

Title: Atty. Melvin D.C. Mane vs. Judge Medel Arnaldo B. Belen, Regional Trial Court, Branch 36, Calamba City

Facts:

- Initial Incident (February 27, 2006):** During a hearing on Civil Case No. 3514-2003-C (“Rural Bank of Cabuyao, Inc. v. Samuel Malabanan, et al.”), Atty. Melvin D.C. Mane, counsel for the plaintiff, was allegedly humiliated and demeaned by Judge Medel Arnaldo B. Belen.
- Remarks:** Judge Belen made remarks questioning Mane’s capability and credibility, notably asking if Mane was from the University of the Philippines College of Law and then suggesting he couldn’t equate himself with the judge because he didn’t graduate from a top-tier law school.
- Motion for Tape Recording (April 24, 2006):** Atty. Mane filed a motion requesting a copy of the tape recording of the proceedings, alleging it was “duly recorded” by stenographer Elenita C. de Guzman. This motion remained unaddressed as of the date of the administrative complaint.
- Administrative Complaint Filed (May 19, 2006):** Atty. Mane filed an administrative complaint with the Office of the Court Administrator (OCA) on May 26, 2006, citing the judge’s inappropriate remarks and actions.
- Judge’s Comment (June 14, 2006):** Judge Belen claimed the remarks were made in response to two prior motions filed by Atty. Mane, which he felt directly assaulted his integrity and alleged potential misconduct.
- Contempt Notices (June 5, 2006):** Judge Belen issued orders for Atty. Mane to explain why he should not be cited for contempt based on statements in the motions suggesting unethical behavior by the judge.
- Withdrawal of Complaint (September 4, 2006):** Atty. Mane informed the court of his decision to withdraw his administrative complaint, attributing it to impulsiveness.
- OCA Evaluation (November 7, 2007):** The OCA recommended that the proceedings continue despite the withdrawal and advised reprimanding Judge Belen for his conduct.

Issues:

- Whether Judge Belen’s statements and actions during the February 27, 2006 hearing constituted conduct unbecoming of a judge and violated the Code of Judicial Conduct.**

Court’s Decision:

- Finding of Fact:** The Court affirmed that the judge indeed made sarcastic, humiliating, and condescending remarks during the court proceedings, as evidenced by the

transcript and not disputed by the judge.

2. **Code of Judicial Conduct:** The Court underscored Rule 3.04, which mandates that judges should be patient, attentive, and courteous to lawyers, especially those inexperienced, and maintain professionalism in conduct.

3. **Performance Analysis:** The Court noted that Judge Belen's remarks were inappropriate, constituting an unnecessary exhibition of personal views and academic superiority, detrimental to the lawyer's dignity and professional standing.

4. **Disciplinary Action:** The Court reprimanded Judge Belen for conduct unbecoming of a judge and violating Canon 3 of the Code of Judicial Conduct, with a stern warning against future violations.

Doctrine:

- **Judicial Conduct:** Judges must exhibit patience, attentiveness, and courtesy, avoiding unnecessary personal commentary that undermines the dignity of those before the court. Professionalism and impartiality are paramount.

Class Notes:

- **Key Elements in Judicial Conduct:**

- **Patience & Courtesy (Rule 3.04):** Judges should treat all participants before the court respectfully.

- **Impartiality & Integrity:** Judges must avoid personal biases or remarks that question their or others' integrity.

- **Professional Conduct:** Judicial behavior must reflect the highest standards of professionalism and be above reproach.

- **Essential Principles:**

- **Respect in Discourse:** Even when provoked, judges must maintain decorum.

- **Role of Lawyers:** Legitimacy of lawyer's competence is presumed regardless of alma mater.

Historical Background:

This case highlights the evolution of judicial conduct regulations in the Philippine judiciary. The judgment reinforced the need for maintaining judicial decorum, especially in contexts where personal and professional respect intersects. The decision echoes past cases that underscore the importance of impartiality and professionalism for maintaining public confidence in the judiciary.