

Title:

Teodoro C. Santiago, Jr., represented by Mrs. Angelita C. Santiago vs. Miss Juanita Bautista, et al.

Facts:

In mid-1965, Teodoro C. Santiago, Jr., a Grade VI pupil at Sero Elementary School in Cotabato City, was assigned third place honors by a “Committee On The Rating Of Students For Honor” at the school. This committee, chaired by the school principal and comprising Grade VI teachers, selected Socorro Medina as first honor and Patricia Liñgat as second honor.

Three days before the scheduled graduation on May 21, 1965, Santiago’s mother filed Civil Case No. 2012 in the Court of First Instance of Cotabato challenging the rankings. The complaints included:

1. Santiago, Jr. was a consistent honor student, while Liñgat had not been a close rival until Grade V.
2. Socorro Medina’s tutoring by her English teacher Mrs. Alpas during summer 1964 led to an unfair advantage.
3. The committee’s composition violated the Service Manual for Teachers, which required inclusion of Grade V and VI teachers.
4. Allegations of grade tampering in favor of Medina and Liñgat.
5. Disallowed district exams played a major role in the final ratings.
6. Mysterious changes to Santiago’s Grade I certificate suggesting bias.
7. Petitioner’s personal appeals to school authorities were ignored.

Petitioners sought invalidation of the honor ranking and an injunction to prevent the announcement at graduation. The court denied the injunction the day before graduation, reasoning that the disruption would be inappropriate. Graduation proceeded as planned. Then, three days later, respondents moved to dismiss the case, claiming it had become academic and improper for certiorari relief.

Procedural Posture:

The trial court dismissed the case, citing several grounds:

1. Improper filing because the alleged facts did not warrant certiorari.
2. Failure to exhaust administrative remedies.

3. Lack of substantial showing of grave abuse of discretion by the defendants.

Upon denial of their motion for reconsideration, the petitioners appealed.

Issues:

1. Whether the “Committee on the Rating of Students for Honor” exercised judicial or quasi-judicial functions amenable to certiorari proceedings under Rule 65.
2. Whether the procedural flaws, particularly the failure to attach pertinent documents, including an official judgment or order, to the petition warranted dismissal.
3. Whether judicial intervention was appropriate without exhausting administrative remedies.

Court’s Decision:

****Issue 1: Judicial or Quasi-Judicial Functions****

The Supreme Court upheld that the committee did not exercise judicial or quasi-judicial functions. Rule 65 applies to tribunals, boards, or officers with such functions, but the committee’s task was administrative and evaluative, not legal adjudication.

****Issue 2: Procedural Flaws****

The Court affirmed the lower court’s ruling that the failure to attach relevant documents (official judgment/order, grading sheets, Service Manual pages) to the petition was indeed a fatal flaw. This procedural non-compliance rendered the petition defective and indefinite.

****Issue 3: Administrative Remedies****

The Court noted that Santiago neglected formal administrative remedies. It emphasized the necessity of exhausting these remedies before seeking judicial intervention. While personal appeals were made, the specific and structured reliefs provided by administrative protocols within the Department of Education were not utilized.

Doctrine:

1. ****Judicial/Quasi-Judicial Functions****: Certiorari under Rule 65 requires that the contested authority exercises judicial or quasi-judicial functions, which involve determining rights and obligations legally.
2. ****Procedural Compliance in Certiorari****: Compliance with procedural requirements under Rule 65, including attaching relevant documents, is mandatory. Failure to do so can result in case dismissal.
3. ****Exhausting Administrative Remedies****: Where administrative remedies are available and adequate, judicial intervention is premature and typically unwarranted until those

remedies have been fully exploited.

Class Notes:

- **Judicial/Quasi-Judicial Functions** (Rule 65): Necessitates the exercise of legal adjudicative power.
- **Procedural Compliance** (Rule 65, Sec 1): Mandatory requirement to attach the judgment/order and relevant documents.
- **Exhaustion of Administrative Remedies**: Essential before seeking judicial intervention.

Relevant Statutes/Provisions:

- **Rule 65, Section 1** of the Rules of Court
- Requirement for certified true copies of judgments and other relevant documents.

Historical Background:

During the mid-1960s in the Philippines, educational evaluations and their fairness were heavily scrutinized, often reflecting broader societal concerns about equity and transparency in public institutions. This case epitomized these tensions, highlighting the emerging struggle for procedural correctness in administrative actions within public schools.

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This case underscores strict adherence to procedural rules in legal filings and the proper delineation of administrative versus judicial functions in educational settings.