

Title: Nilo Padre vs. Fructosa Badillo, et al.

Facts:

The sequence of events began with Civil Case No. A-514, decided on October 13, 1986, by the RTC of Allen, Northern Samar, in favor of the Badillo family, which owned 5/6 of Lot No. 4080. The defendants, including Consesa Padre, were ordered to vacate and pay rentals since 1980 and cover attorney's fees and litigation expenses. This decision became final on November 5, 1986.

On December 29, 1997, significantly past the decision of Civil Case No. A-514, the Badillo family initiated Civil Case No. 104 at the MTC of San Isidro, Northern Samar against various occupants, including Nilo Padre, heir of the deceased Consesa Padre. Nilo did not file an answer and was declared in default.

Despite being labeled as an ownership and possession action, the Badillo family sought the MTC to enforce the RTC decision in Civil Case No. A-514. On July 17, 2003, the MTC interpreted their action as a revival of dormant judgment and decided in their favor.

Nilo filed a motion for reconsideration, arguing that the MTC lacks jurisdiction as the action should be considered real, not personal, and be handled by the RTC, given the land's assessed value of P26,940.00. He also claimed the action was time-barred and lacked a certificate for non-forum shopping. The MTC denied the motion.

Nilo elevated the case to the RTC via a special civil action for certiorari, questioning the MTC's jurisdiction and arguing late filing and erroneous classification of the action as personal. The RTC dismissed Nilo's petition citing late filing and concurred with the MTC's ruling on the jurisdictional issue.

In its Order dated September 20, 2004, the RTC further justified Nilo's late petition submission and supported the MTC's jurisdiction stance, dismissing Nilo's prescription claim, declaring that the action was timely. Subsequently, Nilo sought relief from the Supreme Court, arguing that the RTC's ruling lacked sufficient explanation, reiterating jurisdictional objections, and stressing the timely filing of his certiorari petition.

Issues:

The principal legal issues revolved around:

1. Whether the MTC had jurisdiction over Civil Case No. 104
2. Whether the action of the Badillo family before the MTC was time-barred

### 3. The timeliness of Nilo Padre's petition for certiorari to the RTC

#### Court's Decision:

The Supreme Court granted Nilo's petition. By law, an action for accion publiciana given its ejectment nature after one year from dispossession must be filed with the RTC, as the assessed value of the property was P26,940.00. The MTC, therefore, lacked jurisdiction. The Supreme Court instructed the MTC to dismiss Civil Case No. 104 and set aside the RTC orders that upheld the MTC's jurisdiction and decisions. The issue of non-forum shopping certification was deemed unnecessary to discuss.

#### Doctrine:

The nature of the action and the court's jurisdiction are determined by the allegations in the complaint and the character of the relief sought. Additionally, a court without jurisdiction cannot render a valid judgment; the result is legally null and void—a court may not exercise authority outside its statutory jurisdiction.

#### Class Notes:

- Accion Publiciana: A plenary action to determine the better right of possession, filed within 10 years of dispossession, and jurisdiction falls with the RTC if the assessed property value exceeds P20,000.
- Timeliness of Certiorari: The date of mailing a petition via registered mail is considered its filing date.
- Jurisdictional Limits: MTC's exclusive original jurisdiction in property cases is limited to those where the value does not exceed P20,000.
- Legal Action Revival: A dormant judgment may be revived, but specific processes and timelines apply, which differ from seeking enforcement of judgments not yet dormant.
- Procedural Posture: The Supreme Court may review the decisions made by lower courts if the latter are suspected of having acted without or in excess of their jurisdiction or with grave abuse of discretion.

#### Historical Background:

This case illustrates the delineation of the jurisdiction between the MTC and the RTC in civil cases involving property in the Philippines. The proper classification of actions as personal or real is significant in determining the appropriate court to file the action. The Supreme Court's decision reinforces the statutory jurisdiction boundaries and ongoing jurisprudence on the jurisdictional requirements and the process of reviving judgments.