

Title: ****Guido-Enriquez vs. Victorino, et al.****

Facts:

The case traces its roots to February 1980 when Antonia Vda. De Victorino filed an Application for Registration of Title over a 10,603 square-meter lot in Binangonan, Rizal. The Republic of the Philippines, through the Director of Lands, challenged the application, asserting that the lot was public land.

During the proceedings, it was found that the subject lot was part of a larger parcel registered under the name of Antonia Guido, et al., under TCT No. M-2102, and overlapped with another disputed lot. This spawned a separate legal challenge (Guido Case) questioning the validity of TCT No. 23377, the origin of TCT No. M-2102, which was pending decision from the Supreme Court.

Notably, an erroneous coordinate led to a brief confusion about the lot's overlap, which was later clarified, confirming no overlap existed. Subsequently, the RTC-Pasig granted Antonia Victorino's application for registration in August 1988, a decision that became final and executory.

Years later, the Supreme Court resolved the Guido Case favorably for the Guidos but recognized the rights of bona fide occupants whose possession could qualify as ownership. This complicated the enforcement of the final decision in Antonia Victorino's favor, given her death and subsequent transaction that transferred the lot to Alicia Victorino.

Efforts to execute the registration decision experienced multiple legal challenges, with various motions and orders concerning the annotation of the Supreme Court's decision on TCT No. M-2102 and the issuance of a new decree for Antonia Victorino, eventually leading to this petition.

Issues:

1. Whether the August 15, 1988 RTC Decision in favor of Antonia Victorino was null and void.
2. If the subsequent orders and actions based on this decision were valid.
3. Whether the process deprived petitioner and co-owners of property without due process.

Court's Decision:

The Philippine Supreme Court denied the petition for review on certiorari, affirming the Court of Appeals decision to uphold the RTC's orders. It ruled that the August 15, 1988

Decision had become final and executory, thus immutable. It also held that the land registration case was appropriately handled as a proceeding in rem, negating the petitioner's claim of denial of due process. The segregation of the subject lot from TCT No. M-2102 was deemed the logical consequence of Antonia Victorino's validated claim over the portion.

Doctrine:

The Supreme Court reiterated the doctrine of finality of judgment, emphasizing that a decision that has acquired finality becomes immutable and unalterable. Additionally, it highlighted land registration proceedings as in rem, not requiring personal notice to owners or claimants to confer jurisdiction or afford due process.

Class Notes:

- Finality of Judgment: A legal principle that a decision, once it has reached finality, cannot be modified in any respect.
- Proceedings In Rem: Legal proceedings based on the status of a property rather than personal jurisdictions, necessitating no personal notices to confer jurisdiction.
- Immutable Decision: A legal decision that is unchangeable once it has become final and executory.
- Doctrine of Laches: Refers to the failure to assert one's rights in a timely manner, leading to a presumption that the party has waived those rights.

Historical Background:

This case is emblematic of the complex land disputes in the Philippines, highlighting issues of land ownership validity, the impact of final and executory decisions, and the rights of bona fide occupants. The amalgam of pre-war land titles, agrarian reform, and judicial interventions in property disputes underscores the challenges of land registration and titling in the country.