

Title: Municipality of Bakun vs. Municipality of Sugpon: A Boundary Dispute

Facts:

This case revolves around a territorial dispute over a 1,117.20-hectare parcel of land between the Municipality of Bakun, Benguet, and the Municipality of Sugpon, Ilocos Sur. The Sangguniang Panlalawigan issued Joint Resolution No. 1, Series of 2014, favoring Bakun. Dissatisfied, Sugpon appealed to the RTC, which reversed the decision and favored Sugpon, setting aside the Sangguniang Panlalawigan's resolution. Bakun's attempts at reconsideration were unsuccessful, leading to further appeals to the Court of Appeals (CA), which upheld the RTC's decision. The Supreme Court was later approached under a Petition for Review on Certiorari.

Issues:

1. Whether the petition involves questions of law, allowing the Supreme Court to review the CA's decision.
2. Whether Sugpon or Bakun has the valid legal claim over the disputed land based on preponderance of evidence and applicable laws.

Court's Decision:

The Supreme Court decided that the petition lacked merit, affirming the CA's decision that favored Sugpon. It reiterated that the Supreme Court is generally not a trier of facts unless certain exceptions apply, which Bakun failed to prove were present in this case. The Court further elaborated that Sugpon provided a preponderance of evidence proving its jurisdiction over the disputed area, including an Administrative Map of Benguet, official certifications, and historical documents related to the land's usage and governance.

Doctrine:

The case reiterates the principle that the Supreme Court is not a trier of facts and generally addresses only questions of law in Petitions for Review on Certiorari under Rule 45, unless specific exceptions apply. It also upholds the use of preponderance of evidence as the standard in civil cases, particularly boundary disputes.

Class Notes:

- ****Preponderance of Evidence****: The standard used in civil cases wherein the burden is met if the proposition is more likely to be true than not true.
- ****Boundary Disputes****: When resolving boundary disputes, historical evidence, official maps, certifications, and legislative acts are crucial in establishing jurisdictional claims.

- **Rule 45 Exceptions**: Includes situations when the findings are grounded on speculation, there's a grave abuse of discretion, or when the lower court's findings are contrary to the evidence on record.
- **Historical Legislative Acts**: Acts such as Nos. 1646 and 2877, while historical, may not always provide clear delineation of current municipal boundaries.

Historical Background:

The origin of Bakun and Sugpon's territorial dispute can be traced back to the early 20th century legislative acts, including Acts No. 1646 and 2877, which attempted to delineate boundaries between provinces and sub-provinces. Historically, both municipalities were part of the Amburayan sub-province within the Mountain Province. Over the years, administrative changes, amendments, and the creation of new provinces complicated the original boundaries established, leading to the present dispute. The case underscores the complexity of territorial jurisdiction issues stemming from historical administrative reorganizations.