

### Title: Macailing et al. v. Andrada et al.

### Facts:

A land dispute emerged in Lebak, Cotabato, Philippines, involving Rafael Macailing, Silvestre Macailing, Dominico Necesito, and Rafael Necesito (Plaintiffs-Appellees) and the heirs of Salvador Andrada (Defendants-Appellants) over four (4) parcels of land. The Plaintiffs, settlers occupying four hectares each, contested Salvador Andrada's application for a larger parcel which included their occupied lands. The District Land Officer decided in favor of the Plaintiffs, excluding the contested parcels from Andrada's application. This decision, however, was reversed by the Director of Lands, who ordered the parcels to be restored to the Andradas. The Plaintiffs appealed to the Secretary of Agriculture and Natural Resources, which reversed the Director of Lands' decision on October 27, 1956, awarding the lands to the Plaintiffs.

The Defendants sought reconsideration twice but were denied, with the Secretary declaring the decision final and executory by September 12, 1957. Ignoring the finality, the Defendants appealed to the Office of the President on October 23, 1957. On August 20, 1959, the Assistant Executive Secretary reversed the Secretary's decision, siding with the Defendants.

The Plaintiffs filed a suit against this reversal in the Cotabato court on December 23, 1959, challenging the finality of the Secretary's decision. On January 21, 1963, based on a stipulated facts agreement, the court ruled the Secretary's decision as valid, final, and executory, nullifying the Assistant Executive Secretary's reversal.

### Issues:

1. Whether plaintiffs employed the correct legal remedy.
2. If the Court of First Instance of Cotabato had jurisdiction to issue a writ of certiorari regarding a decision made by an officer situated outside its territorial jurisdiction.
3. Whether the decision of the Secretary of Agriculture and Natural Resources had become final and executory.
4. Whether the Office of the President has the authority to review a decision which has been declared final and executory by the Secretary of Agriculture and Natural Resources.

### Court's Decision:

1. The Supreme Court identified the Plaintiff's action as a special civil action of certiorari, focusing on the Assistant Executive Secretary's grave abuse of discretion, thereby agreeing

with the plaintiff's choice of remedy.

2. The Court held that the Cotabato court had jurisdiction on the basis that the case involved the judicial review of administrative decisions, citing precedents that supported reviewing administrative decisions by courts located in the plaintiff's residence locality.

3. The Court affirmed the decision of the Secretary of Agriculture and Natural Resources as final and executory, based on the lapse of the appeal period stated in Lands Administrative Order No. 6.

4. The Supreme Court ruled that the Office of the President could not review a decision of the Secretary once it became final and executory, emphasizing the need for administrative finality.

### ### Doctrine:

The decision of an administrative authority designated by law becomes final and executory after a lapse of the appeal period provided by relevant administrative orders or regulations. Any review, after such decision becomes final and executory, even by the Office of the President, constitutes a grave abuse of discretion rendering such review null and void.

### ### Class Notes:

- **Finality of Administrative Decisions**: Administrative decisions become final and executory upon the lapse of the appeal period unless noted otherwise. Review or reconsideration after finality is considered grave abuse of discretion.

- **Jurisdiction for Certiorari Against Administrative Acts**: Courts of First Instance have jurisdiction to issue writs of certiorari for reviewing decisions of administrative authorities based on legality regardless of the territorial jurisdiction where such administrative decisions were made or are being enforced.

- **Role of Administrative Orders in Review Periods**: Administrative orders or regulations lay down the period within which an appeal against an administrative decision must be made. The expiration of this period renders the decision final and unalterable by the same or higher administrative authority unless under exceptional circumstances provided by the regulations themselves.

- **Presidential Review of Administrative Decisions**: The authority of the President to review administrative decisions is subject to the finality of such decisions as provided by administrative law and regulations. Attempting a review after a decision has become final and executory is considered beyond the scope of presidential review powers.

### ### Historical Background:

This case highlights the tension between administrative finality and the supervisory review

powers of the Office of the President over administrative decisions in the Philippines. It underscores the judiciary's role in upholding the finality of administrative decisions and the limits of executive review to ensure stability and predictability in administrative law.