

****Title:**** Heirs of Teodora Loyola vs. Court of Appeals and Alicia R. Loyola

****Facts:****

The dispute revolves around a 4,419-square-meter parcel of land in Lingatin, Morong, Bataan. The Heirs of Teodora Loyola, represented by Zosimo Mendoza, Sr., filed a complaint against Alicia R. Loyola on May 19, 2003, for annulment of free patent and original certificate of title, reconveyance of ownership and possession, and damages. The Heirs claimed ancestral possession of the land since time immemorial, which was fraudulently registered by Alicia through Free Patent No. (III-14) 001627 and Original Certificate of Title No. 1782.

The dispute escalated from the Regional Trial Court (RTC), which dismissed the complaint due to non-impleadment of indispensable parties, to the Court of Appeals (CA) where the dismissal was upheld albeit for different reasons. The CA found no error in the evidentiary support for the claim of the Heirs, thus affirming the dismissal. The heirs then filed a Petition for Certiorari under Rule 65 to the Supreme Court, claiming grave abuse of discretion by the CA for delving into factual findings beyond the procedural issues raised.

****Issues:****

1. Whether the CA committed grave abuse of discretion by addressing the merits of the petitioners' claim instead of limiting its review to the procedural issue of indispensable party non-impleadment.
2. Whether the petitioners were able to prove their title or ownership over the subject property effectively to warrant reconveyance.

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

The Supreme Court dismissed the petition, highlighting the procedural impropriety of utilizing a petition for certiorari under Rule 65, pointing out that the proper recourse should have been a petition for review under Rule 45. The Court emphasized that errors of judgment, including procedural errors, are addressable by appeal, not certiorari. Despite this procedural misstep, the Court proceeded to review the CA's decision to address the issues and prevent further delay in case resolution.

The Supreme Court agreed with the CA's findings, emphasizing that the petitioners failed to present sufficient evidence to overturn the presumption of regularity in the issuance of the free patent and original certificate of title to respondent Alicia R. Loyola. Notably, the Heirs did not convincingly prove their ancestral possession claim, and the alleged procedural

misstep by the CA in reviewing the merits of the case was deemed within its discretionary purview when necessary to arrive at a just decision.

****Doctrine:****

1. A petition for certiorari under Rule 65 is designed for the correction of errors of jurisdiction, not errors of judgment, which are reviewable by appeal.
2. The presumption of regularity in the issuance of administrative actions (e.g., free patents and original certificates of title) stands unless convincingly rebutted by clear and compelling evidence.

****Class Notes:****

- ****Correct Remedy for Errors of Judgment:**** For procedural or factual errors within the jurisdiction of the issuing court, the appropriate remedy is an appeal under Rule 45, not a special civil action for certiorari under Rule 65.
- ****Indispensable Party Non-Impleadment:**** Dismissal for failure to include an indispensable party may be corrected on appeal, subject to the appellate court's discretion to review related issues for a just resolution.
- ****Presumption of Regularity:**** Administrative and quasi-judicial actions, including issuance of lands titles, carry a presumption of regularity that can only be overturned by clear, convincing, and specific evidence of fraud or irregularity.
- ****Evidentiary Requirements for Property Claim:**** Claimants must present clear and convincing evidence of ownership or exclusive possession that predates the issuance of contested titles.

****Historical Context:****

This case reflects the Philippine judiciary's procedural rigor and evidentiary standards in land dispute resolutions, emphasizing the sanctity of administrative land grants and the need for clear, unambiguous evidence when challenging such grants. The detailed procedural journey from the RTC to the Supreme Court underlines the legal complexities in contesting property titles, including the procedural hierarchy and the evidentiary burden required to invalidate government-issued land titles.