

****Title: Cadayona vs. Court of Appeals and Provincial Governor of Leyte****

****Facts:****

1. ****Suspension and CSC Decision (Before 1997):**** Ricardo C. Cadayona, petitioner, received a preventive suspension order from the Provincial Governor of Leyte due to unspecified administrative issues. Cadayona challenged this suspension before the Civil Service Commission (CSC), which ultimately affirmed the suspension in Resolutions Nos. 96-7418 and 96-2569.
2. ****Petition for Review at the Court of Appeals (January 13, 1997):**** Dissatisfied with the CSC's decision, Cadayona filed a Petition for Review with the Court of Appeals (CA), intending to have the CSC resolutions annulled. In his filing, his counsel, not Cadayona himself, executed the certificate of non-forum shopping. Additionally, three significant annexes in his filing (Annexes D, E, and F) were not certified true copies, just plain xerox copies.
3. ****Summary Dismissal by the Court of Appeals (February 19, 1997):**** The CA dismissed Cadayona's petition outright due to procedural deficiencies: the certificate of non-forum shopping was not personally signed by the petitioner, and critical documents were not provided as certified true copies.
4. ****Motion for Reconsideration (March 31, 1997):**** Cadayona filed a motion for reconsideration/review, arguing substantial compliance with rules because certified versions of only necessary documents were required, and the doctrine of last antecedent was applied erroneously by the CA. The CA dismissed this motion, saying Cadayona's error was fatal and justifying the dismissal of his case based on procedural technicalities.
5. ****Petition to the Supreme Court:**** Unsatisfied with the CA's disposition, Cadayona elevated the matter to the Supreme Court, challenging the CA's perceived stringent procedural applications.

****Issues:****

1. Whether the rule requiring certified true copies of annexes in petition filings was properly interpreted.
2. Whether the CA committed an error in dismissing the petition based on procedural grounds, particularly on technicality versus substantive justice.

3. Procedural fairness: Consideration of whether the CA should have requested Cadayona to correct his filings instead of outright dismissal.

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

1. ****Interpretation of Certification Requirement:**** The Supreme Court found Cadayona's reading of Administrative Circular 1-95 as meritorious. The "certified true copies" requirement should not strictly apply to all annexes or supporting documents, only to judgments, final orders, or specific records necessary for the core petition.

2. ****Error in Dismissing Petition:**** The Court acknowledged the CA's mistake in dismissing the petition for non-certification of annexes D, E, and F, stressing a more flexible application of procedural rules. Substantive compliance and the focus on substantial justice over procedural technicalities were to be given precedence, standing as the heart of justice administration.

3. ****Direction to Court of Appeals:**** The Supreme Court ordered that Cadayona's case merits further review by the CA with instructions to give flexibility upon record certification issues.

****Doctrine:****

- The Supreme Court re-emphasized the doctrine of procedural liberalism where rules of procedure are interpretable and not rigidly or robotically applied. The goal remains the just, speedy, and inexpensive resolution of cases.

****Class Notes:****

- Petitions for Review require essential documents like judgments and final orders to be certified true copies, but procedural liberality should avoid optical dismissal based on non-certification of supplementary papers.

- Statutory interpretation: Application of the doctrine of last antecedent can alter procedural obligations, underscoring nuances in statutory language.

- Procedural fairness: Courts should prefer substantive review of cases versus procedural dismissal where reasonable compliance or fulfillment is evident.

****Historical Background:****

The case was situated in the landscape of Philippine administrative law development focusing on bolstering procedural justice without cumbersome technicalities, especially in context with appeals from quasi-judicial bodies like the CSC. This period underscored the judiciary's mandate to strike equilibrium between strict rule observance and fairness promotion, aligning with broader judicial reform aspirations during the late 1990s.