

****Title:****

Ramos v. Muyot: A Case on Final Judgment and Service of Summons in the Philippine Supreme Court

****Facts:****

This case centers around a dispute over the sale of a parcel of land in Tondo, Manila, known as Lot No. 2-G of Subdivision Plan SWO No. 7308, co-owned by Paulino V. Chanliongco Jr., his sister Narcisa, and his brothers Mario and Antonio. The contention arose when Adoracion C. Mendoza, Narcisa's daughter, sold the property to the respondents in September 1986 through a Special Power of Attorney (SPA) granted by the co-owners to Narcisa.

The respondents, questioning the legitimacy of the sale due to the conflicts among the heirs of the co-owners, filed a Complaint for interpleader with the Regional Trial Court (RTC) to resolve the dispute. The RTC validated the sale regarding Narcisa's share, stating Adoracion lacked authority to sell the other co-owners' shares. This was appealed to the Court of Appeals (CA), which modified the RTC decision by upholding the sale on the grounds that Adoracion acted as her mother's sub-agent, thus not requiring another SPA.

As the CA decision became final and was not appealed, it was entered in favor of the respondents on August 8, 1996. On April 10, 1999, the petitioners filed a Motion to Set Aside the CA's Decision, contending they were not served with the complaint or the summons and had not been impleaded as parties to the case, thus depriving them of due process. The CA denied this motion, leading to the petitioners taking their case to the Supreme Court.

****Issues:****

1. Whether the Court of Appeals erred in denying the petitioners' Motion to Set Aside its Decision, hence violating the petitioners' right to due process.

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

The Supreme Court found the petition unmeritorious, holding that a decision that has acquired finality becomes immutable and not subject to alteration except under specific exceptions, which did not apply in this case. The Court identified the action as quasi in rem, affecting the interests of parties over the property, not a personal liability which necessitates individual summonses. Since the legal action addressed the property's ownership collectively represented by the estates of the deceased co-owners, there was no

necessity to individually implead the petitioners or serve them with summons. The Court highlighted that the estate of Paulino was properly represented and participated in the proceedings, obviating the need for direct involvement of his heirs, the petitioners.

****Doctrine:****

The doctrine established in this case reiterates the immutability of a final judgment, barring exceptions such as the correction of clerical errors, nunc pro tunc entries, or void judgments. It also clarified the application of rules on the service of summons, particularly in actions quasi in rem, where the failure to serve summons individually to interested parties does not necessarily infringe on due process, provided that the estate of the deceased owner, seen as representing their interest, has been properly impleaded and served.

****Class Notes:****

1. ****Finality of Judgment:**** Once a decision is finalized, it cannot be modified or overturned except for correcting clerical errors, making nunc pro tunc entries, or if the judgment is void.
2. ****Service of Summons:**** In quasi in rem actions, as long as the estate of a deceased property owner is represented and served, individual heirs or interested parties do not need to be separately served or impleaded for the proceedings to be considered valid.
3. ****Interpleader Action:**** This is utilized when conflicting claims over a property require adjudication to determine rightful ownership, typically not implicating the personal liabilities of the individuals involved but rather their interests in the specific property.

****Historical Background:****

This case highlights the complexities involved in property disputes within familial contexts, especially when multiple heirs and unclear authorizations come into play. It underscores the importance of clear legal representation and authority in transactions involving co-owned properties and serves as a pivotal reminder of the rigidity of the finality of court decisions within the Philippine legal system, ensuring stability and predictability in legal proceedings.