

Title:

****Virginia Calalang et al. vs. Register of Deeds of Quezon City et al.****

Facts:

This case involves a dispute over Lot 671-A of the Piedad Estate in Barrio Culiati, Diliman, which was claimed both by individual lot owners who bought portions from Amando Clemente in the 1950s and by the Iglesia ni Kristo (INK), which bought the property from Lucia de la Cruz in 1975. The case stemmed from a previous legal contest, *dela Cruz v. dela Cruz*, which determined the ownership of Lot 671 in favor of Lucia de la Cruz. Following the Supreme Court's decision, INK began to fence the disputed area, leading to the filing of two petitions by affected lot owners. The procedural journey to the Supreme Court involved numerous motions, consultations, interventions, and appeals, ultimately centering around the ability of the Supreme Court's decision in *dela Cruz v. dela Cruz* to apply to the present contestation over property rights.

Issues:

1. The applicability of the Supreme Court's decision in *dela Cruz v. dela Cruz* to the present cases, concerning both the parties involved in the original case and those claiming rights transmitted from persons not a party to the original litigation.
2. The validity and effect of Lucia dela Cruz's title and its subsequent sale to INK on the petitioners' claims to portions of Lot 671-A.
3. The appropriateness of the method used by petitioners to challenge the validity of the reconstituted title in Lucia dela Cruz's name.

Court's Decision:

The Supreme Court dismissed the petitions for lack of merit, holding that:

1. The decision in *dela Cruz v. dela Cruz* applies to the present cases under the doctrine of *res judicata*, or conclusiveness of judgment, which precludes the petitioners from challenging the ownership determined therein.
2. The title in the name of Lucia de la Cruz was deemed valid and the sale to INK conveyed rightful ownership, rendering the subsequent and overlapping claims based on titles emanating from Amando Clemente inferior.
3. The petitioners' approach to challenging the validity of titles was inappropriate as it constituted a collateral attack on a certificate of title, which is prohibited. A direct challenge in a proper judicial proceeding was necessary to alter or cancel a certificate of title.

Doctrine:

The case reiterated the doctrines of res judicata, or conclusiveness of judgment, which prevents re-litigation of issues that have been definitively settled by competent courts. Furthermore, it underscored the concept that a certificate of title cannot be the subject of a collateral attack and must be challenged directly in a proceeding specifically meant for such purpose.

Class Notes:

- **Res Judicata**: A matter that has been adjudicated by a competent court and therefore may not be pursued further by the same parties.
- **Torrens System**: A system of land registration wherein the register of titles is maintained by the government. The title granted under the system is generally indefeasible and incontrovertible after the lapse of a certain period.
- **Direct vs. Collateral attack on title**: A direct attack challenges the validity of a title through a specific proceeding for that purpose, whereas a collateral attack seeks to invalidate the title indirectly through another proceeding.
- **Indefeasibility of Title**: Under the Torrens system, once a title becomes indefeasible, it is immune from challenge except in direct and specific proceedings.

Historical Background:

The case is situated within the historical context of property disputes in the Philippines, highlighting the complexities of land ownership, the significance of the Torrens system in establishing and contesting titles, and the finality and reach of Supreme Court decisions in such matters.