

Title: Cristina de Knecht vs. Hon. Pedro JL. Bautista and The Republic of the Philippines

Facts:

Cristina de Knecht filed a petition for certiorari and prohibition against Judge Pedro JL. Bautista of the Court of First Instance of Rizal, Pasay City, and the Republic of the Philippines. The petition sought to annul the order for immediate possession issued by the respondent court in expropriation proceedings for the extension of Epifanio de los Santos Avenue (EDSA) to Roxas Boulevard through Fernando Rein and Del Pan Streets, affecting residential areas including de Knecht's property. The government's original plan was to extend EDSA through Cuneta Avenue, which was mostly occupied by motels, but subsequently shifted to Fernando Rein and Del Pan Streets, prompting a formal petition by affected homeowners to President Ferdinand E. Marcos. Despite a presidential directive for review and a subsequent recommendation by the Human Settlements Commission to revert to the original plan, the ministry insisted on the revised plan. In February 1979, the government filed an expropriation complaint, leading to de Knecht's motion to dismiss and urgent motion for preliminary injunction. The respondent judge granted the Republic a writ of possession in June 1979, which de Knecht contested on constitutional grounds.

Issues:

1. Whether the choice of Fernando Rein and Del Pan Streets for the EDSA extension, over Cuneta Avenue, constitutes an exercise of discretion subject to review by courts for allegations of fraud, bad faith, or gross abuse.
2. Whether the respondent court acted with jurisdiction and within its discretion in issuing the order authorizing the Republic of the Philippines to take immediate possession of the properties for expropriation.
3. Whether the government's expropriation action violated constitutional requirements of due process and equality before the law.

Court's Decision:

The Supreme Court granted de Knecht's petition, ruling that the government's choice of Fernando Rein and Del Pan Streets over Cuneta Avenue for the EDSA extension was arbitrary and didn't receive judicial approval. The Court held that the respondent judge committed grave abuse of discretion in allowing the government to take immediate possession of the properties sought to be expropriated. The Court set aside the order for the immediate possession of the properties and permanently enjoined the respondent judge from taking further action on the case, except to dismiss it.

Doctrine:

The decision reiterates principles concerning eminent domain, specifically that the choice of property for public purposes cannot be arbitrary and must meet the standards of due process and equal protection. The government's power to expropriate is subject to judicial review to ensure that there is no fraud, bad faith, or gross abuse of discretion in the selection of the property. The exercise of eminent domain must be in strict conformity with constitutional provisions guaranteeing due process and equal protection.

Class Notes:

- Eminent domain: The government's right to expropriate private property for public use, subject to the payment of just compensation.
- Due process: Legal principle ensuring fair treatment through the judicial system, especially as a citizen's entitlement.
- Equal protection: Constitutional guarantee that no person or class of persons shall be denied the same protection of the laws that is enjoyed by other persons or other classes in like circumstances.
- Judicial review of expropriation: Courts can review government actions in expropriation cases to ensure there's no fraud, bad faith, or gross abuse of discretion.

Historical Background:

The case reflects the tension between public infrastructure development and private property rights during the late 1970s in the Philippines. It underscores the Marcos administration's aggressive push for infrastructure development and the inevitable conflicts arising from such efforts, particularly in urban areas where land use and ownership issues were complex. This case highlights the judicial branch's role in reviewing executive actions and decisions, ensuring they conform to constitutional mandates and protections.