

****Title:**** Raquel G. Dy Buncio vs. Leontina Sarmenta Ramos and Fernando Ramos

****Facts:**** The case began with a Complaint for Accion Reinvidicatoria and Damages filed by Raquel G. Dy Buncio against Leontina Sarmenta Ramos and Fernando Ramos in the Regional Trial Court (RTC) of Cabanatuan City on January 8, 2007. Buncio claimed co-ownership of a parcel of land, alleging unauthorized possession by the respondents. The respondents countered, citing a leasehold agreement indicating a tenancy relationship, thus arguing the RTC's lack of jurisdiction.

During preliminary proceedings, the RTC, on January 30, 2008, ruled in favor of jurisdiction, finding inadequate evidence of a tenancy relationship. However, following an ocular inspection on November 19, 2009, and subsequent motions, the RTC reversed its stance on October 28, 2010, referring the case to the DARAB based on alleged agrarian nature under Section 50-A of RA 6657, amended by RA 9700.

Buncio's Omnibus Motion for Reconsideration was denied on June 6, 2011. She then filed a Petition for Certiorari with the Court of Appeals (CA), which was dismissed on September 30, 2011, and her motion for reconsideration was denied on March 6, 2013. Buncio's final recourse was a Petition for Review on Certiorari to the Supreme Court, arguing against the CA's decision and procedural mishandlings concerning the jurisdictional referral to DARAB.

****Issues:**** The Supreme Court addressed whether the CA erred in dismissing Buncio's Petition for Certiorari, specifically examining the procedural and jurisdictional routes taken by the lower courts and the correct application of laws governing agrarian disputes.

****Court's Decision:**** The Supreme Court denied Buncio's petition, affirming the CA's rulings. The Court highlighted that Buncio had other adequate remedies before the DARAB and could appeal adverse decisions. It reiterated that jurisdiction issues, especially those involving agrarian disputes, must be referred to the DARAB if alleged. The case's referral was deemed appropriate given the raised agrarian dispute allegations, dismissing Buncio's argument on acquired vested rights from the RTC's preliminary order.

****Doctrine:****

- Jurisdiction over agrarian disputes lies primarily with the Department of Agrarian Reform (DAR) or DARAB when alleged, notwithstanding initial rulings on jurisdiction by civil courts.
- The recognition of DARAB's authority to adjudicate agrarian disputes, emphasizing the automatic referral mechanism for cases alleging to be agrarian in nature.

****Class Notes:****

1. ****Jurisdiction Over Agrarian Disputes:**** The DAR or DARAB has primary jurisdiction over agrarian disputes. Civil courts must defer and refer cases if there's an allegation of such a nature.
2. ****Automatic Referral Mechanism:**** Under Section 50-A of RA 6657, as amended, any case alleging to be agrarian in nature must be automatically referred to the DAR/DARAB for determination.
3. ****Proper Recourse:**** Parties must exhaust administrative remedies before seeking judicial intervention through certiorari, unless devoid of any other plain, speedy, and adequate remedies.
4. ****Establishment of Tenancy Relationship:**** The existence of a tenancy relationship depends on specific requisites being met, including consent and sharing of harvests between landlord and tenant.

****Historical Background:**** This case underscores the evolving jurisprudence on jurisdiction over agrarian disputes in the Philippines. It highlights the legislative intent of RA 6657, as amended by RA 9700, to centralize the adjudication of agrarian disputes within the specialized body of DARAB, ensuring expertise and consistent application of agrarian laws. The Supreme Court's decision reflects an adherence to statutory mandates governing agrarian reforms and dispute resolutions, marking a continuous effort to delineate the bounds of jurisdiction between civil courts and agrarian authorities.