

****Title:** Concepcion C. Anillo vs. Commission on the Settlement of Land Problems, et al.**

****Facts:****

The case commenced with a letter from Bacoor's Mayor Jessie B. Castillo to COSLAP Commissioner Ernesto A. Cardíño on May 29, 2001, requesting assistance to resolve a land dispute in Green Valley Subdivision, Bacoor, Cavite. Squatters, allegedly under the representation of Henry Rodriguez who claimed to own vast areas of Bacoor through a Spanish title, had turned vacant lots into a squatter colony. Mediation conferences followed, during which the representatives of Green Valley Homeowners Association and Southrich Acres, Inc., the registered owners, insisted on their Torrens titles' respect. With mediation failing and submission of position papers only by complainants, COSLAP favored the complainants in a resolution issued on July 30, 2001, ordering the squatters to vacate the premises. Despite a writ of execution and later a writ of demolition, the squatters did not vacate.

On January 21, 2002, an unsuccessful Rule 47 petition was filed with the Court of Appeals by Eduardo Cabesa Abear and others aiming to nullify COSLAP's resolution. On April 21, 2003, petitioner Concepcion C. Anillo, claiming ownership of a portion of the land, received a notice to vacate leading her to file the instant petition, arguing lack of jurisdiction and denial of due process by COSLAP.

****Issues:****

1. Whether COSLAP had jurisdiction over the land dispute.
2. Whether COSLAP issued its resolution with grave abuse of discretion.
3. Whether the petitioner was denied due process of law.
4. Applicability of judicial hierarchy and res judicata doctrines.

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

The Supreme Court dismissed the petition, emphasizing the procedural impropriety of bypassing lower courts and directly invoking the high court's original jurisdiction. It highlighted the hierarchy of courts and the doctrine of res judicata, stating that the CA-G.R. SP No. 68640's resolution operated as a bar against Anillo's petition. The court found that COSLAP had jurisdiction by virtue of EO 561 and that due process was observed, noting Anillo's constructive notice and representation during the proceedings through Attorney Larry Pernito.

****Doctrine:****

1. **Judicial Hierarchy and Res Judicata:** Direct recourse to the Supreme Court is improper when lower courts' avenues are available. The dismissal of a related petition by a competent court precludes subsequent actions against the same issue.
2. **Administrative Due Process:** Includes notification of proceedings, an opportunity to be heard, a competent tribunal, and decisions supported by substantial evidence.

Class Notes:

- **Judicial Hierarchy:** Direct filing of petitions for extraordinary writs with the Supreme Court is discouraged unless special reasons are clearly stated.
- **Res Judicata:** A final judgment is conclusive and bars subsequent actions involving the same parties and issues.
- **Administrative Due Process:** Notification, opportunity to be heard, a competent and impartial tribunal, and substantial evidence are key elements.
- **EO 561, sec. 3(2):** COSLAP's jurisdiction in land disputes may include cases with broad social implications or when other critical factors are present.

Historical Background:

The case underscores the challenges in land dispute resolutions in the Philippines, where issues of squatting, ownership claims based on Spanish titles, and the role of government agencies like COSLAP are prevalent. It also highlights the importance of adhering to procedural rules and the doctrines of judicial hierarchy and res judicata in the orderly administration of justice.