

### Title:

**\*\*University of the Philippines vs. Segundina Rosario: A Dispute over Land Title Validity and Ownership\*\***

### Facts:

The case revolves around a complex sequence of events concerning the ownership and registration of a parcel of land situated in Quezon City, Philippines. The original application for land registration was filed by Datu Ditingke Ramos in 1971, claiming a parcel of 100,000 square meters. The University of the Philippines (U.P.) intervened in this application in 1972, asserting ownership of the land. Despite U.P.'s opposition, the court granted the application in favor of Rosario Alcovendras Vda. de Ramos, the wife of the original applicant, in 1973, and subsequent title transfers and registrations followed.

After a series of transactions and the issuance of new Transfer Certificates of Title (TCT), Segundina Rosario eventually purchased the land in 1988 and secured a TCT in her name in 1994. U.P. filed a petition in 1993 for the cancellation of the TCT held by Segundina, alleging the titles to be spurious and fraudulently issued. The requests by U.P. for motions to dismiss and cancel the notice of lis pendens were denied by the trial court, leading Segundina to file a petition for certiorari with the Court of Appeals. The Court of Appeals ruled in favor of Segundina, finding the trial court's actions to be a grave abuse of discretion. U.P. then appealed to the Supreme Court.

### Issues:

1. Whether the Court of Appeals erred in allowing Segundina's motion to dismiss without a full-blown hearing on the authenticity and basis of her title.
2. The validity of OCT No. 17 and the subsequent titles derived from it, in light of the alleged lack of signature approval from the Director of Lands.
3. The propriety of the Court of Appeals' treatment of factual issues in the absence of authentication and examination of the evidence by the trial court.
4. The alleged defect in the verification of Segundina's petition in the Court of Appeals.

### Court's Decision:

The Supreme Court found the petition by U.P. to be meritorious, citing that the title held by Segundina (TCT No. 121042) traces its roots back to an Original Certificate of Title (OCT No. 17), which was called into question for lacking the requisite approval signature from the Director of Lands. This lack of approval was deemed a critical jurisdictional flaw that could render the title and its derivatives void ab initio. Consequently, the Supreme Court

overturned the decision of the Court of Appeals, remanded the case to the trial court for a full trial on the merits, and emphasized the necessity for both parties to substantiate their claims with ample evidence.

### ### Doctrine:

Significant in this case is the reiteration of the principle that no land registration plan or survey may be admitted in proceedings unless approved by the Director of Lands, as mandated by P.D. No. 1529. A title issued without adherence to this requirement is considered void ab initio. Moreover, the doctrine of res judicata is rendered inapplicable in instances where the foundational legality of a title's origin is put into question.

### ### Class Notes:

- **\*\*P.D. No. 1529\*\***: A critical examination of the procedural requirements for land registration, emphasizing the necessity of approval by the Director of Lands for a survey plan.
- **\*\*Void ab initio Titles\*\***: A title declared void from the outset cannot confer ownership, regardless of subsequent transactions.
- **\*\*Doctrine of Res Judicata\*\***: Its application is limited in scenarios involving the legality of title origins.

### ### Historical Background:

This case highlights the complexities of land ownership and registration in the Philippines, where disputes often arise from overlapping claims, procedural discrepancies, and the need for rigorous verification of title authenticity. It underscores the crucial role of judicial oversight in ensuring that land titles are issued and transferred based on valid and legal grounds, reflecting the challenges in property law unique to Philippine jurisprudence.