

Title:

Tan Siok Kuan & Pute Ching vs. Felicisimo “Boy” Ho, et al.: A Case on Unlawful Detainer in the Philippines

Facts:

This case involves seven separate complaints for unlawful detainer filed by Tan Siok Kuan and Pute Ching (petitioners) against various defendants, including Felicisimo “Boy” Ho, Rodolfo Returta, Vicente Salas, and Lolita Malonzo (respondents), relating to a parcel of land in Quezon City, Philippines. The petitioners claimed ownership of the land and alleged failure of rental payments by the defendants since 1997 and demanded vacation of the premises upon non-payment. The defendants countered, arguing the lease agreements were void since petitioners were Chinese nationals not entitled to own land in the Philippines. Furthermore, they’ve been in possession since 1968, challenging the action should be *accion publiciana*, not for ejectment or unlawful detainer.

After trials, the Metropolitan Trial Court (MeTC) ruled in favor of the petitioners, a decision which was affirmed by the Regional Trial Court (RTC). However, upon appeal, the Court of Appeals (CA) reversed the decisions, dismissing the complaints for lack of merit, primarily because the petitioners failed to prove a lessor-lessee relationship and the right to eject the respondents.

Issues:

1. Whether the Joint Motion for Reconsideration of the RTC Decision was timely filed.
2. Whether a lessor-lessee relationship between the parties was properly established.

Court’s Decision:

The Supreme Court denied the petition, affirming the CA’s decision to dismiss the complaints for unlawful detainer. The Court found the Joint Motion for Reconsideration was indeed timely filed. Moreover, the petitioners failed to establish a lessor-lessee relationship with the respondents or any evidence of lease agreements. The principle of *res inter alios acta* was applied, leading to the conclusion that actions or defenses of some defendants cannot be used against others who consistently denied any lease agreement with the petitioners.

Doctrine:

This case highlights the principle of *res inter alios acta*, emphasizing that a party’s right cannot be prejudiced by another’s act or declaration, except under specific provided

exceptions.

Class Notes:

- **Unlawful Detainer**: A legal action initiated by a landlord to regain possession of rented property due to the tenant's failure to comply with an agreement, typically non-payment of rent.
- **Accion Publiciana**: The ordinary civil proceedings to determine the better right of possession of realty independently of title.
- **Res Inter Alios Acta**: A principle stating that matters between other parties do not harm or benefit someone not party to such matters.
- **Timeliness of Judicial Motions**: The importance of filing within prescribed periods is crucial in legal proceedings to prevent decisions from becoming final and executory.
- **Proof of Agreement**: The necessity of proving express or implied agreements or contracts in disputes over them.

Historical Background:

This case provides insight into the complexities of property disputes in the Philippines, especially involving foreign nationals and historical possession. It underscores the intricate balance between legal ownership, long-term possession, and the evidentiary requirements to establish claims and defenses in property disputes within the Philippine legal system.