

Title: Aquino vs. Aure: A Case of Non-Compliance with Barangay Conciliation in Ejectment Disputes

Facts:

Librada M. Aquino and Ernest S. Aure were involved in a property dispute regarding a parcel of land in Roxas District, Quezon City. Aure, alongside E.S. Aure Lending Investors, Inc., filed an ejectment complaint against Aquino for refusing to vacate the subject property after selling it to Aure. Aquino rebutted, arguing the sale was conditioned upon Aure securing a loan and turning over the proceeds, which he failed to do. The Metropolitan Trial Court (MeTC) of Quezon City dismissed the complaint due to non-compliance with barangay conciliation requirements among other reasons. The Regional Trial Court (RTC) affirmed this decision, which was then reversed by the Court of Appeals, leading Aquino to appeal to the Supreme Court.

Issues:

1. Whether non-compliance with barangay conciliation proceedings constitutes a jurisdictional defect warranting the dismissal of the complaint.
2. Whether the allegation of ownership divests the MeTC of jurisdiction over an ejectment case.

Court's Decision:

The Supreme Court denied Aquino's petition, affirming the decision of the Court of Appeals. On the first issue, the Court held that non-compliance with barangay conciliation is not a jurisdictional flaw and does not affect the jurisdiction of the court over the subject matter. The Court emphasized that Aquino waived any objections by failing to raise the issue in her answer. On the second issue, the Court ruled that MeTC retains jurisdiction in ejectment cases, even if ownership is questioned, as jurisdiction is determined by the allegations in the complaint. The Court stated that resolution of ownership in ejectment cases is provisional and will not prejudice an action involving title to the land.

Doctrine:

This case reaffirms that non-compliance with the requirement for barangay conciliation under the Local Government Code before filing a complaint in court is not a jurisdictional defect. However, such non-compliance makes the action premature and subject to dismissal

if timely objection is made. Furthermore, it clarifies that Metropolitan Trial Courts can resolve issues of ownership in ejectment cases, but only provisionally and for the purpose of determining possession.

Class Notes:

1. **Barangay Conciliation Requirement:** Before filing certain complaints in court, parties must undergo barangay conciliation proceedings (Local Government Code, Section 412). Failure to do so renders a case premature but does not affect court jurisdiction if not timely objected in the pleadings.
2. **Jurisdiction in Ejectment Cases:** Metropolitan Trial Courts have jurisdiction over ejectment cases, including when issues of ownership are raised, provided the primary question is that of possession.
3. **Provisional Determination of Ownership:** Determinations of ownership in ejectment cases by lower courts are provisional and do not bar further litigation on ownership.

Historical Background:

The barangay justice system, including the conciliation process, was established under Presidential Decree No. 1508, and later integrated into the Local Government Code (Republic Act No. 7160) in an effort to decongest court dockets and promote local dispute resolution. This case illustrates how the judiciary interprets and applies these mechanisms in contemporary legal disputes.