

**\*\*Title:\*\*** Superiora Locale Dell' Istituto Delle Suore Di San Giuseppe Del Caburlotto, Inc. v. Republic of the Philippines

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

1. On March 22, 2013, Superiora Locale Dell' Istituto Delle Suore Di San Giuseppe Del Caburlotto, Inc. filed an application for the registration of title over Lots No. 1341-A (2,876 sqm) and No. 1341-B (136 sqm) in Amadeo, Cavite, citing ownership by purchase and open, continuous, exclusive, and notorious possession since June 12, 1945 or earlier.
2. The Office of the Solicitor General (OSG) opposed the application under res judicata for Lot No. 1341-A due to a 2012 Court of Appeals (CA) decision that dismissed a similar application due to insufficient proof of possession since June 12, 1945 or earlier and the land being alienable and disposable. For Lot No. 1341-B, the OSG argued the Regional Trial Court (RTC) lacked jurisdiction due to the lot's assessed value being under the threshold, making it a matter for the Municipal Trial Court (MTC).
3. The RTC, Tagaytay City, issued an order on April 11, 2016, dismissing the application for Lot No. 1341-A on res judicata grounds and Lot No. 1341-B for lack of jurisdiction.
4. Superiora Locale filed an appeal with the CA, which was denied in a decision dated April 6, 2018, affirming the RTC's decision. A subsequent motion for reconsideration was also denied on October 23, 2018.
5. Superiora Locale then filed a petition for review on certiorari with the Supreme Court.

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

1. Does the principle of res judicata apply to land registration proceedings, particularly for Lot No. 1341-A?
2. Does the RTC have jurisdiction over Lot No. 1341-B despite its assessed value being below the threshold for RTC jurisdiction?

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

1. **\*\*Res judicata in Land Registration Proceedings:\*\***

The Supreme Court ruled that res judicata does not apply to registration proceedings since there is no conclusive adjudication of rights as the previous application was dismissed for insufficient evidence without resolving ownership conclusively. The Court cited past rulings and legal principles emphasizing that defects in applications can be remedied over time or by presenting new evidence.

2. **\*\*Jurisdiction over Lot No. 1341-B:\*\***

Despite the RTC's decision based on the assessed value, the Supreme Court allowed the

jurisdiction to stand due to a joinder of causes of action under Sections 18 and 34 of P.D. No. 1529 and Section 5, Rule 2 of the 1997 Rules of Civil Procedure, which permits joinder provided one cause of action falls within the RTC's jurisdiction.

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

1. **\*\*Res Judicata Principle in Registration Proceedings:\*\***

Res judicata does not bar subsequent applications for land registration where prior applications were dismissed for procedural reasons or insufficient evidence without a substantive resolution of rights.

2. **\*\*Joinder of Causes of Action:\*\***

Multiple parcels of land in the same application can be jointly heard by the RTC if one of the parcels falls within the RTC's jurisdiction, and the total assessed value does not determine jurisdiction.

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

1. **\*\*Res Judicata Requirements:\*\*** A final judgment on the merits, involving the same parties, subject matter, and cause of action is essential.

2. **\*\*Land Registration:\*\*** Under R.A. No. 11573, applicants only need to prove 20 years of possession immediately preceding the application, simplified by a DENR-geodetic engineer's certification for alienable and disposable land.

3. **\*\*Joinder of Causes of Action:\*\*** Certain procedural rules permitting courts with higher jurisdiction to hear cases including components typically within the jurisdiction of lower courts allow for procedural efficiency, ensuring all related claims are resolved together.

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

This case reflects the evolving legal framework for land registration in the Philippines, transitioning from stringent proof requirements under P.D. No. 1529 to simplified processes under R.A. No. 11573 to improve land tenure security and clarify the confirmation process for imperfect titles. It underscores the adaptability of the judicial system in addressing procedural inefficiencies while balancing the need for finality and fairness in land disputes.