

# Law Making in the Guise of Procedures: Placing Hurdles to the Right of Appeal to the National Labor Relations Commission

**Emmanuel O. Sales**

De La Salle University

emmanuel.sales@dlsu.edu.ph

It is a legal given that the power to make laws or new norms lies with Congress and this power, granted by the Constitution, cannot be shared with or should not be encroached upon by another branch of government or an instrumentality of a branch. Rule making to implement the law or the promulgation of procedures to establish the process of enforcing rights is not always done subordinate to or in accordance with law. This study posits that the 2005 Rules of Procedure of the National Labor Relations Commission, specifically on the requirements for taking an appeal, is a case of law making in the guise of procedures. This study maintains in its discussion that the procedures placed hurdles to the right of appeal that can be considered as a diminution of the statutory right to appeal the decision of the labor arbiter involving monetary judgment.

**Keywords:** Administrative remedies, appeals, judicial process, labor relations.

Upon the creation of the National Labor Relations Commission (NLRC) on May 1, 1974<sup>1</sup>, the jurisdiction to entertain and decide labor disputes arising from an employer-employee relationship was vested on the NLRC first at the arbitral level, or the labor arbiter, and then on the appellate level to the commission proper of the NLRC. This process established a two-tier mechanism of deciding labor disputes, known as compulsory arbitration, where the losing party in the arbitral level is given the right to appeal the decision of the labor arbiter to the NLRC (Labor Code of the Philippines, Art. 217).

The NLRC is an administrative agency, not part of the court system, but whose decisions on appeal can be brought before the Court of Appeals (*St.*

*Martin Funeral Homes v. NLRC*, 2006). Courts no longer decide labor disputes. Nonetheless, in deciding labor disputes, the NLRC exercises judicial functions and, as such, its decisions, but not the organization, are subject to limited judicial review only on jurisdictional grounds. Stated otherwise, errors in fact or in law committed by the NLRC cannot be checked by the court as they are errors that do not pertain to the authority itself of the NLRC to decide or to the exercise of authority, if it exists, done as if there was no authority because it was done with grave abuse of discretion.<sup>2</sup>

Unlike an ordinary legal dispute, resolution of labor disputes is made with concern with social justice. This concern results in bias for labor, that

is, doubts are resolved in favor of labor in the interpretation of documents or contractual or legal provisions (see *Terminal Facilities and Services Corp. v. NLRC*, 1991); in the assessment of evidence (see *Triple Eight Integrated Services Inc. v. NLRC*, 1998; also, *Damaso v. NLRC*, 2000); up to the actual judgment where an employee already found to be lawfully dismissed may still be awarded financial assistance from the employer (See *Phil. Long Distance Tel. Co. v. NLRC*, 1988).

In the normal course of the proceedings, an employer can avail of the remedy of appeal to the NLRC in the event of unfavorable judgment of the labor arbiter (Labor Code of the Philippines, Arts. 217 & 223). The remedy of appeal, however, may only be illusory considering the procedural requirements of the NLRC before such an appeal can be perfected. Thus, there may be legitimacy in the complaint of employer that labor justice may only be for labor.

## SUBMISSIONS

It is the submission of this paper that the requirements for an appeal to be taken to the NLRC under its existing 2005 Rules of Procedure should be considered and validated from the requirements of the law and on the constitutional limitation on the making of rules of procedure and practice. The paper advances the position that the procedural requirements of NLRC on taking the appeal have modified the legal requirements and, consequently, resulted in the diminution of the substantive right of the appellant.

## REVIEW OF PROVISIONS

To understand the thrust of this paper, the history of the provisions on appeal to this NLRC from decision of the labor arbiter is reviewed. The changes of the procedures on appeal to the NLRC are compared with each succeeding change and on the actual provision of the law.

The original provision on appeal under the Labor Code provided that the appeal to the National Labor Relations Commission be taken within 10 days from receipt of the decision of the decision of the labor arbiter (Labor Code of the Philippines, as amended by Pres. Decree Nos. 643 and 1367).

On March 2, 1989, the appeal provision was amended by Republic Act No. 6715 where it now reads:

ARTICLE 223. Appeal. — Decisions, awards, or orders of the Labor Arbiter are final and executory unless appealed to the Commission by any or both parties within ten (10) calendar days from receipt of such decisions, awards, or orders.

