

### Title:

Adelia C. Mendoza vs. Hon. Angelito C. Teh, et al.: A Case of Jurisdiction and Reconveyance

### Facts:

Adelia C. Mendoza, widow and proposed administratrix of the late Norberto B. Mendoza's estate, filed a reconveyance of title and damages case with the Regional Trial Court (RTC) of Batangas. The controversy arose from parcels of land located in Batangas, with Mendoza seeking reconveyance due to a purported error in the titles. Following the complaint, respondents contested the action, raising issues including lack of jurisdiction and cause of action, among others. They particularly contested Mendoza's capacity to represent the estate without formal appointment as administratrix by a competent court. Proceedings in the Batangas RTC saw the dismissal of the case on jurisdictional grounds, specifically questioning the mix of a reconveyance claim (an ordinary civil action) with a request for the appointment of an estate administratrix (a special proceeding). Mendoza's motion for reconsideration was denied, prompting an appeal to the Supreme Court on pure questions of law.

### Issues:

1. Does the inclusion of a petition for appointment as administratrix in a reconveyance action strip the RTC of its jurisdiction over the case?
2. Can a probate court settle questions of property ownership within a reconveyance suit?
3. Does the residence of the decedent at the time of death determine the venue and jurisdiction for cases involving estate administration?

### Court's Decision:

The Supreme Court reversed the decisions of the Batangas RTC, establishing that:

1. The RTC possesses jurisdiction over reconveyance cases, regardless of the inclusion of an appointment for an estate administratrix. The jurisdiction of a court is determined by the nature of the action and the value of the claim, not by incidental procedural requests.
2. The resolution stated that questions of ownership could be resolved within an action for reconveyance without necessitating a probate court's decree, thereby separating it from the proceedings for estate settlement or administration.
3. The Court clarified that residence at the time of death affects only the venue, not the jurisdiction, for estate-related proceedings. Jurisdiction over such actions is vested in RTCs, subject to pecuniary estimations or the nature of the action (e.g., title to property, estate proceedings).

### Doctrine:

This case reiterates the doctrine distinguishing between jurisdiction and venue, particularly in civil actions involving property and incidental probate matters. It underscores the RTC's capacity to adjudicate cases involving title to property and related matters of estate administration within the same proceedings.

### Class Notes:

- **Jurisdiction vs. Venue:** Jurisdiction relates to a court's authority to hear a case based on the nature of the action and the amount involved, while venue pertains to the geographical location where the case should be heard.
- **Reconveyance Actions:** Involve disputes over property title, where the court's aim is to correct or annul titles wrongfully or mistakenly awarded.
- **Probate Matters in Civil Litigation:** Requests such as appointment of estate administrators can be made incidentally in civil actions without altering the jurisdiction of courts generally dealing with civil litigation.
- **Estate Administration Venue:** Determined by the decedent's residence at death, affecting where estate administration proceedings are initiated; however, this does not limit jurisdiction over related civil actions involving estate properties.

### Historical Background:

This decision underscores the evolving jurisprudence on handling combined civil and probate matters within the Philippine legal system. By clarifying jurisdictional and procedural nuances, it ensures that the administration of justice respects the breadth of RTC authority while accommodating the efficient resolution of intertwined civil and special proceedings.