

Title: Notre Dame de Lourdes Hospital vs. Hon. Heilla S. Mallare-Phillips, et al., G.R. No. 274 Phil. 467 (1991)

Facts:

Notre Dame de Lourdes Hospital (NDLH), owned and operated by the Sisters of St. Paul de Chartres, represented by Sister Maria Linda Tanalgo, faced an injunction suit filed by private respondents—various members of its medical staff, resident physicians, medical interns, and patients. The suit was filed as Civil Case No. 90-CV-0541 in the Regional Trial Court (RTC) of Baguio and Benguet at La Trinidad, Benguet.

Petitioner, NDLH, moved to dismiss the complaint on grounds of lack of jurisdiction and improper venue. The RTC's Acting Presiding Judge, Heilla S. Mallare-Phillips, denied the motion to dismiss in her order dated January 11, 1991, leading NDLH to file a petition for certiorari before the Supreme Court questioning the RTC's jurisdiction and venue determination. NDLH contended that the RTC in La Trinidad, Benguet, lacked the authority to entertain the case and alleged that improper venue was chosen.

Issues:

1. Whether the RTC Branch VIII at La Trinidad, Benguet had jurisdiction to entertain the injunction suit.
2. Whether the venue was properly laid before the RTC at La Trinidad, Benguet.
3. Whether the issuance of a writ of injunction by the RTC in La Trinidad was enforceable in Baguio City.

Court's Decision:

The Supreme Court dismissed the petition for certiorari for lack of merit. The Court held:

Issue 1: Jurisdiction

The Court upheld that according to Section 18 of B.P. 129 and Supreme Court Administrative Orders, the RTC Branch VIII at La Trinidad, Benguet, had territorial jurisdiction over all municipalities in Benguet province, including the location of NDLH. Civil actions for injunction fall within the exclusive original jurisdiction of RTCs when the subject matter is incapable of pecuniary estimation.

Issue 2: Venue

The Court found that venue was proper under Sec. 2(b), Rule 4 of the Rules of Court as personal actions can be commenced where either the plaintiffs or defendants reside. Since two plaintiffs, Dr. Felipe Tabanda Jr. and Dr. Rosann Sta. Cruz, resided in La Trinidad,

venue in RTC La Trinidad was appropriate. The Court noted that jurisdiction and venue are determined by the allegations in the complaint, not the defense's pleadings.

### Issue 3: Enforceability of Injunction

The Supreme Court ruled that injunction writs issued by RTCs are enforceable within their respective regions as per Section 21 of B.P. 129. Therefore, a writ from the RTC in La Trinidad, Benguet, was enforceable in Baguio City, which is within the First Judicial Region.

#### Doctrine:

1. **Territorial Jurisdiction**: RTC branches have jurisdiction as defined by Supreme Court administrative orders and B.P. 129.
2. **Venue of Personal Actions**: Venue is proper in the locale where any of the plaintiffs or defendants reside or may be found.
3. **Enforceability of Writs**: Writs of injunction and other special writs issued by a Regional Trial Court are enforceable within the entire region it serves.

#### Class Notes:

- **Jurisdiction and Venue**: Emphasizes the importance of Sections 18 and 21 of B.P. 129 and Sec. 2, Rule 4 of the Rules of Court.
- **RTC's Powers**: RTCs have original jurisdiction over civil actions where subject matters are not pecuniary and can issue enforceable writs region-wide.
- **Pleading Allegations**: Jurisdiction and venue determinations are based on complaint allegations, not the defense's contentions.

#### Historical Background:

This case occurred in the context of judicial administration reforms under B.P. 129 that aimed to delineate trial court jurisdictions and improve accessibility for litigants. Administrative orders were mechanisms to execute these reforms and address overlaps or gaps in judicial coverage, specifically around increasing the efficiency of regional trial courts.