

Title: Municipality of Nueva Era, Ilocos Norte vs. Municipality of Marcos, Ilocos Norte (G.R. No. 167227, January 31, 2008)

Facts:

1. The Municipality of Nueva Era was established by consolidating various rancherias under Executive Order No. 66 on September 30, 1916.
2. On June 22, 1963, the Municipality of Marcos was created by Republic Act (R.A.) No. 3753, derived from specific barangays of Dingras.
3. Dispute arose when Marcos, after nearly 30 years, claimed part of Nueva Era based on the boundary description in the law creating Marcos.
4. On March 8, 1993, Marcos passed Resolution No. 93-015 claiming territory within Barangay Sto. Niño, Nueva Era.
5. Nueva Era opposed the claim, asserting its entire territory as ancestral domain of the “tinguians” indigenous community.
6. The Sangguniang Panlalawigan (SP) of Ilocos Norte ruled in favor of Nueva Era on March 29, 2000.
7. On appeal, the Regional Trial Court (RTC) of Laoag City affirmed the SP decision on March 19, 2001.
8. Marcos filed a petition for review with the Court of Appeals (CA), which partly reversed the RTC on June 6, 2005, extending Marcos’ eastern boundary to Kalinga-Apayao but denying Marcos’ claim over Sto. Niño’s isolated northern portion.
9. Nueva Era petitioned for review on certiorari before the Supreme Court.

Issues:

1. Whether the CA had jurisdiction over the case given the statutory provision of appeal only to the RTC.
2. Whether the CA erred in treating Marcos’ petition for review as a petition for certiorari.
3. Whether the CA erred in declaring the extension of Marcos’ eastern boundary beyond the eastern boundary of Dingras up to Kalinga-Apayao.

Court’s Decision:

1. ****Appellate Jurisdiction****: The Supreme Court held that while the CA concluded that no additional appeal was permitted beyond the RTC per Sec. 119 of the Local Government Code, the CA still had jurisdiction to entertain Marcos’ appeal under B.P. Blg. 129, as amended by R.A. No. 7902.
2. ****Plebiscite Requirement****: At the time of Marcos’ creation, no plebiscite was required, making its establishment lawful without one. The requirement of a plebiscite was a later

constitutional and statutory innovation.

3. **Territorial Boundaries**: The Court underscored the legislative intent that Marcos' creation involved only Dingras' territory, excluding Nueva Era. The eastern boundary description in R.A. No. 3753 applied only to Dingras' barangays, making Marcos' extensive boundary claim invalid.

Doctrine:

- Legislative intent is paramount in statutory interpretation.
- Boundaries set by law must be adhered to without unauthorized expansion.
- The maxim "expressio unius est exclusio alterius" leads to the exclusion of non-enumerated elements.

Class Notes:

1. **Expressio unius est exclusio alterius**: The mention of one thing implies the exclusion of another. Applied here to affirm that only the listed barangays from Dingras form Marcos' territory, excluding Nueva Era.
2. **Legislative Intent**: Statutes must be interpreted in light of legislative intent, avoiding absurd results.
3. **Standard of Appeal**: Proper appeal mechanisms must be followed, with specific statutory jurisdictional grants holding primacy for higher review.

Historical Background:

- The dispute arose in the context of legislative boundary creation and subsequent expansions, reflecting on historical increments in local autonomy.
- The establishment of Marcos was rooted in mid-20th-century legislative actions aimed at regional administration, adjusted later by legal boundaries and local government autonomy reforms post-1987 EDSA Revolution.