

**\*\*Title:\*\***

Heirs of Spouses Teofilo M. Reterta and Elisa Reterta vs. Spouses Lorenzo Mores and Virginia Lopez

**\*\*Facts:\*\***

1. **\*\*Initial Inheritance Claim\*\***: On May 2, 2000, the Heirs of Teofilo M. Reterta filed a complaint for quieting of title and reconveyance in the RTC of Trece Martires City. They claimed as legitimate heirs that they inherited a 47,708 square meters parcel of land (the land) in Trez Cruzes, Tanza, Cavite from their father, who had possessed it openly, exclusively, and continuously for over 30 years.
2. **\*\*Contested Affidavit\*\***: Petitioners discovered an affidavit dated March 1, 1966, supposedly executed by their father, waiving his rights to the land. Based on this affidavit, a Sales Certificate No. V-769 was issued to respondent Lorenzo Mores, leading to the issuance of Transfer Certificate of Title No. T-64071.
3. **\*\*Motion to Dismiss by Respondents\*\***: On August 1, 2000, respondents filed a motion to dismiss, arguing that RTC had no jurisdiction because the subject property was friar land, under the exclusive jurisdiction of the Land Management Bureau (LMB). They asserted another ground stating the petitioners had no legal personality to initiate the case.
4. **\*\*RTC Decision\*\***: On October 29, 2001, RTC concurred with respondents and dismissed the case on jurisdictional grounds, citing Act No. 1120 that bestows exclusive administrative and dispositional authority of friar lands to the LMB.
5. **\*\*Motion for Reconsideration\*\***: Petitioners filed for reconsideration, which was denied by RTC on February 21, 2002.
6. **\*\*Certiorari Petition\*\***: On May 15, 2002, petitioners filed a petition for certiorari with the Court of Appeals (CA), which was dismissed on April 25, 2003. CA relied on the principle that certiorari cannot substitute an appeal.
7. **\*\*CA Reconsideration Denied\*\***: Petitioners filed a motion for reconsideration with CA, denied on September 9, 2003, leading to the present appeal with the Supreme Court.

**\*\*Issues:\*\***

1. Did the CA err in dismissing the petition for certiorari on procedural grounds?
2. Whether RTC acted correctly in dismissing the action by asserting it lacked jurisdiction

over friar land?

3. Do the rights and remedies, as claimed by the petitioners, fall exclusively within the regulatory framework of the LMB?

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

1. **\*\*Certiorari as a Remedy\*\***: The Supreme Court acknowledged discretionarily that normally certiorari is not a substitute for an appeal. However, it ruled exceptional circumstances warranted certiorari to correct RTC's jurisdictional error preventing substantial justice.

2. **\*\*Jurisdiction on Friar Lands\*\***:

- **\*\*RTC Responsibility\*\***: RTC or MTC have original and exclusive jurisdiction on cases involving title or possession of real property. Distinguishing between administrative and legal issues, LMB deals with administrative aspects, but questions regarding title validity when fraudulently argued fall under regular courts.

- **\*\*Precedent in Arayata v. Joya\*\***: A transfer of rights concerning friar lands requires formal procedures, which when questioned legally, demands judicial rather than administrative review.

3. **\*\*RTC's Grave Abuse of Discretion\*\***: The court identified RTC's dismissal based on jurisdiction as a grave abuse of discretion, citing lack of judicial commitment to resolve petitioners' substantial claims regarding fraud and misappropriated titles.

**\*\*Doctrine:\*\***

Certiorari can intervene in final orders on the basis of broader justice interests or prevention of manifest errors reflecting gross injustice, especially in misapplying culpability in land jurisdiction cases.

**\*\*Class Notes:\*\***

- **Jurisdictional Mandate**: Actions questioning the validity of land titles, especially involving allegations of fraud, fall within the jurisdiction of RTCs.

- **Role of Certiorari**: While not a substitute for appeal, certiorari can correct jurisdictional misjudgments leading to unjust decisions.

- **Final vs. Interlocutory Orders**: Certiorari is nuanced, resorted under extraordinary conditions beyond regular appeal scope, signaling judicial discretion where necessary for justice.

**\*\*Historical Background:\*\***

This case unfolds against the backdrop of complex land laws dating back to colonial Philippines (highlighted by the friar lands issue). Act No. 1120 (Friar Lands Act) regulated the disposition and administration of these lands post-Spanish era, a matter ripe for judicial interpretation on individual vs. state claims over time, notably as properties transitioned from colonial to public domains undergoing democratization in Filipino legal standing.