Title: Fulgencio, et al. vs. National Labor Relations Commission (First Division) and Raycor Aircontrol Systems, Inc.

Facts:

1. **Employment and Termination**: In 1992, Raycor Aircontrol Systems, Inc., which installed air conditioning systems, terminated several employees including the petitioners (Roberto Fulgencio et al.) who were hired in various capacities (tinsmiths, aircon mechanics, etc.). They received uniformly worded notices of termination.

2. **Initial Legal Proceedings**: The petitioners filed three separate illegal dismissal cases at the National Labor Relations Commission (NLRC), which were consolidated.

3. **Labor Arbiter's Decision**: On January 22, 1993, the Labor Arbiter dismissed the complaints, finding no merit.

4. **NLRC's Initial Ruling**: Petitioners appealed to the NLRC, which reversed the Labor Arbiter's dismissal and ordered reinstatement with full backwages.

5. **Supreme Court Involvement (First)**: Raycor filed a petition for certiorari before the Supreme Court, which resulted in the SC setting aside the NLRC's decision but still ordered the reinstatement and payment of backwages to the petitioners.

6. **Finality and Computation of Backwages**: The Supreme Court's decision became final and executory on November 18, 1996, and the NLRC calculated backwages totaling PHP 3,600,607.69 for the petitioners up to April 15, 1997. The Labor Arbiter approved this computation.

7. **Writ of Execution**: On January 28, 1998, a writ of execution was issued for reinstatement and collection of backwages, which resulted in garnishment of Raycor's funds from Intel Technology Philippines, Inc.

8. **Appeal by Raycor**: On February 13, 1998, Raycor appealed the Labor Arbiter's order resulting in NLRC ruling on June 16, 1998 that reduced the backwages computed only up to July 13, 1992, the date of the alleged offer of reinstatement that was refused by the petitioners.

9. **Motion and Petition for Certiorari**: Petitioners filed a motion for reconsideration, denied on May 11, 1999, followed by a petition for certiorari with the Court of Appeals (CA) on August 31, 1999, which was dismissed outright on September 10, 1999 for technical deficiencies.

10. **Current Petition**: The petitioners then filed a petition for review on certiorari before the Supreme Court, contesting the CA's strict adherence to procedural errors over substantive merits.

Issues:

1. **Technicality vs. Substantial Justice**: Whether the CA erred in dismissing the petitioners' petition for certiorari due to procedural deficiencies.
2. **Modification of Final and Executory Decision**: Whether the NLRC committed a grave abuse of discretion by modifying the final and executory decision of the Supreme Court regarding the computation of backwages up to actual reinstatement.

Court's Decision:
1. **Substantial Justice**: The Supreme Court decided to set aside the procedural lapses to prevent miscarriage of justice, emphasizing that rigid technicalities should not impede the service of substantial justice. The petitioners raised meritorious arguments.
2. **Modification of Decision**: The Court declared that the NLRC committed grave abuse of discretion in limiting backwages up to July 13, 1992. It affirmed the principle that final and executory decisions should not be altered, except to correct clerical errors.

Doctrine:
1. **Final and Executory Decisions**: Once a decision has become final and executory, it is immutable and can no longer be modified in any respect except to correct clerical errors.
2. **Judgments in Execution**: Writs of execution must conform strictly to the details of the judgment rendered.

Class Notes:
1. **Procedural Technicalities vs. Substantial Justice**: Courts may set aside procedural errors to serve the ends of justice.
– Rule 46, Section 3: Material dates must be stated in petitions.
– Rule 13, Section 11: Personal service is mandatory unless impracticable, requiring a written explanation.
2. **Doctrine of Immutability of Judgments**:
– Once a decision is final and executory, it cannot be amended, except for clerical corrections (Raycor Aircontrol Systems, Inc. v. NLRC, 261 SCRA 589).
3. **Backwages Calculation**: Backwages should cover from the time of illegal dismissal to actual reinstatement as per final court orders.

Historical Background:
This case represents the dynamic between labor rights and procedural adherence within the Filipino judicial system. During the early 1990s, labor disputes, especially concerning unjust terminations, were prevalent, urging the courts to balance strict procedural rules with equitable outcomes. This case highlights the judiciary's flexibility in ensuring justice without

compromising legal standards, reinforcing doctrines about the finality and enforcement of judgments in the context of labor disputes.