

****Title:**** Martin Diuquino vs. J. Antonio Araneta (74 Phil. 690)

****Facts:****

On April 6, 1940, Martin Diuquino, the plaintiff, was engaged in pouring water into the tank of an automobile belonging to his employer, Mr. Manuel Aguas, parked in front of Villa Carmelita in Baguio. During this time, Pedro Estrada, a chauffeur employed by the defendant J. Antonio Araneta, negligently drove Araneta's car and struck Diuquino. As a result, Diuquino sustained severe injuries, including a broken kneecap, and was hospitalized from April 6 to May 4, 1940. Before the accident, Diuquino earned a monthly salary of P35 but became permanently disabled and unable to perform his ordinary work due to the incident. Consequently, Diuquino filed a complaint seeking P10,000 in damages, claiming that Araneta failed to exercise due diligence in selecting and supervising his chauffeur, as mandated by Article 1903 of the Civil Code.

****Procedural Posture:****

The Court of First Instance of Manila dismissed the complaint, concluding that it did not state a valid cause of action against Araneta. Diuquino appealed the decision, leading to the present case before the Supreme Court of the Philippines.

****Issues:****

1. Whether J. Antonio Araneta can be held liable under Article 1903 for the negligent act of his chauffeur, Pedro Estrada.
2. Whether Araneta's alleged failure to exercise due diligence in the selection and supervision of his chauffeur establishes a cause of action under Article 1903.

****Court's Decision:****

The Supreme Court affirmed the dismissal of the complaint.

1. ****Liability Under Article 1903:****

The Court held that Article 1903 of the Civil Code imposes liability on certain persons for the negligent acts of those under their control or supervision, including parents for their minor children, guardians for their wards, and owners or directors of establishments for their employees. However, in the case of J. Antonio Araneta, he was not engaged in any business or establishment at the time of the incident. Therefore, negligence on the part of the chauffeur could not be imputed to Araneta under Article 1903.

2. ****Diligence in Selection and Supervision:****

The Court noted that Article 1902, which addresses individual negligence, requires a causal

link between the alleged negligence (failure to exercise due diligence) and the injury. Here, failing to exercise such diligence was not the proximate cause of the accident. The proximate cause was the chauffeur's negligent driving, hence the liability would be personal to the chauffeur rather than Araneta, the employer.

Doctrines:

The Court reiterated the interpretation of Article 1903 that limits the liability for another's negligent acts to specific relationships and contexts such as parent-child, guardian-ward, and owner-employee within an establishment or business. Liability cannot be extended to scenarios where the owner or employer is not operating within these contexts.

Class Notes:

- **Article 1902:** Addresses individual liability for negligence, requiring a direct causal connection between the negligent act and the injury.
- **Article 1903:** Specifies relationships and contexts wherein a person can be held liable for another's negligence. Excludes owners not engaged in an establishment or enterprise.
- **Key Principle:** Liability under Article 1903 requires the existence of a specified relationship or context, and the negligent act must occur within the scope of this relationship.

Historical Background:

This case was set in the context of pre-World War II Philippines, with the country still under the influence of the Spanish Civil Code, emphasizing the principles derived from Spanish legal traditions. The case addresses evolving issues of negligence liability as automotive accidents became more prevalent, highlighting the need for adapting legal doctrines to new societal conditions.