

Title: Elsa Degayo vs. Cecilia Magbanua-Dinglasan, et al.

Facts:

The case revolves around a dispute over a parcel of land, Lot No. 861, located in Dingle, Iloilo, originally owned by Elsa Degayo's deceased parents. The respondents, Cecilia Magbanua-Dinglasan and others, owned an adjacent parcel, Lot No. 7328, in Pototan, Iloilo. Over time, the Jalaud River, which separated the properties, altered its course, resulting in a section of Lot No. 7328 being added to Lot No. 861. The respondents claimed this section as an abandoned riverbed rightfully belonging to them, while Degayo and her tenants treated it as an accretion to Lot No. 861 and began cultivating it.

Respondents initiated a lawsuit in the RTC of Iloilo against the tenants of Lot No. 861 (Civil Case No. 16047), claiming ownership of the disputed land. Degayo's subsequent attempt to intervene in this case was denied, and she did not challenge this decision. Instead, Degayo filed a separate suit (Civil Case No. 18328), asserting her ownership of the disputed area as an accretion to her property.

The RTC ruled in favor of the respondents in Civil Case No. 16047, a decision that became final after the tenants failed to appeal. Meanwhile, in Civil Case No. 18328, originally decided in Degayo's favor by another RTC branch, was later reversed by the Court of Appeals (CA), ruling the disputed property as an abandoned riverbed belonging to the respondents.

Issues:

1. Whether the disputed property is an abandoned riverbed or an accretion to Lot No. 861.
2. Whether the CA erred in taking judicial notice of the RTC decision in Civil Case No. 16047.
3. Whether the RTC Branch 27 decision in Civil Case No. 16047 is conclusive upon Degayo, who was not a formal party in that case.

Court's Decision:

The Supreme Court denied Degayo's petition, affirming the CA's decision. The Court ruled that:

1. ****Abandoned Riverbed vs. Accretion****: The disputed property is an abandoned riverbed, not an accretion to Lot No. 861, following the natural alteration of the Jalaud River's course.

Consequently, the property legally belongs to the respondents as compensation for the portion of Lot No. 7328 overtaken by the river.

2. **Judicial Notice of Civil Case No. 16047**: The CA did not err in taking judicial notice of the RTC decision in Civil Case No. 16047, as Degayo had referred to this case in her pleadings and it was closely connected to the matter in controversy.

3. **Conclusiveness of Civil Case No. 16047 on Degayo**: The decision in Civil Case No. 16047 is binding on Degayo despite her not being a formal party, since she had a chance to present her claims during that trial, establishing the principle of res judicata.

Doctrine:

The Supreme Court reiterated the doctrines of res judicata or claim preclusion, which prevents parties from litigating the same issue more than once, and the rules regarding the recognition of accretions and the determination of abandoned riverbeds under Philippine law.

Class Notes:

- **Res Judicata**: A matter already adjudged; a thing judicially acted upon or decided.
- **Accretion**: The gradual and imperceptible accumulation of land, by natural causes, on property situated along the banks of rivers.
- **Article 461 of the Civil Code**: Governs that riverbeds abandoned through natural changes become the property of the owners of the land newly occupied by the water in proportion to the area lost.

Key Concepts:

- Illustration of the principles surrounding land disputes involving natural changes in river courses, accretions, and abandoned riverbeds.
- Application of the doctrine of res judicata in Philippine jurisprudence.

Historical Background:

This case highlights the complexities of property disputes in regions where natural alterations in landscapes, such as the changing courses of rivers, play a significant role. It underscores the importance of accurately identifying land changes as either accretions or abandoned riverbeds in determining rightful ownership under Philippine law.