

Title:

Gomez vs. Court of Appeals: A Legal Battle Over Land Ownership Rights

Facts:

The case begins with the petitioners, heirs of Teodoro Y. Gomez, filing an application for registration of several lots in Bayombong, Pangasinan, on 30 August 1968. These lots, subdivided into Lots Nos. 1-12 of Plan Psu-54792 Amd.-2, were previously owned by Consolacion M. Gomez, Teodoro's daughter, whose ownership was affirmed in a prior Supreme Court decision (*Government of the Philippine Islands vs. Abran*). Following Consolacion's death, her son Luis Lopez executed a Quitclaim in favor of the petitioners. After public notice and the issuance of an order of general default due to no opposition, the trial court adjudicated the lots to the petitioners' favor on 5 August 1981, with a final and executory order issued on 6 October 1981.

Subsequently, in July 1984, the respondent Silverio G. Perez reported that the lots were already covered by homestead patents issued in 1928 and 1929, recommending the set-aside of the 1981 decisions. Despite petitioners' opposition, the lower court set aside its prior decision and order on 25 March 1985. The petitioners' subsequent movements, including the petition for certiorari and mandamus filed with the Supreme Court, which referred it to the Court of Appeals, resulted in dismissal for lack of merit in September 1986, a decision upheld upon petitioners' motion for reconsideration.

Issues:

1. Did respondent Judge have jurisdiction to amend the 1981 decisions?
2. Was issuance of the decrees by respondent land registration officials purely ministerial?
3. Is the *Government vs. Abran* decision "the law of the case," precluding land covered by homestead patents from registration?

Court's Decision:

The Supreme Court denied the petition, affirming the appellate court's decision. It ruled that:

1. The adjudication of land doesn't become final until after the entry of the final decree of registration and the elapsing of one year, thus the court may amend its decision within this period.
2. The duty of land registration officials to issue decrees, while generally ministerial, includes the discretion to refer matters to the court when in doubt, thereby not mandating the issuance of decrees contrary to discovered facts such as prior homestead patents.

3. The Government vs. Abran decision did not cover lands already under homestead patents, thus not applying as “the law of the case” here, where such patents predated the contested decision and were incontrovertible under the Torrens system.

Doctrine:

The case reiterates the doctrine that the finality of land registration decisions and the issuance of corresponding decrees are not absolute until after the entry of the final decree and a one-year period, during which the court retains jurisdiction to alter its rulings based on new evidence or facts.

Class Notes:

- In land registration cases, the adjudication of land does not become final until 1 year after the entry of the final decree of registration.
- Homestead patents, once registered under the Land Registration Act, become indefeasible and incontrovertible, equivalent to a Torrens title.
- Land registration officials act under the discretion of the court and their duties extend beyond just issuing decrees; they must ensure accuracy and compliance with the court’s final decision.

Historical Background:

This case illustrates the complexities of land ownership rights and the registration process in the Philippines, highlighting how prior Supreme Court decisions and existing land titles, such as homestead patents, can affect current land registration applications. It underscores the judiciary’s role in addressing and resolving conflicts arising from overlapping claims and the importance of the Torrens system in ensuring land title security.