In case of a judgment involving a monetary award, an appeal by the employer may be perfected only upon the posting of a cash or surety bond issued by a reputable bonding company duly accredited by the Commission in the amount equivalent to the monetary award in the judgment appealed from.

The amendatory law (Rep. Act No. 6715) mandated that in perfecting an appeal it should be done within 10 calendar days from receipt of the decision and the appeal may be perfected only upon the posting of a cash or surety bond in the amount equivalent to the monetary award in the judgment appealed from.

On May 24, 1989, the Implementing Rules and Regulations of Republic Act No. 6715 were promulgated and the IRR defined perfection of appeal as:

(w) 'Perfection of an Appeal' includes the filing, within the prescribed period, of the memorandum of appeal containing, among others, the assignment of error/s, the argument in support thereof, the reliefs sought and posting of the appeal bond. (Book V, Rule I, Section 1)

On August 18, 1989, the National Labor Relations Commission (NLRC) issued its Interim Rules on Appeals under Republic Act No. 6715. Under the then interim rules, the appellant should:

**SECTION 5. Requisites of Appeal; When Perfected.** — (A) The appeal shall be filed within the reglementary period as provided in Section I (A) of these rules; shall be under oath with proof of payment of the required appeal fee and the posting of a cash or surety bond as provided in Section 7 of these rules; shall be accompanied by a memorandum of appeal which shall state the grounds relied upon and the arguments in supports thereof; a statement of the date when the appellant received the appealed decision, order or award; and proof of service of the other party of such appeal.

**SECTION 7. Bond.** — In case of a judgment of a Labor Arbiter involving a monetary award, an appeal by the employer shall be perfected only upon the posting of a cash or surety bond issued by a reputable bonding company duly accredited by the Commission in an amount equivalent to the monetary award in the judgment appealed from.

For purposes of the bond required under Article 223 of the Labor Code as amended, the monetary award computed as of the date of the promulgation of the decision appealed from shall be the basis of the bond. For this purpose, moral and exemplary damages shall not be included in fixing the amount of the bond.

Pending the issuance of the appropriate guidelines for accreditation bonds posted by bonding companies duly accredited by the regular courts, shall be acceptable.

In relation to the requirement of the appeal bond required by Republic Act No. 6715, the interim

rules provided that the bond should be equivalent to the “monetary award computed as of the date of the promulgation of the decision appealed from” and that “moral and exemplary damages shall not be included in fixing the amount of the bond.”

Thus, while the law requires the bond to be in the amount equivalent to the monetary award in the judgment appealed from, the interim rules excluded and did not require the posting of a bond for moral and exemplary damages included in the monetary judgment appealed from.

In 1999, the NLRC issued Resolution No. 3-99 amending its Rules of Procedure. The procedural requirements of the NLRC for an appeal stated that:

**SECTION 6. Bond** — In case the decision of THE Labor Arbiter, the Regional Director or his duly authorized Hearing Officer involves a monetary award, an appeal by the employer shall be perfected only upon the posting of cash or surety bond, WHICH SHALL BE IN EFFECT UNTIL FINAL DISPOSITION OF THE CASE, issued by a reputable bonding company, duly accredited by the Commission or the Supreme Court in an amount equivalent to the monetary award, exclusive of damages and attorney’s fees.

The employee, HIS COUNSEL, AS WELL AS THE BONDING COMPANY, shall submit a joint declaration under oath attesting that the surety bond posted is genuine.

The Commission may, in JUSTIFIABLE cases and upon motion of the appellant, reduce the amount of the bond.

The filing of the motion to reduce bond shall not stop the running of the period to perfect appeal. (Emphasis original.)

The emphasized text of Resolution No. 3-99 changed the then existing 1990 Rules of Procedure

of the NLRC as amended on November 5, 1993. Compared with the interim rules, 1990 Rules of Procedure, as amended in 1993, deleted attorney's fees from the requirement of an appeal bond and allowed the reduction of the bond by means of a motion of the appellant. Resolution No. 3-99 qualified the grant of reduction of bond for *justifiable* cases.

As can be seen from these changes, the procedural requirement on reduction of bond clearly provided mitigation to the requirement of Rep. Act No. 6715 that the amount of the required bond should be "equivalent to the monetary award in the judgment appealed from."

