

****Title**:** Pio Balatbat vs. Court of Appeals and Domingo Pasion

****Facts**:**

Pio Balatbat was an agricultural lessee of an 18,490 square meter parcel of land in Santiago, Sta. Ana, Pampanga, initially owned by Daniel Garcia. Daniel Garcia sold the land to Domingo Pasion, who sought to eject Balatbat claiming he intended to personally cultivate the land pursuant to Section 36(1) of R.A. No. 3844. Pasion notified Balatbat of such intention, but Balatbat refused to vacate the land after the notice period.

Pasion filed a complaint for ejectment with the Court of Agrarian Relations on June 15, 1970. Balatbat denied receiving notice and raised several defenses: non-compliance with jurisdictional requirements, Pasion owning another palay land, Pasion's physical unfitness for farm work, and that Pasion was suing out of vindictiveness due to Balatbat's refusal to revert to a 50-50 sharing arrangement. Balatbat also counterclaimed to exercise his right of redemption due to lack of prior notice of the land sale.

After a trial on the merits, the agrarian court ruled in favor of Pasion, authorized Balatbat's ejection, and dismissed the counterclaim.

Balatbat appealed to the Court of Appeals (CA-G.R. No. 00479-R), which affirmed the agrarian court's decision, finding that Pasion complied with the notice requirement and no substantial evidence showed Pasion's physical incapacity for cultivation. The court also dismissed the redemption counterclaim due to lack of compliance and indicative lack of funds by Balatbat.

Balatbat's motion for reconsideration was denied by the Court of Appeals, prompting him to file a petition for review on certiorari with the Supreme Court.

****Issues**:**

1. What is the effect of Section 7 of R.A. No. 6389, abolishing personal cultivation by landowners as a ground for dispossession of tenants, on pending appealed cases?
2. Should pending appealed cases on personal cultivation be decided in the light of Section 7 of R.A. No. 6389?

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

The Supreme Court denied the petition. The Court emphasized that laws generally operate prospectively unless explicitly stated otherwise. Section 7 of R.A. No. 6389, which removed personal cultivation as a ground for dispossessing agricultural lessees, did not contain

express provisions for retroactive application, and hence could not apply to pending cases. The Court reiterated precedent decisions (Nilo vs. Court of Appeals and Castro vs. Castro) determining that R.A. No. 6389 does not retroactively affect ongoing disputes. Given this context, Pasion's right to personally cultivate, as acknowledged by lower courts based on earlier laws, remained valid.

****Doctrine**:**

Laws operate prospectively unless express or implied retroactive intent is clearly indicated by the legislature. Following Article 4 of the New Civil Code, a statute's application to past actions requires explicit legislative provision.

****Class Notes**:**

1. ****Prospective Operation of Laws**:** Statutes are presumed to operate prospectively unless stated otherwise (Art. 4, Civil Code).
2. ****Personal Cultivation**:** Originally allowed as a ground for dispossession under Section 36(1) of R.A. No. 3844. Amended by Section 7 of R.A. No. 6389 to eliminate this ground.
3. ****Right to Redemption**:** Lessees must receive notice of the land sale and comply with statutory requirements to assert this right (Sections 11 and 12, R.A. No. 3844).

****Historical Background**:**

The case occurs in the broader context of the Philippines' agrarian reform, aimed at redistributing land from landowners to tenants and promoting social justice and equitable land ownership. Republic Act No. 3844 (Agricultural Land Reform Code) initiated significant reforms, including security of tenure for agricultural lessees. This was further expanded and modified by Republic Act No. 6389, reflecting evolving policies to support tenant farmers. The judicial handling of such cases illustrates the transitional nature of agrarian reforms during this period.