

### Title: Republic of the Philippines vs. Spouses Danilo Go and Amorlina Go

### Facts:

The Spouses Danilo and Amorlina Go sought the registration and confirmation of title over Cadastral Lot No. 4699-B located in Barangay Balagtas, Batangas City, covering an area of 1,000 square meters. They claimed possession since purchasing the lot in 2000 from their predecessors-in-interest who had possessed the property since 1945. Notably, the property was declared alienable and disposable in 1928 according to a DENR certification.

The Spouses Go initially submitted their application for registration in August 2006. A Report by Special Land Investigator Ben Hur Hernandez and a Certification by Forester I Loida Maglinao supported the alienable and disposable character of the property. However, the Republic of the Philippines filed an opposition, arguing that Lot No. 4699-B remained part of the public domain and that the Spouses Go and their predecessors had not shown open, continuous, exclusive, and notorious possession since June 12, 1945.

The Municipal Trial Court in Cities ruled in favor of the Spouses Go in December 2008, a decision subsequently affirmed by the Court of Appeals in January 2011 and its Resolution in June 2011. The Republic then elevated the case to the Supreme Court, arguing issues including the insufficiency of evidence of possession and the inalienable character of the property, compounded by the failure to submit the original classification approved by the DENR Secretary.

### Issues:

1. Whether the Spouses Go and their predecessors-in-interest had been in open, continuous, exclusive, and notorious possession of Lot No. 4699-B since June 12, 1945 or earlier.
2. Whether Lot No. 4699-B was properly classified as alienable and disposable by the DENR, as required for the registration of ancestral lands.

### Court's Decision:

The Supreme Court granted the petition, reversing the decisions of the lower courts. It held that the Spouses Go failed to adequately prove possession in the concept of an owner since June 12, 1945, or earlier. Likewise, the Court found that the land's characterization as alienable and disposable was not satisfactorily established, as the Spouses Go did not present a certified true copy of the original classification signed by the DENR Secretary.

### Doctrine:

Land remains inalienable unless shown to have been reclassified and alienated to a private

individual, and possession since June 12, 1945, or earlier must be proven for the registration of title under Commonwealth Act No. 141.

### Class Notes:

For judicial confirmation of title under Commonwealth Act No. 141:

- Applicants must prove open, continuous, exclusive, and notorious possession and occupation of the property under a bona fide claim of ownership since June 12, 1945, or earlier.
- The land must be declared alienable and disposable agricultural land of the public domain.
- A mere CENRO Certification is insufficient; evidence of the DENR Secretary's approval of the land classification must be presented.

### Historical Background:

This case underscores the stringent requirements for judicial confirmation of imperfect titles to public lands in the Philippines, emphasizing the need for clear proof of longstanding possession and the explicit classification of lands as alienable and disposable by competent authority.