.

****Procedural Posture:****

1. ****Labor Arbiter Ruling:**** The Labor Arbiter ruled in favor of Guerrero, awarding him \$60,000 in permanent disability benefits, with PTCI and Celebrity Cruises held solidarily liable. Carlos C. Salinas was excluded as a respondent.
2. ****NLRC Appeal:**** The NLRC reversed the Labor Arbiter's decision, finding Guerrero's injury was not work-related and dismissing his claims.
3. ****Court of Appeals:**** Guerrero's certiorari petition to the Court of Appeals was denied, with the CA affirming the NLRC's findings.
4. ****Supreme Court:**** Guerrero filed a petition for review on certiorari to the Supreme Court.

****Issues:****

1. ****Work-Related Injury:**** Whether Guerrero's injury was work-related, thereby entitling him to disability benefits under the Philippine Overseas Employment Administration (POEA) standard terms.
2. ****Validity of Medical Findings:**** The conflicting medical findings between the company-designated physician and Guerrero's personally chosen physician.
3. ****Procedural Admissibility:**** Whether arguments and evidence raised by Guerrero for the first time on appeal should be considered.

Court's Decision:

1. **Work-Related Injury:** The Supreme Court held that Guerrero failed to provide substantial evidence connecting his injury to his work. Evidence presented by the respondents demonstrated that the injury occurred during a personal gym workout, not while performing his duties.
2. **Medical Findings:** The Court found that Dr. Garcia's one-time evaluation declaring Guerrero unfit lacked necessary supporting diagnostic tests and was not adequate to counter the company-designated physician's more comprehensive evaluation.
3. **Procedural Admissibility:** The Court ruled that Guerrero's arguments raised for the first time on appeal were inadmissible. Claims not presented in initial proceedings could not be entertained on appeal.

The Supreme Court dismissed Guerrero's petition, upholding the CA's ruling that confirmed the NLRC's decision.

Doctrine:

- **Work-Related Disability Compensation:** To be entitled to disability benefits, a seafarer must establish a causal connection between the work and the injury through substantial evidence.
- **Review on Certiorari:** The Supreme Court generally does not review factual matters, focusing only on legal issues unless particularly compelling circumstances warrant otherwise.
- **Burden of Proof:** The burden of proof lies on the petitioner to present adequate evidence supporting their claims. Self-serving declarations without corroborative evidence are insufficient.

Class Notes:

- **Work-Related Injury:** Evidence must show injury arose out of and in the course of employment.
- **Substantial Evidence Requirement:** Adequate relevant evidence that a reasonable person might accept as sufficient to support a conclusion.
- **Medical Assessment Validity:** Comprehensive medical assessments take precedence over single consultations lacking detailed diagnostic support.
- **Procedural Rules:** New arguments cannot be introduced on appeal if not previously raised in lower tribunals.

Historical Background:

- ****Seafarer Protection:**** The case is grounded in the broader context of legal protections for overseas Filipino workers, particularly maritime workers, under the POEA standard employment terms.
- ****Labor Rights:**** Reinforces the principles ensuring labor rights are balanced and preventing frivolous claims from overshadowing legitimate labor grievances. This reflects ongoing judicial practices aimed at fair treatment and proper procedures in handling labor disputes.