

**\*\*Title:\*\*** Antonio Garcia et al. vs. Felipe Neri Esclito et al.

**\*\*Facts:\*\***

In 1979, petitioner Antonio Garcia bought a 29-hectare land in Barangay Magdug, Governor Generoso, Davao Oriental, which he subsequently divided and donated to his relatives through deeds of transfer of rights in 1998. The recipients then applied for land titles under the DENR's Handog Titulo program and were issued patents and corresponding titles in November 1998. However, in 2003, respondents, holding CLOAs from the Department of Agrarian Reform (DAR) dated December 1998, sought to annul the sale and subsequent transactions citing a violation of RA 6657, as the deed was not registered within the required period, rendering it and its derivative titles void. The petitioners countered by raising jurisdictional questions and defending the integrity of their titles.

This initiated a series of legal disputes across various fora: the Office of the Provincial Adjudicator (which dismissed the case), the DARAB (which reversed the dismissal and nullified the transactions), the Court of Appeals (which affirmed DARAB's decision), and finally, leading to a petition for certiorari under Rule 65 to the Philippine Supreme Court.

**\*\*Issues:\*\***

1. Whether the Court of Appeals committed grave abuse of discretion in dismissing the petition against DARAB's decision.
2. Whether the attack on the deed of sale constituted an impermissible collateral attack on the petitioners' Torrens certificates of title.
3. Whether DARAB had jurisdiction over the matter.

**\*\*Court's Decision:\*\***

The Supreme Court granted the petition, setting aside the decisions of the Court of Appeals and DARAB, and reinstating the Provincial Adjudicator's decision which dismissed the respondents' petition for annulment. The Court highlighted that the remedy of certiorari was improperly availed by the petitioners but chose to address the matter in the interest of justice. The Court ruled that the respondents' petition before the Provincial Adjudicator was a collateral attack on the Torrens certificates of title, which is prohibited, and that the DARAB and Court of Appeals erred in affirming a decision based on such an attack. Consequently, all subsequent documents and titles derived from the original deed of sale were ruled valid.

**\*\*Doctrine:\*\***

The ruling reiterated the doctrine that a certificate of title cannot be subject to a collateral attack and can only be altered, modified, or canceled in a direct proceeding in accordance with the law. This case illustrates the principle that the integrity of land titles under the Torrens system is to be preserved against collateral challenges.

**\*\*Class Notes:\*\***

- The principle of indefeasibility of Torrens title: A Torrens title cannot be challenged except in direct proceedings.
- Collateral vs. Direct attack: This case differentiates between a direct attack aimed specifically at annulling a title, and a collateral attack where an attempt to invalidate a title is made incidentally in another proceeding.
- Jurisdiction over land registration issues: Jurisdiction belongs to the authority that originally issued the title or certificate, and such issues cannot be collaterally questioned in proceedings under a different jurisdiction (i.e., DARAB's jurisdiction over agrarian reform matters does not extend to nullifying Torrens titles issued by the DENR).
- Misapplication of remedies: Despite the improper use of certiorari when appeal was available, the Supreme Court may still consider the petition if it serves the interest of justice.

**\*\*Historical Background:\*\***

This case occurs within the context of conflicting interests over land ownership and reform in the Philippines. The Comprehensive Agrarian Reform Law (RA 6657) aimed at equitable land distribution clashed with established property rights under the Torrens system, highlighting tensions between land reform policies and individual land ownership rights. The legal battle traversed various administrative and judicial platforms, reflecting the complex web of land ownership, agrarian reform, and the legal protections afforded to land titles in the Philippines.