

Title:

Tomas U. Soliven and Eulogia Malijan vs. Workmen's Compensation Commission and the Republic of the Philippines (Bureau of Public Schools)

Facts:

These consolidated cases involve the annulment of the Workmen's Compensation Commission's decisions which reversed disability compensation awards that had become final and executory due to the respondent's failure to appeal within the prescribed periods. The detailed factual chronology leading to the Supreme Court's involvement is as follows:

- **Case of Tomas U. Soliven (L-44763)**

- Soliven, who served as a teacher from 1931 until 1966, was granted disability benefits by a referee for ailments contracted during his employment.
- The decision, made on September 25, 1975, granted him P6,000 in disability benefits, plus legal and administrative fees.
- The decision was received by the respondents through the Solicitor General on December 19, 1975. However, they failed to appeal within the 15-day reglementary period, citing work pressure.
- A belated petition for relief from judgment was filed on February 3, 1976, beyond the 30-day grace period allowed by Commission Rules. Despite this, the Workmen's Compensation Commission entertained the petition and reversed the referee's decision.

- **Case of Eulogia Malijan (L-45381)**

- Malijan was awarded disability benefits by a referee for service-connected ailments incurred during her teaching career.
- The decision, dated September 10, 1975, provided her with P2,095.74 in benefits, along with legal and administrative fees.
- Respondent received the decision on September 11, 1975, and similarly failed to appeal within the required period, again citing work pressure.
- The petition for relief from judgment was not filed until December 29, 1975, well past the 30-day grace period. The Commission nonetheless reversed the referee's decision.

The procedural journey of these cases to the Supreme Court involved the filing of petitions invoking the Court's certiorari jurisdiction, challenging the Workmen's Compensation Commission's authority to set aside final and executory decisions.

Issues:

1. Whether the Workmen's Compensation Commission had jurisdiction and authority to set aside its own final and executory decisions upon petitions for relief from judgment filed beyond the reglementary periods established by Commission Rules.
2. Whether the decisions of respondent commission reversing the referees' decisions should be considered null and void.

Court's Decision:

The Supreme Court ruled in favor of Tomas U. Soliven and Eulogia Malijan, reinstating the referees' awards for disability compensation and benefits in both cases. The Court firmly nullified the Workmen's Compensation Commission's decisions due to a lack of jurisdiction, emphasizing that:

- The commission improperly entertained petitions for relief from judgment that were filed beyond the permissible grace periods.
- The basic principle of finality of judgments applies to all entities equally, and the lapse of the appeal period renders a decision final and executory, stripping the appellate body of jurisdiction.
- The grace period for seeking relief from judgment is "absolutely fixed, inextendible, never interrupted," and failure to observe this timeframe is fatal.

Doctrine:

The Supreme Court reiterated the doctrine that ****the finality of judgments is a fundamental principle that applies to all entities, public or private, and that appellate jurisdiction is lost once the period for appeal has lapsed without an appeal being perfected or a petition for relief being timely filed.****

Class Notes:

- ****Finality of Judgments****: A basic legal principle that mandates judgments become final after a certain period, preventing further appeal or review, thereby upholding the stability and integrity of the judicial system.
- ****Jurisdiction****: Refers to the legal authority of a court or commission to hear and decide a case. Once a decision becomes final and executory, the original appellate body loses jurisdiction over the matter.
- ****Petition for Relief from Judgment****: A legal remedy that allows a party to seek reversal or modification of a judgment that has become final due to extraordinary circumstances, subject to strict timing requirements.
- ****Doctrine of Loss of Appellate Jurisdiction Due to Lapse of Appeal Period****: Failure to

perfect an appeal within the statutory or reglementary period renders the decision final and executory, depriving the appellate court or body of jurisdiction.

Historical Background:

These cases underscore the Philippine judiciary's commitment to the principles of finality and regularity in legal proceedings, particularly in matters involving workers' compensation. The decisions mark a reaffirmation of jurisdictional boundaries and the timely administration of justice, reinforcing the legal maxim that deadlines for appeals and petitions for relief are to be strictly observed to maintain the efficiency and predictability of the legal system.