

Title: Atty. Fe Q. Pal Miano-Salvador vs. Constantino Angeles, Substituted by Luz G. Angeles

Facts:

Constantino Angeles, the respondent and a registered owner of a parcel of land in Sampaloc, Manila, was involved in a legal dispute with Fe Salvador, the petitioner. Angeles's property was leased to Jelly Galiga from 1979 until 1993. On September 7, 1993, Salvador claimed to have purchased the property from Galiga, believing him to be the owner due to his possession of the land. Despite Angeles's demand on November 18, 1993, for Salvador to vacate the property, she remained in possession.

Angeles, through representative Rosauro Diaz, filed an ejectment case against Salvador with the Metropolitan Trial Court (MeTC) of Manila on October 12, 1994, which decided in favor of Angeles requiring Salvador to vacate and pay compensation and attorney's fees. Salvador appealed to the Regional Trial Court (RTC), which upheld the MeTC ruling and denied her Motion for Reconsideration.

Salvador then appealed to the Court of Appeals (CA), but the petition was dismissed with the CA agreeing with the lower courts' factual findings. The CA ruled that Galiga could not transfer ownership to Salvador as he was only a lessee. Salvador filed a Motion for Reconsideration, which the CA also denied.

Issues:

The main issue brought to the Supreme Court was the effect of Diaz's failure to present proof of his authority to file the complaint for Angeles, affecting the MeTC's jurisdiction over the complaint. Salvador contended that Diaz lacked the authority at the time of the suit and that this matter was overlooked by the trial courts and not addressed by the CA.

Court's Decision:

The Supreme Court granted Salvador's petition and determined that the MeTC did not have jurisdiction over the case because Diaz, who filed the complaint, was not proven to have the authority to act for Angeles. Citing the cases of *Tamondong v. Court of Appeals* and *Cosco Philippines Shipping, Inc. v. Kemper Insurance Company*, the Court affirmed that an unauthorized complaint does not produce any legal effect and thus the court should dismiss the complaint. Consequently, the MeTC's decision, RTC's affirmation, and CA's dismissal were set aside and nullified. The Supreme Court dismissed the complaint by Angeles before the MeTC.

Doctrine:

The doctrine established by the case is that a complaint filed by an individual without proven authority to represent the plaintiff is not deemed legally filed and therefore courts do not acquire jurisdiction over such complaints. If the complaint filed does not establish the court's authority over the plaintiff, all subsequent proceedings are null and void.

Class Notes:

- Jurisdiction: for a court to have the authority over a case, it must acquire jurisdiction over the subject matter and the parties.
- Authority to File: courts acquire jurisdiction over plaintiffs upon the filing of a legitimate complaint.
- Legal Effect of Unauthorized Complaint: an unauthorized complaint does not create any legal effect; thus, the court should dismiss the complaint for lack of jurisdiction.
- Substantive Outcome: courts cannot delve into the merits of a case if there is legally no valid complaint.
- Validation of Foreign Acts: for foreign notarial acts to be recognized, they must be certified by appropriate diplomatic or consular officers.

Historical Background:

The case reflects the judicial standards and procedures for ensuring that legal actions are initiated by individuals with the proper authority to do so, emphasizing the significance of jurisdiction and proper representation in Philippine legal proceedings. It underscores the importance of preserving the integrity of the judicial process against unauthorized or improper legal actions and the adherence to procedural rules, particularly in disputes involving property rights and land ownership.