

Title: Raynera v. Hiceta and Orpilla, G.R. No. 365 Phil. 546 (1995)

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Facts

On March 23, 1989, at about 2:00 AM, Reynaldo Raynera was riding a motorcycle southbound on East Service Road, Cupang, Muntinlupa. An Isuzu truck-trailer owned by Freddie Hiceta and driven by Jimmy Orpilla was ahead of him, traveling at 20-30 km/h. The truck carried metal sheets extending two feet to the left and three feet to the right, with 35-watt red lights on both sides. The road was poorly illuminated, and the truck had no tail lights. Reynaldo crashed into the truck's left rear side and suffered fatal head injuries. He was declared dead on arrival at Parañaque Medical Center.

Reynaldo, 32 years old at the time of his death, was the manager of the Engineering Department at Kawasaki Motors (Phils.) Corporation, earning an annual net income of at least P73,500.00, projected to increase annually by 10%.

His widow, Edna Raynera, and their two children demanded damages from the truck owner and the driver, but were refused payment. Subsequently, they filed a complaint for damages in the Regional Trial Court.

At trial, various testimonies revealed conflicting accounts of the truck's condition and behavior at the time of the accident. Virgilio Santos, a witness, testified seeing the parked truck without tail lights or early warning devices. Geraldino Lucelo, the truck helper, affirmed the truck was moving slowly with lights installed on the metal sheets. The trial court found the truck was without tail lights or a license plate and improperly parked, thus liable due to negligence, awarding damages reduced by 20% for contributory negligence by Reynaldo.

On appeal, the Court of Appeals reversed the decision, ruling Reynaldo's negligence as the proximate cause of the accident. The Rayneras filed a petition for review on certiorari to the Supreme Court.

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Issues

1. Were the respondents negligent in operating the truck without tail lights and a license plate?

2. Was the said negligence the proximate cause of Reynaldo Raynera's death?
3. Did the Court of Appeals err in applying the doctrine of last clear chance and setting aside the damages awarded by the trial court?

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Court's Decision

The Supreme Court upheld the Court of Appeals' decision that Reynaldo's own negligence was the proximate cause of the accident and denied the petition.

1. **Negligence of Respondents**:

- The Court acknowledged that the truck did not have tail lights or a proper license plate.
- Respondents did install 30-40 watt red lights on the metal sheets in compliance with the Land Transportation Traffic Code, which were visible from 100 meters.

2. **Proximate Cause of Death**:

- The Court found that Reynaldo, as the driver following behind the truck, had the responsibility to avoid a collision.
- He had headlights on his motorcycle, making it possible for him to see the truck if he had been driving prudently.
- The accident could have been avoided if Reynaldo had observed due care.

3. **Doctrine of Last Clear Chance**:

- The doctrine applies when both parties are negligent but one has the last opportunity to avoid the accident. Here, Reynaldo had the last clear chance to avoid the collision.
- Drivers who rear-end another vehicle are presumed to be the cause of the accident, having full visibility and control over the situation.

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Doctrine

- **Proximate Cause**: The Court defined proximate cause as an unbroken natural and continuous sequence, producing the injury without which the result would not have occurred.
- **Last Clear Chance**: The responsibility to avoid collision lies with the driver who has the last clear opportunity to prevent the accident.

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Class Notes

- **Negligence**: Defined as the failure to do what a reasonable person would do, or doing something a prudent person would not do.
- **Proximate Cause**: Key elements include natural and continuous sequence, and unbroken by an efficient intervening cause.
- **Rear-end Collisions**: The following vehicle driver is presumed negligent unless evidence contradicts this.
- **RA 4136, Land Transportation Traffic Code**: Requires vehicles with loads extending more than a meter to display red flags or lights visible at 50 meters as a safety measure.

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Historical Background

The case reflects the Philippine legal principles on negligence and proximate cause, emphasizing the importance of adherence to road safety measures and assigning responsibility in vehicular accidents. The judgment reinforces the accountability of both the lead and rear drivers, delineating conditions where either party may be held liable.