

Title:

Valencia (Bukidnon) Farmers Cooperative Marketing Association, Inc. vs. Heirs of Amante P. Cabotaje

Facts:

1. **Initial Litigation**: Valencia (Bukidnon) Farmers Cooperative Marketing Association, Inc. (FACOMA), represented by its Board of Directors, filed a complaint for quieting of title and recovery of ownership and possession of a parcel of land, along with damages, against Francisco Estrada and Amante P. Cabotaje.
2. **RTC Decision**: On December 3, 2010, the Regional Trial Court (RTC) of Malaybalay City Branch 8 ruled in favor of FACOMA, ordering the annulment and cancellation of the Deed of Sale executed by Francisco Estrada in favor of Amante Cabotaje and ordering the defendants to refrain from interfering with FACOMA's ownership.
3. **Motion for Reconsideration**: Defendants filed a Motion for Reconsideration arguing that FACOMA had no legal personality to sue, the Deed of Sale was valid, and the sale was binding. The RTC denied this motion on February 3, 2011.
4. **Notice of Appeal**: Respondents (Heirs of Amante P. Cabotaje) filed a Notice of Appeal on February 25, 2011.
5. **Motion to Dismiss Appeal**: FACOMA filed a Motion to Dismiss the Notice of Appeal, arguing that the Motion for Reconsideration did not toll the appeal period as it was pro forma.
6. **RTC Denial**: On April 4, 2011, the RTC denied the Notice of Appeal, concurring with FACOMA that the respondents' motion had no new issues and was pro forma.
7. **CA Petition for Certiorari**: Respondents filed a Petition for Certiorari before the Court of Appeals (CA) challenging the RTC's denial of their Notice of Appeal.
8. **CA Ruling**: On March 27, 2014, the CA granted the Certiorari Petition, setting aside the RTC's April 4, 2011 resolution and ordering the RTC to give due course to the respondents' Notice of Appeal.
9. **Motion for Reconsideration**: FACOMA filed a Motion for Reconsideration, which the CA denied on August 13, 2015.

10. **Petition for Review**: FACOMA then filed a Petition for Review on Certiorari before the Supreme Court, assailing the CA's decisions.

Issues:

1. Whether the CA erred in determining that the respondents' Certiorari Petition assailed the RTC Resolution dated April 4, 2011, rather than the RTC's Decision dated December 3, 2010.
2. Whether the CA committed an error in holding that the respondents' Notice of Appeal was wrongfully denied by the RTC, considering that the Motion for Reconsideration filed by respondents was not pro forma.
3. Whether the CA erred in failing to declare the Certiorari Petition moot and academic, considering the RTC's execution of judgment during the pendency of the petition.

Court's Decision:

Issue 1:

- The Supreme Court held that the CA did not err in determining that the respondents' Certiorari Petition assailed the RTC's Resolution dated April 4, 2011, not the RTC's Decision dated December 3, 2010. The Certiorari Petition focused on the RTC's denial of their Notice of Appeal, which was timely and properly addressed.

Issue 2:

- The Court ruled that the respondents' Motion for Reconsideration was not pro forma. It reiterated existing issues but introduced valid concerns that the RTC had failed to address. Thus, the Notice of Appeal should not have been denied.

Issue 3:

- The Court found that the execution of the RTC's judgment did not render the case moot and academic. The Rules of Court provide mechanisms for restitution or reparation of damages if an executed judgment is reversed on appeal. Consequently, the pending appeal remained substantial and actionable.

Doctrine:

- A motion for reconsideration that reiterates issues passed upon by the court does not automatically make it pro forma. Such motions aim to convince the court of errors in its ruling, and dismissal on such grounds would improperly limit legal recourse.

Class Notes:

- **Pro Forma Motion**: Redefined by jurisprudence to not include motions that merely reiterate issues but essentially argue that the court's decision was incorrect.
- **Execution Pending Appeal**: Does not moot a case if there's potential for reversal; restitution mechanisms are in place as per Rule 39, Sec. 5 of the Rules of Court.
- **Certiorari vs. Lost Appeal**: The timing and focus of a Certiorari Petition are crucial in determining its validity to correct abuse of discretion by a lower court.

Historical Background:

- This case reflects ongoing jurisprudence clarifying procedural aspects of motions for reconsideration and the interplay between execution pending appeal and continuing judicial review. It underscores the balance between timely resolution of disputes and ensuring substantive justice through appellate mechanisms.