

Title: Josefina Benares vs. Jaime Pancho, et al.

Facts:

Employment History:

1. **Jaime Pancho:** Employed since November 15, 1964.
2. **Rodolfo Pancho, Jr.:** Employed since February 1, 1975.
3. **Joselito Medalla:** Employed since November 15, 1964.
4. **Paquito Magallanes:** Employed since March 10, 1973.
5. **Felomino Magallanes:** Employed since November 15, 1964.
6. **Alicia Magallanes:** Employed since January 15, 1964.
7. **Evelyn Magallanes:** Employed since January 1, 1974.
8. **Violeta Villacampa:** Employed since December 1, 1979.
9. **Maritess Pancho:** Employed since December 15, 1985.
10. **Rogelio Pancho:** Employed since December 1, 1979.
11. **Arnolfo Pancho:** Employed since February 1, 1975.

Action and Claims:

- **July 24, 1991:** Complainants requested Department of Labor and Employment (DOLE) intercession on wage and benefit issues.
- **September 24, 1991:** DOLE inspection carried out.
- **October 15, 1991:** Complainants alleged termination without benefits as retaliation for reporting to DOLE.
- **July 14, 1992:** Notification and summons for formal complaint.
- **July 28, 1992:** Formal complaint for illegal dismissal with monetary claims filed.
- **January 22, 1993 - May 16, 1994:** Exchange of position papers, replies, and rejoinders.

Decisions:

- **April 30, 1998:** Labor Arbiter dismissed the complaints for lack of merit.
- **June 26, 1998:** Appeal to the National Labor Relations Commission (NLRC).
- **NLRC Decision:** Reversed Labor Arbiter, ruled respondents were illegally dismissed, awarded separation pay, backwages, 13th month pay, COLA, ERA, salary differentials, and attorney's fees.
- **May 12, 1999:** Petitioner's motion for reconsideration denied.
- **Court of Appeals:** Affirmed NLRC decision with modification.
- **November 28, 2001:** Court of Appeals denied petitioner's motion for reconsideration.

Issues:

1. **Regularity of Employment:** Whether respondents are regular employees of Hacienda Maasin.
2. **Legality of Termination:** Whether respondents were illegally terminated.
3. **Monetary Awards:** Whether NLRC erroneously and zealously awarded COLA and ERA despite no specific prayers for such awards in the complaint.
4. **Evidence Evaluation:** Whether the payroll submitted by petitioner was given proper weight.
5. **Jurisdictional Matters:** Whether the Court of Appeals overstepped in affirming NLRC findings.

Court's Decision:

1. **Regularity of Employment:**

- **Issue:** Respondents should be recognized as regular seasonal workers as they have worked for the petitioner for a significant period intermittently or continuously.
- **Ruling:** Established that the respondents achieved the status of regular seasonal employees having worked for more than one year in petitioner's hacienda.

2. **Legality of Termination:**

- **Issue:** The termination of employment without just or authorized cause.
- **Ruling:** Petitioner failed to justify the termination. Respondents were thus illegally dismissed.

3. **Monetary Awards:**

- **Issue:** NLRC awarded COLA and ERA without these being explicitly prayed for.
- **Ruling:** Supported by *Osias Academy v. DOLE*; NLRC can grant statutory benefits not explicitly demanded in the complaint to support workers' welfare.

4. **Evidence Evaluation:**

- **Issue:** Whether payroll submission was appropriately evaluated.
- **Ruling:** Quantitatively ample without concrete reasons from petitioner on payroll rejection. Court deferred to quasi-judicial agencies' expertise.

5. **Jurisdictional Matters:**

- **Issue:** Appropriateness of Court of Appeals adhering to NLRC's factual findings.
- **Ruling:** Upheld factual basis protocols in quasi-judicial procedural norms.

Doctrine:

- **Principle:** Regular seasonal workers retain regular employment status even with

intermittent work periods, provided the work performed is necessary and desirable for the business.

- **Application:** Established continuity in employment relationship for tasks inherent and indispensable in sugar plantation operations.

Class Notes:

- **Article 280 of Labor Code:**

- **Regular Employees:** Engaged in activities necessary or desirable to the business.

- **Seasonal Employees:** Regular employment for specific seasons.

- **Casual Employment Rule:** Over one year of service, even intermittently, deems employment regular.

- **Burden of Proof in Termination:**

- **Employer's Obligation:** Prove just cause for termination.

Historical Background:

- **Philippine Labor Relations Law:** Established under the Labor Code ensuring worker's rights in seasonal and regular employment.

- **Jurisprudence Evolution:**

- Cases like **Mercado v. NLRC** and **Hacienda Fatima v. National Federation** shaped operational definitions for worker categories, entitlements, and protections under labor laws.

These principles reinforce labor protections, especially in industries such as agriculture where seasonal and intermittent work is prevalent.