

Title: Garcia v. Francisco – Disbarment for Forum Shopping and Abuse of Judicial Processes

Facts:

1. On March 9, 1964, Concordia B. Garcia, her husband Godofredo, the Dionisio spouses, and Felisa and Magdalena Baetiong leased land to Sotero Baluyot Lee for 25 years starting May 1, 1964.
2. Upon lease expiration, despite demands, Lee refused to vacate, claiming a right to extend the lease and a pre-emption right on the property.
3. In 1989, Lee’s lawyer, Atty. Crisanto L. Francisco, began a series of legal actions to prevent Garcia from reclaiming her property.

Procedural Posture:

1. March 29, 1989: Lee, via Francisco, filed a complaint for specific performance and damages (Civil Case No. Q-89-2118, RTC Quezon City); dismissed on August 10, 1989.
2. May 29, 1989: Garcia filed an unlawful detainer suit against Lee (Civil Case No. 1455, Met_TC Quezon City); Francisco’s defenses rejected on September 5, 1989.
3. October 24, 1989: Francisco filed certiorari against the Met_TC (Civil Case No. Q-89-3833), enjoined on November 13, 1989, but dismissed on January 9, 1990, unappealed by Lee.
4. April 6, 1990: Francisco petitioned CA (CA G.R. Sp No. 20476) against RTC dismissal, which was denied on May 31, 1989.
5. June 14, 1990: Met_TC ruled for Garcia; instead of appealing, Francisco filed another petition (Civil Case No. 90-5852) with the RTC.
6. Post-September 24, 1991: Multiple motions by Francisco to obstruct execution of the judgment were denied.
7. Subsequent petitions up to the Supreme Court were similarly denied, leading to the dismissal by August 4, 1992.

Issues:

1. Whether Francisco engaged in forum shopping and abused judicial processes in representing his client.
2. If Francisco’s actions warranted disciplinary sanctions under the lawyer’s Code of Professional Responsibility.

Court’s Decision:

1. The Court found Francisco guilty of forum shopping by filing multiple suits with the same issues, causing undue delay and burden on the court system.

2. The Court ruled that Francisco breached his professional duty by persisting in frivolous litigation, disdainful of ethical practice.

3. As a sanction, Francisco was suspended from law practice for one year, serving as both punishment and deterrence for similar misconduct by other lawyers.

Doctrine:

- A lawyer must avoid multiple litigation (forum shopping) designed to harass the other party and clog judicial dockets.
- Professional responsibility requires lawyers to maintain only just, lawful claims and defenses. Frivolous suits and delays are contrary to ethical practice.

Class Notes:

- Key Concepts: Professional Responsibility, Forum Shopping, Frivolous Litigation, Legal Ethics
- Statutory Foundations: Code of Professional Responsibility, Rule on Summary Procedure
- Application: Ensure all claims are substantively distinct; adhere to ethical practice, avoiding motions intended to delay judicial procedures.

Historical Background:

This case, judged in 1992, emphasized the Philippine Supreme Court's stand against unethical legal tactics. The legal climate at the time highlighted systemic congestions within the judiciary, and professional misconduct exacerbating such issues was ripe for redress, marking a period where judicial efficiency and integrity were under scrutiny.