

****Title:**** Nactor et al. vs. Intermediate Appellate Court, et al.

****Facts:****

In 1962, Spouses Claro and Magdalena Melchor allowed Guillermo Nactor to build a shanty on their property as caretakers while they were abroad. Nactor stayed without paying rent. Contrary to the agreement, Nactor allowed his relatives to build houses on the property without the Melchors' consent. Upon the Melchors' return, they discovered numerous squatters and demanded that Nactor and his relatives vacate. When they refused, the Melchors filed a complaint at the Barangay level, later elevating it to the Metropolitan Trial Court (MTC), Branch 64, Makati.

The MTC ruled in favor of the Melchors on September 5, 1984, ordering the Nactors to vacate and pay monthly rentals from August 30, 1983, until they vacate, and other fees. The Nactors appealed to the Regional Trial Court (RTC) of Makati, which affirmed the MTC's decision on June 4, 1985, emphasizing that Nactor's occupancy was by mere tolerance and did not affect the Melchors' legal possession.

The Nactors' motion for reconsideration, filed on June 24, 1985, was denied by the RTC for being late and lacking merit. A writ of execution was issued simultaneously. The Nactors filed a petition for review on certiorari with the Court of Appeals (CA) on October 31, 1985. On January 30, 1986, the CA affirmed the RTC's decision, noting its finality and merit. The Nactors' motion for reconsideration was denied on March 21, 1986. Subsequently, the Nactors petitioned the Supreme Court.

****Issues:****

1. Whether the motion for reconsideration filed on June 24, 1985, was timely.
2. Whether the lower courts erred in binding all the defendants under the unlawful detainer charge, rather than as separate cases of forcible entry.
3. Whether the complaint lacked jurisdiction and a cause of action.

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

1. ****Timeliness of the Motion for Reconsideration:****

The Supreme Court held that the motion for reconsideration was timely. It considered that June 23, 1985, was a Sunday; thus, the deadline extended to the next working day, June 24, 1985, following the Judiciary Reorganization Act (B.P. 129) and Civil Code's computation of deadlines.

2. ****Binding Defendants:****

The Court agreed with the lower courts in binding all defendants in the unlawful detainer case. Although the original agreement was with Guillermo Nactor, it was evident that his relatives occupied the property under his responsibility. Thus, a single judgment applying to all occupants was justified.

3. **Jurisdiction and Cause of Action:**

The Supreme Court found no merit in the petitioners' claim of lack of jurisdiction or cause of action. The property in question fell outside the protection of the Urban Land Reform under P.D. No. 1517, as certified by the Human Settlements Regulation Commission.

Doctrine:

1. **Timeliness of Legal Filings:** When the last day of the period falls on a Sunday or legal holiday, the deadline extends to the next working day.
2. **Unlawful Detainer:** Acts of possession by tolerance do not grant rights of ownership or permanent possession.
3. **Jurisdiction in Property Claims:** Proper jurisdiction is determined by the actual possession and legal standing of the owners, not merely by the nature of the suit.

Class Notes:

- **Judiciary Reorganization Act (B.P. 129):** Section 39 regarding appeal periods.
- **Civil Code (Article 13):** Computation of legal periods.
- **Unlawful Detainer Cases:** Governed by tolerance and the need for lawful acts of possession.
- **Urban Land Reform (P.D. No. 1517):** Applicability must be spatially verified through certified boundaries.

Historical Background:

The case reflects the post-war migration boom and urbanization in Metro Manila during the 1960s and 1980s. During this period, urban areas saw numerous informal settlers (squatters). The Urban Land Reform Law under Marcos aimed to address these squatter issues but also led to many legal challenges as property owners and informal settlers navigated their respective rights. The rules of property ownership and tolerated possession became critical in resolving numerous such cases across rapidly urbanizing Philippine cities.