

Title: Sofia Aniosa Salandanan vs. Spouses Ma. Isabel and Bayani Mendez

Facts:

This case originated from an ejectment complaint filed by the respondents, Spouses Mendez, against Spouses Fernandez for refusing to vacate a property in Manila, claiming ownership by donation. The Manila MeTC ruled in favor of the Mendezes, ordering Spouses Fernandez to vacate and pay rentals and attorney's fees. The decision was affirmed by the RTC and then by the CA. Sofia Aniosa Salandanan, claiming to be the true owner and not properly included in the proceedings, sought clarification and intervention at the CA after the decision, which the CA denied for being filed out of time and because her rights as an owner would be sufficiently protected in a separate annulment and reconveyance case she had previously initiated.

Issues:

1. Was the CA's denial of Salandanan's motion for clarification and intervention correct, despite her claim of being improperly included in the ejectment proceedings?
2. Did the CA commit a grave abuse of discretion in including Salandanan in its judgment against Spouses Fernandez, thus violating her right to due process?
3. Should the issue of ownership have been considered by the CA in resolving who has the better right to possess the disputed property?
4. Was there a necessity to suspend the ejectment case in light of Salandanan's claim over the property and based on jurisprudential precedents?

Court's Decision:

The Supreme Court denied Salandanan's petition for review on certiorari, upholding the CA's decisions. The SC ruled the CA did not commit grave abuse of discretion. It noted that interventions must be made before the trial court renders judgment and reasoned eviction cases must be resolved swiftly. The Court emphasized that questions of ownership cannot be resolved in ejectment proceedings, and the proper venue for Salandanan's ownership claims was her earlier filed case for annulment and reconveyance of the property. The SC highlighted that lower courts correctly identified respondents as having the better right to possess the property based on their registered title.

Doctrine:

The ruling reinforced the doctrine that actions for ejectment are concerned solely with possession, not ownership, and interventions should be filed before the trial court's judgment. Additionally, it established that a titleholder's prima facie proof of possession

subsists unless and until the title is overturned or invalidated in an appropriate proceeding.

Class Notes:

- Ejectment proceedings are summary in nature, aimed at restoring physical possession rather than adjudicating ownership disputes.
- Intervention in a lawsuit must be timely filed, specifically before the rendering of judgment by the trial court.
- Ownership issues are outside the ambit of ejectment cases and should be pursued in separate proceedings.
- Registered ownership under the Torrens system provides a presumptive right of possession that prevails in ejectment disputes, barring evidence proving otherwise in an appropriate proceeding.

Historical Background:

This case illustrates the Philippine legal system's approach to disputes combining claims of possession and ownership over real property, highlighting the procedural nuances that can affect the substantive rights of the parties involved, especially regarding timely intervention and the appropriate venue for resolving ownership claims separate from possession disputes.