

### Title:

Republic of the Philippines vs. Clemente Tapay and Alberto T. Barrion: A Land Registration Conflict

### Facts:

In 1980, respondents Flora and Clemente Tapay filed an application for registration of a 684-square-meter Lot No. 10786 in Lipa City, claiming possession since 1925 through a predecessor, which the Republic of the Philippines opposed. The RTC declared a general default and adjudicated the land to the Tapays in 1982. However, the LRC (now LRA) flagged that the lot was previously adjudicated in an unidentified cadastral case. Despite this, the RTC in 1996 set aside the cadastral court's decision upon the respondent's motion, a move opposed and taken to the CA by the Republic, which upheld the RTC's decision.

### Issues:

- Whether the RTC has the authority to nullify the decision of a co-equal cadastral court;
- Whether the doctrine of judicial stability applies to this case;
- If elements of res judicata bar the respondents' subsequent application for land registration;
- Whether the doctrine of immutability of judgment prevents the nullification of the cadastral court's decision.

### Court's Decision:

The Supreme Court denied the petition, siding with the respondents and affirming the CA's decision. It ruled that the RTC's order to set aside the cadastral court's decision does not contravene the doctrine of judicial stability, given the absence of records to prove the existence or the contents of the alleged cadastral case decision. It also rejected the application of res judicata and the doctrine of immutability of judgment in this context.

### Doctrine:

This case upholds the principle that practical considerations and the interest of justice can prevail over the doctrines of judicial stability and immutability of judgment when records of a previous court decision are absent and unverifiable. It also emphasizes the procedural aspect that the finality of judgments and the execution thereof are within the jurisdiction of the court rendering the decision to the exclusion of any intervention by co-equal courts unless specific procedural grounds are met.

### Class Notes:

- **Doctrines of Judicial Stability**: Indicates that a court's decision cannot be interfered with by any court of concurrent jurisdiction unless appeal mechanisms are employed within the procedural bounds.
- **Res Judicata**: Requires identity of parties, subject matter, and cause of action for its application; aims to prevent litigation of the same issue twice.
- **Immutability of Judgment**: Once a judgment becomes final, it cannot be altered or amended except for clerical errors or nunc pro tunc entries which cause no prejudice to any party.
- **Land Registration Process**: Demonstrates the nuances and legal challenges that can arise in the process of registering land, including the role of historical possession, documentary evidence, and the potential for conflicts in land records.
- **Presidential Decree No. 1529**: Governs the land registration process in the Philippines, emphasizing the need for clear and convincing proof of ownership and the procedural steps for registration.

### Historical Background:

This case underscores the complexities embedded in Philippines land registration laws and the potential for historical land records to influence present legal proceedings. It highlights the challenges faced by the judiciary in reconciling past administrative actions with current legal standards and the paramount importance of maintaining accurate and accessible public records for the administration of justice.