

**Title:** J.M. Tuason & Co., Inc., et al. vs. Hon. Herminio C. Mariano, Manuela Aquial, Maria Aquial, Jose M. Cordova, and Saturnina C. Cordova

**Facts:**

- **Initial Filing:** On October 1, 1965, Manuela Aquial and Maria Aquial filed a complaint in forma pauperis in the Court of First Instance of Rizal, Pasig Branch X (Civil Case No. 8943). They claimed ownership over a 383 quiñones land in Balara, Marikina, alleging their father obtained it in 1877 using a Spanish title. They discovered that J.M. Tuason & Co., Inc. had supposedly included this land fraudulently in OCT No. 735 and registered it under various defendants.
- **Scope of OCT No. 735:** The land encompassed by OCT No. 735 included the Santa Mesa and Diliman Estates, totaling 2502 hectares and originally titled in 1914.
- **Claims and Defendants:** The plaintiffs sought the nullification of OCT No. 735 and its derived titles, including those held by J.M. Tuason & Co., Inc., the University of the Philippines, the National Waterworks and Sewerage Authority (NAWASA), and a lessee, Capitol Golf Club.
- **Defendants' Response:** J.M. Tuason & Co., Inc. moved to dismiss the complaint, citing lack of jurisdiction, improper venue, prescription, laches, and prior judgment issues. The lower court dismissed their motion, leading them to enter these points as affirmative defenses and seeking a preliminary hearing.
- **Intervenors:** On January 25, 1967, the spouses Jose M. Cordova and Saturnina C. Cordova intervened, having bought eleven hectares from the plaintiffs.
- **Discovery Motions:** The trial court ordered the production of OCT No. 735, related transfer certificates, and land plans to determine overlap between plaintiffs' claims and the lands under OCT No. 735.
- **Petition for Certiorari and Prohibition:** On February 11, 1971, J.M. Tuason & Co., Inc. filed a civil action for certiorari and prohibition to dismiss the lower court case. After posting a bond, they obtained a writ of preliminary injunction.

**Issues:**

1. **Validity of OCT No. 735:** Can respondents Aquial and Cordova challenge the validity

of OCT No. 735 and its derived titles given prior rulings?

2. **Doctrines of Stare Decisis:** Does the established legal principle prevent relitigation of previously settled matters regarding OCT No. 735?

**Court's Decision:**

1. **Validity of OCT No. 735:** The Supreme Court held that OCT No. 735 and its titles could not be challenged due to the established precedents upholding its validity. Previous cases, notably *Benin vs. Tuason*, had confirmed the legitimacy of OCT No. 735.

2. **Doctrines of Stare Decisis:** The Court emphasized the principle “*stare decisis et non quieta movere*,” which necessitates adherence to settled precedents to maintain judicial consistency and policy. Given this, relitigating OCT No. 735 was against public policy and previous adjudications should prevail.

**Doctrines:**

- **Stare Decisis:** Courts must follow established precedents to avoid endless relitigation and ensure legal stability and predictability.

- **Finality of Judgments:** Matters already decided should not be reopened to maintain judicial efficiency and respect for finalized rulings.

**Class Notes:**

- **Key Elements:** Land ownership disputes, principles of finality, public policy against repetitive litigation, motions for dismissal, and certiorari and prohibition remedies.

- **Statutory Citations:**

- Philippine Land Registration Act (Act No. 496) – Governing body of land registration and title issuance.

- Doctrine of “*stare decisis*” – Importance of adhering to settled case law to ensure consistency in rulings.

Application: In this case, the Court reiterates the importance of finality and public policy in upholding OCT No. 735, aligned with consistent judicial precedent.

**Historical Background:**

- **Land Registration and Spanish Titles:** Post-Spanish era saw litigation over Spanish

land titles converted under American land registration laws.

- **Previous Litigations:** OCT No. 735 has been historically contentious, involved in multiple cases affirming its validity and complicating direct challenges to settled titles.
- **Legal Context:** The 1914 issuance of OCT No. 735 and subsequent disputes epitomize the shift from Spanish to American land laws and the complexities therein.