On February 12, 2002, the NLRC changed the provisions on appeal and specified the following requisites for perfection of appeal:

#### SECTION 4. REQUISITES FOR

PERFECTION OF APPEAL. a) The Appeal shall be filed within the reglementary period as provided in Section 1 of this Rule; shall be VERIFIED BY APPELLANT HIMSELF IN ACCORDANCE WITH SECTION 4, RULE 7 OF THE RULES OF COURT, with proof of payment of the required appeal fee and the posting of a cash or surety bond as provided in Section 6 of this Rule; shall be accompanied by memorandum of appeal IN THREE (3) LEGIBLY TYPEWRITTEN COPIES which shall state the grounds relied upon and the arguments in support thereof; the relief prayed for; and a statement of the date when the appellant received the appealed decision, RESOLUTION or order AND A CERTIFICATE OF NON-FORUM SHOPPING WITH proof of service on the other party of such appeal. A mere notice of appeal without complying with the other requisites aforesaid shall not stop the running of the period for perfecting an appeal.

SECTION 6. BOND. — In case the decision of the Labor Arbiter OR the

Regional Director involves a monetary award, an appeal by the employer MAY be perfected only upon the posting of a cash or surety bond. THE APPEAL BOND SHALL EITHER BE IN CASH OR SURETY IN AN AMOUNT EQUIVALENT TO THE MONETARY AWARD, EXCLUSIVE OF DAMAGES AND ATTORNEY'S FEES.

IN CASE OF SURETY BOND, THE SAME SHALL BE ISSUED BY A REPUTABLE BONDING COMPANY DULY ACCREDITED BY THE COMMISSION OR THE SUPREME COURT, AND SHALL BE ACCOMPANIED BY:

- a) A JOINT DECLARATION UNDER OATH BY THE EMPLOYER, HIS COUNSEL, AND THE BONDING COMPANY, ATTESTING THAT THE BOND POSTED IS GENUINE, AND SHALL BE IN EFFECT UNTIL FINAL DISPOSITION OF THE CASE.
- b) A COPY OF THE INDEMNITY AGREEMENT BETWEEN THE EMPLOYER-APPELLANT AND BONDING COMPANY; AND
- c) A COPY OF SECURITY DEPOSIT OR COLLATERAL SECURING THE BOND.

A CERTIFIED TRUE COPY OF THE BOND SHALL BE FURNISHED BY THE APPELLANT TO THE APPELLEE WHO SHALL VERIFY THE REGULARITY AND GENUINENESS THEREOF AND IMMEDIATELY REPORT TO THE COMMISSION ANY IRREGULARITY.

UPON VERIFICATION BY THE COMMISSION THAT THE BOND IS IRREGULAR OR NOT GENUINE, THE COMMISSION SHALL CAUSE THE

## IMMEDIATE DISMISSAL OF THE APPEAL.

NO MOTION TO REDUCE BOND SHALL BE ENTERTAINED EXCEPT ON MERITORIOUS GROUNDS AND UPON THE POSTING OF A BOND IN A REASONABLE AMOUNT IN RELATION TO THE MONETARY AWARD.

The filing of the motion to reduce bond WITHOUT COMPLIANCE WITH THE REQUISITES IN THE PRECEDING PARAGRAPH shall not stop the running of the period to perfect AN appeal. (Verbatim from NLRC RESOLUTION NO. 01-02)

The 2002 procedural requirements allowed, within the reglementary period to appeal, the posting of a bond in a reasonable amount in relation to the monetary award pending resolution of the motion to reduce bond allowed under 1999 procedure. Secondly, the 2002 rules of procedure required the appellant to provide: (1) a copy of the indemnity agreement between the employer-appellant and bonding company; and (2) a copy of security deposit or collateral securing the bond. In relation to Rep. Act No. 6715 that required the bond, either in the form of cash or surety, the 2002 rules of procedure added the requirement of a copy of the indemnity agreement and the security deposit or collateral securing the bond.

Finally, in 2005, the Rules of Procedure of the NLRC were revised and the appellant should now hurdle the following requirements:

SECTION 4. Requisites for Perfection of Appeal. — a) The appeal shall be: 1) filed within the reglementary period provided in Section 1 of this Rule; 2) verified by the appellant himself in accordance with Section 4, Rule 7 of the Rules of Court, as amended; 3) in the form of a memorandum of appeal which shall state the grounds relied upon and the arguments in support thereof,

the relief prayed for, and with a statement of the date the appellant received the appealed decision, resolution or order; 4) in three (3) legibly typewritten or printed copies; and 5) accompanied by i) proof of payment of the required appeal fee; ii) posting of a cash or surety bond as provided in Section 6 of this Rule; iii) a certificate of non-forum shopping; and iv) proof of service upon the other parties.

