

Title: Department of Agrarian Reform Adjudication Board (DARAB) vs. Josefina S. Lubrica

Facts:

The legal battle began with Federico Suntay filing a petition against the Department of Agrarian Reform (DAR) and Land Bank for just compensation under Presidential Decree No. 27 for his 948.1911 hectares of land in Sablayan, Occidental Mindoro. The DAR and Land Bank valued the land at approximately P4.25 million, a figure Suntay contested as unjustly low. The case was filed before the Regional Agrarian Reform Adjudicator (RARAD) Conchita Miñas, leading to a decision in January 2001 favoring Suntay with P157.5 million compensation. Despite Land Bank's motion for reconsideration being denied in March 2001, they filed for just compensation with the Regional Trial Court (RTC) in April 2001, which was dismissed due to late docket fee payment.

Subsequently, the RTC dismissal was appealed by Land Bank to the Court of Appeals. Meanwhile, RARAD declared its decision final and executory, and upon Land Bank's continued pursuit for reconsideration, including a certiorari petition with DARAB, Josefina Lubrica (Suntay's assignee) filed a prohibition petition with the Court of Appeals against DARAB's jurisdiction over certiorari petitions. DARAB responded, asserting its supervisory power over RARAD, leading to a legal debate on DARAB's jurisdiction and authority to issue writs of certiorari.

Issues:

1. Whether DARAB, being a quasi-judicial body, has the jurisdiction over Land Bank's petition for certiorari.
2. The appropriateness of DARAB's participation in the proceedings before the Court of Appeals.
3. The validity of the procedures followed by DARAB in issuing its ruling, specifically in dealing with jurisdictional issues and its supervisory authority.

Court's Decision:

The Supreme Court affirmed the Court of Appeals' ruling that DARAB lacks jurisdiction over the petition for certiorari filed by Land Bank. It was clarified that jurisdiction must be expressly conferred by the Constitution or law, and it cannot be implied or assumed by an administrative or quasi-judicial body. DARAB's rule-making power does not extend to granting itself such jurisdiction. The Supreme Court also addressed the implications of not adhering to procedural timelines, emphasizing that Land Bank's petition for just compensation filed beyond the reglementary period rendered RARAD's decision final and

executory.

Doctrine:

The decision reiterates the doctrine that the jurisdiction of administrative or quasi-judicial bodies, like DARAB, is limited and must be expressly granted by the Constitution or relevant statutes. Moreover, it establishes that such bodies cannot assume jurisdiction over actions like certiorari without a clear legislative mandate.

Class Notes:

- Jurisdiction must be explicitly granted; it cannot be derived by implication.
- Rules of procedure are distinct from jurisdiction; they cannot confer or expand jurisdiction.
- Compliance with procedural timelines is critical in legal proceedings to ensure fairness and the timely resolution of disputes.
- The role of administrative and quasi-judicial bodies is confined to their statutory authority and expertise; stepping beyond this scope requires express legal authorization.

Historical Background:

This case illustrates the complex interplay between administrative bodies like DARAB and the judiciary in the Philippines' agrarian reform context. It underscores the challenges in ensuring just compensation for land taken under agrarian reform laws and the procedural intricacies involved in adjudicating these disputes. This decision clarifies the limits of DARAB's authority, emphasizing the principle of judicial and quasi-judicial restraint and the importance of adhering to the procedural and jurisdictional boundaries set by law.