

Title:

GCP-Manny Transport Services, Inc. vs. Hon. Abraham Y. Principe, et al.

Facts:

This case stems from a complaint for damages filed by Nelson Recolizado against GCP-Manny Transport Services, Inc. (petitioner) due to physical injuries sustained while he was a passenger on one of the petitioner's buses. The Regional Trial Court (RTC) of Tuguegarao, Cagayan, decided in favor of Recolizado on November 2, 1995, awarding him various types of damages. The decision mailed to the petitioner and its counsel, Atty. Arnold M. Aquino, was returned to sender. When Aquino refused to receive a personal delivery of the decision, alleging he was no longer the petitioner's counsel, the petitioner was left uninformed of the judgment. A motion for execution was filed by Recolizado and granted by the court on October 9, 1996, with the petitioner receiving the writ of execution on October 30, 1996. Subsequent legal maneuvers by the petitioner to appeal or quash the writ were denied, leading to the appeal to the Court of Appeals (CA), which dismissed the petition for lack of merit. The petitioner then elevated the case to the Supreme Court, citing issues of due process and proper notification.

Issues:

1. Whether the refusal of the petitioner's counsel to receive the court's decision constitutes negligence that binds the petitioner.
2. Whether the petitioner was denied due process due to improper notification of the trial court's decision.
3. Whether the subsequent writ of execution issued by the RTC was valid.

Court's Decision:

The Supreme Court dismissed the petition for lack of merit, upholding the actions of the RTC and the CA. The Court emphasized the principle that clients are bound by the acts of their counsel, including any negligence, unless such acts result in gross negligence causing serious injustice. In this case, the actions of the petitioner's counsel did not rise to the level of gross negligence that would warrant relief for the petitioner. Furthermore, the Court noted that while the refusal of the counsel to receive the decision did not invalidate the notification process, as prior attempts to serve the decision by mail were made in accordance with the procedural rules. Therefore, the issuance of the writ of execution by the RTC, based on the decision becoming final and executory, was deemed valid.

Doctrine:

The doctrine established in this case reinforces that clients are bound by the acts and omissions of their counsel in the conduct of their case, including instances of negligence unless such negligence is so gross as to deprive the client of due process. It also emphasizes that service upon counsel of record is deemed service to the client, and the client's awareness of the court's decisions and orders ultimately rests on maintaining proper communication with their counsel.

Class Notes:

- **Clients bound by counsel's actions:** Clients are responsible for the acts, omissions, and negligence of their counsel in legal proceedings, impacting the course and outcome of their cases.
- **Due process and right to appeal:** The right to appeal is not intrinsic to due process but is a statutory privilege. Parties must be given the opportunity to defend their interests in due course.
- **Notification of decisions:** Notification to a party's counsel of record is considered as notification to the party itself. Clients should ensure their counsel's contact information is up-to-date and must proactively inquire about their case status.
- **Withdrawal of counsel:** The formal withdrawal of counsel requires a motion to the court with the client's consent. Until formally recognized by the court, the original counsel is considered as counsel of record for all legal purposes.

Historical Background:

This case underscores the jurisprudential principles surrounding the role and responsibilities of legal counsel in representing their clients within the Philippine legal system. It highlights the procedural steps involved in notifying parties of court decisions and emphasizes the importance of the attorney-client relationship in the context of legal representation and communication. This case is a reinforcement of established doctrines regarding counsel's negligence, service of court decisions, and the procedural formalities in the withdrawal of counsel.