SECTION 6. Bond. — In case the decision of the Labor Arbiter or the Regional Director involves a monetary award, an appeal by the employer may be perfected only upon the posting of a bond, which shall either be in the form of cash deposit or surety bond equivalent in amount to the monetary award, exclusive of damages and attorney's fees.

In case of surety bond, the same shall be issued by a reputable bonding company duly accredited by the Commission or the Supreme Court, and shall be accompanied by original or certified true copies of the following:

- a) a joint declaration under oath by the employer, his counsel, and the bonding company, attesting that the bond posted is genuine, and shall be in effect until final disposition of the case.
- b) an indemnity agreement between the employer-appellant and bonding company;
- c) proof of security deposit or collateral securing the bond: provided, that a check shall not be considered as an acceptable security;
- d) a certificate of authority from the Insurance Commission;
- e) certificate of registration from the Securities and Exchange Commission;
- f) certificate of authority to transact surety business from the Office of the President;

- g) certificate of accreditation and authority from the Supreme Court; and
- h) notarized board resolution or secretary's certificate from the bonding company showing its authorized signatories and their specimen signatures.

A cash or surety bond shall be valid and effective from the date of deposit or posting, until the case is finally decided, resolved or terminated, or the award satisfied. This condition shall be deemed incorporated in the terms and conditions of the surety bond, and shall be binding on the appellants and the bonding company.

From the text of the 2005 procedural requirements, the security deposit or collateral securing the bond should be proved and that a check shall not be considered as acceptable security.

There were changes in the procedural requirements for perfecting an appeal to the NLRC from the time a cash or surety bond equivalent to the monetary judgment was required by Rep. Act No. 6715 in 1989 up to the latest version of the rules in 2005. As commented above, these procedural changes show that, while legal requirements for perfecting the appeal remained the same and are constant, that is, on the period of appeal and the requirement of a cash or surety bond for the monetary judgment, the NLRC had revised its procedures several times using the same legal authority to do so: Art. 218 of the Labor Code.<sup>3</sup>

## DISSECTING THE NLRC RULES OF PROCEDURE

The procedural requirements for perfecting an appeal to NLRC no longer confined themselves to providing a rule of practice or procedure, but encroached already on substantive matters and rights provided by the law, specifically Rep. Act No. 6175. It is basic legal principle that the

procedure cannot prevail over substance and this principle finds expression in the grant of power to the Supreme Court to promulgate rules of procedure (Philippine Constitution, Article VIII, Section 5, par. 5.).

The rule-making power of the Supreme Court itself, while vested by the Constitution, is limited as well by the same constitutional grant in that its rules of procedure should "not diminish, increase, or modify substantive rights" (Philippine Constitution, Article VIII, Section 5, par. 5.). This constitutional limitation to rule-making also applies to the grant of power to the constitutional commissions<sup>4</sup> to promulgate its own rules of procedure that shall not diminish, increase, or modify substantive rights (Philippine Constitution, Section 6, Article IX-A).

In comparison, the NLRC is vested by the Labor Code, not the Constitution, to promulgate rules of procedure.<sup>5</sup> It is with more reason therefore that the rules of procedure should hew ever more closely to the constitutional limitation.

When the changes over time of the NLRC procedural requirements of appeal are reviewed, it is submitted that the changes do not regulate the procedure to appeal, but had already changed or modified the legal requirements, as distinguished from procedural requirements, in perfecting the appeal. According to the Supreme Court in the case of *Fabian vs. Desierto* (1998), as affirmed in *Bernabe vs. Alejo*, (2002):

'[I]n determining whether a rule prescribed by the Supreme Court, for the practice and procedure of the lower courts, abridges, enlarges, or modifies any substantive right, the test is whether the rule really regulates procedure, that is, the judicial process for enforcing rights and duties recognized by substantive law and for justly administering remedy and redress for a disregard or infraction of them. If the rule takes away a vested right, it is not procedural. If the rule creates a right such as the right to appeal, it may be classified as a substantive matter, but if it operates as a means of implementing an

existing right then the rule deals merely with procedure.’ (underlining ours.)

