

Title: Elizabeth M. Lansangan v. Antonio S. Caisip

Facts:

Elizabeth M. Lansangan (petitioner) filed a Complaint for Sum of Money and Damages against Antonio S. Caisip (respondent) at the 2nd Municipal Circuit Trial Court (MCTC) of Capas-Bamban-Concepcion, Tarlac, docketed as Civil Case No. 2738-12. The complaint was due to respondent's failure to pay installments per a promissory note worth €2,522.00.

Upon respondent's failure to file any response, petitioner moved to declare him in default, which the MCTC granted. The case was submitted for resolution. However, on September 3, 2012, the MCTC, *motu proprio*, dismissed the complaint for failure to undergo barangay conciliation proceedings as required under Republic Act No. 7160 (RA 7160), or "The Local Government Code of 1991."

Petitioner filed a motion for reconsideration, which was denied. Aggrieved, she filed a petition for certiorari before the Regional Trial Court (RTC). The RTC upheld the MCTC's dismissal, emphasizing the jurisdictional nature of barangay conciliation. Petitioner's subsequent motion for reconsideration was likewise denied. Unyielding, petitioner appealed to the Court of Appeals (CA), which affirmed the RTC's decision. The CA ruled that pre-litigation barangay conciliation was mandatory because the parties were residents of the same barangay. Subsequent motions for reconsideration were also denied, leading to a petition before the Supreme Court.

Issues:

The principal issue was whether the CA erred in upholding the *motu proprio* dismissal of petitioner's complaint due to failure to undergo barangay conciliation proceedings before filing the complaint in court.

Court's Decision:

The Supreme Court (SC) found the petition meritorious, stating that non-compliance with barangay conciliation requirements does not affect a court's jurisdiction and can be deemed waived if not timely raised by the defendant. SC emphasized that while failure to comply with a condition precedent may lead to dismissal for lack of cause of action or prematurity, it does not strip the court of its jurisdiction if the defense fails to object properly.

Since respondent was declared in default for failing to respond and did not raise any objection to the court's jurisdiction, the courts *a quo* erred in dismissing the case on the grounds of non-compliance with barangay conciliation. Accordingly, the SC reversed and set

aside the CA's decisions and remanded Civil Case No. 2738-12 back to the MCTC for resolution on the merits.

Doctrine:

Non-compliance with barangay conciliation requirements pursuant to RA 7160, while a condition precedent for filing a complaint in court, is not jurisdictional in nature. Such non-compliance can be waived if the defense does not timely object to the jurisdiction of the court during the proceedings.

Class Notes:

- Jurisdiction: The authority granted to a formal legal body to adjudicate legal disputes and carry out the administration of justice in a specific field.
- Condition Precedent: An event or state of affairs that is required before something else will occur.
- Motion to Dismiss: A formal request for a court to dismiss a case.
- Barangay Conciliation: A mandatory pre-litigation process in the Philippines where parties must attempt to resolve disputes at the barangay (village) level before resorting to formal court action.

Relevant Legal Provisions:

- Section 1, Rule 16, Rules of Court: Lists the grounds an action may be dismissed, including a condition precedent for filing the claim has not been complied with.
- Section 409 and Section 412 of RA 7160: Mandate barangay conciliation as a pre-condition to filing cases in court involving parties in the same barangay.

Historical Background:

The barangay conciliation system, which originated from Presidential Decree No. 1508 (Katarungang Pambarangay Law), aims to reduce court litigations and improve the quality of justice by mandating the settlement of certain disputes at the local, community level. RA 7160 furthered this policy by integrating such provisions into the Local Government Code. The case exemplifies the challenges and interpretations of these laws in the modern judicial context.