

Title

Public Estates Authority v. Hon. Court of Appeals and Bernardo de Leon

Facts

The central factual narrative involves a dispute over Lot No. 5155, initially under water, then reclaimed by Public Estates Authority (PEA) in 1982 for the R-1 Toll Expressway part of the Manila-Cavite Coastal Road Reclamation Project. Bernardo de Leon, asserting long-term possession by his family—at least 50 years—via his deceased father, was contested by PEA. Actions escalated from construction on the lot to confrontations and legal actions, leading to the engagement of security forces, destruction of constructed houses by de Leon, and subsequent legal battles.

Following the dispute, Bernardo de Leon filed a complaint for damages, including a prayer for a writ of preliminary injunction against PEA and its representatives, in the Regional Trial Court of Makati, which granted a temporary restraining order and, after the hearing, a writ of preliminary injunction, premised on de Leon's supposed lawful possession and ownership claim.

PEA's appeal to the Court of Appeals was dismissed, leading to the Supreme Court appeal.

Issues

1. Whether Bernardo de Leon and his family constituted lawful owners and possessors of Lot 5155 based solely on a claim of ownership by possession for over fifty years.
2. The propriety of granting a writ of injunction to protect de Leon's claimed rights of possession against ongoing government infrastructure projects.

Court's Decision

The Supreme Court reversed the Court of Appeals' decision, emphasizing the principles governing the acquisition of public lands in the Philippines. It highlighted that lands presumed to be owned by the state could only be acquired through explicit grants or by meeting the stringent requirements for adverse possession laid out in the Public Land Act and its amendments. The Court found de Leon's claim of ownership based on possession and a cadastral map, certification of the land as alienable and disposable, and tax declarations since 1992, insufficient to establish ownership or lawful possession. Thus, it dismissed the complaint in Civil Case No. 93-143 of the Regional Trial Court, Makati.

Doctrine

- Public land in the Philippines cannot be acquired by private individuals without an explicit

grant from the government, except through long-term possession under a bona fide claim of ownership that can be judicially confirmed.

- Only alienable and disposable lands of the public domain that have been in open, continuous, exclusive, and notorious possession since June 12, 1945, may have their titles judicially confirmed.

Class Notes

1. **Public Land Act (Commonwealth Act No. 141, as amended by PD No. 1073):** Sets forth the requirements for the judicial confirmation of imperfect or incomplete titles due to long-term possession.
2. **Adverse Possession:** To justify judicial confirmation of title over public land, possession must be in the concept of an owner, open, continuous, exclusive, notorious, and since a period specified by law (initially since time immemorial or since July 26, 1894, later amended to possession since June 12, 1945, by PD No. 1073).
3. **Alienable and Disposable Land:** For a land to be subject to ownership claims through possession, it must first be declared as alienable and disposable by the government.

Historical Background

The case is illustrative of the complex legal framework governing land ownership in the Philippines, where vast tracts of land are considered public domain. It underscores the challenges in proving ownership or lawful possession over such lands, particularly for lands reclaimed or not initially available for private ownership. It reflects the judiciary's role in interpreting and applying legislative standards on land ownership and possession, embedded within the broader context of national development and infrastructure projects.