

Title:

Mario Siasoco et al. vs. Court of Appeals, Iglesia ni Cristo

Facts:

Petitioners, registered owners of nine parcels of land in Montalban, Rizal, Philippines, attempted to sell their properties in December 1994. The Iglesia ni Cristo (INC) initially negotiated with them but failed to reach an agreement. Negotiations resumed over a year later, culminating in an offer made by the petitioners to INC in a letter dated December 16, 1996. A counter-response from INC's counsel indicating acceptance but disagreement over the proposed undervaluation of the total consideration was received on December 24, 1996. Before receiving this response, the petitioners claimed to have contracted the sale of the properties to Carissa Homes Development and Properties, Inc. (Carissa) due to no response from INC.

INC filed a civil case against the petitioners and Carissa on January 14, 1997, for specific performance and damages, designated as Civil Case No. Q-97-29960, claiming a sale had been consummated. While petitioners filed a motion to dismiss based on improper venue and lack of capacity to sue, Carissa submitted its answer to the complaint on February 24, 1997. Amid unresolved disputes, INC negotiated and bought the properties from Carissa, leading to an Amended Complaint filed on April 24, 1997, focusing on damages and dropping Carissa as a defendant.

Issues:

1. The propriety of the Amended Complaint's admission without leave of court.
2. Whether the amendment constituted a substantial alteration of the cause of action.
3. The jurisdiction of the Regional Trial Court (RTC) of Quezon City over the original and amended complaints.

Court's Decision:

The Supreme Court affirmed the decisions of the lower courts, allowing the Amended Complaint filed by INC. It ruled that an amendment is permissible as a matter of right before a responsive pleading has been served against the defendants who have not yet answered. Hence, since Carissa had answered but the petitioners had not, INC could amend its complaint regarding claims against the petitioners without seeking leave of court. Additionally, the amendment did not substantially alter the cause of action and did not prejudice the petitioners' rights or delay the action. The Court also clarified that the RTC of Quezon City had proper jurisdiction over the case because it involved a personal action for

specific performance with damages, which could be filed where any of the parties resided.

Doctrine:

The Supreme Court reiterated that a plaintiff could amend their complaint once as a matter of right before a responsive pleading is served by any defendant. Furthermore, certiorari under Rule 65 is not appropriate for contesting a court's final decision when an appeal is available and provides an adequate remedy.

Class Notes:

- **Amendment of Pleadings**: As per Rule 10 of the Rules of Court, a party may amend their pleading once as a matter of right before a responsive pleading is served, regarding claims against non-answering defendants.
- **Certiorari vs. Appeal**: Certiorari (Rule 65) is not a substitute for a lost appeal, especially when the latter provides a sufficient remedy.
- **Jurisdiction Over Personal Actions**: Personal actions, such as specific performance with damages, can be filed in the court where any of the parties reside, regardless of where the subject property is located.

Historical Background:

This case highlights the procedural intricacies and strategic considerations in civil litigation within the Philippine legal landscape, emphasizing the fluidity in amending complaints based on defendants' responses and the court's discretion in admitting such amendments. The decision underscores the judiciary's commitment to resolving cases based on their real facts and expediting their resolution while ensuring that no party is prejudiced by procedural maneuvers.