

Ignacio v. Office of the City Treasurer of Quezon City

Supreme Court of the Philippines

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Title: Teresa R. Ignacio, represented by her Attorney-in-Fact, Roberto R. Ignacio, vs. Office of the City Treasurer of Quezon City, Victor B. Endriga, the Office of the City Assessor of Quezon City, the Registrar of Deeds of Quezon City, Atty. Felixberto F. Abad, and Alejandro Ramon and Racquel Dimalanta, Respondents.

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Facts

Initial Proceedings and Auction Sale:

- February 9, 2012:** Teresa R. Ignacio, through her Attorney-in-Fact, Roberto R. Ignacio, filed a complaint before the RTC, Branch 85, for the annulment of warrant of levy, public auction sale, recovery of ownership and possession, and damages.
- 2009:** Public auction sold the property covered by TCT No. 60125 to Sps. Dimalanta without Teresa's notice, allegedly depriving Teresa of her property without due process.

Respondents' Arguments and MTD (Motion to Dismiss):

- Public respondents adhered to legal procedures for the auction, sending notice to Teresa's address listed with the City Assessor's office.
- Sps. Dimalanta's Motion to Dismiss:** Claimed the action was barred by res judicata due to a prior final judgment in LRC Case No. Q-31505 (11), and cited Teresa's non-compliance with Section 267 of the Local Government Code.

Proceedings in Cancellation Case (LRC Case No. Q-31505):

- December 22, 2011:** RTC Branch 83, acting as land registration court, upheld the legality of the public auction and new title issuance to Sps. Dimalanta.
- June 14, 2012:** Teresa filed a Petition for Relief (to set aside the LRC's Decision), citing lack of due process and notice.

RTC-Branch 85 and CA Ruling:

- June 3, 2013:** RTC-Br. 85 dismissed Teresa's Annulment Complaint citing res judicata.

8. **January 26, 2015**: CA upheld RTC-Br. 85's dismissal.
9. **June 11, 2015**: LRC admitted Teresa's motion for reconsideration, ordering Sps. Dimalanta to comment.

Issues

1. **Jurisdiction**: Did the CA have jurisdiction over Teresa's appeal or should the case have been elevated to the CTA?
2. **Res Judicata**: Was Teresa's Annulment Complaint barred by res judicata?
3. **Forum Shopping**: Did Teresa commit forum shopping by filing the Petition for Relief in the Cancellation Case while pursuing the Annulment Case?

Court's Decision

Jurisdiction:

- **Decision**: The Supreme Court ruled that the CA had proper jurisdiction over Teresa's appeal.
- **Rationale**: The nature of Teresa's complaint was primarily about the recovery of ownership and possession due to alleged denial of due process, not a local tax case. Hence, the correct appellate forum was the CA, not the CTA.

Res Judicata:

- **Decision**: The Supreme Court held that the Annulment Case was not barred by res judicata.
- **Rationale**: The causes of action in the Cancellation Case and the Annulment Case were distinct. The Cancellation Case involved the expiration of the redemption period, while the Annulment Case involved the alleged lack of notice and denial of due process regarding the auction sale.

Forum Shopping:

- **Decision**: The Court found that Teresa did not commit forum shopping.
- **Rationale**: The reliefs sought in the Petition for Relief and Annulment Case were different. A decision in one action would not constitute res judicata in the other, as the former concerned setting aside the earlier LRC decision and the latter involved recovery of the property.

The Supreme Court set aside the CA Resolutions, reinstated Civil Case No. Q-12-70759, and remanded it to the RTC-Br. 85 for resolution.

Doctrine

****Jurisdiction in Local Tax Cases****: Cases primarily involving due process issues related to property recovery do not fall within the exclusive appellate jurisdiction of the CTA, even if related to an auction sale initiated for tax delinquency.

****Res Judicata Requirements****: The identity of causes of action, parties, subject matter, issues, and reliefs must exist for res judicata to apply. Differences in these elements imply that res judicata does not bar subsequent actions.

****Forum Shopping****: Simultaneous multiple actions by a litigant are not necessarily forum shopping if the rights asserted and reliefs sought in each case legally differ.

Class Notes

1. ****Local Tax Cases Jurisdiction****: Review by appeal in local tax cases requires jurisdiction over tax issues.

- ****Statute****: Section 7(a)(3) of RA No. 9282.

- ****Application****: Distinguish between tax issues and due process claims in jurisdictional assessments.

2. ****Res Judicata Elements****:

- Final judgment.

- Judgment on merits.

- Competent jurisdiction.

- Identity of actions and parties.

- ****Significance****: Varying causes of action and issues between cases disallow res judicata application.

3. ****Forum Shopping****:

- Multiple suits based on identical issues and facts to obtain favorable outcomes.

- ****Assessment****: Element of identical reliefs in multiple suits establishes forum shopping.

Historical Background

This case underscores the judicial balance between procedural rules and substantive rights,

specifically addressing mechanisms against procedural overreach (res judicata and forum shopping) and safeguarding due process. It highlights judiciary efforts to ensure rightful adjudication while combating redundant and vexatious litigation.