

Title: Republic of the Philippines v. Bantigue Point Development Corporation

Facts:

Bantigue Point Development Corporation, the respondent, filed an application for original registration of title over a parcel of land with the Regional Trial Court (RTC) of Rosario, Batangas on July 17, 1997. The land in question was Lot 8060, with an area of approximately 10,732 square meters located at Barangay Barualte, San Juan, Batangas, and had an assessed value of P14,920. The RTC set the initial hearing past the 90-day period required, and subsequently issued a second Order setting the hearing within the mandatory period provided by law.

The Republic opposed the application on January 8, 1998. On March 31, 1998, the records were transferred to the Municipal Trial Court (MTC) of San Juan, Batangas, on the presumption that the property's value was less than P100,000, and thus within that court's delegated jurisdiction for land registration cases. The MTC ruled in favor of the respondent, which led the Republic to file an appeal with the Court of Appeals (CA). The CA dismissed the appeal and upheld the MTC's decision, stating that the Republic was estopped from questioning the jurisdiction, as it only raised the jurisdictional issue on appeal.

Issues:

1. Is the Republic estopped from questioning the jurisdiction of the MTC over the application for original registration of land title for the first time on appeal, having not raised the issue at the trial court?
2. Did the MTC fail to acquire jurisdiction over the case due to non-compliance with procedural requirements and the property's assessed value?

Court's Decision:

In the decision written by Justice Sereno, the Supreme Court resolved the issues as follows:

1. The Republic is not estopped from questioning the jurisdiction of the MTC, even if only raised on appeal. The Court noted that the question of jurisdiction over the subject matter can be raised at any stage of the proceedings as it is conferred only by the Constitution or the law.
2. The MTC properly acquired jurisdiction. The Court rejected the Republic's argument that the MTC lacked jurisdiction due to the RTC's failure to adhere to the prescribed period for setting the initial hearing and due to the alleged selling price of the land exceeding P100,000. However, the Court remanded the case to the MTC for further proceedings to determine whether the property is indeed part of alienable and disposable land of the public

domain, as the respondent's evidence (a CENRO certification) fell short of the required proof.

Doctrine:

Jurisdiction over the subject matter can be questioned at any stage of the proceedings. Additionally, a certification from the CENRO alone is insufficient to prove that the property in question is alienable and disposable land of the public domain; a certified true copy of the original classification approved by the DENR Secretary is also necessary.

Class Notes:

- Jurisdiction over the subject matter is conferred by the Constitution or law, not by waiver or omission of the parties or court acquiescence.
- The Judiciary Reorganization Act stipulates MTCs may be assigned to hear land registration cases if the property does not exceed P100,000 in value.
- In original land registration applications, the applicant must prove the alienable and disposable nature of the land through an approved land classification from the DENR Secretary, not just a CENRO certification.

Historical Background:

This case illustrates the interplay between the delegated jurisdiction of municipal trial courts and the procedural standards for land registration in the Philippines. The decision underscores the legal principle that estoppel does not bar challenges to jurisdiction over the subject matter when such challenges are raised at the appellate level. Additionally, it reflects the judiciary's adherence to the Regalian Doctrine regarding land ownership and the need for clear proofs of a property's status within the public domain.