

Title: Maxima Realty Management and Development Corporation vs. Parkway Real Estate Development Corporation and Segovia Development Corporation

Facts:

The case revolves around the dispute over the ownership and payment obligations concerning Unit #702 of Heart Tower Condominium in Makati City. Segovia Development Corporation initially sold the unit to Masahiko Morishita, who then transferred his rights to Parkway Real Estate Development Corporation on October 16, 1989. In April 1990, Parkway entered into an agreement to sell the unit to Maxima Realty Management and Development Corporation for 3 Million Pesos, payable in installments. Maxima failed to pay the installments on time but managed to pay a total of P1,180,000.00.

To enable Maxima to finalize the purchase and secure a loan from Rizal Commercial Banking Corporation (RCBC), Parkway and Segovia agreed to transfer the title to Maxima, subject to payment of additional fees by Maxima. However, Maxima failed to pay these fees and the balance of the purchase price, leading Parkway to cancel the agreement.

Maxima then filed a complaint with the Housing and Land Use Regulatory Board (HLURB), seeking specific performance to enforce the buy-and-sell agreement. The HLURB Arbiter decided in Parkway's favor, ordering a refund to Maxima with conditions. Both parties appealed to the Board of Commissioners of HLURB, which partly modified the Arbiter's decision. Maxima failed to comply with the Board's directives, prompting further legal action.

Maxima's subsequent appeal to the Office of the President was dismissed for being filed out of time, a decision affirmed by the Court of Appeals. Maxima then elevated the case to the Supreme Court, focusing on the timeliness of its appeal.

Issues:

1. Whether Maxima's appeal to the Office of the President was filed within the reglementary period.

Court's Decision:

The Supreme Court affirmed the decision of the Court of Appeals, holding that Maxima's appeal was filed out of time. The Court emphasized that the prescribed period for filing an appeal from the decision of the HLURB Board of Commissioners to the Office of the President is fifteen (15) days as per relevant Presidential Decrees, contrary to the thirty (30) days Maxima presumed was applicable based on HLURB Rules of Procedure.

Doctrine:

The Court reiterated that in instances where special laws, such as Presidential Decree No. 957 and Presidential Decree No. 1344, prescribe a specific period for filing an appeal, such laws prevail over general rules or internal procedures of regulatory bodies. This establishes the precedence of special laws over administrative rules in determining appeal periods.

Class Notes:

1. Special Laws vs. Administrative Regulations: Special laws prescribing specific periods for legal actions take precedence over general administrative rules or procedures.
2. Appeals in Administrative Law: The specific period within which to file an appeal from a regulatory body's decision to a higher authority or court must adhere to statutory provisions, disregarding contrary procedural rules.

Historical Background:

This case underscores the complexities involved in real estate transactions and the subsequent legal battles that can arise from disagreements over contractual obligations, payment terms, and compliance with procedural rules. It highlights the legal mechanisms available for disputing parties in real estate transactions, including arbitration by regulatory bodies like the HLURB and the appeal process up to the Supreme Court. The case also exemplifies the judicial preference for adhering to specific statutory periods over administrative or procedural timelines in the adjudication of legal appeals.