

****Title****: Cordero and Salazar vs. Cabatuando and Sta. Romana

****Facts****:

- ****Initial Filing****: On July 21, 1958, Manuel A. Cordero, a trial attorney from the Tenancy Counsel Unit of the Agricultural Tenancy Commission, Department of Justice, represented indigent tenant Vicente Salazar. They filed CAR Case No. 1379-NE-58 with the Court of Agrarian Relations (Second Regional District) against landlord Leonardo Sta. Romana for “reinstatement and reliquidation of past harvests.”

- ****Motion to Disqualify****: On September 16, 1958, Leonardo Sta. Romana filed a “Motion to Disqualify Counsel and To Set Hearing at Cabanatuan City,” requesting that Cordero be disqualified from acting as Salazar’s counsel.

- ****Disqualification Order****: On September 22, 1958, the respondent Judge issued an order disqualifying Cordero and any attorney from the Mediation Division of the Department of Justice from appearing as counsel for tenants in his court.

- ****Motion for Reconsideration****: An “Urgent Motion for Reconsideration” was filed on September 29, 1958, but denied on October 1, 1958.

- ****Petition to Supreme Court****: Following this, Cordero and Salazar filed a petition for certiorari and mandamus with the Supreme Court to nullify the lower court’s disqualification order and compel the judge to allow Mediation Division attorneys to represent indigent tenants.

- ****Legislative Amendment****: While the case was pending, Congress passed Republic Act No. 2263, which expressly allowed trial attorneys from the Tenancy Mediation Commission to represent indigent tenants.

- ****Mootness Argument****: Subsequent to this, Cordero filed a manifestation on August 11, 1959, declaring the issue moot given the new legislation, a position the respondent Judge contested.

****Issues****:

1. ****Constitutionality****: The primary issue was whether Sections 19 and 20 of Republic Act No. 2263, amending Sections 53 and 54 of Republic Act No. 1199, were constitutional. Specifically, whether these sections violated Section 21, paragraph 1, of Article VI of the Philippine Constitution.

Court's Decision:

1. **Single Subject Rule Compliance:** The Court held that Republic Act No. 2263 met the constitutional requirement that a bill should embrace only one subject expressed in its title. The challenged provisions were seen as germane and necessary for the general subject of agricultural tenancy.

2. **Legislative Intent:** The Court emphasized that the transfer of functions from the Department of Labor to the Department of Justice, as intended by Republic Act No. 2263, aligned with the legislative purpose.

- **Ruling on Constitutionality:** The Court declared Sections 19 and 20 of Republic Act No. 2263 valid and constitutional. The Court found that the various provisions were related and germane to the general subject of agricultural tenancy.

Doctrine:

- **Germane Subject Requirement:** The constitutional requirement that a bill must embrace only one subject, which must be expressed in its title, is satisfied if all parts of the law are related to and necessary for the legislative purpose.

- **Legislative Intent and Practical Construction:** The title of a law need not be an exhaustive index; it is sufficient if it reasonably includes the general object of the statute.

Class Notes:

1. **Single Subject Rule:** Article VI, Sec 21(1) of the Philippine Constitution requires that a bill embrace only one subject expressed in its title.

2. **Germane to Subject:** All parts must be germane and related to the title's subject.

3. **Construction of Statutory Titles:** Titles should not be narrowly construed; sufficient if comprehending the general object.

4. **Legislative Amendments:** Legislative amendments involving transfer of functions within government departments must be clearly articulated to ensure they do not violate constitutional provisions.

Historical Background:

- **Agricultural Tenancy Context:** In the post-war Philippines, agricultural tenancy was a critical issue, leading to the enactment of the Agricultural Tenancy Act (Republic Act No. 1199) to regulate tenancy relations and safeguard tenant rights.

- **Legislative Evolution:** The passage of Republic Act No. 2263 represents a legislative endeavor to consolidate functions within the justice system to improve the enforcement of tenancy laws, reflecting the evolving legislative landscape aimed at tenant protection.