

Title: ****Heirs of Luis J. Gonzaga vs. Spouses Jose Leelin and Lilia Sevilla: A Land Title Controversy****

****Facts:****

The case involves two conflicting Torrens titles over the same parcels of land, identified as lot nos. 3619 and 3620 in the Cadastral Survey of Caloocan. Initially owned by Jose Eugenio under TCT No. 17519, the lots were sold to Luis J. Gonzaga (now deceased) in 1960, leading to the cancellation of Eugenio's title and the issuance of TCT No. 81338 to Gonzaga. Subsequently, Gonzaga sold these lots to Guillermo Y. Mascariñas in 1981, leading to the issuance of TCT No. 48078 to Mascariñas. In contradiction, another title, TCT No. C-26086, was issued to Lilia Sevilla (married to Jose Leelin) in 1979, covering the same lots (referred to as lots nos. 65 and 66). This title tracks back to OCT No. 994 registered in 1917, from which both conflicting titles allegedly derive.

Sevilla purchased the lots from the heirs of Bartolome Rivera, successors-in-interest of Maria de la Concepcion Vidal, confirmed by court rulings related to ownership and partition from OCT No. 994. The Gonzagas and Mascariñas, challenging Sevilla's title, faced a legal battle culminating in a Supreme Court decision.

After navigating through the lower courts, including a notable amendment to include Mascariñas as a defendant following Gonzaga's sale of the subject properties, the case escalated to the Supreme Court. The trial and appellate courts favored Sevilla's claim, citing priority in registration and invalidity of subsequent registrations covering the same property.

****Issues:****

1. Validity of conflicting transfer certificate of titles derived from a common Original Certificate of Title (OCT No. 994).
2. Jurisdiction of cadastral courts in issuing titles for already decreed lands.
3. Efficacy of an LRC Report and Recommendation in contesting the validity of titles.

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

The Supreme Court dismissed the consolidated petitions of the heirs of Gonzaga and Mascariñas, affirming the lower courts' decisions that favored Sevilla's claim. The decision hinged on the interpretation that Sevilla's title, derived directly from an earlier OCT (dated April 19, 1917), had primacy over Gonzaga's and Mascariñas's titles (stemming from a later registration dated May 3, 1917). Echoing precedent, the court held that a land already

decreed in an earlier registration case cannot be subject to a new decree in a cadastral case, rendering any successive registration null and void.

****Doctrine:****

In conflicts between overlapping titles, the one with the earlier registration date prevails. A cadastral court lacks jurisdiction to decree registration of lands already decreed in prior land registration cases, and any subsequent decree covering the same land is null and void.

****Class Notes:****

- ****Priority of Registration:**** When two certificates of title purport to include the same land, the one with the earlier date prevails.
- ****Jurisdiction over Already Decreed Lands:**** Cadastral courts cannot decree the registration of land already registered under a previous decree. Successive registrations for the same land are null and void.
- ****Land Registration Cases are in Rem:**** Decisions in land registration cases are binding against the whole world. The principle of *res judicata* applies, rendering such decisions final and conclusive.
- ****Doctrine of Nullity for Overlapping Titles:**** A certificate of title is not conclusive evidence of title if it is shown that the same land had already been registered and an earlier certificate for the same exists.

****Historical Background:****

The case underscores the complexity of land registration disputes in the Philippines, particularly those involving derivatives of older, original titles pre-dating the establishment of the Torrens system in the country. OCT No. 994, central to this controversy, exemplifies the difficulties in tracing land ownership back through historical records and court decisions to determine the rightful ownership of properties when overlapping claims arise. This decision reflects the court's adherence to established principles of land registration law, emphasizing the sanctity of the earliest recorded title in resolving ownership disputes.