

### ### Title

**\*\*Alberto G. Pinlac & Others vs. Court of Appeals & Others: A Land Title Controversy\*\***

### ### Facts

This case involves a complex dispute over the ownership of three large parcels of land known as Lot Nos. 1, 2, and 3, leading to protracted litigation culminating at the Supreme Court of the Philippines. The petitioners, led by Alberto G. Pinlac and several others, initiated a petition for Quieting of Title after a trial court's partial decision in 1988 declared them absolute owners of the contested lands by virtue of extraordinary prescription. This decision was challenged by the defaulted title owners of Vilma Subdivision (located within Lot No. 2) through a Petition to Annul filed at the Court of Appeals, which granted the annulment in 1989 on grounds of defective service of summons. The Supreme Court, in a decision on January 19, 2001, denied the petitioners' subsequent certiorari petition, affirming the appellate court's ruling.

However, the petitioners, unsatisfied with the blanket affirmation of the appellate decision by the Supreme Court, filed a Motion for Reconsideration concerning Lot No. 3, arguing that its adjudication should be distinct from that of Lot No. 2. This resulted in a Resolution on November 20, 2001, by the Supreme Court partially granting the motion by reinstating the portions of the trial court's decision relating to Lot No. 3.

Subsequent legal maneuvers saw the Republic of the Philippines, through the Land Registration Authority (LRA), filing a motion for intervention and Petition-In-Intervention, arguing several points aimed at protecting public interest and government properties on the contested land. This prompted a thorough re-examination by the Supreme Court, leading to the realization that certain parts of the reinstated decision regarding Lot No. 3 were void due to lack of clarity necessary for implementation.

### ### Issues

1. The propriety of service of summons by publication affecting jurisdiction over respondents.
2. The legality and implications of the trial court's partial decision pertaining to Lot Nos. 1, 2, and 3.
3. The admissibility and impact of the Republic of the Philippines' late intervention in the case.
4. The validity of Original Certificate of Title No. 333 (OCT No. 333) and its related proceedings.

5. The extent to which the annulment of the trial court's decision affects the declarations of ownership over Lot Nos. 2 and 3.

### ### Court's Decision

The Supreme Court partially granted the Republic's intervention, significantly modifying its previous resolutions. It annulled the trial court's decision as it pertains to Lot Nos. 2 (originally covered by OCT No. 614) and 3 (originally covered by OCT No. 333), grounding its decision on several critical considerations, including the unclear delineation and implications of the trial court's designation of property boundaries and ownership through extraordinary prescription. Notably, the Supreme Court underscored the validity of OCT No. 333, aligning with earlier jurisprudence, but delineated its ruling concerning the specific property bounds of Lot No. 3 due to due process concerns for adjacent landowners.

### ### Doctrine

The resolution reiterated the principle of "stare decisis et non quieta movere" (to stand by decisions and not disturb the undisturbed), emphasizing the binding power of final and executory judicial decisions on the validity of OCT No. 333 to preclude its relitigation. Additionally, it highlighted the procedural latitude in allowing intervention even post-judgment in exceptional circumstances to serve the ends of justice and protect substantial public interest and government properties.

### ### Class Notes

- **Service of Summons**: Proper service is crucial for jurisdiction over respondents, and defective service can void court proceedings.
- **Doctrine of Stare Decisis**: Affirms that settled matters should not be disturbed. This principle solidifies the reliance on judicial decisions as precedents.
- **Intervention**: Legal standing and timing of intervention can be flexibly considered to ensure substantive justice, especially when public interests or indispensable parties are involved.
- **Property Ownership through Prescription**: Claims of ownership based on prescription must clearly delineate property boundaries to be valid and implementable.
- **Validity of Titles**: Original Certificate of Titles (OCT) issued by competent courts are considered valid unless duly annulled through judicial proceedings.

### ### Historical Background

This case belongs to a series of litigations illustrating the complex and often contested nature of land titles and ownership in the Philippines, exacerbated by historical antecedents

such as the colonial land titling system and post-colonial government proclamations affecting massive parcels of land. The dispute underscores the importance of clear legal procedures for land registration, titling, and jurisdictional challenges in protecting property rights and the interests of both private and public parties.