

Title: CLT Realty Development Corporation vs. Hi-Grade Feeds Corporation

Facts:

The dispute centers around properties formerly part of the Maysilo Estate left by Gonzalo Tuason, covering 1,660.26 hectares. One key title in dispute is OCT No. 994. CLT Realty Development Corporation (CLT) filed a case against Hi-Grade Feeds Corporation (Hi-Grade) for Annulment of Transfer Certificates of Title, Recovery of Possession, and Damages, claiming overlapping ownership of properties.

Hi-Grade, the registered owner of parcels under TCT Nos. 237450 and T-146941, traced its ownership to OCT No. 994 dated 3 May 1917. CLT, on the other hand, claimed ownership via TCT No. T-177013, asserting that Hi-Grade's title is null due to being fake and spurious.

The RTC ruled in favor of CLT, questioning the validity of Hi-Grade's title. However, upon appeal, the Court of Appeals reversed the RTC's decision, citing flaws in the trial court's findings and affirming Hi-Grade's ownership. The Court of Appeals took judicial notice of a Senate Report concerning the estate and allowed the Office of the Solicitor General's Intervention. CLT subsequently escalated the matter to the Supreme Court via a Petition for Review on Certiorari.

Issues:

1. Whether the Court of Appeals erred in taking judicial notice of the Senate Report.
2. Whether the Court of Appeals erred in admitting the Office of the Solicitor General's Petition for Intervention.
3. The validity of conflicting dates on OCT No. 994.

Court's Decision:

The Supreme Court upheld the Court of Appeals' decision. It ruled that judicial notice of the Senate Report did not violate any rules and was within the power of the court, dismissing CLT's arguments regarding separation of powers and due process. The intervention by the Office of the Solicitor General was deemed inappropriate due to its belated filing, but this did not affect the case's outcome. Critically, the Court affirmed that the genuine OCT No. 994 is dated 3 May 1917, invalidating CLT's claim to the property which traced back to an OCT dated 19 April 1917.

Doctrine:

The Supreme Court reiterated the doctrine that a title can only have one date of registration, and the genuine OCT No. 994 is the one dated 3 May 1917. Titles derived from

a mother title with an incorrect registration date are considered void. The principle “nemo potest plus juris ad alium transferre quam ipse habet” was highlighted, meaning one cannot transfer more rights than they have.

Class Notes:

- The concept of judicial notice and its applicability to official acts of government departments.
- The role and limitations of intervention in litigation.
- The importance of accurate dates in land title registration and the principle that titles traced to a voided original certificate of title are also void.
- The maxim “nemo potest plus juris ad alium transferre quam ipse habet” is crucial in property law, indicating the limitations on the transfer of rights.

Historical Background:

The dispute traces back to the vast Maysilo Estate, with a history of complex ownership and fraudulent titling issues. This case exemplifies the challenges in land ownership disputes in the Philippines, highlighting the necessity of diligence and the integrity of the Torrens system in ensuring reliable title registration.