

Title: Sandejas vs. Robles

Facts:

1. **Original Transaction**:

- A contract of sale for three parcels of land located in the Municipality of Passi, Province of Iloilo, was executed between the parties - Jose P. Sandejas (Plaintiff) and Zacarias C. Robles, Elena C. Vda. de Robles, and Rosario Y. Singson (Defendants).

2. **Japanese Occupation**:

- During the Japanese occupation of the Philippines, Defendants filed a case in the Court of First Instance (CFI) of Iloilo (Civil Case No. 21) to resolve contractual disputes regarding the performance or non-performance of the terms and conditions of the sale.

3. **Proceedings in CFI of Iloilo**:

- Attorneys for the Defendants notified the Plaintiff and his attorney, Benjamin H. Tirrol, about the hearing dates and other proceedings.
- Plaintiff's attorney requested to withdraw his appearance citing communication difficulties, and the hearing was rescheduled but still proceeded without the Plaintiff.

4. **Judgment by CFI during Occupation**:

- On October 2, 1944, the Court of First Instance of Iloilo declared the resolution of the contract and ordered the appellees to return P5,723.60 received as a down payment.

5. **Post-Decision Actions During Occupation**:

- On October 25, 1944, the Plaintiff filed a motion for reconsideration which was denied.
- Plaintiff attempted to appeal the decision, but on November 23, 1944, the appeal was denied, making the judgment final.
- On November 29, 1944, another motion for reconsideration regarding the denial of the appeal was filed, with no resolution received by the time of the current case filing.

Issues:

1. **Jurisdiction of the Court during Japanese Occupation**:

- Did the Court of First Instance of Iloilo have jurisdiction to render a valid judgment on October 2, 1944, when the parcels of land in question were in a territory controlled by guerrilla forces?

2. **Deprivation of Due Process**:

- Was the Plaintiff deprived of his day in court, thereby violating the due process clause of the Constitution?

Court's Decision:

1. **Jurisdiction**:

- The Supreme Court upheld the ruling that the Court of First Instance of Iloilo had the jurisdiction to render the judgment.
- The Court reasoned that the action was in personam, not quasi in rem, and jurisdiction over the property's physical control did not affect the action involving personal rights and obligations under the contract.

2. **Due Process**:

- The Court found that the Plaintiff had not been deprived of due process. Despite Plaintiff's attorney withdrawing and the Plaintiff's subsequent non-appearance, proper notification and rescheduling had been made. The absence was due to Plaintiff's fault.

Doctrine:

- **Action in Personam vs. Quasi in Rem**:

- Actions in personam are directed at enforcing personal rights and obligations against a person, irrespective of location or control over the property involved.
- Jurisdiction is based on the person, not on the physical location of the property.

- **Due Process Applied during Wartime Situations**:

- Judicial notices and procedures that afford reasonable opportunity and scheduling are seen as fulfilling due process requirements even under challenging communication conditions due to war.

Class Notes:

- **Action in Personam**: Targets enforcement of rights against individuals, not tied to property location (Grey Alba vs. De la Cruz, 17 Phil. 61-62, Banco Español-Filipino vs. Palanca, 37 Phil. 921, 928).

- **Jurisdiction**: Legitimacy of judgments rendered by courts during an occupation, providing they adhere to in personam parameters and ensure proper legal notifications and opportunities.

- **Due Process**: Ensuring fair access to courts despite absence, with fault attributed to the party can dismiss claims of due process violation.

Historical Background:

- **War-time Judicial Functioning**:

- The decision reflects the judiciary's attempts to confirm their wartime actions as valid, addressing questions around jurisdiction under adversarial control and absence.

- The utilization of existing judicial structures by occupying forces raised complex legal questions about post-liberation legitimacy and enforcement.

This case signifies the continuity and adaptability of legal principles under wartime and occupation, emphasizing crucial doctrines regarding jurisdiction and due process in tumultuous circumstances.