

Title: Marlon Butial Agapito vs. Aeroplus Multi-Services, Inc. and Mitzi Therese P. De Guzman

Facts:

- Employment Background:** Marlon Butial Agapito began his employment with Aeroplus Multi-Services, Inc. in February 2004 as a housekeeper, earning a daily wage of P466.00, less P200.00 as a cash bond.
- December 30, 2014 Incident:** Agapito raised concerns about management's treatment during a company meeting, specifically questioning why he was required to explain tardiness when others were not. His supervisor, George Constantino, responded aggressively, leading to conflict.
- January 5, 2015 Complaint:** Agapito reported the incident to the personnel office. Consequently, Constantino issued a memorandum citing insubordination.
- February 13, 2015 Suspension:** Aeroplus suspended Agapito until March 3, 2015 after the memorandum was given.
- March 3, 2015 Dismissal:** Upon reporting back, Agapito was told by Darrel Mendoza, Aeroplus' OIC-Personnel, that management lost trust in him, resulting in immediate termination.
- NLRC Complaint:** Agapito filed a complaint with the National Labor Relations Commission (NLRC) for illegal dismissal, suspension, and money claims.
- Labor Arbiter Ruling (Feb 5, 2016):** Found Aeroplus liable for illegal dismissal, awarding Agapito monetary compensation and damages as listed in the decision, citing lack of due process in his termination and unjustified termination.
- NLRC Appeal (April 19, 2016):** On Aeroplus's appeal, the NLRC reversed the labor arbiter's decision, dismissing Agapito's complaint. The NLRC accepted and considered affidavits from Aeroplus denying wrongful termination, presented for the first time on appeal.
- Court of Appeals Petition:** Agapito sought certiorari, arguing the NLRC erred by accepting belated affidavits and claimed his dismissal without just cause. The Court of Appeals affirmed the NLRC's decision.

10. **Supreme Court Petition:** Agapito contested the decision of the Court of Appeals, reiterating lack of due process in his dismissal and the belated consideration of Aeroplus' evidence against him.

Issues:

1. Was Agapito's dismissal illegal, lacking just cause and due process?
2. Should belatedly filed affidavits by Aeroplus have been considered by the NLRC?
3. Is Agapito entitled to reinstatement or separation pay and additional monetary claims?

Court's Decision:

1. **Reversal of Lower Courts' Decisions:** The Supreme Court reversed the decisions of the Court of Appeals and NLRC.
2. **Evaluation of Dismissal:** The Court found Agapito was illegally dismissed based on credible evidence of his unlawful termination without due process, rejecting the belated affidavits due to lack of justification for their delayed submission.
3. **Monetary Claims:** Aeroplus was ordered to pay full backwages, separation pay, service incentive leave, 13th month pay, reimbursement for illegal cash bond deductions, moral and exemplary damages, and attorney's fees.
4. **Instructions for Computation:** Case remanded to the Labor Arbiter for computation of the monetary awards.

Doctrine:

1. **Liberty in Procedural Rules:** While labor proceedings allow liberality with procedural rules, this must still adhere to principles of justice, fair play, and due process. Belated submissions require justification.
2. **Illegally Dismissed Employee Rights:** Reinforces the rights of an illegally dismissed employee to remedies such as backwages and separation pay, inclusive of benefits or their monetary equivalent.

Class Notes:

- **Elements of Illegal Dismissal:** Must provide just cause and due process; failure triggers entitlements of full backwages and either reinstatement or separation pay.

- **Procedural Liberality in Labor Disputes:** Evidence can be admitted on appeal only with adequate explanation for delay and must genuinely add substance to the case.
- **Labor Code Provision (Art. 279):** Details employee entitlements upon unjust dismissal. Legal interest applies from decision finality until fully paid.

Historical Background:

The case occurs within a labor environment where due process and fair treatment at the workplace are paramount. Philippine labor law strongly protects employees' rights against unjust termination. This case illustrates the judiciary's role in upholding such protections against arbitrary employer actions.