

****Title:**** *Antonio Arbizo vs. Sps. Antonio Santillan and Rosario L. Santillan & Others*

****Facts:**** The case revolves around the possession of three adjacent parcels of land in Barangay San Isidro, Cabangan, Zambales. Petitioner Antonio Arbizo claimed possession based on Tax Declaration No. 16-0032 in his deceased father, Celestino Arbizo's name. Respondents, claiming ownership based on separate titles in their names, filed complaints for ejectment against Arbizo in June 2001 with the Municipal Circuit Trial Court (MCTC) of Botolan-Cabangan, asserting occupancy post-1998 purchase and alleging Arbizo's unauthorized occupation and destruction of their perimeter fence in September 2000. Arbizo contended the lands were part of his father's estate, occupied since 1921 and transferred to him and his wife through purchases from siblings. The MCTC, followed by the RTC, sided with Arbizo, recognizing his prior possession. However, the Court of Appeals reversed these decisions, ordering Arbizo to vacate and pay damages, based on the respondents' earlier lawful possession and evidence, including title certification and witness affidavits.

****Issues:****

1. Whether the respondents had a valid ground to evict Arbizo from the subject properties.
2. The determination of prior physical possession between the parties.
3. Evaluation of evidence and application of laws and jurisprudence on forcible entry and ejectment cases.

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

- The Supreme Court affirmed the Court of Appeals' decision, citing respondents' superior right of possession based on earlier lawful possession, reinforced by documentary evidence, including their titles and affidavits highlighting their actions asserting control over the properties since 1998. The Court emphasized the provisional determination of possession, independent of ownership, in ejectment cases, underscoring that Arbizo may challenge the sale and title in appropriate proceedings but his forcible entry claim lacked merit due to insufficient rebuttal against respondents' established prior possession.

****Doctrine:****

- In ejectment cases, prior physical possession is pivotal, irrespective of ownership. The plaintiff must prove prior de facto possession and unlawful dispossession. Actual physical possession, rather than legal possession, is the focal point, and the case proceeds independently of ownership claims.

****Class Notes:****

- ****Ejectment Cases:**** Focuses on de facto rather than legal possession. Plaintiff must demonstrate prior possession and subsequent unlawful deprivation.
- ****Prior Possession:**** Critical in determining the rightful possessor in forcible entry cases.
- ****Rule on Summary Procedure:**** Utilized in ejectment cases for expedited resolution, primarily reliant on affidavits and position papers unless clarification is needed.
- ****Burden of Proof:**** Lies on the party claiming prior possession, requiring preponderance of evidence.

****Historical Background:****

- This case underscores the evolving landscape of land disputes and property rights in the Philippines, reflecting the tension between traditional possession claims and formalized property titles. While reinforcing the sanctity of property titles, the judiciary navigates through claims rooted in historical occupancy versus documented legal ownership, with the broader context of land reform and property regularization efforts in the country shaping its approach to resolving such disputes.