

****Title:**** *Medalla et al. vs. Balbin et al.*

****Facts:****

The Medallas purchased agricultural land in Mamburao, Occidental Mindoro, from the heirs of Juan Ladao in 1962. The Medallas applied for registration of title but faced opposition from the petitioners (Balbin, Oriña, Narag, the Sytamcos, and the Reyes'), who held Original Certificates of Title through Homestead or Free Patent grants. The land registration court abstained from ruling due to the respondents' intention to file a separate action for cancellation of the petitioners' titles. A subsequent action for reconveyance and annulment of titles was initiated by the Medallas against the petitioners, leading the lower court to declare the lands private properties of the Medallas and ordered the cancellation of the petitioners' titles and payment of damages.

****Issues:****

1. The validity of the possessory information title of Juan Ladao and its registration beyond the statutory period.
2. Whether the Medallas' cause of action has prescribed.
3. The personality and capacity of the Medallas to institute the action, considering the lands were allegedly public when the patents and titles were issued to the petitioners.
4. The jurisdiction of the lower court over the cause of action.

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

Analyzing each issue, the Supreme Court found petitioners' contentions without merit regarding the validity and timeliness of Ladao's possessory information title. The court clarified that the institution of possessory information proceedings within a specified period was required, not the registration itself. The court also addressed the issue of prescription, concluding the action for reconveyance had indeed prescribed as it was filed more than four years after the discovery of the alleged fraud. The Supreme Court reversed the lower court's decision, dismissing the complaint filed by the Medallas with costs against them.

****Doctrine:****

1. ****Possessory Proceedings Requirement****: The institution of possessory information proceedings, not the registration of the possessory title, must occur within the mandated period.
2. ****Action for Reconveyance****: An action for reconveyance based on fraud must be filed within four years from the discovery of the fraud, marking the issuance and registration of patents as the moment of discovery.

****Class Notes:****

- Possessory information title legitimacy under the Maura Law requires the initiation of proceedings within one year; registration may follow afterward.
- Actions for reconveyance due to fraud are subject to a statute of limitations of four years from the moment of discovery, highlighted by the issuance of pertinent titles.
- Relevant legal citations include Sections 19 and 20 of the Royal Decree of February 13, 1894 (the Maura Law), and Section 55 of Act 496 regarding prescription of action for reconveyance.

****Historical Background:****

This case underscores the complex interplay between Spanish land laws (such as the Maura Law) and the Philippines' transition to American and later to independent governance, particularly concerning land titles. The controversy over the validity and timeliness of possessory information titles and the application of homestead or free patents underscores the challenges in reconciling old and new regimes of land registration and ownership in a post-colonial context.