

****Title:**** Baguio Trinity Developers, Inc. v. Heirs of Ramos and Nepa (678 Phil. 930)

****Facts:****

1. Spouses Meliton Grabiles and Leona Calderon originally owned a 2,933-square-meter lot in Rosario, La Union.
2. Through a series of transfers, the property was sold to Baguio Trinity Developers, Inc. (BTD) on January 3, 1994.
3. In 1985, Anastacio Laroco and Leona Javier initiated a reconstitution proceeding at the RTC of Agoo, La Union (Branch 31).
4. RTC ordered the reconstitution of title to Maria Bernal on October 20, 1986.
5. Melicia Silva filed another reconstitution petition in the same RTC branch on behalf of Grabiles on October 28, 1986.
6. RTC reconstituted the title in Grabiles' name (OCT RO-4717), which noted sales of portions of the lot to Jose Ramos and spouses Leopoldo and Victorina Nepa.
7. BTD filed a complaint for recovery and nullity of title before the MTC of Rosario, La Union on September 14, 1995, which was dismissed for lack of jurisdiction.
8. BTD filed a similar complaint before RTC Agoo, Branch 32, on December 3, 1997, which was also dismissed, leading to a petition for certiorari to the Court of Appeals (CA).
9. CA dismissed the certiorari petition on September 13, 2007, advising BTD to file a petition for annulment of judgment.
10. On December 20, 2007, BTD filed a petition for annulment of judgment before the CA regarding the 1986 orders.
11. CA dismissed the petition on May 8, 2008, and denied the motion for reconsideration on November 7, 2008, for failing to attach certified copies of the RTC orders and on grounds of laches.

****Issues:****

1. Did the CA err in dismissing the petition for annulment of judgment for failure to attach certified true copies of the assailed RTC orders?
2. Was the action for annulment of judgment barred by laches?

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

1. ****Certified True Copies Requirement:****

- The Supreme Court held that although Rule 47 explicitly requires a certified true copy of the judgment/order, BTD's inability to obtain such copies due to the 1990 earthquake should

not penalize them.

- BTD provided alternative secondary evidence and supplied machine copies authenticated by verified statements.
- The Court ruled the CA should have accepted these substitutes given the special circumstances and loss of records.

2. **Laches:**

- The Court found the action was not barred by laches as BTD actively pursued legal remedies since discovering the issue in 1995.
- BTD's initial misfiling in non-jurisdictional courts contributed to delays, but these were not due to BTD's negligence.
- The serious allegations in the petition, if correct, could invalidate the respondents' titles and should not be dismissed for laches.

Doctrine:

1. **Secondary Evidence:** When original documents are lost or destroyed, appropriate secondary evidence (e.g., authenticated copies and verified statements) is acceptable (Rule 130, Sec. 5).
2. **Laches:** Inaction due to pursuing remedies mistakenly in inappropriate forums does not necessarily constitute laches.

Class Notes:

1. **Reconstitution of Title:** Legal process for restoring lost or destroyed original land titles.
2. **Annulment of Judgment:** Under Rule 47, a petition must include a certified true copy unless circumstances justify secondary evidence.
3. **Jurisdiction and Procedural Posture:** Ensure proper jurisdiction and compliance with procedural requirements to avoid dismissals.
4. **Laches:** The mere passage of time is not enough; it requires a negligent failure to assert a right.

Historical Background:

This case provides context to the effects of natural disasters (the 1990 earthquake) on legal proceedings and the procedural remedies available. It underscores the challenge between procedural rigour and the need for judicial flexibility due to extraordinary circumstances.