

Title: Municipality of Makati (now City of Makati) vs. Municipality of Taguig (now City of Taguig)

Facts:

The dispute between the City of Makati and the City of Taguig over the territories comprising the Enlisted Men's Barangays (EMBOs) and Fort Andres Bonifacio (formerly known as Fort William McKinley) has been a long-standing issue. The contention escalated when Taguig filed a Complaint before the Regional Trial Court (RTC) of Pasig in 1993, challenging the constitutionality of Presidential Proclamations Nos. 2475 and 518, which allegedly altered Taguig's boundaries without a plebiscite in violation of constitutional requirements. The case weaved through multiple pleadings, motions, and interim decisions, including discrepancies on procedural matters such as forum shopping and the authority of the presiding judge. Both municipalities (now cities) anchored their claims on historical narratives, cadastral surveys, and other legal documents purporting to establish jurisdiction over the disputed territories. The appellate court initially ruled in favor of Makati, but following procedural intricacies and a Supreme Court decision on related forum shopping issues, the case ultimately returned to the question of rightful jurisdiction based on the preponderance of evidence and historical records.

Issues:

1. Whether Presidential Proclamations Nos. 2475 and 518 violated constitutional provisions regarding the alteration of local government unit boundaries without a plebiscite.
2. Whether Taguig or Makati has rightful jurisdiction over the disputed territories including the EMBOs and Fort Andres Bonifacio based on historical evidence, cadastral surveys, and official acts by lawful authorities.
3. Whether procedural issues pertaining to forum shopping and the authority/jurisdiction of the issuing court affected the legality and outcomes of the subsequent rulings.

Court's Decision:

The Court denied the petition, reinstated the RTC Decision dated July 8, 2011, with modifications affirming Taguig's jurisdiction over the disputed territories. It was held that Taguig provided a preponderance of evidence indicating that the contested areas were historically within its territorial jurisdiction. The proclamations issued by previous presidents did not expressly alter Taguig's boundaries to include or exclude the disputed territories under Makati, and such were deemed insufficient to establish Makati's claim. Further, procedural issues including alleged forum shopping and authority of the presiding judge were resolved in favor of pursuing substantial justice over procedural technicalities,

recognizing the importance of resolving the substantive territorial dispute based on merits.

Doctrine:

- The Court reinforced the doctrine that substantial justice should prevail over procedural technicalities, particularly in cases involving significant public interest such as territorial disputes between local government units.
- It also highlighted the principle that the creation, division, merger, abolition, or substantial alteration of the boundaries of local government units requires compliance with constitutional and statutory requirements, including a plebiscite.

Class Notes:

1. Alteration of Local Government Unit Boundaries: Constitutional provisions stipulate that no province, city, municipality, or barangay may be created, divided, merged, abolished, or its boundary substantially altered except in accordance with the Local Government Code and subject to approval by a majority of the votes cast in a plebiscite in the political units affected (1987 Constitution, Article X, Section 10).
2. Preponderance of Evidence: In civil cases, the party with the burden of proof must establish their claims by a preponderance of evidence, meaning the evidence presented is more convincing and probable of the truth than that offered by the opponent.
3. Procedural vs. Substantial Justice: The Court may choose substantive justice over procedural formality in cases where rigid adherence to rules of procedure would prevent the proper and just resolution of substantive issues, especially in cases of greater public importance.

Historical Background: The territorial dispute between Makati and Taguig over the EMBOs and Fort Andres Bonifacio has historical roots dating back to the American colonial period, with significant legal developments over the years influenced by administrative actions, cadastral surveys, and legislative enactments up to the contemporary period under the 1987 Philippine Constitution. This case illustrates the complex interplay between historical claims, legal procedures, and constitutional principles in resolving territorial disputes between local government units in the Philippines.