

Title:

Ramos v. C.O.L. Realty Corporation [G.R. No. 181021, March 2, 2010]

Facts:

On the morning of March 8, 2004, around 10:40 AM, a vehicular accident occurred at the corner of Katipunan Avenue and Rajah Matanda Street, Quezon City. The collision was between a Toyota Altis Sedan owned by C.O.L. Realty Corporation, driven by Aquilino Larin, and a Ford Expedition owned by Lambert S. Ramos, driven by his driver, Rodel Ilustrisimo. Estela Maliwat, a passenger in the Toyota sedan, sustained injuries and required hospitalization. C.O.L. Realty asserted that their vehicle was slowly crossing Katipunan Avenue when the Ford Expedition, driven by Ilustrisimo, rammed into its side, causing significant damage and injury.

Upon investigation by the City Prosecutor of Quezon City, probable cause was found to indict Ilustrisimo for Reckless Imprudence Resulting in Damage to Property. Efforts by C.O.L. Realty to obtain reimbursement for the damages and medical expenses from Ramos were unsuccessful, leading to the filing of a Complaint for Damages based on quasi-delict in the Metropolitan Trial Court of Metro Manila (MeTC), Quezon City.

At the MeTC, Ramos denied liability, attributing the accident to the negligence of Larin, the driver of C.O.L. Realty, for crossing the intersection despite existing prohibitions. Ramos asserted he had exercised due diligence in the selection and supervision of Rodel. The MeTC sided with Ramos, dismissing the complaint for lack of merit.

C.O.L. Realty appealed to the Regional Trial Court (RTC) of Quezon City, which affirmed the MeTC's decision. Upset by the consistent dismissals, C.O.L. Realty took the case to the Court of Appeals (CA). The CA modified the RTC's decision, finding both drivers negligent—Aquilino for disregarding traffic prohibitions and Rodel for excessive speed in a busy area under construction. Ramos was held solidarily liable with his driver for damages amounting to P51,994.80. Ramos' subsequent motion for reconsideration was denied by the CA, prompting him to elevate the matter to the Supreme Court.

Issues:

1. Whether Aquilino Larin's violation of the Metropolitan Manila Development Authority (MMDA) prohibition was the proximate cause of the accident.
2. Whether Lambert Ramos can be held solidarily liable with his driver Rodel Ilustrisimo for the damages caused by the accident.

3. The role of contributory negligence of Rodel Ilustrisimo in the accident.

Court's Decision:

The Supreme Court resolved to grant the petition, reversing and setting aside the CA's decision. The Court reinstated the RTC's decision dismissing C.O.L. Realty's complaint for damages. Here is a detailed resolution of each issue:

1. **Proximate Cause by Aquilino Larin:**

- The Court emphasized Aquilino Larin's violation of a known MMDA prohibition against crossing Katipunan Avenue from Rajah Matanda Street. This infraction was deemed the proximate cause of the accident. The Court relied on Article 2185 of the Civil Code, which presumes negligence when a traffic regulation is violated at the time of an accident.

2. **Solidary Liability of Lambert Ramos:**

- Ramos argued that Aquilino's violation was the sole proximate cause, negating any claim for damages against him. The SC agreed, noting that Aquilino's willful disregard of traffic rules directly caused the accident. The Court found no basis for imposing solidary liability on Ramos as the negligence of his driver was secondary and contributory, not the primary cause.

3. **Contributory Negligence of Rodel Ilustrisimo:**

- Although the CA found Ilustrisimo guilty of contributory negligence for driving at high speed, the Supreme Court deemed it irrelevant for determining Ramos' liability, given Aquilino's more significant fault. The Court iterated that contributory negligence would have affected only the extent of damages, not the fundamental liability stemming from the proximate cause.

Doctrine:

Proximate Cause and Traffic Regulation Violations:

- The ruling underscores the principle that when a person operates a vehicle in violation of traffic regulations, the presumption of negligence applies (Article 2185, Civil Code). If such violation is the proximate cause of a subsequent accident, recovery of damages by the violator is precluded (Article 2179, Civil Code).

Class Notes:

Key Elements:

- **Quasi-Delict:** Requires fault or negligence, damages, and a causal link between them.
- **Proximate Cause:** The direct cause producing the injury without which the event would

not have occurred.

- **Contributory Negligence:** Negligence by the injured party that, while not the proximate cause, contributes to the injury.

Relevant Statutes:

- **Article 2179, Civil Code:** If the plaintiff's negligence is the proximate cause, no damages are recoverable; if contributory, damages may be mitigated.

- **Article 2185, Civil Code:** Presumption of negligence when a person drives in violation of traffic regulations.

Historical Background:

- The decision reflects stringent adherence to traffic regulations in the Philippines, heightened by growing urban congestion and road safety concerns. This case also illustrates the evolving jurisprudence on employer liability and due diligence concerning their employees in the context of vehicular accidents.