

Title:

Layugan vs. Intermediate Appellate Court, G.R. No. L-71960, April 18, 1989

Facts:

Pedro T. Layugan filed an action for damages against Godofredo Isidro after an incident on May 15, 1979. Layugan was repairing a tire on his cargo truck when Isidro's truck, driven recklessly by Daniel Serrano, bumped into him, causing severe injuries that resulted in Layugan's hospitalization and eventual amputation of his left leg. Layugan sought TEN THOUSAND PESOS (P10,000.00) for medical expenses and SEVENTY THOUSAND PESOS (P70,000.00) for lost income.

Initially, Godofredo Isidro was declared in default, but this was set aside to allow him to file an answer and a third-party complaint against his insurer, Travellers Multi-Indemnity Corporation. Isidro admitted ownership of the truck but counter-claimed that the proximate cause was the improperly parked truck without early warning devices.

Isidro filed a third-party complaint against his insurer, claiming coverage under Insurance Policy No. 11723. The insurer argued that their liability was limited, the claim was premature, and the accident was due to Layugan's negligence.

The trial court ruled in favor of Layugan, awarding him actual, compensatory, and moral damages, while ordering the insurer to indemnify Isidro. The Intermediate Appellate Court reversed this decision and dismissed the complaints and counterclaims. Layugan then brought the case to the Supreme Court.

Issues:

1. Whether the Intermediate Appellate Court erred in reversing the trial court's decision.
2. Whether the doctrine of "res ipsa loquitur" was correctly applied.
3. Who was negligent in causing the accident.

Court's Decision:

1. ****Reversal by Intermediate Appellate Court:****
 - The Supreme Court found that the Intermediate Appellate Court's decision was based on speculation and conjecture, particularly regarding the parked truck's location and the absence of a warning device. The trial court's findings, including the installation of a lighted kerosene lamp as a warning device, were supported by evidence.
 - The Supreme Court chastised the Intermediate Appellate Court for overlooking specific trial court findings and dismissing them without proper justification.

2. **Doctrine of Res Ipsa Loquitur:**

- The Supreme Court clarified that the presumption of negligence under “res ipsa loquitur” was misapplied by the Intermediate Appellate Court. Serrano’s admission that his truck’s failed brakes caused the accident, combined with Layugan using an adequate warning device, shifted negligence to Serrano and, by extension, Isidro.
- Res ipsa loquitur is intended for circumstances where direct evidence of negligence is unavailable, not applicable when specific acts of negligence are clear and evident.

3. **Negligence Determination:**

- The Supreme Court ruled that Daniel Serrano’s failure to control the vehicle, exacerbated by ignored maintenance issues, asserted his negligence.
- This negligence extended to Isidro under Art. 2176 in relation to Art. 2180 of the Civil Code, as Isidro failed to prove due diligence in the supervision and maintenance of his vehicle.

Doctrine:

- **Plaintiff Safety Measures:** Proper installation of warning devices mitigates negligence claims, and drivers must ensure the roadworthiness of their vehicles.
- **Role of Evidence in Res Ipsa Loquitur:** This doctrine can only be invoked when direct evidence is absent; otherwise, specific proof of negligence must be submitted.
- **Employer Liability Under Article 2180:** The presumption of an employer’s negligence in supervising employees is juris tantum and rebuttable with evidence of due diligence, which was found lacking in this case.

Class Notes:

- **Res Ipsa Loquitur:** A doctrine implying negligence from the mere occurrence of certain types of accidents.
- **Negligence:** Measured by the reasonable care a prudent person would use under similar circumstances.
- **Employer Liability (Article 2180):** Employers are presumed negligent in supervision; rebuttable with evidence of due diligence.
- **Burden of Proof in Civil Cases:** Shifts depending on the presented evidence and adherence to procedural rules.

Historical Background:

This case is situated within a broader historical context of evolving jurisprudence on employer liability and the application of negligence doctrines in the Philippines. The

decision underscores the importance of evidentiary support and due process in appellate review, reinforcing the precedent established in *Picart vs. Smith* on the reasonable standard of care, and aligns with global interpretations of “*res ipsa loquitur*” in negligence law. It reflects judicial checks on appellate courts, ensuring they adhere strictly to principles of sound legal reasoning and evidence assessment.