

****Title:**** Republic of the Philippines vs. Cristina de Knecht and the Court of Appeals

****Facts:**** In an expropriation proceeding initiated on February 20, 1979, the Republic of the Philippines sought to condemn properties along Fernando Rein-Del Pan streets in Pasay City, Rizal, including that of Cristina De Knecht among others, for public use, specifically for the extension of Epifanio de los Santos Avenue (EDSA). De Knecht opposed the expropriation, alleging lack of jurisdiction and improper valuation, among other points, and sought to restrain the Republic from taking immediate possession. The Republic, having made a requisite deposit for compensation, was granted a writ of possession by the trial court, which De Knecht contested before the Supreme Court in G.R. No. L-51078. The Supreme Court, on October 30, 1980, invalidated the expropriation on the ground of arbitrariness in the choice of properties to be condemned. Following this, a directive to dismiss the case was ignored until Batas Pambansa Blg. 340 was enacted, directly expropriating the same properties for the same purposes, leading the trial court to dismiss the original expropriation case. De Knecht appealed, but the appellate court upheld the Supreme Court's earlier decision, emphasizing it became the law of the case. The Republic then filed a petition for review with the Supreme Court challenging the appellate court's decision.

****Issues:****

1. Whether subsequent legislation (Batas Pambansa Blg. 340) expropriating the same properties can override a final judgment by the Supreme Court in an expropriation case.
2. Whether the Department of Public Works and Highways' choice of land to be expropriated, overridden by legislation, remains an issue.
3. Whether the law of the case theory applies, preventing legislative action from affecting the final judgment.

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

The Supreme Court granted the petition, finding that Batas Pambansa Blg. 340 justified proceeding with the expropriation through Fernando Rein-Del Pan streets due to supervening events that rendered the Court's earlier decision in De Knecht inapplicable. The Court highlighted the significant progress and changes that occurred after its 1980 decision, including the relocation and compensation of residents, which fulfilled the social impact concerns previously identified. Consequently, the Supreme Court reversed the appellate court's decision and reinstated the order of the trial court dismissing the original expropriation proceeding in light of the newly enacted law.

****Doctrine:****

This case reiterates the principle that the government's right to expropriate private property for public use, upon just compensation, is constitutional and can be exercised through negotiation, court action, or legislation. It also illustrates that legislative action can supersede a final court judgment in expropriation cases if justified by supervening events that significantly alter the original context of the court's decision.

****Class Notes:****

- ****Expropriation:**** The power of the state to take private property for public use upon payment of just compensation.
- ****Law of the Case:**** The legal principle that a final decision by a competent court on a matter of fact or law should be binding in subsequent stages of the same case.
- ****Supervening Events:**** Events that occur after a court's decision that fundamentally alter the circumstances or facts underlying that decision.
- ****Legislative Fiat:**** A decree or authorization issued by a legislative body, in this case, Batas Pambansa Blg. 340, which directly expropriated the properties for public use.

****Historical Background:****

The dispute arose in the context of efforts to alleviate traffic congestion and control flooding in Manila and surrounding areas through the extension of EDSA and related infrastructure projects. The original Supreme Court decision taken in 1980 found the government's choice of properties for this purpose to be arbitrary. However, the enactment of Batas Pambansa Blg. 340 two years later and subsequent developments led to a reevaluation of the necessity and justification for the expropriation, demonstrating the dynamic interaction between judicial decisions, legislative actions, and evolving public needs.