

Title:

Bokingo vs. The Honorable Court of Appeals and The Heirs of Celestino Busa

Facts:

The case originated from a complaint filed by Ernesto Campos and the Heirs of Celestino Busa against Alfredo Bokingo and others in the Regional Trial Court (RTC) of Butuan City. The complaint sought injunction and damages, alleging co-ownership of a parcel of land, which Bokingo and others attempted to title through the Department of Environment and Natural Resources. The land had been inherited from Celestino Busa. After Bokingo's application was protested by the complainants and subsequently dismissed by the Provincial Environment and Natural Resources Officer (PENRO), they were authorized to survey the land. Bokingo and his representatives obstructed the survey, leading to the filing of the complaint for injunction and damages, alleging bad faith and seeking attorney's fees and damages.

Bokingo filed a motion to dismiss on the grounds of jurisdiction, arguing the RTC lacked jurisdiction as the case involved land possession and its assessed value was below the threshold for RTC jurisdiction. The RTC denied the motion. Bokingo then filed a petition for certiorari with the Court of Appeals (CA), which was dismissed for lack of merit. The CA held that an order denying a motion to dismiss is interlocutory, and not proper for a certiorari petition, especially as Bokingo failed to file a motion for reconsideration with the RTC.

Issues:

1. Whether the RTC of Butuan City had jurisdiction over the complaint for injunction and damages.
2. Whether the Court of Appeals erred in dismissing Bokingo's petition for certiorari.

Court's Decision:

The Supreme Court denied the petition, upholding the CA's decision. The SC held that the RTC indeed had jurisdiction over the case, as the principal action sought was not for the recovery of a sum of money or possessory action but for an injunction to prevent interference with the surveying of the land, which is a matter incapable of pecuniary estimation and within the RTC's exclusive jurisdiction. Furthermore, the SC agreed that the CA was correct in dismissing the petition for certiorari due to Bokingo's failure to first file a motion for reconsideration with the RTC and the interlocutory nature of the order denying the motion to dismiss.

Doctrine:

- The nature of an action and the court's jurisdiction over it are determined by the material allegations in the complaint, the type of relief sought by the plaintiff, and the law in effect when the action is filed.
- Actions where the principal relief sought is to enjoin specific acts are considered incapable of pecuniary estimation and exclusively cognizable by Regional Trial Courts.

Class Notes:

- **Jurisdiction Over the Subject Matter**: Determined by the allegations of the complaint and the relief sought, irrespective of whether the plaintiffs are entitled to all or some of the claims asserted therein.
- **Injunction as a Principal Relief**: An action primarily seeking an injunction to prevent specific acts pertains to RTC jurisdiction as it's considered incapable of pecuniary estimation.
- **Motions for Reconsideration in Certiorari Proceedings**: A motion for reconsideration with the lower court is essential before filing a petition for certiorari, unless a compelling reason for deviation exists.
- **Interlocutory Orders**: Orders that do not terminate or finally dispose of a case, such as an order denying a motion to dismiss, are not typically appropriate for certiorari.

Historical Background:

This case illustrates the jurisdictional challenges and procedural intricacies in legal disputes over land rights and title in the Philippines. It underscores the importance of correctly identifying the nature of the relief sought in determining the appropriate court to adjudicate the matter.