

Title: Matilde Alavado et al. vs. The City Government of Tacloban and Workmen's Compensation Commission

Facts:

Ricardo Alavado, employed as a carpenter-foreman by the City Engineer's Office in Tacloban City, earned a daily wage of P13.12. His last day of service was on April 19, 1974. He took leave from April 23, 1974, to May 23, 1974, and upon returning on August 6, 1974, was no longer under the supervision of the respondent city. While supervising a construction project in Tolosa, Leyte, he suffered a severe headache and died the following day of a cerebral hemorrhage (CVA).

Matilde Alavado, his surviving spouse, filed a claim for death benefits on behalf of herself and her minor children. The respondent city filed a notice of controversion on December 10, 1974. On March 31, 1975, the hearing officer of Regional Office No. 9, Tacloban City, awarded Matilde P5,200.00 in death benefits and P200.00 for burial expenses.

The respondent city appealed. On November 29, 1975, the Workmen's Compensation Commission dismissed Matilde's claim, citing a lack of proof of her marriage and the filiation of her children.

Matilde Alavado then petitioned the Supreme Court to review the Commission's decision.

Issues:

1. **Is a church-issued marriage certificate sufficient proof of marital status in the absence of contrary evidence?**
2. **Did the Workmen's Compensation Commission commit grave abuse of discretion in dismissing the death benefits claim?**

Court's Decision:

The Supreme Court reversed the Workmen's Compensation Commission's decision and reinstated the awards given by the Regional Office No. 9 in Tacloban City.

Resolution of Issues:

1. **Marital Status Proof:**

- **Legal Presumption:** The Court cited Section 5(bb) of Rule 131 of the Rules of Court, which presumes that a man and a woman deporting themselves as husband and wife have entered into a lawful marriage contract.

- **Evidence Favorability:** Courts favor this presumption and require cogent contrary evidence to overcome it. The Commission did not present any such evidence, making the presumption uncontested.
- **Competent Evidence:** The Court affirmed that the declaration of a spouse, public cohabitation, and subsequent documentation (including children's birth/baptismal certificates) are competent proof of marriage. Thus, Matilde's marriage to Ricardo was sufficiently proven through multiple pieces of evidence, including the subsequent presentation of an authenticated marriage certificate from the Local Civil Registrar.

2. **Grave Abuse of Discretion:**

- **Failure to Controvert Timely:** The respondent city's failure to timely controvert the benefits' claim resulted in a waiver of their right to challenge compensability.
- **Liberality in Social Legislation:** As the Workmen's Compensation Act is a social legislation benefiting laborers, its provisions should be liberally interpreted in their favor. The Commission's dismissal, considering such a liberal mandate, was seen as a grave abuse of discretion.

Doctrine:

The doctrine reaffirmed involves the liberal interpretation of social legislation, particularly the Workmen's Compensation Act, in favor of laborers. Courts uphold a presumption of marriage based on public cohabitation and require substantial contrary evidence to rebut such presumption.

Key legal principle: **Semper praesumitur pro matrimonio (Always presume marriage).**

Substantial compliance with procedural evidentiary requirements (e.g., presenting alternative forms of marital proof like a church-issued certificate) should protect claims under social legislations designed to benefit employees and their dependents.

Class Notes:

- **Disputable Presumptions (Rule 131, Sec. 5, Rules of Court):** Legal presumption of marriage based on public department as a married couple.
- **Competent Evidence (Adong vs. Cheong Seng Gee):** Reliability of public cohabitation, declarations, and subsequent documents in proving marriage.
- **Workmen's Compensation Act (Act No. 3428):** Emphasis on social legislation favoring employees, deadline for controverting claims to establish compensability.
- **Liberal Interpretation of Labor Laws:** Courts should protect the intended beneficiaries

of labor laws by interpreting these laws in their favor, especially in the case of financial support for their families.

Historical Background:

Contextualized within a period when the labor sector was striving for better protection under social welfare laws, the case underscores the judiciary's role in safeguarding labor rights. At this juncture in the Philippines, social justice programs continued to evolve, with increased attempts to provide comprehensive benefits to workers and their dependents. This case highlights the judiciary's mandate to reinforce these protections through liberal statutory interpretation.