

****Title:****

Emiliano Manuel and Superlines Transportation Co., Inc., Petitioners, vs. Court of Appeals, et al.

****Facts:****

On December 27, 1977, an International Harvester Scout Car (Scout car) owned by Ernesto A. Ramos and driven by Fernando Abcede, Sr. was traveling from Manila to Camarines Norte. At about 4:10 PM, amidst a drizzle and while negotiating a zigzag road in Bo. Paraiso, Sta. Elena, Camarines Norte, the Scout car was hit on its left side by a bus owned by Superlines Transportation Co., Inc. and driven by Emiliano Manuel. The collision caused the Scout car to be thrown backwards against a protective railing, preventing it from falling into a ravine. All ten occupants, including four children, were injured, with seven sustaining serious injuries.

The case originated in the Municipal Court of Sta. Elena, Camarines Norte, where Manuel was prosecuted for multiple physical injuries through reckless imprudence. Shortly after the incident, Manuel reportedly ceased reporting for work and could not be located. Consequently, the injured parties filed a civil action for damages based on quasi-delict in the Court of First Instance (CFI) of Camarines Norte (Civil Case No. 3020).

The CFI ruled in favor of the plaintiffs, finding Manuel negligent and ordering him, Superlines Transportation Co., Inc., and their insurer, Perla Compania de Seguros, to jointly and severally pay Php 49,954.86 in damages. On appeal, the Court of Appeals affirmed the CFI's decision. Manuel and Superlines then elevated the case to the Supreme Court (CA-G.R. CV No. 11780) via an appeal by certiorari under Rule 45, contesting the lower courts' findings.

****Issues:****

1. ****Negligence and Liability** - Was the driver of the Scout car, Fernando Abcede, Sr., negligible as contended by the petitioners, thus absolving the bus driver, Emiliano Manuel, and the bus company of liability?
2. ****Evidence** - Were the pictures, sketches, and skid marks used as evidence by the respondents accurate and admissible?
3. ****Damages** - Were the damages awarded by the lower courts excessive and unsubstantiated?

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

1. **Negligence and Liability:**

The Supreme Court affirmed the findings of both the CFI and the Court of Appeals that Emiliano Manuel was negligent in operating the bus, which usurped a portion of the Scout car's lane and caused the collision. The physical evidence, including the trail of broken glass and the positioning of the vehicles, supported this conclusion. The defense's contentions regarding the inexperience and lack of a license of the Scout car's driver, Fernando Abcede, Jr., were dismissed due to a lack of substantial evidence proving he was driving at the time of the incident.

2. **Evidence:**

The Supreme Court upheld the admissibility and accuracy of the sketches and evidence presented by the respondents. It emphasized the strong presumption of regularity in the performance of official duty and the reliability of the police investigation. This presumption was not rebutted by the petitioners' claims regarding obliterated skid marks.

3. **Damages:**

Upon thorough review, the Court found the awarded damages reasonable and supported by evidence, such as medical expenses, impairment of earning capacity, and the Scout car's value. The Supreme Court reinforced its position that moral damages are recoverable if they are the proximate result of the defendant's wrongful acts, consistent with previous rulings.

Doctrine:

1. **Presumption of Regularity in Official Duty:**

The presumption that official duties are regularly performed serves as a cornerstone in evaluating the reliability of evidence provided by public officers unless contradicted by solid proof.

2. **Award of Damages in Quasi-Delict Cases:**

Damages such as actual, compensatory, moral, and attorney's fees may be awarded in quasi-delict cases when plaintiffs substantiate their claims with sufficient evidence and if damages are a proximate result of the defendant's wrongful conduct.

Class Notes:

- **Elements of Negligence:**

1. Duty of care owed by defendant to plaintiff.
2. Breach of that duty.
3. Causation linking the breach to the injury.

4. Actual damages sustained by the plaintiff.

- **Presumption of Regularity (Rule 131, Sec. 3[m], 1989 Rules on Evidence):**

Public officers' actions are presumed regular unless proven otherwise.

- **Quasi-Delict (Culpa Aquiliana) under Philippine Civil Code:**

- **Article 2176:** Liability for damages caused by fault or negligence not arising from a contractual obligation.

- **Article 2205:** Compensation for impairment of earning capacity due to injury.

- **Burden of Proof:**

- The plaintiffs must provide substantial evidence to support claims of negligence and damages.

Historical Background:

The case emerged during a time when the Philippine legal system increasingly emphasized the protection of road users and strict liabilities of transportation companies for accidents involving their vehicles. The case reflects judicial adherence to ensuring public safety and accountability in vehicular negligence, mirroring efforts in the 1970s and 80s to enforce more stringent vehicular regulations and compensation mandates for accident victims.