

Title: Domingo vs. Landicho, et al.

Facts:

Crisologo C. Domingo applied for land registration covering five parcels in Tagaytay with the Regional Trial Court (RTC) on April 20, 1993. Domingo claimed to have purchased the lots from Genoveva Manlapit in 1948, alleging over 30 years of possession by Genoveva prior to the sale and continuous possession by himself thereafter. The application was supported by various documents, including a Tracing Cloth of Approved Plan and Tax Declarations in Domingo's name.

The Land Registration Authority (LRA) identified discrepancies in the submitted plan. Respondents Severino and Raymundo Landicho, Julian Abello, Marta de Sagun, and Editha G. Sarmiento opposed the application, claiming possessions of the lots. Domingo died on March 9, 1996, during the proceedings, which was not immediately disclosed to the court.

The RTC ruled in favor of Domingo on December 22, 1997. Respondents appealed, and on June 30, 2005, the Court of Appeals reversed the RTC decision, finding insufficient proof of the required period of possession for a land registration under P.D. No. 1529. Domingo appealed to the Supreme Court, challenging the appellate court's interpretation and application of the relevant legal provisions.

Issues:

1. Whether the lots are part of alienable public land;
2. Whether Domingo proved possession since June 12, 1945, or earlier;
3. Whether Domingo's death was properly disclosed and its impact on the proceedings;
4. Whether Domingo's counsel fulfilled their duties concerning the disclosure of Domingo's death.

Court's Decision:

The Supreme Court denied Domingo's petition. The Court found that:

1. Domingo failed to provide incontrovertible evidence that the lots were declared alienable and disposable. Documents presented were either in photocopy form or lacked authentication and verifiable content.
2. Even assuming the lots were alienable, Domingo did not satisfy the possession requirement since June 12, 1945, or earlier. The Court noted discrepancies in the tax declarations and a lack of substantive evidence of possession or ownership prior to 1948.
3. The failure to notify the court of Domingo's death undermined the proceedings at the

RTC, rendering them potentially null and void. However, jurisdiction over the person could be waived explicitly or implicitly, and Domingo's heirs effectively submitted to the jurisdiction by participating in the proceedings.

4. Domingo's counsel was warned for failing to notify the court of his death, a violation of professional and procedural rules.

Doctrine:

1. Lands presumed to belong to the State require positive acts of government reclassification as alienable and disposable for private appropriation.
2. The jurisdiction over the person of the parties may be waived, but counsel has a duty to inform the court of a party's death to avoid nullity of proceedings.

Class Notes:

- Jurisdictional challenges and procedural compliance are pivotal; failure may result in nullification of proceedings.
- Documentary evidence must meet stringent standards of authenticity and relevance.
- The possession requirement for land registration under P.D. No. 1529 emphasizes continuous, open, exclusive, and notorious possession since June 12, 1945.
- Counsel's duties extend beyond mere representation, encompassing obligations to the court and adherence to procedural norms.

Historical Background:

This case reflects the stringent requirements for judicial confirmation of imperfect titles in the Philippines, emphasizing the need for clear, incontrovertible evidence of possession and land status. It underscores the challenges in land registration proceedings, especially concerning lands presumed to belong to the public domain.