Title: William Go Que Construction and/or William Go Que v. Court of Appeals and Danny Singson, Rodolfo Pasaqui, Lendo Lominiqui, and Jun Andales

Facts:

– Private respondents Danny Singson, Rodolfo Pasaqui, Lendo Lominiqui, and Jun Andales filed complaints for illegal dismissal and non-payment of benefits against William Go Que Construction and/or William Go Que (the petitioner) with the National Labor Relations Commission (NLRC). They alleged they were regular employees unlawfully dismissed and denied rightful monetary benefits.

– Petitioner contended the complainants were project employees whose services were linked to specific phases of construction. A theft incident involving unused steel bars led to the dismissal of the private respondents, who were identified as the probable thieves.

– A criminal complaint for theft was filed against them, supported by probable cause found during preliminary investigation by the City Prosecutor of Quezon City.

– The Labor Arbiter, on March 23, 2007, ruled in favor of the private respondents, declaring them regular employees wrongfully dismissed, and ordered their reinstatement with back wages but denied their claims for other monetary benefits.

– The petitioner appealed to the NLRC, which reversed the Labor Arbiter's decision on December 8, 2008. It found that the private respondents were validly dismissed due to theft but awarded each nominal damages for lack of procedural due process during termination.

– The private respondents sought reconsideration, which the NLRC denied, prompting them to file a petition for certiorari with the Court of Appeals (CA), alleging irregularities in the verification and certification of non-forum shopping that accompanied their petition.

– The CA granted their motion to litigate as paupers but noted defective jurat issue in their pleadings; it was subsequently "cured" by submitting photocopies of personal IDs and a Joint Affidavit that confirmed identities, including that of Andales who was reportedly missing.

– Despite petitioner's motion to dismiss based on alleged signature forgeries and discrepancies, the CA allowed the petition to proceed and required submissions of further pleadings.

Issues:

– Whether the CA acted with grave abuse of discretion by not dismissing the petition for certiorari on grounds of non-compliance with verification and certification against forum shopping due to defective evidence of identity.

Court's Decision:

– The Supreme Court found the petition meritorious. It concluded that due to a defective jurat and lack of proper identification, the private respondents did not comply with procedural rules for verification and certification of non-forum shopping.

– The Court criticized the CA's treatment of invalid documentation as compliant, thereby acting with grave abuse of discretion. As the claim waivers and identification paperwork were inadequate, the Supreme Court ordered the CA's resolutions reversed and the petition for certiorari dismissed.

Doctrine:

– The case underlines the procedural requisite of proper verification and certification in legal pleadings. Specifically, it highlights that substantial compliance requires competent documentation of identity, and defective jurats render filings procedurally irregular.

– Verification requires verifying the truth of the document content and certification against forum shopping ensures no simultaneous litigation is pursued in multiple forums.

Class Notes:

– *Verification and Certification Requirements:* Central procedure elements need thorough observance for petitions, especially when they involve affidavit verifications, to validate claims authenticity effectively.

– *Procedural Due Process in Dismissal:* Importance of adhering to termination procedures that provide due process, even amid justifiable dismissal reasons.

Historical Background:

– The case reflects a strict interpretation of procedural rules, upholding conventional jurisprudence aimed at preventing forum shopping and assuring reliable identities, which are foundational justice system principles in the Philippines.