

Title: Municipality of Meycauayan, Bulacan vs. Intermediate Appellate Court and Philippine Pipes & Merchandising Corporation

Facts:

In 1975, Philippine Pipes & Merchandising Corporation (respondent) applied for a permit to fence a property in Meycauayan, Bulacan, for storing heavy equipment and products. The same year, the Municipal Council, under Mayor Celso R. Legaspi, passed Resolution No. 258, expressing intent to expropriate part of the respondent's property for public road use. The respondent opposed this, prompting a provincial investigation that concluded with a recommendation against expropriation due to lack of genuine necessity. In 1983, under Mayor Adriano D. Daez, the Municipal Council passed Resolution No. 21, renewing the expropriation effort, which was subsequently approved by the Provincial Board. The municipality filed a special civil action for expropriation in 1984, leading to a trial court's grant of a writ of possession upon deposit of the land's market value. The trial court later declared the expropriation lawful. The respondent appealed, and the Intermediate Appellate Court initially affirmed the decision but reversed it upon reconsideration, citing no genuine necessity for a public road. The municipality's motion for reconsideration was denied, prompting a petition for review on certiorari to the Supreme Court.

Issues:

1. Whether the Intermediate Appellate Court erred in reversing its decision on the ground of lack of genuine necessity for expropriation.
2. Whether the Supreme Court can review factual findings in certiorari proceedings.
3. Whether an alternate, more appropriate lot exists for the intended public road, affecting the necessity of expropriating respondent's property.

Court's Decision:

The Supreme Court dismissed the petition, affirming the respondent court's resolution that found no genuine necessity for the expropriation. The decision highlighted the existence of other connecting roads and a more suitable lot for a public road, making the expropriation unnecessary. The Court reiterated that it only reviews errors of law, not factual findings unless certain exceptions apply, none of which were present in this case.

Doctrine:

The foundation of the right to exercise the power of eminent domain is genuine necessity, and such necessity must be of a public character. Courts have the power to inquire into the legality of the exercise of eminent domain to determine this necessity.

Class Notes:

- The power of eminent domain requires genuine necessity for public use.
- Judicial inquiry into the exercise of eminent domain focuses on validating the genuine necessity and public character of the necessity.
- The Supreme Court generally does not review factual findings in certiorari proceedings unless exceptional circumstances justify such review.
- Legal statutes: Constitution of the Philippines on eminent domain; Rules of Court on certiorari proceedings.

Historical Background:

The case represents how municipal resolutions aimed at public development, such as road expansion, can be contested when perceived as lacking genuine necessity or when alternative, less intrusive options are available. It exemplifies the judicial checks on local government powers of eminent domain, underscoring the importance of careful consideration of property rights and the genuine necessity for public use before expropriating private property.