

Title: Sabina Exconde v. Delfin Capuno and Dante Capuno

Facts:

1. **Incident**:

- On March 31, 1949, Dante Capuno, then 15 years old, was involved in a parade in San Pablo City honoring Dr. Jose Rizal.
- Dante, a member of the Boy Scouts and student at Balintawak Elementary School, was instructed to attend the parade by the city school's supervisor.
- Dante improperly took control of a jeep's wheel while the jeep driver sat beside him.
- The jeep turned turtle, resulting in the deaths of Isidoro Caperina, Sabina Exconde's son, and Amado Ticzon.

2. **Criminal Case**:

- Dante was charged with double homicide through reckless imprudence in the Court of First Instance of Laguna (Criminal Case No. 15001).
- Sabina Exconde reserved her right to file a separate civil action for damages.
- Dante was found guilty; the decision was affirmed on appeal by the Court of Appeals.

3. **Civil Case Initiation**:

- Sabina Exconde filed a separate civil action against Dante and his father Delfin Capuno, seeking damages amounting to PHP 2,959.00.
- Delfin Capuno defended that Dante was not under his supervision and control at the time of the accident, implying that liability should not rest on him.

4. **Trial Court Decision**:

- The Court convicted only Dante Capuno to pay the damages claimed, absolving Delfin Capuno of any civil liability.

5. **Appeal**:

- Sabina Exconde appealed, contending that Delfin should also be held jointly and severally liable with Dante as per Article 1903 of the Spanish Civil Code.

Issues:

1. **Primary Issue**:

- Whether Delfin Capuno can be held civilly liable, jointly and severally with his son Dante, for damages resulting from the death of Isidoro Caperina.

Court's Decision:

1. **Application of Article 1903**:

- The Supreme Court primarily considered Article 1903 of the Spanish Civil Code, which holds parents liable for damages caused by their minor children who live with them.

2. **Parental Liability Under Article 1903**:

- Despite teachers being liable under the same article when students are under their custody, this applies specifically to institutions of arts and trades, not to regular academic institutions.

- Since Dante Capuno was not in an institution of arts and trades but in an academic setting, this provision supporting teachers' liability is inapplicable.

3. **Parental Responsibility**:

- Parents, exercising parental authority, have duties imposed upon them to support, correct, and supervise their minor children. Therefore, they can be held liable for damages caused by their minors.

- Delfin Capuno did not provide sufficient proof that he was absolved from liability under Article 155 of the Spanish Civil Code, which may discharge parental liability if there is no negligence on their part.

4. **Final Verdict**:

- The Supreme Court modified the decision, holding both Delfin and Dante Capuno jointly and severally liable for the damages amounting to PHP 2,959.00.

Doctrine:

1. **Spanish Civil Code**:

- Article 1903: Imposes liability on parents for the damages caused by minor children who live with them, creating a presumption of negligence (*culpa in vigilando*).

- Articles 154 and 155: Outline parental authority and responsibility, reinforcing the duty of supervision and instruction.

Class Notes:

- **Key Elements**:

- **Parental Liability**: Under Article 1903 of the Spanish Civil Code, parents are generally liable for torts committed by their minor children living with them.

- **Culpa in Vigilando**: Presumption of negligence in supervision when damage is caused by minors under their care.
- **Teacher Liability Limitations**: Liability of teachers is restricted to institutions of arts and trades, not encompassing general academic settings.
- **Statutory Citations**:
 - **Article 1903, Spanish Civil Code**: “The obligation imposed by the next preceding articles is enforceable not only for personal acts and omissions, but also for those of persons for whom another is responsible.”
 - **Articles 154 and 155, Spanish Civil Code**: Obligations of parental authority encompass duty of support, company, education, instruction, and moderate punishment.

Historical Background:

- **Legal Framework**:
 - This case was adjudicated under the Spanish Civil Code, which applies specific liabilities to parents for minors’ actions, reflecting older legal understandings of parental and educational authority.
- **Post-War Context**:
 - The decision was made a few years post-World War II, a period when the Philippine legal system was transitioning from its colonial legal influences while maintaining certain civil code provisions from the Spanish era.