

### Title:

\*\*Spouses Henry Lanaria and the Late Belen Lanaria (substituted by Francis John Lanaria)  
v. Francisco M. Planta\*\*

### Facts:

1. The case involves a parcel of land, Lot 1, Plan PSU-198719, Oton Cadastre, located in Brgy. Alegre, Municipality of Oton, Iloilo, registered under Transfer Certificate of Title (TCT) No. T-14,420 in the name of Rosario Planta.
2. Rosario Planta's nephew, Francisco M. Planta (Respondent), filed a complaint for Unlawful Detainer against Spouses Henry Lanaria and the late Belen M. Lanaria (Petitioners).
3. The land in dispute was initially occupied by the grandparents and parents of Belen Lanaria with Rosario Planta's permission, with an implied promise to vacate upon demand.
4. On July 4, 2003, a formal demand to vacate was issued, which the petitioners refused.
5. In the Municipal Trial Court (MTC) of Oton, Iloilo, the respondent was declared the lawful co-owner, and the petitioners were ordered to vacate the lot.
6. The petitioners appealed to the Regional Trial Court (RTC) of Iloilo, Branch 38 (Civil Case No. 04-28007), which affirmed the decision of the MTC, with the deletion of attorney's fees and litigation expenses.
7. A subsequent Motion for Reconsideration by the petitioners was denied by the RTC.
8. The petitioners filed a Petition for Review with the Court of Appeals (CA) on August 3, 2004, which was dismissed due to deficiency in form and substance for not attaching necessary pleadings and documents.
9. Petitioners' Motion for Reconsideration to allow the submission of the necessary documents was also denied by the CA.
10. The case was then elevated to the Supreme Court through a Petition for Review on Certiorari under Rule 45, Revised Rules of Court.

### Issues:

1. Whether the Court of Appeals erred in dismissing the Petition for Review due to non-compliance with procedural requirements related to form and substance.
2. Whether the Court of Appeals erred in denying the Motion for Reconsideration and not allowing the inclusion of the required pleadings and documents.
3. Whether the procedural oversight resulted in a denial of substantial justice for the petitioners.

### Court's Decision:

1. **Dismissing Petition due to Procedural Deficiency**:

- The SC noted that procedural rules are essential to ensure orderly conduct; however, they should not impede the pursuit of justice.
- The submission of documents with the Motion for Reconsideration constituted substantial compliance with Section 2, Rule 42 of the Rules of Civil Procedure, referencing cases like *Padilla, Jr. v. Alipio*.
- The Court held that only the judgments or orders of the lower courts needed to be certified true copies or duplicate originals, not the other pleadings.

2. **Motion for Reconsideration**:

- The SC upheld that the subsequent submission of required documents ought to allow relaxation of the procedural rules.
- Procedural rules should be liberally construed to promote substantial justice, indicating that the CA should have accepted the subsequent compliance.

3. **Substantial Justice**:

- The Court emphasized that the rules of procedure should help secure and not defeat substantial justice.
- It was found the petitioners' procedural oversight was not a deliberate attempt to impede justice, recommending that substantial compliance be acknowledged.

**Doctrines:**

1. **Substantial Compliance**:

- The doctrine of substantial compliance allows for procedural lapses to be overlooked so long as the fundamental requirements are met, particularly when later compliance rectifies the initial failures (e.g., *Padilla, Jr. v. Alipio*).

2. **Relaxation of Procedural Rules**:

- Courts have the discretion to relax procedural rules to avoid injustice and ensure fair hearing, based on the principles that procedural rules are meant to aid justice, not impede it.

**Class Notes:**

- **Key Elements**:
- **Unlawful Detainer**: Requires formal demand to vacate.
- **Procedural Rules**: Compliance with Rule 42, Rule 45, and substantial compliance.
- **Substantial Justice**: Courts' discretion to relax procedural rules.

- **Sections**:

- Rule 42, Section 2 & 3, 1997 Rules of Civil Procedure.
- Rule 45, Section 4, 1997 Rules of Civil Procedure.

- **Application**:

- Correct compliance with attaching necessary documents to petitions.
- The principle of rectifying procedural shortcomings through subsequent actions.

**Historical Background:**

- The case is set against the backdrop of the rights of titled property owners versus long-standing occupants claiming permissive use, highlighting the robustness of the Torrens system of land registration and proprietary claims under Philippine property law.
- The procedural journey underscores how appellate courts manage compliance with procedural rules in the Philippine judicial system, balancing technical adherence with the imperative of substantial justice.