

****Title:**** Teresita Tan vs. Jovencio F. Cinco, et al.: A Study on Judicial Stability and Interference Among Courts

****Facts:****

In 2001, Dante Tan borrowed PHP 50,000,000.00 from respondents, secured by shares in Best World Resources Corporation (BWRC). Failing to repay, Dante proposed settling by selling the shares, assigning proceeds to respondents. Upon disappearing, respondents filed a sum of money action against Dante, leading to a May 21, 2002 Makati RTC judgment ordering Dante to pay PHP 100,100,000.00 plus interests, attorney's fees, and costs. Despite appeals, a Writ of Execution was issued, leading to a property auction won by respondents. Dante's quashal attempts and his assertion that the property was conjugal/family home failed in Makati RTC, leading to a final judgment for respondents.

In 2007, Teresita Tan, Dante's wife, filed a complaint in Parañaque RTC to nullify the auction and sale, as she was not part of the Makati RTC case. Initially dismissed for res judicata, the Parañaque RTC reversed upon reconsideration, nullifying the auction and sale, citing Teresita was not a party in the collection case.

Respondents' appeal was delayed, and the Parañaque RTC denied it for tardiness. The CA, however, directed Parañaque RTC to allow the appeal, emphasizing judicial stability, suggesting the need for review over technicality disposal.

****Issues:****

1. Did the Parañaque RTC violate the doctrine of judicial stability by taking cognizance of Teresita's nullification case?
2. Is the nullification of the auction sale and related actions by the Parañaque RTC correct despite the final judgment from the Makati RTC?

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

The Supreme Court denied Teresita's petition, stating the Parañaque RTC violated the doctrine of judicial stability by addressing the nullification case, which was effectively challenging a final judgment by the Makati RTC, a co-equal court. The SC emphasized that courts of equal jurisdiction cannot interfere with each other's judgments/orders, declaring the Parañaque RTC's proceedings null and void due to lack of jurisdiction.

****Doctrine:****

The Supreme Court reiterated the doctrine of judicial stability or non-interference among courts of concurrent jurisdiction. This doctrine holds that one court cannot interfere with

the judgments or orders of another co-equal court. This principle ensures the orderly administration of justice and prevents jurisdictional encroachment among courts.

****Class Notes:****

1. ****Judicial Stability:**** Courts of equal authority must not interfere with each other's cases, orders, or judgments to ensure smooth judicial proceedings.
2. ****Res Judicata:**** Once a case is decided with finality, the same parties cannot raise the same issue in another court.
3. ****Writ of Execution:**** A court order enforcing a judgment, usually involving property seizure and sale, which cannot be interfered with by another court of equal rank.
4. ****Petition for Certiorari under Rule 65:**** The remedy for challenging a lower court's jurisdiction or grave abuse of discretion is not through another court of similar rank but through a higher court.

****Historical Background:****

This case underscores the intricacies of Philippine judicial proceedings, especially when it comes to executing judgments and recognizing the boundaries of judicial authority among courts. It highlights the constitutional safeguards against judicial overreach, ensuring that the adjudication of cases remains orderly and respects the finality of judgments.