

### Title: Floraida Teraña v. Hon. Antonio de Sagun & Antonio B. Simuangco

### Facts:

Antonio Simuangco leased his property in Nasugbu, Batangas to Floraida Teraña. In 1996, without Simuangco's consent, Teraña demolished the leased house and constructed a new one, allegedly also giving the original materials to her sister. Simuangco demanded Teraña vacate in February 1997, leading to a complaint for unlawful detainer filed on April 16, 1997. The MTC, upon the inhibition of the presiding judge due to relation with Simuangco, went through procedural steps including a failed amicable settlement, denial of extensions for filings, and eventually issued a decision against Teraña for violation of the lease contract, ordering her ejectment, to pay attorney's fees, and costs.

Teraña's subsequent appeal to the RTC was denied, affirming the MTC's decision. However, upon motion for reconsideration/new trial arguing lack of evidence from Simuangco and procedural oversights, the RTC reverses its decision, ordering remand for further proceedings, emphasizing equitable considerations. The CA affirmed the RTC's remand decision, leading to Teraña's petition to the Supreme Court.

### Issues:

1. Whether a remand of the case to the MTC is proper?
2. Whether the Court should admit Teraña's late paperwork?
3. Whether the complaint for unlawful detainer should be dismissed based on the Rules of Summary Procedure?

### Court's Decision:

The Supreme Court partly granted the petition. It found that remanding the case was unnecessary, as sufficient records existed for review and decision. The Court decided not to admit Teraña's late submissions, maintaining the strict timelines of the Rules of Summary Procedure (RSP) to ensure quick resolution of cases. On the complaint for unlawful detainer, the Court held that Simuangco had a valid cause for ejectment under Article 1673(3) of the Civil Code, as the lease agreement was violated by Teraña without proven consent for the alteration. The Court ordered Teraña to vacate and surrender possession of the property to Simuangco.

### Doctrine:

The decision underscored the adherence to the procedural timelines stipulated in the Rules of Summary Procedure, highlighting the RSP's purpose of expeditious and inexpensive

determination of cases covered by these rules, including unlawful detainer cases. It reiterated that the material allegations in a complaint not specifically denied are deemed admitted and stressed that damages recoverable in an unlawful detainer action are limited to rentals or reasonable compensation for the use of the property.

**### Class Notes:**

- **\*\*Rules of Summary Procedure\*\***: Strict adherence to timelines is crucial for speedy case resolution. Motions for extensions, late pleadings or submissions are generally prohibited.
- **\*\*Unlawful Detainer Essentials\*\***: Valid lease agreement, lease termination/expir