

Title: Jakosalem and Dulfo vs. Barangan

Facts:

On August 13, 1966, Col. Roberto S. Barangan entered a Land Purchase Agreement to buy a 300 square meter lot in Antipolo, Rizal, from Citadel Realty Corporation. After completing the payment by August 31, 1976, he received the title (TCT No. N-10772). Despite being unable to occupy the land due to his military assignments, Barangan paid the property taxes regularly. Upon his visit in December 1993, he discovered the lot occupied by Godofredo Dulfo and his family. After a failed demand for Dulfo to vacate, Barangan sought legal action. When Barangan's complaint for Anti-Squatting was dismissed by the Prosecutor's Office, he commissioned a relocation survey which confirmed Dulfo was occupying Barangan's titled property.

Subsequently, Barangan filed a Complaint for Recovery of Possession against Dulfo and Dulfo's son-in-law, Atty. Rogelio J. Jakosalem, in the Regional Trial Court (RTC), Antipolo City. The RTC, however, dismissed Barangan's claim, citing insufficient evidence and ruling that laches and prescription barred Barangan's recovery. Barangan appealed to the Court of Appeals (CA), which reversed the RTC's decision, affirming Barangan's title to the property and right to possession.

Issues:

1. Whether Barangan successfully identified the subject property covered by his title.
2. Whether the relocation survey's protocols and outcomes are valid.
3. The reasonableness of the PHP 3,000.00 per month as rent or compensation for unauthorized use.
4. The appropriateness of awarded moral, temperate or moderate, and attorney's fees by the CA.
5. Whether laches and prescription barred Barangan's claim.

Court's Decision:

The Supreme Court denied the petition, affirming the CA's decision with modifications. It confirmed Barangan had sufficiently proven the identity of the land and his title to it. The Court found the petitioners' refusal to cooperate in the survey indicative of their awareness of the possible adverse outcome. The CA's awards for compensation, moral damages, and attorney's fees were affirmed, though the temperate damages were deleted for not being alleged in the complaint. Laches and prescription do not apply to registered land under the Torrens system.

Doctrine:

1. A party must prove (1) the identity of the claimed land, and (2) his title to it, to recover possession.
2. Prescription and laches cannot apply to registered land covered by the Torrens system.

Class Notes:

1. Identity and Title Proof in Recovery Actions: To recover possession, a plaintiff must establish the land's identity and hold strong title evidence, such as a Torrens title.
2. Relocation Surveys: Failure to participate in agreed-upon relocation surveys may be viewed unfavorably by the courts.
3. Damages and Compensation: Legal interest on unpaid compensation and the setting of reasonable amounts involve judicial discretion based on presented evidence.
4. Registered Land Immunity: Registered land is protected from claims based on prescription and laches due to the indefeasibility of the Torrens title system.

Historical Background:

This case emphasizes the protection afforded by the Torrens title system, highlighting the challenges landowners face when their property rights are contested, especially due to long periods of physical absence. It underscores the importance of participation in legal processes, like surveys, to substantiate ownership claims.