

Title: Heirs of Telesforo Julao vs. Spouses Alejandro and Morenita De Jesus

Facts:

In the 1960s, Telesforo Julao filed two Townsite Sales Applications (TSA) with the Department of Environment and Natural Resources (DENR) in Baguio City, TSA No. V-2132 and TSA No. V-6667. Following his death, the applications were transferred to his heirs. On April 30, 1979, Solito Julao, purportedly one of the heirs, transferred his hereditary share in the property covered by TSA No. V-6667 to the respondent spouses Alejandro and Morenita De Jesus. In 1983, the respondent spouses built a house on the acquired property. Solito went missing in 1986.

On March 15, 1996, the DENR issued an Order rejecting TSA No. V-6667 and transferring TSA No. V-2132 to the heirs of Telesforo. Consequently, OCT No. P-2446 was issued to Telesforo's heirs on December 21, 1998, covering a 641-square meter property.

On March 2, 1999, the petitioners, positioning themselves as the heirs of Telesforo, filed a Complaint for Recovery of Possession of Real Property against respondent spouses, disputing the validity of the Deed of Transfer of Rights executed by Solito and challenging the legitimacy of Solito as Telesforo's son.

The respondent spouses filed a Motion to Dismiss on the ground of prescription, which was denied. They then filed an Answer claiming true ownership. The petitioners presented their evidence and rested their case. The heirs of Solito filed an Answer-In-Intervention, claiming that Solito sold his hereditary share legitimately. The respondents also presented letters from the DENR to suggest that TSA No. V-2132 and TSA No. V-6667 pertained to the same property.

The RTC decided in favor of the petitioners, stating that while Solito's status as heir was not disproven, the property in question arose from TSA No. V-2132, which was different from the TSA No. V-6667 from which the respondents derived their claim.

The CA reversed this decision, citing the failure to identify the property sought to be recovered and lack of jurisdiction, as the assessed value of the property was not alleged, leaving it unclear which court had jurisdiction.

Issues:

1. Whether the petitioners failed to prove the identity of the property in question.
2. Whether the trial court acquired jurisdiction over the complaint.

Court's Decision:

The Supreme Court denied the petition. It upheld the CA's findings that the petitioners failed to establish the RTC's jurisdiction over the complaint, as the assessed value was not specified. Moreover, the petitioners did not properly identify the property sought to be recovered. As such, both the failure to allege the assessed value and the failure to identify the property warranted the dismissal of the Complaint.

Doctrine:

- Jurisdiction over the subject matter is conferred by law and is determined by the material allegations of the complaint.
- In an action for recovery of possession, the plaintiff must clearly identify the land sought to be recovered.

Class Notes:

- The assessed value of real property must be alleged in a recovery of possession complaint to determine jurisdiction.
- Failure to identify real property in a recovery of possession complaint is fatal to a plaintiff's claim.
- Jurisdiction cannot be waived and can be raised at any stage, including on appeal.
- Key Statutes:
 - Section 19(2) and Section 33(3) of Batas Pambansa Blg. 129, as amended by Republic Act No. 7691, concerning jurisdiction based on the assessed value of the real property in dispute.
 - Article 434 of the Civil Code of the Philippines, requiring proper identification of the property in an action to recover.

Historical Background:

This case reflects the procedural requirements in Filipino law that emphasize the importance of pleading the assessed value for jurisdictional purposes and the proper identification of the property in a complaint. These requirements ensure precision in legal claims and uphold the orderly administration of justice in the Philippines, particularly in land disputes subject to specific rules due to the historical complexities of land ownership and registration in the country. The case also underscores the differentiation between Townsite Applications and illustrates issues arising from transfer of hereditary rights in property.