

Title: Edmund Sia vs. Wilfredo Arcenas, Fernando Lopez, and Pablo Rafanan

Facts:

This case revolves around real property tax delinquencies of Panay Railways, Incorporated (PRI) concerning Lot 145-A and Lot No. 1839-pt located in Barangay IX, Roxas City, Capiz. Due to the unpaid taxes from 1992 to 1996, the City Treasurer of Roxas City auctioned the subject lots, concluding with Edmund Sia as the highest bidder. Following the auction on December 20, 1996, a Certificate of Sale was issued in Sia's favor. Despite the lapse of the redemption period, the City Treasurer refused to issue a Final Bill of Sale to Sia, especially after the nullification of the auction sale through Executive Order No. 08-97 issued by Mayor Juliano Alba.

Sia filed a petition against various city officials and PRI in the RTC of Roxas City, Branch 17 (RTC Br. 17), seeking the annulment of EO 08-97 and issuance of the Final Bill of Sale. The RTC ruled in Sia's favor, a decision upheld by the CA upon appeal by PRI. The decision was finalized on October 23, 2007, and Sia sought execution of the judgment, eventually resulting in issuance of a Writ of Possession and a subsequent Writ of Demolition against third-party occupants, including the respondents, who were PRI's lessees.

The respondents contested the writs, arguing that the original mandamus petition's execution did not encompass a writ of possession. The RTC Br. 15 rejected their motion to quash, aligning the tax sale's nature with an extrajudicial foreclosure that necessitated issuance of the writs. Displeased, the respondents appealed to the CA, leading to the questioned writs' annulment by the CA and a directive to enforce the Writ of Execution in line with Sections 9 and 11, Rule 39, in relation to Rule 65 of the Rules of Court.

Issues:

The primary legal contention centers on whether the CA erred in declaring the writs of possession and demolition void and directing enforcement of the Writ of Execution as per the Rules of Court.

Court's Decision:

The Supreme Court affirmed the CA's decision, agreeing that the RTC Br. 15 exceeded its authority by issuing the writs of possession and demolition which varied from the terms of the judgment to execute in SCA No. V-7075. The SC elaborated that the judgment solely compelled the City Treasurer to issue a Final Bill of Sale to Sia and did not extend the writ's coverage to dispossession or demolition against third parties. The case primarily involved a

writ of mandamus—an order to perform a ministerial act, notably distinct from an action demanding or enforcing possession or title to property.

Doctrine:

This case reiterates the doctrine that in the execution of judgments, especially that of mandamus, the execution must substantially conform to, and not go beyond, the dispositive portion of the decision sought to be executed.

Class Notes:

1. Writ of Mandamus: A judicial command to perform a ministerial duty that the law mandates to be done.
2. Execution of Judgments: Must not exceed or vary from the terms of the judgment being enforced.
3. Real Property Tax Auction: Consequences and obligations following the auction sale, including the issuance of a final bill of sale.
4. Rules of Court on Execution of Judgments: Understanding Sections 9 and 11, Rule 39, and Rule 65.

Historical Background:

This case highlights the complexities and procedural nuances in enforcing judgments obtained from mandamus petitions, especially when intersecting with real property law and local governance (e.g., tax delinquencies and public auction sales). It underscores the specificity required in executing court decrees, the limitations of certain judicial writs, and clarifies the scope of remedies available to victorious litigants in mandamus actions.