

### Title:

Heirs of Delfin and Maria Tappa vs. Heirs of Jose Bacud, Henry Calabazon, and Vicente Malupeng: A Legal Analysis on Quieting of Title, Acquisitive Prescription, and the Validity of a Free Patent

### Facts:

The case arises from a **Complaint for Quieting of Title, Recovery of Possession and Damages** filed by the Spouses Tappa (petitioners) against the respondents (Heirs of Bacud, Calabazon, and Malupeng) regarding Lot No. 3341 in Kongcong, Cabbo, Peñablanca, Cagayan. The Tappas, claiming ownership through a Free Patent Title issued on September 18, 1992, accused the respondents of occupying portions of the lot without right. The respondents countered, asserting historical familial ownership and possession, supported by sales and succession. The case progressed from **Branch 5, Regional Trial Court (RTC) of Tuguegarao City**, which ruled in favor of the Tappas, to the **Court of Appeals (CA)**, which reversed the RTC's decision, citing issues with the free patent and acknowledging respondents' acquisitive prescription.

### Issues:

1. Was the CA correct in dismissing the Tappas' complaint for quieting of title?
2. Was the CA correct in not recognizing the Tappas' Certificate of Title as indefeasible against the respondents' claims?
3. Was the CA correct in concluding that the respondents acquired the property through acquisitive prescription?

### Court's Decision:

The Supreme Court affirmed the CA's decision. It held that the Tappas failed to satisfy the requirements for quieting of title, namely: a) they must have a legal or equitable title to, or interest in, the real property which is the subject matter of the action, and b) the deed, claim, encumbrance, or proceeding claimed to be casting a cloud on their title must be shown to be in fact invalid or inoperative despite its prima facie appearance of validity or legal efficacy. The Court also noted that at the time of the free patent application, Lot No. 3341 had already become private land due to the respondents' and their predecessors' open, continuous, exclusive, and notorious possession. Therefore, the free patent and subsequent Certificate of Title granted to the Tappas were void, and respondents' possession amounted to acquisitive prescription.

### Doctrine:

The Supreme Court reaffirmed the principle that a Free Patent issued over private land is null and void and produces no legal effects. It also reiterated that in a quieting of title action, the plaintiff must have a legal or equitable title to or interest in the real property, and the adverse claim must be shown to be legally ineffective. Additionally, the Court illustrated the doctrine that registration of the land under the Torrens system does not create or vest ownership but merely confirms and records title already existing and vested.

### Class Notes:

- **Quieting of Title**: Requires legal or equitable title in the property and that the adverse claim be shown invalid.
- **Acquisitive Prescription**: Continuous, open, and notorious possession of property for a period can ripen into ownership over said property.
- **Free Patent on Private Land**: Void if issued over land already privately owned due to possession.
- **Torrens System**: Does not create or vest title; it confirms and records an already existing and vested title.

### Historical Context:

This case embodies the complexities involved in property disputes, especially in areas with historically informal titles and successive ownership claims. It underscores the legal principle that possession and use of land can lead to ownership under Philippine law, and the importance of the Torrens system in recording but not creating property titles.