

Title:

Spouses Leynes v. Former Tenth Division of the Court of Appeals, et al.

Facts:

The case arose from a Complaint for forcible entry, damages, and attorney's fees filed by the spouses Superales against the spouses Leynes concerning a parcel of residential land in Bansalan, Davao del Sur. The Superales alleged that in February 2000, the Leynes forcibly occupied a portion of their property, leading to a series of legal actions starting from the barangay level to the Municipal Circuit Trial Court (MCTC), and then to the Regional Trial Court (RTC). The MCTC rendered a judgment by default against the Leynes for failing to submit their answer within the prescribed period, which was subsequently upheld by the RTC.

The Leynes sought recourse through a Petition for Certiorari under Rule 65 with the Court of Appeals (CA), alleging grave abuse of discretion by the lower courts. The CA dismissed their petition for being the wrong mode of appeal and failing to state material dates necessary for the petition. The CA's decision led the Leynes to elevate the matter to the Supreme Court, still under a petition for Certiorari under Rule 65, insisting on substantial errors and injustice in the proceedings below.

Issues:

1. Whether the Court of Appeals erred in dismissing the Petition for Certiorari on procedural grounds.
2. Whether the Municipal Circuit Trial Court (MCTC) erred in its application of the rules regarding the period for filing an answer, thereby wrongfully declaring the Leynes in default.
3. Whether the complaint for forcible entry was filed within the prescriptive period.

Court's Decision:

The Supreme Court granted the petition, annulling and setting aside the MCTC's ex parte judgment and remanding the case to the MCTC for further proceedings. The Court clarified procedural issues, particularly the computation of the period within which to file an answer that falls on a non-working day, ruling in favor of the Leynes. The Court noted that the Leynes filed their answer within the allowable period since the last day fell on a Saturday, and thus, they were not in default. On procedural recourse, the Supreme Court recognized that while the Leynes utilized the wrong mode of appeal, under the circumstances, dismissing their petition would result in a miscarriage of justice. Consequently, the Court

applied exception to the procedural rules in the interest of justice and equity, directing the MCTC to admit the Leynes' answer and proceed with the case.

Doctrine:

The Supreme Court reiterated the doctrine that non-working days (Saturdays, Sundays, and legal holidays) are excluded in the computation of filing periods when the last day falls on such non-working days. Moreover, it underscored the principle that technical rules may be relaxed in the interest of justice, especially when dismissing a case on technical grounds would lead to a miscarriage of justice.

Class Notes:

- **Rule on Summary Procedure:** In summary proceedings, answers must be filed within ten (10) days from service of summons, excluding non-working days if the last day falls on such days.
- **Rule 65 (Certiorari):** Utilized for correcting errors of jurisdiction or grave abuse of discretion amounting to lack or excess of jurisdiction, not as a substitute for a lost appeal.
- **Procedural Technicalities:** May be relaxed to prevent miscarriage of justice, emphasizing the courts' discretion in extraordinary circumstances.
- **Computation of Periods:** Rule 22, Section 1 of the Rules of Court, provides guidance on computing time, especially regarding non-working days.

Historical Background:

This case demonstrates the rigid nature of procedural rules in Philippine courts and the Supreme Court's willingness to exercise its discretion to prevent miscarriage of justice. It underscores the importance of proper legal counsel and the potential repercussions of procedural missteps, while also highlighting the judiciary's commitment to fairness and justice over stringent procedural adherence.