

****Title:****

Renato M. Maligaya v. Atty. Antonio G. Doronilla, Jr.

****Facts:****

Renato M. Maligaya, a retired colonel and a doctor, filed Civil Case No. Q-99-38778 for damages against several military officers in the Regional Trial Court (RTC) of Quezon City. Atty. Antonio G. Doronilla, Jr., serving as counsel for the defendants, stated during a hearing on February 19, 2002, that there was an agreement that if the case against Maligaya was withdrawn, Maligaya would also withdraw all his lawsuits. Judge Reynaldo B. Daway asked Doronilla to file a written pleading to substantiate his statement.

Weeks passed without Doronilla filing any pleading or evidence to support his claim. Consequently, Maligaya filed a complaint with the Integrated Bar of the Philippines (IBP) Commission on Bar Discipline on April 29, 2002, accusing Doronilla of misleading the court and obstructing justice. During the investigation, conducted by Commissioner Lydia A. Navarro, Doronilla admitted that no such agreement existed but stated he intended to settle the case amicably among colleagues. The IBP found Doronilla guilty of making false statements, violating Canon 10, Rule 10.01 of the Code of Professional Responsibility, and recommended his suspension from government military service for three months.

****Issues:****

1. Whether Atty. Doronilla's conduct in court constituted a violation of Canon 10, Rule 10.01 of the Code of Professional Responsibility.
2. Whether the recommended suspension from government military service by the IBP was appropriate.
3. What appropriate sanction should be imposed against Atty. Doronilla.

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

1. ****Violation of Canon 10, Rule 10.01****: The Supreme Court affirmed that Atty. Doronilla violated Canon 10, Rule 10.01 by falsely representing in court that an agreement existed for case withdrawal, which he later admitted was untrue. The Court emphasized that lawyers must maintain honesty and must not mislead the court.
2. ****Suspension from Government Military Service****: The Supreme Court disagreed with the IBP's recommendation to suspend Doronilla from government military service, noting that the administrative case was about his conduct as a lawyer and not his role as a military legal officer. Therefore, the Court could only impose penalties related to his practice of law.

3. **Appropriate Sanction**: Considering mitigating factors such as Doronilla's admission of the falsity of his statement during the investigation and lack of material damage to the complainant, along with it being his first offense, the Supreme Court imposed a suspension from the practice of law for two months instead of the three months recommended by the IBP. Doronilla was also warned against repeating similar misconduct in the future.

Doctrine:

The case reiterates that lawyers owe candor, fairness, and good faith to the court. Under Canon 10, Rule 10.01, lawyers should not do any falsehood, nor consent to the doing of any in court; nor shall they mislead, or allow the Court to be misled by any artifice. Violations can result in suspension or other disciplinary actions.

Class Notes:

- **Canon 10, Rule 10.01**: Lawyers must not engage in falsehood nor mislead the court.
- **Honesty to the Court**: A lawyer's duty involves absolute honesty in all representations made to the court.
- **Section 27, Rule 138, Rules of Court**: Deals with the suspension or disbarment of members of the bar for deceit or violation of the lawyer's oath.
- **Mitigating Factors in Legal Sanctions**: First offenses, admissions of misconduct, and absence of material damage can mitigate sanctions.

Historical Background:

This case is situated within the broader context of professional ethical standards for lawyers in the Philippines. It highlights the judiciary's emphasis on ensuring that legal practitioners uphold the principles of honesty and integrity. In a period characterized by a commitment to judicial reforms and upholding the rule of law, this decision fortifies the notion that legal ethics are paramount in the administration of justice.