

Title: Mr. & Mrs. Ronnie Dar, et al. vs. Hon. Rose Marie Alonzo-Legasto, et al.

Facts:

The case involves Mr. and Mrs. Ronnie Dar, Mr. and Mrs. Randy Angeles, Mr. and Mrs. Joy Constantino, and Mr. and Mrs. Liberty Cruz, who were collectively the petitioners. Private respondent Nenita Co Bautista filed an unlawful detainer case against them in the Metropolitan Trial Court of Quezon City. The petitioners were sued as married couples (“Mr. and Mrs.”) asserting their shared claim to reside in the contested property under the system of absolute community of property. In response, they filed a petition for review on certiorari and mandamus to the Court of Appeals. However, the Court of Appeals dismissed their petition because only Ronnie Dar, Randy Angeles, Joy Constantino, and Liberty Cruz, and not their respective spouses, signed the Certification of Non-Forum Shopping required under the rules.

The petitioners then moved to the Supreme Court arguing that since the rights involved were jointly owned due to their married status, the signing by one spouse should suffice. They cited unjustified circumstances for the dismissal and argued that substantial compliance with the certification requirement had been achieved.

Issues:

1. Whether the petition can be dismissed for failure to personally sign the Certification of Non-Forum Shopping by all petitioners, despite the nature of the case involving joint interests of married couples.
2. Whether substantial compliance with the certification rule can be met when only one spouse signs for both.

Court’s Decision:

The Supreme Court found merit in the petitioners’ argument and reversed the ruling of the Court of Appeals. The Court held that the given circumstances should lead to recognizing substantial compliance with the rule on the certification against forum shopping. Given that the couples were sued jointly over their shared property interests, the Supreme Court deemed that one spouse’s signature satisfactorily met the procedural requirement intended to prevent multiple lawsuits in different forums. It emphasized that technicalities should not thwart the ends of justice and ordered that the case be remanded to the Court of Appeals for proper disposition.

Doctrine:

The doctrine established is that substantial compliance with procedural rules such as the Certification of Non-Forum Shopping can be recognized when justified by circumstances surrounding joint interests of parties, such as married couples asserting shared property interests in litigation.

Class Notes:

- Certification Against Forum Shopping: A required procedural certification in most legal filings, meant to avoid multiple legal proceedings in different courts over the same issue.
- Substantial Compliance: Courts may interpret strict procedural requirements with reasonable leniency to favor substance over form, especially involving shared legal interests.
- Joint Interest of Spouses: In litigation concerning shared marital property, acts performed by one spouse may be sufficient for compliance with joint procedural obligations.

Historical Background:

The case falls within the broader historical context of ensuring efficient legal procedures in the Philippine judiciary. The rule on certification against forum shopping was crafted to avoid unnecessary multiplicities in lawsuits, a concern paramount in the 1990s. This decision reflects the Court's flexibility in avoiding overly rigorous application of rules to the detriment of substantial justice, especially considering socio-legal dynamics of marriage and property law in the Philippines.