

****Title:**** G & S Transport Corporation vs. Reynaldo A. Medina

****Facts:****

- G & S Transport Corporation, commonly known as “Avis Rent-A-Car,” hired Reynaldo A. Medina as a driver on September 15, 2008. Medina’s responsibilities primarily included fetching tourists to and from the airport.
- For seven years, Medina maintained a clean service record until February 12, 2015, when he was involved in a heated altercation with a co-employee, Felix Pogoy.
- On February 12, after his shift ended at 3:00 p.m., Medina left G & S premises and returned around 10:00 p.m. to fetch his belongings.
- At the gate, a confrontation occurred when Medina perceived Pogoy staring sharply at him. An exchange of questions escalated into shoving.
- G & S later alleged that Medina was inebriated and physically assaulted Pogoy by boxing and strangling him, requiring intervention by security guards.
- After the incident, G & S placed Medina under preventive suspension and conducted an administrative hearing. It concluded Medina violated the company’s Code of Discipline, justifying termination effective March 20, 2015.
- Aggrieved, Medina filed a complaint for illegal dismissal, seeking damages and attorney’s fees.

****Procedural History:****

- The Labor Arbiter (LA) dismissed the complaint on April 29, 2016, determining Medina’s misconduct as serious, justifying termination.
- Medina appealed to the National Labor Relations Commission (NLRC), which affirmed the LA’s decision on September 23, 2016.
- A motion for reconsideration filed by Medina was denied by the NLRC on November 17, 2016.
- Medina pursued a Petition for Certiorari under Rule 65 with the Court of Appeals (CA), claiming the NLRC’s decision involved grave abuse of discretion.
- On April 27, 2018, the CA ruled that Medina was illegally dismissed. G & S’s motion for reconsideration was denied on December 17, 2018.
- G & S filed a Petition for Review on Certiorari with the Supreme Court, claiming the CA abused its jurisdictional discretion.

****Issues:****

1. Did the Court of Appeals commit grave abuse of discretion in overturning the NLRC’s findings and ruling Medina’s dismissal as illegal?

2. Was serious misconduct present justifying Medina's termination?
3. Was procedural due process adhered to by G & S, and if so, does it validate the dismissal?

Court's Decision:

1. **Jurisdiction and Findings of Fact:**

- The Supreme Court affirmed the CA's decision, determining that the CA did not commit grave abuse of discretion. It held that the CA was within its jurisdiction to examine NLRC's factual findings when they appear capriciously disregarded or inconsistently appreciated.
- The CA appropriately exercised its power to review evidence, concluding discrepancies between parties' representations about the physical altercation and its severity.

2. **Serious Misconduct:**

- The Supreme Court agreed with the CA that the incident was a minor altercation, involving shoving without significant harm or disruption to company operations, and did not meet the threshold of "serious misconduct."
- Elements of serious misconduct—namely being grave, related to duty performance, and done with wrongful intent—were not met.

3. **Procedural Due Process:**

- The Supreme Court found that procedural due process was observed as Medina was given notices and hearings. However, this does not legitimize a dismissal devoid of just cause.
- The penalty of dismissal was disproportionate given Medina's single involvement in minor misconduct after years of service without infractions.

Doctrine:

- **Serious Misconduct:** Termination for serious misconduct requires evidence of grave and aggravated misconduct explicitly related to employee duties, committed with wrongful intent.
- **Appellate Review of NLRC decisions:** CA can reassess facts when NLRC's conclusions seem arbitrary or unsupported by substantial evidence, ensuring a fair and just decision.
- **Proportionality Principle in Labor Sanctions:** Sanctions must align with the gravity of the misconduct, emphasizing measured disciplinary measures.

Class Notes:

- **Elements of Serious Misconduct:** Gravity, relation to employee duty, wrongful intent.
- **Appellate Authority:** Review factual findings under "grave abuse of discretion" in labor cases.

- **Proportionality in Disciplinary Actions:** Employers must assign penalties reflecting the severity of conduct.

Historical Background:

- This case reflects the ongoing effort to balance employer disciplinary authority with employee rights under Philippine labor law, highlighting statutory protections against arbitrary dismissal and emphasizing fairness in adjudicating employer-employee disputes.