

****Title:**** Regalado v. De La Pena: A Jurisdictional Inquiry on Recovery of Possession

****Facts:****

This case revolves around two parcels of land, totaling 44 hectares, in Murcia, Negros Occidental, owned by Emma De La Rama Vda. De La Pena and her family (respondents). Joseph O. Regalado (petitioner) allegedly occupied and cultivated these lands without the owners' consent in 1994. Despite demands and a failed barangay conciliation in 1995-1996, Regalado did not vacate, leading to a lawsuit filed by the De La Penas in March 1998 for recovery of possession and damages with injunction. The petitioner claimed he had rights over the properties through waivers from some of the De La Penas, eventually leading to Jaime Antonio De La Pena waiving his rights to the petitioner. There were also motions challenging the RTC's jurisdiction based on the nature of the action (ejectment vs. accion publiciana) and the value of the properties in question.

****Issues:****

1. Whether the Regional Trial Court (RTC) had jurisdiction over the subject matter of the case?
2. Whether the Court of Appeals erred in ruling that the petitioner must return possession of the properties to the respondents.
3. Whether the petitioner should be awarded damages.

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

The Supreme Court granted the petition, reversing the CA's decision, and dismissed the complaint for lack of jurisdiction. The Court differentiated between ejectment, accion publiciana, and accion reivindicatoria, basing jurisdiction on the nature of action and the value of the property involved. It found the RTC erred in assuming jurisdiction without clear evidence of the property's assessed value. The Court emphasized that jurisdiction must be evident from the law, not presumed, and cannot rest on parties' stipulation or court assumption. Thus, without clear jurisdictional basis, all proceedings, including the RTC decision, were void.

****Doctrine:****

The case reiterates that jurisdiction over civil actions involving title to or possession of real property depends on the assessed value of the property and the specific nature of the action filed (ejectment, accion publiciana, or accion reivindicatoria), as outlined in Republic Act No. 7691 and the Rules of Court.

****Class Notes:****

- ****Jurisdiction:**** Determined by the law, specific nature of the action, and in cases of real property, also by the assessed value (e.g., ejectment, accion publiciana, and accion reivindicatoria).
- ****Republic Act No. 7691:**** Expanded the jurisdiction of lower courts (MTC, MeTC, and MCTC) and clarified jurisdictional boundaries with RTC based on the assessed value of real property.
- ****Rules of Court on Ejectment:**** Ejectment cases require specific jurisdictional facts in the complaint, including the manner and duration of dispossession.

****Historical Background:****

This case highlights the challenges in Philippine legal proceedings regarding land disputes, especially the critical role of jurisdiction. It underscores the necessity for clarity in complaints regarding the action type and property value to correctly establish which court has jurisdiction. This decision further solidifies the jurisprudence on property rights and their recovery, emphasizing the importance of adherence to legal procedures and jurisdictional mandates.