

Title: Rodriguez v. Salvador, G.R. No. 173412

Facts:

- Initial Complaint:** On May 22, 2003, Teresita V. Salvador filed a complaint for unlawful detainer against Lucia Rodriguez and Prudencia Rodriguez, claiming ownership of a land covered by Original Certificate of Title (OCT) No. P-27140 and asserting that the petitioners were occupying it by mere tolerance.
- Defense of Agricultural Tenancy:** Lucia Rodriguez, along with her deceased husband Serapio, allegedly entered the property with the consent of Salvador's predecessors-in-interest, promising to cultivate the land and share the produce.
- MTC Proceedings:** The Municipal Trial Court (MTC) of Dalaguete, Cebu terminated the preliminary conference and asked parties to submit position papers. On September 10, 2003, the MTC dismissed the complaint, finding an agricultural tenancy relationship and ruling that the Department of Agrarian Reform Adjudication Board (DARAB) had jurisdiction, not the MTC.
- RTC Appeal:** Salvador appealed to the Regional Trial Court (RTC) of Argao, Cebu. Initially, the RTC remanded the case to MTC for a preliminary hearing on the existence of tenancy. Upon Lucia's motion for reconsideration, the RTC affirmed the MTC's decision dismissing the complaint.
- CA Petition:** Salvador then petitioned the Court of Appeals (CA) via CA G.R. SP No. 86599. On August 24, 2005, the CA reversed the RTC's decision, ruling no tenancy relationship existed and remanded the case to MTC to determine actual damages sustained by Salvador.
- Supreme Court Petition:** Lucia and Prudencia filed a petition for certiorari under Rule 65 which was later treated as a Petition for Review on Certiorari under Rule 45.

Issues:

- Existence of Agricultural Tenancy:** Whether the CA erred in ruling that the petitioners are not tenants on the subject land.
- Sufficiency of Evidence:** Whether the CA's decision was based on substantial evidence and legally sound.

Court's Decision:

- Existence of Agricultural Tenancy:**
 - Legal Requisites:** The court identified the six requisites for a tenancy relationship, focusing on the lack of evidence for the crucial element of consent and sharing of harvest.

Affidavits submitted by the petitioners were deemed insufficient to prove these elements.

- **Consent:** The petitioners failed to provide conclusive evidence that Salvador's predecessors-in-interest consented to a tenancy agreement. The affidavits were considered self-serving without independent corroboration.
- **Sharing of Harvest:** No additional evidence (e.g., receipts) was provided beyond the affidavits to demonstrate a consistent and agreed method of sharing produce, weakening the claim of a tenancy relationship.

2. **Sufficiency of Evidence:**

- **CA's Ruling Supported:** The Supreme Court affirmed the CA's ruling due to lack of substantial evidence from petitioners proving the consent and sharing of harvest, both vital for establishing the tenancy relationship.

Doctrine:

- **Agricultural tenancy is not presumed but must be proven by the person alleging it.**
- **The burden of proof rests on the tenant to establish the landlord's consent and the sharing of the harvest.**

Class Notes:

- **Elements of Tenancy Relationship:** Landowner and tenant, Agricultural land, Consent, Agricultural production, Personal cultivation, Sharing of harvest.
- **Key Statute:** Section 5 of Republic Act No. 3844 - Agricultural Leasehold Relation can be established orally, in writing, expressly or impliedly.
- **Legal Precedent:** **Mere occupation or cultivation does not constitute tenancy.**

Historical Background:

- **Agricultural Reforms:** The case highlights ongoing agrarian issues and reforms in the Philippines. The requirement to prove tenancy relationship reaffirms principles in the Agricultural Land Reform Code, aiming to balance tenant rights with landowner control. This scenario underscores the legal intricacies in agrarian disputes, particularly the stringent evidence required to establish tenancy in the context of land reforms.