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# REPUBLIC OF THE PHILIPPINES

**REGIONAL TRIAL COURT**  
National Capital Judicial Region  
Branch \_\_\_\_, Pasay City

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**[NAME OF REPRESENTATIVE PLAINTIFF],**

*for himself/herself and as representative of all similarly situated victims,*  
Plaintiff,

-versus-

,

and

**MANILA INTERNATIONAL AIRPORT AUTHORITY (MIAA),**

Defendants.

Civil Case No. \_\_\_\_\_  
For: **Damages (Class Suit)**

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## CLASS SUIT COMPLAINT

Plaintiff, through counsel, respectfully alleges:

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### I. PARTIES

1. Plaintiff **[Name]**, of legal age, Filipino, with address at [address], is one of the victims injured in the ceiling collapse incident and brings this suit **in a representative capacity** under Rule 3, Section 12 of the Rules of Court.
  2. Plaintiff represents **all persons similarly situated**, particularly those injured or otherwise damaged by the ceiling collapse at on April 3, 2026.
  3. The class is so numerous that joinder of all members is impracticable.
  4. There exist **common questions of law and fact**, including:
    - Whether Defendants were negligent
    - Whether safety standards were violated
    - Whether damages are recoverable
  5. Plaintiff will **fairly and adequately protect the interests of the class**.
  6. Defendant **(NNIC)** is a corporation duly organized under Philippine laws.
  7. Defendant **Manila International Airport Authority (MIAA)** is a government instrumentality tasked with airport administration.
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## II. JURISDICTION AND VENUE

8. This Honorable Court has jurisdiction pursuant to **Batas Pambansa Blg. 129**, as amended.
  9. Venue is proper in Pasay City, where the incident occurred.
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## III. FACTUAL ANTECEDENTS

10. On **April 3, 2026**, at approximately **10:43 A.M.**, a portion of the ceiling at collapsed.
11. The incident injured multiple individuals, including Plaintiff and members of the class.
12. Victims suffered:
  - Physical injuries

- Emotional distress
  - Financial losses
13. The collapse occurred in an area under the control and supervision of Defendants.
14. Defendants failed to ensure the structural integrity and safety of the premises.
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#### **IV. CAUSE OF ACTION (QUASI-DELICT)**

15. Plaintiff repleads all prior allegations.
16. Under **Article 2176 of the Civil Code**, Defendants are liable for damages caused by negligence.
17. Defendants failed to exercise due diligence in:
- Inspection
  - Maintenance
  - Safety compliance
18. Under **Article 2180**, Defendants are liable for the acts of their employees.
19. The doctrine of **res ipsa loquitur** applies, consistent with , as:
- The collapse would not occur without negligence
  - The instrumentality was under Defendants' control
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#### **V. CLASS SUIT REQUIREMENTS (RULE 3, SECTION 12)**

20. The subject matter of this action is of **common or general interest** to all class members.
21. The injuries sustained arose from a **single incident** and involve identical legal issues.
22. A class suit is the most efficient and equitable means to resolve the controversy.
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#### **VI. DAMAGES**

## A. ACTUAL DAMAGES

23. Class members incurred:

- Medical expenses
- Loss of income

Estimated aggregate damages: ₱ \_\_\_\_\_

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## B. MORAL DAMAGES

24. Class members suffered:

- Physical pain
- Mental anguish

Claimed amount: ₱ \_\_\_\_\_ per claimant

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## C. EXEMPLARY DAMAGES

25. Defendants' negligence was gross and warrants deterrence.

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## D. ATTORNEY'S FEES

26. Litigation was necessary to protect the rights of the class.

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## VII. PRAYER

WHEREFORE, premises considered, Plaintiff respectfully prays:

1. That this case be **certified as a class suit**;
2. That Defendants be ordered to pay:
  - Actual damages
  - Moral damages
  - Exemplary damages
  - Attorney's fees

3. That Defendants be ordered to implement **corrective safety measures**;
4. Granting such other reliefs as may be just and equitable.

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## **VIII. VERIFICATION AND CERTIFICATION**

(Against Forum Shopping)

[Standard verification and certification clause]

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