

Title: Republic of the Philippines v. Pasig Rizal Co., Inc.

Facts:

This case began with Manuel Dee Ham causing the survey of the Subject Property under Plan Psu-169919 in 1958. The plan was approved by the Director of Lands, and the Property was declared in Manuel's name for tax purposes. Upon Manuel's death in 1961, his wife, Esperanza Gerona, and their children inherited the Property, which they later transferred to the Dee Ham family corporation, Pasig Rizal Co., Inc. (PRCI). Esperanza executed an Affidavit formalizing the transfer on November 6, 2009.

Procedural History:

In 2010, PRCI applied for original registration of title over the Subject Property at the RTC in Pasig City, asserting ownership and continuous possession for over 50 years. The Republic of the Philippines opposed the application. The RTC ruled in favor of PRCI, a decision the Republic challenged before the Court of Appeals (CA). The CA affirmed the RTC's decision, leading the Republic to file a petition for review with the Supreme Court.

Issues:

1. Whether PRCI established the Subject Property as alienable and disposable agricultural land of the public domain.
2. Whether the certifications issued by the DENR Regional Technical Director and the DENR RED-NCR were sufficient to prove the alienable and disposable status of the land for registration purposes under PD 1529.

Court's Decision:

The Supreme Court decided to remand the case to the CA, highlighting two significant legal matters for resolution: (a) the requirements for original registration of land acquired through prescription; and (b) evidence sufficient to prove the alienable and disposable status of land for registration purposes under PD 1529.

Doctrine:

The classification of agricultural land as alienable and disposable by the State constitutes unequivocal proof of its conversion to patrimonial property, making it open to private acquisition.

Class Notes:

1. Agricultural lands classified by the State as alienable and disposable are deemed converted to patrimonial property (Civil Code, Articles 420-422).

2. Ownership over real property can be acquired through prescription under conditions laid down by law (Civil Code, Articles 1113, 1127, and 1129).
3. The Regalian doctrine presumes that all lands of the public domain belong to the State, except those proven to be privately owned.
4. RA 11573 amends Section 14 of PD 1529, simplifying the confirmation process for imperfect land titles and specifying proof of the alienable and disposable status of the land.

Historical Background:

This case reflects the complex interplay between the Regalian doctrine, the State's power to classify lands of the public domain, and private claims to land ownership in the Philippines. The legal proceedings demonstrate the transition and interpretation of laws concerning land registration and the recognition of long-standing possession and use as a basis for confirming imperfect titles.