

****Title:** ABC Davao Auto Supply, Inc. vs. Court of Appeals & Abundio T. Merced******

****Facts:****

This case began with a complaint lodged by ABC Davao Auto Supply, Inc. (petitioner) against Abundio T. Merced (respondent) for a sum of money, attorney's fees, and damages filed on October 6, 1980, in the Court of First Instance (now Regional Trial Court or RTC) of Davao City, Branch XVI. The root of the complaint was the respondent's refusal to pay an outstanding balance of P99,217.15 for vehicular parts purchased on credit from the petitioner.

The pre-trial and trial phases saw the involvement of multiple judges due to various reasons, including judicial reorganization under the Aquino administration, with Judge Roque Agton eventually rendering a decision in favor of the petitioner on June 9, 1987. However, by the time the decision was issued, Judge Agton had been transferred to another branch within the same Judicial Region, and Judge Romeo Marasigan was the presiding judge at Branch XVI.

Upon the respondent's appeal, the Court of Appeals nullified Judge Agton's decision on the grounds that he was neither the de jure nor de facto judge of RTC Branch XVI at the time he rendered the judgment and remanded the case to the lower court. This ruling prompted the petitioner to seek relief from the Supreme Court on the issue of the validity of Judge Agton's decision.

****Issues:****

1. Whether Judge Agton had the authority to render a decision in a case assigned to a branch he was no longer presiding over.
2. Whether the principles of judicial regularity and continuity could validate Judge Agton's decision.

****Court's Decision:****

The Supreme Court set aside the decision of the Court of Appeals and reinstated Judge Agton's decision, establishing that:

- A case is deemed submitted for decision upon the filing of the last pleading, brief, or memorandum required by the court. The record indicated that the case was submitted for decision to Judge Marasigan, not Judge Agton.
- Judge Agton's decision, while seemingly improper due to his transfer, was later validated through Judge Marasigan's actions on a subsequent motion for reconsideration, indicating

an endorsement of Judge Agton's decision.

- Jurisdiction lies with the court and not with any particular judge. Thus, the transfer of Judge Agton did not deprive him of jurisdiction over the case, as judicial branches are considered part of a unified tribunal system.
- The Court referenced its En Banc resolution implementing B.P. 129 which requires that decisions must be signed and promulgated during the incumbency of the signing judge. This was interpreted to allow a judge, who has been transferred within the same court system, to render decisions in cases previously heard by them.

****Doctrine:****

The ruling reinforced the doctrine that jurisdiction is attached to the court rather than to any specific judge, promoting the continuity and efficiency of judicial proceedings regardless of changes in the judiciary. Additionally, it upheld the principle that a decision can be validly rendered and promulgated by a judge who, while no longer presiding over the specific branch to which a case was originally assigned, remains an incumbent within the same judicial system.

****Class Notes:****

- ****Jurisdiction Concept:**** Jurisdiction is vested in the court, not in the individual judge. Transfers of judges within the same judicial system do not affect the continuity of jurisdiction over cases.
- ****Judicial Continuity and Efficiency:**** Changes in the presiding judge, whether due to retirement, transfer, or other reasons, do not disrupt the court's authority over pending cases.
- ****Endorsement of Decisions:**** Actions taken by succeeding judges on motions for reconsideration can reflect an endorsement of decisions rendered by their predecessors, potentially validating decisions that might otherwise seem procedurally improper.
- ****Relevant Legal Provision:**** Batas Pambansa Blg. 129 (Judiciary Reorganization Act of 1980) and related Supreme Court resolutions regarding the promulgation of decisions.

****Historical Background:****

This case took place during a time of considerable change in the Philippine judicial system, reflecting the broader context of political and administrative reforms following the 1986 EDSA People Power Revolution. The judicial reorganization under the Aquino administration involved the reshuffling and reappointment of judges, which made the issues raised in this case particularly relevant to the evolving structure of the judiciary at the time.