

Title: Berbano vs. Heirs of Roman Tapulao

Facts:

- Roman Tapulao was the registered owner of a lot in Taguing, Baggao, Cagayan, covered by OCT No. P-9331.
- After Roman Tapulao and his wife Catalina Casabar-Tapulao passed away, their heirs discovered that petitioners occupied portions of the lot.
- Respondents, the heirs of Tapulao, conducted a relocation survey that confirmed the occupation by petitioners.
- Petitioners refused to vacate despite multiple demands; thus, respondents filed a Recovery of Possession and Damages complaint.
- Petitioners claimed Felipe Peña, the original owner, had ceded the lot to Joaquin Berbano in 1954.
- They argued the adjacent lot sold to Tapulao mistakenly included Joaquin's land due to a survey error, which Tapulao allegedly acknowledged in an affidavit.
- At pre-trial, petitioners failed to appear, resulting in an ex-parte presentation of evidence by respondents.
- The RTC ruled in favor of respondents, ordering petitioners to vacate and compensate for damages.
- Petitioners raised for the first time a jurisdiction issue in their motion for reconsideration, claiming the lot's value was within MTC jurisdiction.

Procedural Posture:

- Trial Court (RTC): Decision favored respondents, ordering petitioners to vacate and pay damages.
- Court of Appeals: Affirmed the RTC decision.
- Supreme Court: Evaluated the jurisdictional challenge raised by petitioners.

Issues:

1. Does the RTC have jurisdiction over the case considering the assessed value of the disputed lot portion?

Court's Decision:

1. The Supreme Court affirmed the RTC and Court of Appeals, holding that jurisdiction is determined by the material allegations in the complaint.
2. As per the complaint, the lot's assessed value was Php 22,070.00 which is within RTC jurisdiction.

3. Petitioners' late challenge of jurisdiction post-adverse decision and their initial engagement in proceedings without objection invalidated their late jurisdictional claim.

Doctrine:

- Jurisdiction over the subject matter is determined by the complaint's allegations and the relief sought (Batas Pambansa 129 and Republic Act No. 7691).
- A party who invokes the court's jurisdiction and seeks affirmative relief cannot later challenge that jurisdiction after receiving an adverse decision (Doctrine of Estoppel in *Tijam v. Sibonghanoy*).

Class Notes:

1. Jurisdiction: Determined by the complaint's subject matter and assessed value.
  - RTC jurisdiction in civil actions (Sec. 19 - BP 129): Actions on title/possession of real property with assessed value over Php 20,000.00.
  - MTC jurisdiction (Sec. 33 - BP 129): Actions on title/possession of real property with assessed value up to Php 20,000.00.
2. Estoppel Doctrine: A party cannot challenge jurisdiction after participating in proceedings and seeking relief.
3. Complaint Allegations: Primary determinant of jurisdiction.

Historical Background:

- Emphasizes the boundaries of jurisdiction between RTCs and MTCs based on property value.
- Reflects consistent applications of statutory provisions governing judicial jurisdiction and estoppel principles to avoid delayed jurisdictional challenges that aim to overturn unfavorable outcomes post-decision.

This case highlights the legal delineation of jurisdiction based on assessed property values and the importance of timely jurisdictional objections in civil litigation.