

### Title:

Liao v. Court of Appeals: A Dispute Over Land Titles and the Invalidity of Friar Land Sales

### Facts:

This case revolves around conflicting ownership claims over parcels of land in Piedad Estate, Quezon City, originally titled under the Philippine Government as Friar Land subsequent to the Friar Lands Act (Act No. 1120). Estrella Mapa petitioned for the reconstitution of lost documents and issuance of titles over the land in 1986, claiming acquisition through certificates of sales issued to Vicente Salgado by the Director of Lands in 1913. These sales were later deemed void for lack of approval by the Secretary of Agriculture and Natural Resources.

Upon the RTC's order, the Quezon City Register of Deeds issued Transfer Certificate of Title (TCT) Nos. 348291 and 348292 to Mapa. These TCTs led to multiple legal actions due to overlaps with existing titles held by different parties, leading to investigations by the National Bureau of Investigation and the Land Registration Commission.

Subsequent appeals and petitions by affected parties resulted in the consolidation of three significant cases before the Court of Appeals, culminating in the annulment of the RTC's order that authorized the issuance of the disputed titles based on the alleged void sales certificates and reconstitution by the Land Registration Commission.

### Issues:

1. Whether the Philippine Court of Appeals erred in upholding the annulment of the RTC's order that favored Estrella Mapa's claim based on void sale certificates of Friar Lands.
2. Whether ownership rights and priority in registration under the Torrens system were properly adjudicated amidst conflicting claims over the same parcels of land.

### Court's Decision:

The Supreme Court affirmed the Court of Appeals' decisions, dismissing Jesus P. Liao's petitions. The decision was grounded on several bases:

- The sales certificates cited by Liao's predecessor, Estrella Mapa, were void ab initio for not having the required approval from the Secretary of Agriculture and Natural Resources.
- The certificates of sale, if ever valid, became stale and could not serve as a basis for the issuance of titles after an inordinately lengthy period.
- The principle of priority in registration under the Torrens system, stating that in case of double sale, the earlier title prevails.

- The affirmation that a title under the Torrens system, while not conferring ownership, provides indefeasible proof of the holder's claim superior to later registrations.

### ### Doctrine:

The Supreme Court reiterated several doctrines:

- Void ab initio transactions for lack of requisite approvals cannot serve as a valid basis for the issuance of a title.
- The stale doctrine, emphasizing that rights not asserted within a reasonable period may not be relied upon for claiming title.
- In cases of double sale, the principle of "primus tempore, potior jure" (first in time, stronger in right) prevails, meaning the one who registered the sale first has a stronger legal claim.
- A title under the Torrens system, while not an absolute proof of ownership, warrants respect and legal acknowledgment beyond the claims of those with subsequent registrations.

### ### Class Notes:

1. **\*\*Void Transactions\*\***: Lack of crucial approvals renders transactions null.
2. **\*\*Stale Doctrine\*\***: Inaction or delay in asserting a right can bar the claim.
3. **\*\*Double Sale Principle\*\***: First to register holds the stronger claim.
4. **\*\*Torrens System\*\***: Provides a presumptive, indefeasible title to registered holders but does not equate to absolute proof of ownership.

### ### Historical Background:

The contested land was part of the Piedad Estate, acquired from various entities by the Philippine Government as Friar Land and governed under Act No. 1120 or the Friar Lands Act. The complexity of the case is heightened by the application of laws pertaining to Friar Lands, the procedural intricacies of land title reconstitution, and the overarching principles governing land registration and ownership disputes in the Philippines.