

Title: Republic of the Philippines v. The Honorable Court of Appeals and Corazon Naguit

Facts:

Corazon Naguit petitioned for the registration of a parcel of land in Aklan under the Property Registration Decree or Presidential Decree (P.D.) No. 1529. The application claimed judicial confirmation of her imperfect title over the 31,374 square meter land, known as Lot No. 10049. The land had been in open, continuous, and exclusive possession by Naguit and her predecessors since 1945. The Municipal Circuit Trial Court (MCTC) of Ibajay-Nabas, Aklan, after a trial where the government and the heirs of Rustico Angeles opposed, ordered the registration of the land in Naguit's name. The Republic, through the Office of the Solicitor General (OSG), filed a motion for reconsideration, arguing the land was declared alienable and disposable only in 1980. Both the Regional Trial Court (RTC) of Kalibo, Aklan, and the Court of Appeals affirmed the MCTC's decision, leading to this petition for review by the Republic.

Issues:

1. Whether the land needs to be declared as alienable and disposable land of the public domain before the applicant's possession can qualify for registration under Section 14(1) of the Property Registration Decree.
2. Whether Naguit had been in possession of the land in the concept of an owner for the required period to qualify for registration.

Court's Decision:

The Supreme Court affirmed the decision of the Court of Appeals. It clarified that Section 14(1) of the Property Registration Decree does not require that the land must have been declared alienable and disposable as of June 12, 1945. Instead, it must only be so at the time of the application for registration. The Court held that the claimants or their predecessors must have been in open, continuous, exclusive, and notorious possession of alienable and disposable land under a bona fide claim of ownership since June 12, 1945, or earlier. The Court found no reason to disturb the lower courts' findings that Naguit and her predecessors had possessed the land since 1945. The Supreme Court ruled that owing to the continuous possession of the land since 1945, Naguit had acquired a title that could be registered under the Torrens system.

Doctrine:

1. For purposes of original registration of land titles under Section 14(1) of the Property

Registration Decree, what is vital is that the land is already declared alienable and disposable at the time the application for registration is filed, not necessarily as of June 12, 1945.

2. The possession of alienable and disposable land of the public domain, in the concept of an owner, that is open, continuous, exclusive, and notorious since June 12, 1945, or earlier, is a sufficient basis to apply for judicial confirmation of an imperfect title.

Class Notes:

- According to the Property Registration Decree (P.D. No. 1529), applicants for registration of title must demonstrate open, continuous, exclusive, and notorious possession of alienable and disposable lands of the public domain under a bona fide claim of ownership since June 12, 1945, or earlier.
- Tax declarations and payment of realty taxes, while not conclusive evidence of ownership, serve as significant indications of possession in the concept of owner.
- Lands classified as alienable public land may be converted into private property through open, continuous, and exclusive possession of at least thirty (30) years.

Historical Background:

Before the imposition of the Property Registration Decree (P.D. No. 1529), land registration and ownership in the Philippines followed the Spanish Mortgage Law and the Public Land Act (Act No. 926). The effective date for determining possession for land registration applications was moved several times through legislative amendments, with the current requirement being possession since June 12, 1945, or earlier. This date aligns with Philippine Independence, marking a significant policy shift aimed at formalizing land ownership among occupants of alienable and disposable lands of the public domain.