To have a better grasp of the difference of rule-making from law-making, the following decisions of the Supreme Court can be cited:

- *Reodica v. Court of Appeals* (1998):

It must be stressed that prescription in criminal cases is a matter of substantive law. Pursuant to Section 5(5), Article VIII of the Constitution, this Court, in the exercise of its rule-making power, is not allowed to diminish, increase or modify substantive rights. Hence, in case of conflict between the Rules on Summary Procedure promulgated by this Court and the Revised Penal Code, the latter prevails.

- *Land Bank of the Philippines v. De Leon* (2003):

We hold that our Decision, declaring a petition for review as the proper mode of appeal from judgments of Special Agrarian Courts, is a rule of procedure which affects substantive rights.

- *Rodriguez v. Ponferrada* (2005):

In promulgating the Rules, this Court did not intend to leave the offended parties without any remedy to protect their interests in estafa cases. Its power to promulgate the Rules of Court is limited in the sense that rules “shall not diminish, increase or modify substantive rights.”<sup>26</sup> Private complainant’s intervention in the prosecution of estafa is justified not only for the prosecution of her interests, but also for the speedy and inexpensive administration of justice as mandated by the Constitution.

- *Labayo-Rowe v. Republic* (1988).

If Rule 108 were to be extended beyond innocuous or harmless changes or corrections of errors which are visible to the eye or obvious to the understanding, so as to comprehend substantial and controversial alterations concerning citizenship, legitimacy of paternity or filiation, or legitimacy of marriage, without observing the proper proceedings as earlier mentioned, said rule would thereby become an unconstitutional exercise which would tend to increase or modify substantive rights.

Indeed, in the case of *Juan v. Musngi* (1987), the Supreme Court held that the rule of procedure of this NLRC cannot prevail over a provision of the Labor Code. Likewise, in the case of *Romulo, Mabanta, Buenaventura, Sayoc & De Los Angeles v. Home Development Mutual Fund (HDMF)* (2000), it was held that the “HDMF cannot, in the exercise of its rule making power, issue regulations not consistent with the law it seeks to apply. Administrative issuances must not override, supplant or modify the law. Only Congress can repeal or amend the law.” Finally, the Court ruled in *Insular Bank of Asia and America Employee’s Union (IBAAEU) vs. Inciong* (1984), that Sec. 2, Rule IV, Book III of the implementing rules and Policy Instruction No. 9 issued by the then Secretary of Labor are null and void since in the guise of clarifying the Labor Code’s provisions on holiday pay, they in effect amended them by enlarging the scope of their exclusions.

## CONCLUSIONS

It is submitted that the 2005 Rules of Procedure had modified the requirement of Rep. Act No. 6715 in perfecting an appeal to the NLRC and the modification already touched upon the substantive right of the party to appeal as given by law. The requirement of this same law that gives the right to appeal is the posting of a cash or surety bond and the filing of the appeal within 10 calendar days. These are the only legal requirements.

Article 223 of the Labor Code mandates that in case of a judgment of the LA involving a monetary award, an appeal by the employer to the NLRC may be perfected only upon the posting of a cash or surety bond issued by a reputable bonding company duly accredited by the Commission, in the amount equivalent to the monetary award in the judgment appealed from.

The posting of a bond is indispensable to the perfection of an appeal in cases involving monetary awards from the decision of the LA. The intention of the lawmakers to make the bond a mandatory requisite for the perfection of an appeal by the employer is clearly limned in the provision that an appeal by the employer may be perfected “only upon the posting of a cash or surety bond”. The word “only” makes it perfectly plain that the lawmakers intended the posting of a cash or surety bond by the employer to be the essential and exclusive means by which an employer’s appeal may be perfected. The word “may” refers to the perfection of an appeal as optional on the part of the defeated party, but not to the compulsory posting of an appeal bond, if he desires to appeal. The meaning and the intention of the legislature in enacting a statute must be determined from the language employed; and where there is no ambiguity in the words used, then there is no room for construction.

The filing of the bond is not only mandatory but also a jurisdictional requirement that must be complied with in order to confer jurisdiction upon the NLRC. Non-compliance therewith renders the decision of the LA final and executory. This requirement is intended to assure the workers that if they prevail in the case, they will receive the money judgment in their favor upon the dismissal of the employer’s appeal. It is intended to discourage employers from using an appeal to delay or evade their

obligation to satisfy their employees’ just and lawful claims. (*Accessories Specialist, Inc. v. Alabanza*, 2008)

It is submitted that substantial justice would not be served with the dismissal of appeal based not on the failure to perfect the appeal as required by Rep. Act No. 6715, but on a failure to comply with the supposed procedural requirements that had been changed with more and more additions. On the other hand, if the NLRC believes that the provision of Rep. Act No. 6715 is no longer adequate or effective, the course of action is not for the NLRC to legislate in the guise of providing rules of procedure but for the NLRC to air its concern to change the requirements for taking an appeal to Congress.

