

Title:

Philippine Rabbit Bus Lines, Inc. v. Intermediate Appellate Court and Casiano Pascua, et al.

Facts:

On December 24, 1966, a jeepney driven by Tranquilino Manalo, owned by spouses Isidro Mangune and Guillerma Carreon, transported seven passengers from Mabalacat, Pampanga to Carmen, Rosales, Pangasinan. The jeepney's right rear wheel detached in San Manuel, Tarlac, causing it to make a U-turn and block the western lane of the road. At this moment, a bus from Philippine Rabbit Bus Lines, driven by Tomas de los Reyes, collided with the jeepney from behind, resulting in the deaths of Catalina Pascua, Erlinda Meriales, and Adelaida Estomo and causing injuries to other passengers.

The police investigation noted the collision occurred on the western lane of the highway, occupied by the jeepney. The right rear wheel's detachment and resulting position of the jeepney were pivotal facts, further exacerbated by testimonies and evidence showing the jeepney's erratic movements and lack of emergency protocols.

Procedural Posture:

1. **Criminal Proceedings:**

- Manalo faced a criminal complaint for multiple homicides and injuries. His case was escalated to the Court of First Instance, where he was convicted and sentenced.

2. **Civil Cases Filed:**

- Civil Case No. 1136: Filed by Caridad Pascua for personal injuries and the heirs of Catalina Pascua.

- Civil Case No. 1139: Filed by Erlinda Meriales' heirs.

- Civil Case No. 1140: Filed by Adelaida Estomo's heirs.

3. **Trial Court Decision:**

- Found Manalo negligent and held him, along with Mangune and Carreon, jointly and severally liable for damages.

- Filriters Guaranty Assurance Corp. also found liable in Civil Case No. 1136.

4. **Intermediate Appellate Court Decision:**

- Reversed the trial court's decision, instead holding Philippine Rabbit Bus Lines and its driver liable based on the doctrine of last clear chance and negligence.

5. **Supreme Court Review:**

- Filed as a petition for certiorari by Philippine Rabbit Bus Lines against the IAC decision, contending factual and legal misappreciations.

Issues:

1. Who is liable for the deaths and injuries resulting from the collision?
2. Application of the doctrine of last clear chance.
3. Presumption of negligence for rear-end collisions.
4. Relevance and application of extraordinary diligence required of common carriers.

Court's Decision:

Issue 1: Liability

- The Supreme Court found the negligence of jeepney driver Manalo and owners Mangune and Carreon to be the proximate cause of the incident. Evidence showed they failed in their duty to maintain the vehicle properly and to exercise extraordinary diligence.

Issue 2: Doctrine of Last Clear Chance

- The doctrine is applicable predominantly between colliding drivers' claims against each other, not where passengers claim against the carrier.

Issue 3: Presumption of Negligence in Rear-End Collisions

- The court rebutted the presumption that the rear driver (bus) is always negligent by clear evidence of the unforeseen and abrupt U-turn by the jeepney.

Issue 4: Extraordinary Diligence Requirement

- The defendants failed to demonstrate the requisite extraordinary diligence as mandated by New Civil Code provisions for carriers, resulting in their liability.

Doctrine:

1. Doctrine of **"Last Clear Chance"**—generally applied between colliding drivers, not against passenger claims.
2. **Presumption of Fault in Rear-End Collisions**—can be rebutted by evidence showing unforeseeable actions by the front vehicle.
3. **Extraordinary Diligence**—carriers must exercise utmost prudence to avoid liability (Art. 1733, 1755, 1756).
4. **Joint and Several Liability**—between carriers and insurers in cases of proven negligence (Art. 2181).

Class Notes:

- Key Legal Principles: **Extraordinary Diligence** (Art. 1733, 1755, 1756), **Last Clear Chance**, **Presumption of Rear-End Collision Fault**, **Joint and Several Liability** (Art. 1217, 2181).
- **Articles Cited**:
 - Art. 1733: Requires extraordinary diligence from common carriers.
 - Art. 1755 & 1756: Liability of carriers for passenger deaths/injuries unless extraordinary diligence is proven.
 - Art. 1174: Exemption due to fortuitous events.
 - Art. 1759: Liability for employee negligence.
 - Art. 1217: Settlement of obligations among solidary debtors.
 - Art. 2181: Recovery from dependents/employees for damages paid.

Historical Background:

The 1966 incident highlighted public transportation vulnerabilities and judicial interpretations of liability under the New Civil Code, emphasizing the high standard of care required from common carriers in the Philippines. This case illustrates the evolution of carrier liability and the operationalization of extraordinary diligence within the legal framework.

This case underscores the role of objective assessments in the apportionment of liability and the evidentiary standards necessary to rebut presumed negligence, shaping subsequent jurisprudence in transport-related personal injury litigations.