

**\*\*Title:\*\* Coombs vs. Castañeda, et al. – Annuling a Court Decision due to Lack of Jurisdiction**

**\*\*Facts:\*\***

This case involves Mercedita C. Coombs, who petitioned for the annulment of a Regional Trial Court (RTC) decision dated August 26, 2004, which declared the lost owner's duplicate copy of Transfer Certificate of Title (TCT) 6715 as null and void and ordered the issuance of a new TCT in its stead. Coombs discovered in March 2005 that her property in Ayala Alabang, Muntinlupa City, was no longer registered under her name but under Virgilio Veloso Santos, who subsequently sold it to the Leviste spouses. The property was mortgaged to BPI Family Savings Bank. Coombs claimed the TCT was never lost and was in her possession, alleging that the RTC had no jurisdiction over the matter. The Court of Appeals dismissed Coombs's petition for annulment of judgment citing procedural grounds.

**\*\*Issues:\*\***

1. Whether the Court of Appeals erred in dismissing Coombs's petition for annulment of judgment on the grounds that it was not sufficiently substantiated and lacked the necessary procedural requirements.
2. Whether the RTC had jurisdiction over the case in light of the assertion that the TCT was never lost.

**\*\*Court's Decision:\*\***

The Supreme Court ruled in favor of Coombs, setting aside the resolutions of the Court of Appeals and directing it to reinstate and proceed with the Petition for Annulment of Judgment. The Court found that:

- The petition was indeed grounded on lack of jurisdiction, not extrinsic fraud as initially dismissed by the Court of Appeals.
- The factual assertion that the TCT was never lost, but always in Coombs's possession, if upheld, would mean the RTC originally did not have jurisdiction, making any decisions on the matter void.

**\*\*Doctrine:\*\***

The Court reiterated the doctrine that jurisdiction over the nature of the action or the subject matter is conferred by law and that a judgment rendered without jurisdiction is void. The fact of the loss of a duplicate certificate being jurisdictional was highlighted, emphasizing that a court cannot have jurisdiction over a case involving a certificate of title that was alleged to have been lost but was, in fact, in the possession of another person.

**\*\*Class Notes:\*\***

- Jurisdiction is conferred by law and is fundamental to any legal proceeding.
- A judgment rendered without jurisdiction over the subject matter is void.
- The requirements for filing a petition for annulment of judgment include a clear demonstration of the grounds whether lack of jurisdiction or extrinsic fraud.
- Procedural lapses, like the failure to include certain documents or affidavits, should not automatically lead to the dismissal of a petition that otherwise shows prima facie merit.
- Legal provisions relevant to this case include Sections 1 and 2, Rule 47 of the Revised Rules of Court concerning annulment of judgments.

**\*\*Historical Background:\*\***

The case illustrates the critical importance of jurisdiction in legal proceedings and the proper procedures for contesting judgments that may have been rendered without jurisdiction. It underscores the Philippine legal system's safeguards against errors in the administration of justice, particularly in cases involving land registration and property rights.