

****Title: Ando vs. Campo: Property Execution Dispute in Labor Litigation****

****Facts:****

1. Premier Allied and Contracting Services, Inc. (PACSI), through its President, Paquito V. Ando, hired respondents as laborers to move sugar bags.
2. In June 1998, respondent laborers were dismissed; they filed claims of illegal dismissal against PACSI with the National Labor Relations Commission (NLRC).
3. The NLRC Regional Arbitration Branch No. VI delivered a decision on June 14, 2001, in favor of the respondents, awarding them P422,702.28 in separation pay and attorney's fees, against PACSI and Ando.
4. Ando and PACSI appealed but were denied by NLRC due to Ando's failure to pay the supersedeas bond. The decision of the Labor Arbiter was affirmed with slight modifications.
5. An execution order was issued, leading to a Notice of Sale on Execution of Personal Property covering property under TCT No. T-140167, belonging to Ando and his wife.
6. Ando sought prohibition and damages from the Regional Trial Court (RTC), claiming the property was conjugal and should not be levied for corporate liabilities.
7. RTC denied jurisdiction but ventured into merits, nonetheless dismissing Ando's prohibition action.
8. Without moving for RTC reconsideration, Ando appealed to the Court of Appeals (CA) via certiorari under Rule 65, arguing improper execution against personal property.
9. The CA upheld RTC's lack of jurisdiction and nullified other RTC orders, prompting Ando to seek Supreme Court redress.

****Issues:****

1. Whether regular courts hold jurisdiction over enforcement matters related to NLRC decisions.
2. Is the conjugal property of a corporate officer executable in satisfaction for a corporation's debt?

3. Can a third-party claim be pursued alternatively through NLRC proceedings or a separate court action regarding claimed property?

Court's Decision:

- **Jurisdiction Issue:** The Supreme Court affirmed that regular courts have no jurisdiction over enforcement of NLRC decisions. Jurisdiction resides with labor tribunals to prevent jurisdictional conflicts.

- **Third-Party Claims:** Petitioner's challenge was essentially a third-party claim, which should have been processed under NLRC's rules. Proper procedure demands this be resolved within labor tribunal auspices rather than through the RTC.

- **Conjugal Property:** The Court recognized TCT indicating property belonged to Ando and his wife. As only the corporation (not Ando personally) was responsible for liabilities, executing against conjugal property violated due process, as the wife was not part of the original suit.

Doctrine:

1. **Labor Jurisdiction Primacy:** Regular courts lack jurisdiction over enforcement or incidental matters arising from labor tribunals' decisions (NLRC jurisdiction encompasses enforcement proceedings).

2. **Binding Powers Over Property:** NLRC's jurisdiction on enforcement extends only to confirmed properties of judgment debtors.

3. **Third-Party Property Safeguard:** Enforcement against property not attributable to judgment obligor breaches ownership rights, maintaining procedural protection is crucial.

Class Notes:

- **Elements of Enforcement:** Under labor jurisdiction, execution entails exclusive processes controlled by NLRC.

- **Conjugal Property Protection:** Personal involvement doesn't extend corporate liabilities to conjugal assets unless corporate misconduct transforms individual into a judgment debtor.

- **Third-Party Claims Framework:** Procedure dictates addressing third-party claims

through labor procedures inherently; deviation only allowed per specific statutory mandates.

****Historical Background:****

The case typifies labor dispute impacts, particularly execution tensions when corporate judgment conflicts with personal property rights. Institutional reluctance to extend jurisdiction over labor controversies underlines the need for specialized expertise in labor and corporate law interactions, marking continued interpretation of statutory enforcement boundaries post-labor adjudication.