

Title: Correa v. Court of First Instance of Bulacan

Facts:

1. On December 13, 1968, the Court of First Instance (CFI) of Bulacan rendered judgment in Civil Case No. 3621-M against Eufemio T. Correa, then municipal mayor of Norzagaray, and Virgilio Sarmiento, municipal treasurer.
2. The judgment declared the removal of the plaintiffs as illegal and ordered their reinstatement.
3. Correa and Sarmiento were personally held liable for the payment of back salaries of the removed policemen until they were reinstated.
4. On March 22, 1976, the Court of Appeals affirmed the CFI's decision, with the decision becoming final and executory on August 24, 1976.
5. On March 8, 1977, Correa, no longer municipal mayor, filed a motion to quash the writ of execution and argued that liability should be with the Municipality of Norzagaray.
6. On April 22, 1977, the CFI denied Correa's motion to quash the writ.
7. Correa then filed a petition for certiorari, prohibition, and declaratory relief to the Supreme Court, claiming that since he was no longer in office, he could not be personally liable.

Issues:

1. Whether the Court of First Instance committed grave abuse of discretion in denying Correa's motion to quash the writ of execution.
2. Whether Correa could be personally liable for payment of back salaries after vacating his office.

Court's Decision:

1. On the matter of the court's discretion, the Supreme Court held that the CFI did not abuse its discretion because it issued the writ strictly in accordance with the terms of judgment as affirmed by the Court of Appeals. The judgment specifically stated personal liability, not the municipal corporation.
2. Regarding personal liability, the Court reaffirmed its earlier position that public officials could be held personally accountable if they acted outside the legal authority. Correa was personally liable because the judgment clearly stipulated his personal obligation.

Doctrine:

- Personal liability of public officers when acting beyond legal authority was reaffirmed. Public officials committing wrongful acts beyond their official capacities cannot transfer

liability to the municipal corporation.

Class Notes:

- Key Legal Concepts: Personal liability of public officials, Writ of Execution, Illegal Dismissal, Municipal Corporation Liability.
- Personal liability issues stem from officials acting beyond their scope.
- Public officers are personally liable for wrongful dismissals under their authority when not justifiable per law.
- Relevant Citations:
 - Nemenzo vs. Sabillano
 - Sison v. Pajo
 - Palma v. Graciano
- Application: Judgments directing personally committed obligations cannot be shifted unless explicitly altered by courts.

Historical Background:

- This case arises from a historical context when enforcement of municipal authority's actions against civil service personnel was stringently monitored through court intervention. During that period, the assumption of political victory, often leading to political appointees replacing incumbents, was heavily scrutinized under laws ensuring job security and accountability in public employment. This decision underscored the accountability of local officials and aimed to curtail the arbitrary exertion of power upon assuming office.