

Title:

Cosme Lacuesta vs. Barangay Casabaan, Municipality of Cabangan, Zambales, and Teofilo Ronquillo

Facts:

Cosme Lacuesta, an agricultural lessee, cultivated a 5,000 square meter portion of a landholding in Barangay Casabaan, Cabangan, Zambales, for planting palay. Barangay Casabaan initiated expropriation proceedings for this land portion before the Court of First Instance (CFI) of Zambales to convert it into a public plaza, with constructions including a basketball court, a rural health center, a barangay hall, and a stage. Lacuesta was not named as a party in the expropriation case.

Feeling aggrieved by the deprivation of his right to cultivate the land due to the expropriation, Lacuesta filed a complaint for Reinstatement and Damages against the Barangay before the Court of Agrarian Relations (CAR) of Zambales. He claimed illegal deprivation leading to loss of income and sought moral damages.

The CAR dismissed Lacuesta's claim on grounds of comity, stating it could not interfere with the acts of another court of equal rank which first acquired jurisdiction over the case. It also ruled out entitlement to actual and disturbance compensation.

Lacuesta appealed to the Court of Appeals, asserting CAR's jurisdiction over the matter, citing Section 12(n) of P.D. No. 946. The case was then certified to the Supreme Court as involving a pure question of law.

Issues:

1. Jurisdiction: Whether the CAR or the CFI holds jurisdiction over cases of expropriation involving tenanted agricultural lands.
2. Entitlement to Compensation: Whether Lacuesta is entitled to any form of compensation due to the expropriation of the land he was tilling.

Court's Decision:

The Supreme Court clarified jurisdictional concerns, recognizing that although P.D. No. 946 vested jurisdiction in the CAR, the law came into effect after the expropriation proceedings began in CFI, hence jurisdiction rightfully belonged to CFI.

On compensation, the Court ruled Lacuesta deserved compensation for the deprivation of his farmholding, albeit not disturbance compensation typically awarded in agrarian cases

but rather damages equivalent to 17.5 cavans of palay for five years, calculated from the expropriation date by analogy. It was determined that the claim for moral damages was unfounded as the Barangay did not act with malice or bad faith.

Doctrine:

In cases of expropriation involving tenanted agricultural lands where proceedings began before the enactment of a statute granting exclusive jurisdiction to a specific court, the jurisdiction lies with the court where the expropriation proceedings were initially instituted. Furthermore, a tenant deprived of land due to expropriation is entitled to compensation, even though the standard disturbance compensation under agrarian reform laws might not directly apply.

Class Notes:

- **Jurisdiction over Expropriation**: Jurisdiction lies with the court where the case was first instituted, especially if subsequent laws altering jurisdiction were enacted after the case began.
- **Compensation for Tenants in Expropriation**: Tenants deprived of their leased land due to expropriation are entitled to compensation, even if it does not conform to the typical disturbance compensation under agrarian reform laws. The compensation can be analogously applied from similar provisions granting disturbance compensation.
- **Legal Statutes**:
 - Section 12(n) of P.D. No. 946 concerning CAR's jurisdiction over expropriation cases.
 - Section 36 of R.A. 3844 concerning disturbance compensation.

Historical Background:

The case is set against the backdrop of evolving authority between the Court of Agrarian Relations and the Court of First Instance in the context of expropriation proceedings for tenanted agricultural lands in the Philippines. The specific timing of jurisdictional statutes coming into effect versus the initiation of court proceedings plays a crucial role in determining jurisdiction and rights to compensation. This reflects the broader legal and societal shifts in the Philippines regarding land use, agrarian rights, and the exercise of eminent domain for public purposes.