## NOTES

<sup>1</sup> Created by Pres. Decree No. 442. With the creation of the National Labor Relations Commission, the then existing Courts of Industrial Relations were abolished.

<sup>2</sup> In procedural terms, the judicial review is made by filing a petition for certiorari with the Court of Appeals on the grounds of grave abuse of discretion; lack of jurisdiction; or in excess of jurisdiction. Please see, Rule 65 of the Rules of Court.

<sup>3</sup> The Commission shall have the power and authority (a) to promulgate rules and regulations governing the hearing and disposition of cases before it and its regional branches as well as those pertaining to its internal functions and such rules and regulations as may be necessary to carry out the purposes of this Code.

<sup>4</sup> These are the Civil Service Commission, the Commission on Elections and the Commission on Audit.

<sup>5</sup> See, fn 4.

## REFERENCES

- Accessories Specialist Inc. v. Alabanza*, G.R. No. 168985, July 23, 2008.  
*Bernabe v. Alejo*, G.R. No. 140500, January 21, 2002.  
*Constitution of the Republic of the Philippines*. (1987).



- Damaso v. NLRC, G.R. Nos. 115755 and 116101, December 4, 2000.
- Fabian v. Desierto, 295 SCRA 470. (1998).
- Insular Bank of Asia and America Employees' Union v. Inciong, 132 SCRA 663. (1984).
- Juan v. Musngi, G.R. No. 76053, October 27, 1987.
- Labayo-Rowe v. Republic, 168 SCRA 294. (1988).
- Labor Code of the Philippines*. (1974).
- Land Bank of the Phil. v. De Leon, G.R. No. 143275, March 20, 2003.
- NLRC interim rules on appeals under R. A. 6716, amending the Labor Code*. (1989).
- Phil. Long Distance Tel. Co. v. NLRC, 164 SCRA 671. (1988).
- Presidential Decree No. 643. (1975, January 21). *Amending Section 42 of Presidential Decree No. 570-A amending certain provisions of Presidential Decree No. 442, entitled "Labor Code of the Philippines"*.
- Republic Act No. 6715. (1989, March 2). *An Act to extend protection to labor, strengthen the constitutional rights of workers to self-organization, collective bargaining and peaceful concerted activities, foster industrial peace and harmony, promote the preferential use of voluntary modes of settling labor disputes, and reorganize the National Labor Relations Commission, amending for these purposes certain provisions of Presidential Decree No. 442, as amended, otherwise known as the Labor Code of the Philippines, appropriating funds therefore and for other purposes*.
- Presidential Decree No. 442. (1974, May 1). *A Decree instituting a labor code, thereby revising and consolidating labor and social laws to afford protection to labor, promote employment and human resources development and ensure industrial peace based on social justice*.
- Presidential Decree No. 1367. (1978, May 1). *Further amending certain in provisions of Book V of Presidential Decree No. 442, otherwise known as the Labor Code of the Philippines, as amended*.
- Reodica v. Court of Appeals, G.R. No. 125066, July 8, 1998.
- Rodriguez v. Ponferrada, G.R. Nos. 155531-34, July 29, 2005.
- Romulo Mabanta Buenaventura Sayoc and De Los Angeles v. Home Development Mutual Fund, G.R. No. 131082, June 19, 2000.
- Rules and regulations implementing Republic Act No. 6715*. (1989).
- St. Martin Funeral Homes v. National Labor Relations Commission, G.R. No. 142351, November 22, 2006.
- Terminal Facilities and Services Corp. v. NLRC*, 199 SCRA 269. (1991).
- The new rules of procedure of the National Labor Relations Commission*. (1990).
- The new rules of procedure of the National Labor Relations Commission*. (1990).
- The new rules of procedure of the National Labor Relations Commission*. (2002).
- The 2005 revised rules of procedure of the National Labor Relations Commission*. (2005).
- Triple Eight Integrated Services Inc. v. NLRC, G.R. No. 129584, December 3, 1998.