

****Title**:** Santos Ventura Hocorma Foundation, Inc. v. Mabalacat Institute, Inc.: A Case of Alleged Forum Shopping in Filing Collection and Ejectment Cases

****Facts**:**

Santos Ventura Hocorma Foundation, Inc. (SVHFI), the petitioner, claimed ownership of a parcel of land in Mabalacat, Pampanga, which Mabalacat Institute, Inc. (MII), now known as Don Teodoro V. Santos Institute, occupied since 1983 without paying rent. In March 2002, SVHFI demanded rental payment from MII, which MII refused to comply with. After failed negotiations and MII's continued refusal to pay or vacate the premises, SVHFI filed a Complaint for collection of sum of money (Collection Case) in the Makati City Regional Trial Court (RTC). MII's subsequent Motion to Dismiss was denied, and their petition for certiorari was also denied by the Court of Appeals (CA) and Supreme Court due to procedural errors.

Parallely, while the Collection Case was underway, SVHFI initiated an Ejectment Case against MII in a Municipal Circuit Trial Court (MCTC) in Pampanga. MII moved to dismiss the ejectment suit, alleging forum shopping and splitting a single cause of action by SVHFI. The RTC dismissed the Collection Case due to perceived forum shopping. Aggrieved, SVHFI appealed to the CA, which affirmed the RTC's decision. SVHFI then brought the case to the Supreme Court.

****Issues**:**

The Supreme Court was tasked to determine:

1. Whether SVHFI committed forum shopping by filing separate actions for collection and ejectment in different courts.
2. Whether there was an identity of rights asserted and relief prayed for between the collection of a sum of money and unlawful detainer cases.

****Court's Decision**:**

The Supreme Court granted SVHFI's Petition, reversing and setting aside the CA's decision. It ruled that SVHFI did not commit forum shopping. The Court clarified that forum shopping requires identity of parties, rights asserted, relief prayed for, and that a judgment in one case would amount to res judicata in the other - conditions not met in this situation.

The Court distinguished between the nature of collection and ejectment actions, noting that the former focuses on the recovery of unpaid rent through a full trial, while the latter, being summary in nature, determines only the issue of physical possession. Thus, there was no

identity of rights asserted or relief prayed for between the two cases, and a judgment in one would not resolve the other. Furthermore, the prohibition against forum shopping aims to prevent contradictory judgments by different tribunals, a concern not present in this case.

****Doctrine**:**

The Supreme Court reiterated the doctrine against forum shopping, emphasizing that it exists where actions are instituted in different courts to obtain favorable judgment based on the same set of facts, and that *litis pendentia* or *res judicata* between actions negates such occurrence. Also, the Court highlighted the distinction between collection of sum of money actions and ejectment suits and their incompatibility for joinder due to their different natures and procedural paths.

****Class Notes**:**

- ****Forum Shopping****: Initiating multiple actions across different courts for similar relief to increase favorable judgment chances. Elements: identity of parties or interests, rights asserted, relief prayed for, and resultant *res judicata* or *litis pendentia*.
- ****Ejectment Cases****: Focus on physical possession of the property, pursuing the fair rental value or reasonable compensation for use and occupation.
- ****Collection of Sum of Money Cases****: Aim at the recovery of unpaid rent through full trials, unrelated to the legality of occupancy.
- ****Litis Pendentia and Res Judicata****: Key in avoiding forum shopping. Absence in cases with different causes of action and requested reliefs signifies no forum shopping.

****Historical Background**:**

This case exemplifies the Philippine legal system's handling of property disputes involving occupancy, rental arrears, and the strategic legal frameworks employed by parties to assert their claims. It highlights the judiciary's approach to delineate between different causes of action - collection of sums due and recovery of property possession - reinforcing procedural integrity and the judicious use of legal remedies in the Philippines.