

Title: Municipality of Candijay, Bohol vs. Municipality of Alicia, Bohol: A Case of Territorial Jurisdiction and Judicial Review

Facts:

The Municipality of Candijay, Bohol filed a complaint against the Municipality of Alicia, Bohol, seeking to establish territorial jurisdiction over Barangay Pagahat. The Regional Trial Court (RTC) of Tagbilaran City ruled in favor of Candijay, declaring Barangay Pagahat within its jurisdiction and permanently enjoining Alicia from asserting control over the same. Alicia appealed to the Court of Appeals (CA), which reversed the RTC's decision based on a scrutiny of conflicting claims and evidence. The CA found errors in the RTC's reliance on certain exhibits to determine territorial boundaries and concluded that neither municipal ordinance nor executive orders definitively placed Pagahat within Candijay's jurisdiction. Following an "equiponderance of evidence" principle, the CA dismissed the complaint for lack of preponderance of evidence. Candijay, dissatisfied with the CA's ruling, filed a petition for review on certiorari with the Supreme Court (SC), challenging the application of the "equiponderance of evidence" principle, questioning Alicia's juridical personality, and expressing concerns over the unresolved territorial dispute.

Issues:

1. Was the Court of Appeals' application of the "equiponderance of evidence" principle correct?
2. Does the Municipality of Alicia possess juridical personality despite the contention that its creation was based on an unconstitutional delegation of legislative powers?

Court's Decision:

The Supreme Court denied the petition for review on certiorari, upholding the CA's decision.

1. **Equiponderance of Evidence:** The SC agreed with the CA's findings that neither party could definitively prove its territorial claim over Barangay Pagahat due to the equal weight of evidence presented. This principle dictates that when evidence from both sides is equally balanced, the court must rule in favor of the defendant, as the plaintiff bears the burden of proving their case.
2. **Juridical Personality of Alicia:** The Court dismissed Candijay's challenge to Alicia's juridical personality, emphasizing that the attack was both improper and untimely. The SC highlighted its previous rulings, asserting that municipalities created by executive orders,

which have been functioning and recognized as de facto municipalities for an extended period, acquire a unique status approximating de jure municipalities. Specifically, the SC cited the transition of such entities to regular, de jure municipalities under Section 442 (d) of the Local Government Code.

****Doctrine:****

The SC reiterated the doctrine of “equiponderance of evidence,” whereby in the absence of a preponderance of evidence, the complaint must be dismissed in favor of the defendant. Moreover, it underscored the principle that municipalities created by executive orders, which have operated for years and achieved recognition as functioning local government units, are deemed to have de jure status under the Local Government Code.

****Class Notes:****

- ****Equiponderance of Evidence:**** A legal principle in which, if the evidence presented by both sides is equally balanced, the court must find for the defendant, as the burden of proof lies with the plaintiff.
- ****De Jure Municipality:**** A municipality that is legally established and recognized. The Local Government Code’s Section 442 (d) provides that municipal districts organized under presidential issuances or executive orders and having elective officials at the time of the Code’s effectivity are considered as regular municipalities.
- ****Burden of Proof:**** The obligation to prove one’s assertion or case, which rests with the plaintiff in civil cases.

****Historical Background:****

The case touches upon the complex issue of territorial jurisdiction between local government units in the Philippines, an issue that dates back to the colonial and early post-colonial periods where boundaries were often ambiguously defined. The controversy also highlights the evolving nature of local governance structures and the legal implications of executive orders in creating municipalities, especially in the context of the Philippines’ administrative law. This case crystallizes the approach taken by the judiciary in resolving boundary disputes among local government units, emphasizing evidence evaluation, historical acts of recognition, and statutory interpretations of local government codes.