

### Title:

Gutierrez vs. Valiente: A Philippine Supreme Court Resolution on Boundary Disputes, Verification Compliance, and Execution Quashal

### Facts:

This case revolves around a land boundary dispute in Meycauayan, Bulacan between the Spouses Gutierrez, owners of Lot 6098-D, and Spouses Valiente, owners of Lot 6098-E. The Valientes acquired their lot from the heirs of Crispin Gutierrez, brother to Alberto Gutierrez of Spouses Gutierrez. Upon survey, it was discovered that 99 square meters of Lot 6098-E were encroached by the Gutierrezes, leading to a legal battle initiated by the Valientes for Quieting of Title and Recovery of Possession with Damages. The procedural journey saw a series of motions, non-appearance in hearings, and default orders, culminating in the Regional Trial Court (RTC) ordering a relocation survey to determine exact boundaries. Despite agreement motions and court orders for reconciliation of the disputed portions, the case proceeded to a petition for execution after Spouses Gutierrez failed to comply with or appeal against court orders for reconveyance of encroached portions.

### Issues:

1. Whether strict compliance with verification and documentation requirements under Rule 65 of the Rules of Court is indispensable for the resolution of the petition.
2. Whether the RTC had exceeded the relief prayed for by ordering the reconveyance of encroached portions.
3. The appropriateness of Spouses Gutierrez's motion to quash the writ of execution based on the claims that the orders for reconveyance were either interlocutory or exceeded the complained relief.

### Court's Decision:

1. **Procedural Technicalities**: The Supreme Court found that the appellate court could have been more lenient in handling procedural defects in verification and documentation since the defects were not intentional, and Spouses Gutierrez showed willingness to correct them. The Court emphasized the primacy of resolving cases on their merits over strict adherence to technicalities.
2. **Reliefs and Orders**: The Court held that the general prayer in Spouses Valiente's complaint was broad enough to encompass the relief of reconveyance, aligning with the principle of granting relief warranted by the allegations and proof, even if not specifically

prayed for. Thus, the RTC did not exceed the scope of requested relief by ordering reconveyance.

3. **Motion to Quash**: The Supreme Court determined that Spouses Gutierrez's motion to quash the writ of execution was inappropriate since it was not based on valid grounds under the circumstances. Moreover, the issues they raised should have been addressed in a motion for reconsideration or an appeal against the trial court's orders. Non-action within the reglementary period rendered the orders final and executory.

### ### Doctrine:

The case reaffirms doctrines regarding liberality in procedural requirements when substantive justice demands, the power of courts to grant reliefs warranted by the allegations and proofs even if not specifically prayed for, and the immutability of final and executory judgments.

### ### Class Notes:

- **Boundary Disputes**: This case highlights the legal steps for resolving boundary disputes, including filing for Quieting of Title and Recovery of Possession with Damages, conducting relocation surveys, and court-ordered reconveyance.
- **Verification Under Rule 65**: Verification aims to secure the allegations' truth and correctness, with courts having the discretion to overlook formal non-compliance to serve justice.
- **General Prayers in Complaints**: General prayers in a legal complaint can justify granting relief not specifically sought, based on the merits of the case.
- **Execution of Judgment**: A motion to quash a writ of execution must be based on valid grounds that specifically relate to the propriety of the execution rather than the merits of the final judgment itself.
- **Finality of Judgment**: Once a judgment or order becomes final, it is immutable barring clerical errors, underscoring the importance of timely motions for reconsideration or appeals.

### ### Historical Background:

This case is situated within the broader context of land dispute and property law in the Philippines, emphasizing the legal intricacies involved in boundary disputes, the balance between procedural rigor and substantive justice, and the finality of judicial decisions, which are critical in ensuring certainty and stability in property ownership and rights.