

Title: Magaspi v. Ramolete (200 Phil. 583)

Facts:

1. The petitioners Mario Rodis Magaspi, Justino R. Magaspi, Baldomera M. Alejandro, and Manolita M. Cortes filed a complaint on September 16, 1970, in the Court of First Instance of Cebu to recover ownership and possession of a parcel of land, with additional claims for damages.
2. The initial complaint listed The Shell Co. of the Philippines, Ltd., The Shell Refining Co. (Phil.) Inc., Central Visayan Realty & Investment Co., Inc., and Cebu City Savings & Loan Association as defendants. They paid a docket fee of P60.00 and P10.00 for sheriff fees.
3. On September 18, 1970, defendants Central Visayan Realty & Investment Co., Inc. and Cebu City Savings & Loan Assn. filed a motion to compel the plaintiffs to pay correct docket fees, arguing that the total claims included additional demands for damages, moral damages, attorney's fees, and rentals that far exceeded the P60.00 fee paid.
4. The plaintiffs opposed this motion, maintaining that the P60.00 fee was appropriate based on the assessed value of the land.
5. On October 5, 1970, Judge Mateo Canonoy asked the Clerk of Court to comment. The Clerk opined that the correct fee should be based on the total claims, summing up to P3,164.00.
6. On October 14, 1970, Judge Canonoy ordered the plaintiffs to pay an additional fee of P3,104.00. Defendants filed a manifestation seeking further adjustments based on other damages claimed.
7. Plaintiffs filed an amended complaint on November 3, 1970, adding the Government of the Republic of the Philippines as a defendant and significantly reducing the monetary claims for damages.
8. Despite opposition from the defendants, the amended complaint was admitted on November 16, 1970.
9. Defendants continued to file motions to enforce payment of the additional docket fee ordered on October 14, 1970, even after the acceptance of the amended complaint.
10. On April 3, 1971, Judge Jose R. Ramolete ruled that the case was not properly docketed due to insufficient fee payment and suggested that until correct fees were paid, the proceedings could not proceed. The petitioners sought to contest this ruling.

Issues:

1. Whether the civil case was deemed filed and docketed upon the initial payment of P60.00, despite alleged insufficiency in the amount.
2. Whether the additional docket fee should be based on the original complaint or the

amended complaint.

Court's Decision:

1. **First Issue:** The Supreme Court held that the civil case was indeed docketed upon the initial payment of P60.00, even if it was insufficient, drawing distinctions between the case at bar and referenced cases.
2. **Second Issue:** The Court ruled that since the pleading was amended and the original pleading was deemed abandoned, the additional docket fee must be based on the amended complaint. The petitioners correctly argued for consideration of the amended complaint, and the trial court's proceedings were declared regular.

Doctrine:

1. The amount initially paid to docket a case, even if insufficient, allows the court to acquire jurisdiction, but further proceedings mandate correct fee adjustment to reflect claims.
2. When a pleading is amended, the original complaint ceases to function as a basis for assessment, and the assessment must rely on the amended document.

Class Notes:

1. **Jurisdiction and Fees:** Jurisdiction is deemed acquired upon the initial payment of docket fees, notwithstanding sufficiency. Adjustments must ensure all claims are duly covered.
- **Relevant Statute:** Section 5, Rule 141 of the Rules of Court - "Clerks of Court of First Instance" - regulates fees based on property values and claims.
  - **Application:** The correct interpretation indicates total claimed sums, including damages, must reflect in fees for proper case docketing and management.

Historical Background:

This case arose during a period of procedural reforms in the Philippine judiciary system aimed at better administration of justice, following procedural codes evolving post-Commonwealth and throughout subsequent revisions in the Rules of Court. The major shifts were aimed at refining procedural requirements for clarity, including fee structures directly impacting case docketing, ensuring comprehensive consideration of claims and court fees.