

Title: Esquivel vs. Alegre, G.R. No. 74339, 254 Phil. 316 (1989)

Facts:

1. **Initiation of Ejectment Case (Civil Case No. 990):**

- Petitioner Cresenciana Atun Esquivel and Lamberto Esquivel initiated an ejectment case in the City Court of Legaspi City (Civil Case No. 990) against respondents Teotimo Alaurin and Visitacion Magno, claiming the right to possession of a 205-square meter parcel of land known as Lot No. 57.

2. **Judgments and Appeals:**

- The City Court ruled in favor of petitioners, ordering respondents to vacate the property. Respondents appealed to the Court of First Instance (CFI), which affirmed the lower court's decision. The Court of Appeals (CA) further affirmed the CFI's ruling, and the Supreme Court ultimately upheld it, making the decision final and executory on July 25, 1973.

3. **Filing of Civil Case No. 4883 (Post-Final Judgment):**

- Before the final decision was executed, petitioners filed Civil Case No. 4883 on August 24, 1973, seeking reconveyance, nullity of judgment, damages, and a preliminary injunction. The trial court issued a writ of preliminary injunction.

4. **Petition for Certiorari (G.R. No. L-38826):**

- Respondents filed a petition for certiorari in the Supreme Court to set aside the issuance of the preliminary injunction. Both parties agreed to let Civil Case No. 4883 be tried on the merits, as recorded in a Joint Manifestation.

5. **Trial and Decision in Civil Case No. 4883:**

- On October 29, 1975, the CFI dismissed Civil Case No. 4883 and dissolved the preliminary injunction. Petitioners filed a notice of appeal, but the process was delayed.

6. **Supplemental Complaint:**

- Respondents Alaurin and Magno sold the property to Wilfredo and Patrocinia Encinas. Consequently, petitioners filed a supplemental complaint. The court declared Encinas as successors-in-interest, binding them to the judgment on the appealed case.

7. **Appellate and Supreme Court Decisions:**

- The CA dismissed the petition of Encinas on November 18, 1982. When petitioners' appeal in Civil Case No. 4883 was reviewed, the CA affirmed the CFI's dismissal on March 10,

1986. Petitioners challenged the CA decision to the Supreme Court, resulting in a denied petition on July 2, 1986, and denial of reconsideration on September 17, 1986.

8. **Execution and Subsequent Proceedings:**

- Petitioners filed for execution, claiming to be the prevailing party based on the supplemental complaint. The court initially granted the writ but later restrained petitioners based on respondents' motion.

9. **Contempt and Final Orders:**

- Respondents filed for contempt against petitioners, resulting in an additional restraining order and police enforcement. Petitioners' subsequent motions for reconveyance and possession were denied on July 21, 1987, and August 6, 1987.

Issues:

1. **Whether the supplemental complaint judgment modified the original complaint judgment.**
2. **Whether petitioners were entitled to possession of the property based on the agreements and subsequent judgments.**
3. **Whether the trial court committed grave abuse of discretion in denying petitioners' motion for reconveyance and vacating the premises.**

Court's Decision:

1. **On the Supplemental Complaint Judgment:**

- The Supreme Court ruled that the supplemental complaint did not modify the original judgment. The supplemental decision declaring Encinas as successors-in-interest was to ensure they were bound by the final outcome of the initial litigation, not to amend or supersede the original judgment.

2. **On the Entitlement to Possession:**

- The Court held that the original judgment from Civil Case No. 4883 was conclusive, citing the principles of res judicata. The CFI's affirming decision, upheld by higher courts, resolved the issue of possession in favor of respondents. Thus, reconveyance or reassignment of possession to petitioners was unwarranted.

3. **On Alleged Grave Abuse of Discretion:**

- The Supreme Court found no grave abuse of discretion by the trial court. The decisions to

deny petitioners' motions and uphold the restraining order were in line with previous judgments affirming respondents' possession rights.

****Doctrine:****

- ****Res Judicata:**** Once a final judgment has been rendered by a competent court, it becomes conclusive on issues directly litigated in that case.
- ****Execution of Judgment:**** The prevailing party is entitled to execution as a matter of right, which is a ministerial duty of the court mandated by law (Nunez v. Court of Appeals).

****Class Notes:****

- ****Res Judicata:**** Essential in preventing re-litigation of settled issues. It ensures legal stability and respect for judicial decisions.
- ****Ministerial Duty of Execution:**** When a judgment becomes final, the prevailing party can request its execution, and the court is obliged to enforce it.
- ****Supplemental vs. Amended Judgments:**** Understand the distinction; a supplemental judgment complements the original without superseding it, while an amended judgment is a new decision replacing the original.

****Historical Background:****

This case underscores the Philippine judicial system's emphasis on finality of judgments and addresses the complexities of property disputes rooted in claims of possession and fraud. It demonstrates the procedural safeguards in place to ensure judgments are respected and to clarify possession rights post-litigation. This case also highlights how agreements and supplemental complaints interact with original judgments in property law contexts.