

### Title:

Royales et al. v. Intermediate Appellate Court et al.: A Dispute over Jurisdiction and the Necessity of Barangay Conciliation

### Facts:

The core of this case revolves around an ejectment suit initiated by respondent Jose Planas against petitioners Apolinar R. Royales and Presentacion Gregorio for a property in Manila. Planas filed the suit on August 25, 1980, in the City Court of Manila, Civil Case No. 057662-CV. The case proceeded to trial, and on November 26, 1981, the court ordered the petitioners to vacate the premises, pay attorney's fees, and cover the costs of the suit.

The conflict escalated when, after the decision became final and executory, Planas sought execution, which the petitioners opposed in the Regional Trial Court (RTC) of Manila. They argued that the jurisdiction was improperly assumed due to the failure of initiating barangay conciliation as mandated by P.D. 1508, known as the "Katarungang Pambarangay Law." The RTC sided with the petitioners, declaring the City Court's judgment void for lack of jurisdiction. However, upon Planas' appeal, the Intermediate Appellate Court reinstated the City Court's decision.

Unable to secure a reconsideration from the Intermediate Appellate Court, the petitioners brought their case to the Supreme Court, challenging the decisions on grounds of jurisdictional error for bypassing barangay conciliation.

### Issues:

1. Does the failure to undergo barangay conciliation, as required by P.D. 1508, deprive the court of jurisdiction over an ejectment case?
2. Can parties invoke the jurisdiction of a court to secure affirmative relief and later challenge that same jurisdiction?

### Court's Decision:

The Supreme Court dismissed the petition, affirming the decision of the Intermediate Appellate Court. The Court expounded that while P.D. 1508 indeed mandates barangay conciliation as a prerequisite to filing a complaint in court, the petitioners' active participation in the court proceedings without timely contesting jurisdiction waives their right to raise such objection. Analogous to the doctrine established in *Tijam vs. Sibonghanoy*, the Court emphasized that parties cannot belatedly attack the jurisdiction of a court to which they have voluntarily submitted.

### Doctrine:

The case reiterates the doctrine of estoppel by laches, whereby a party cannot challenge the jurisdiction of a court if they have already engaged in the legal proceedings without timely objection. It underscores the principle that jurisdictional challenges should be promptly raised, particularly if the party has actively sought affirmative relief from the court.

### Class Notes:

- **Estoppel by Laches**: A legal principle preventing a party from claiming a right due to their lengthy delay in asserting it, especially when such delay has prejudiced the opposing party.
- **P.D. 1508 "Katarungang Pambarangay Law"**: Mandates barangay conciliation as a precondition for filing certain complaints in court to encourage settlement at the barangay level.
- **Jurisdiction**: The authority of a court to hear a case and make legal judgments.
- **Affirmative Relief**: Legal relief sought by a defendant in the course of litigation, turning to the court for a favorable action or decision.

### Historical Background:

The case highlights the legal intricacies surrounding jurisdiction and procedural requirements, such as barangay conciliation mandated by P.D. 1508. Enacted to promote amicable settlement among community members, this law requires disputants in certain cases to attempt resolution at the barangay level before engaging the courts. The Royales case illustrates how neglecting procedural preconditions, and the tactical responses to jurisdictional challenges, can critically impact the litigation process and case outcomes in Philippine jurisprudence.