

****Title: Heirs of the Late Jose De Luzuriaga vs. Republic of the Philippines****

****Facts:****

This complex legal matter begins with the heirs of the late Jose De Luzuriaga, seeking to register a parcel of land known as Lot No. 1524 of the Bacolod Cadastre. The petitioners filed an Application for the Registration of Title in 1997 at the Regional Trial Court (RTC) of Bacolod City. The application underwent amendments aimed at registering the land under the late Jose R. Luzuriaga, Sr., pursuant to Decree No. 22752.

Despite the RTC granting the application and confirming the incomplete title of Jose R. De Luzuriaga, Sr. over Lot No. 1524, the decision incited several succeeding legal maneuvers. The Office of the Solicitor General (OSG) represented the Republic of the Philippines, contesting the RTC decision with a Petition for Relief from Judgment on grounds, including procedural lapses by the petitioners and the questionable basis of their claim—Decree No. 22752, which supposedly barred such application.

Additionally, Dr. Antonio A. Lizares Co., Inc. (DAALCO) filed a Complaint for Quieting of Title, emphasizing their legal ownership through a Transfer Certificate of Title in the name of Lizares, also under Decree No. 22752 since November 14, 1916.

****Procedural Posture:****

- The heirs of Luzuriaga filed an Application for Registration, leading to an RTC decision in their favor.
- The OSG filed an unverified Petition for Relief from Judgment, considered late and initially rejected by the RTC due to non-compliance with form and timeliness.
- DAALCO initiated a separate Quieting of Title case, claiming rightful ownership of the same property.
- The CA reversed the RTC's dismissals, allowing the Republic's plea for a reevaluation concerning the issue of double titling.

****Issues:****

1. Whether the appellate court acted within its discretion in granting the Republic's petition for relief from judgment despite the finality of the RTC decision and the ongoing quieting of title case.
2. Legal implications of double titling and procedural lapses in land registration cases.

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

The Supreme Court upheld the CA's decision, denying the petitions for review by the heirs

of Luzuriaga. It recognized the exceptional circumstances warranting the Republic's petition for relief, notably the prima facie case of double titling suggested by the presence of two OCTs covering the same lot issued under the same decree but to different parties. The Court emphasized the importance of substantial justice over procedural technicalities and projected that the cadastral and quieting of title cases could proceed independently, albeit consolidation being ideal.

****Doctrine:****

The case reiterates the principle that procedural rules can be relaxed in the interest of substantiating justice, especially where grave abuse of discretion is apparent. It highlights that relief from judgment is an equitable remedy for exceptional cases and that proceedings for relief from judgment and for quieting of title can proceed separately.

****Class Notes:****

- Land Registration: An application for land registration must comply with procedural requirements, including publication and adherence to decrees. Decree No. 22752 played a central role here, illustrating the vital task of establishing clear legal bases for claims.
- Equitable Remedies: This case underscores the availability of relief from judgment as an equitable remedy, which can be invoked under exceptional circumstances, despite procedural lapses or the finality of decisions.
- Double Titling: A crucial issue in property law, highlighting the challenges and legal implications of issuing two titles for the same property under the same decree to different parties.

****Historical Background:****

The case encapsulates the complexities of property litigation in the Philippines, involving overlapping claims to property, historical decrees, and the interplay between judicial decisions and cadastral processes. It demonstrates evolving jurisprudence in addressing conflicts arising from legacy issues in land titles and the judiciary's discretion in balancing legal technicalities with substantive justice.