

Title: Montehermoso v. Batuto, G.R. No. 159373 (2019)

Facts:

- **Initial Incident (2015):** Respondents Romeo Batuto and Arnel Batuto filed a complaint for cancellation of title, reconveyance, and damages against petitioners Marilyn B. Montehermoso, Tanny B. Montehermoso, Emma B. Montehermoso Oliveros, Eva B. Montehermoso, Teresa B. Montehermoso Carig, and Salvar B. Montehermoso. They claimed that their 44,410 sq.m. property was erroneously included in the petitioners' OCT No. 5781.
- **RTC Decision (March 8, 2015):** The Regional Trial Court (RTC) found merit in respondents' claim and ordered the reconveyance of the property to them.
- **Appeal to Court of Appeals (August 5, 2016):** Petitioners appealed the RTC decision; the Court of Appeals dismissed their appeal. The decision became final and executory on September 9, 2016, resulting in the issuance of a writ of execution and writ of demolition.
- **Petition for Relief from Judgment:** A year later, petitioner Tanny Montehermoso alone filed a petition for relief from judgment. This petition was dismissed by the Court of Appeals on September 27, 2017, and the motion for reconsideration was denied on April 24, 2018.
- **Petition for Review on Certiorari:** Petitioners filed a petition for review on certiorari before the Supreme Court, which denied the petition on August 6, 2018, due to lack of reversible error committed by the Court of Appeals.
- **Petition for Annulment of Judgment:** Petitioners filed a petition for annulment of judgment before the Court of Appeals, claiming lack of jurisdiction by the RTC. The Court of Appeals dismissed the petition on February 13, 2019, and denied the motion for reconsideration on April 10, 2019.
- **Supreme Court Appeal (2019):** Petitioners once again lodged an appeal before the Supreme Court, challenging the resolutions of the Court of Appeals dated February 13, 2019, and April 10, 2019.

Issues:

1. Whether the petitioners could contest the finality and immutability of the RTC decision that had long become final and executory.
2. Whether the repetitive filings and appeals by the petitioners constituted a violation of the principle of finality of judgment.
3. Whether the petitioners' counsel's actions could be deemed as violating ethical duties as an officer of the court.

Court's Decision:

1. **Immutability of Judgment:** The Supreme Court emphasized the doctrine of finality and

immutability of judgments, underscoring that the RTC decision became final on September 9, 2016, and could no longer be altered or contested.

2. **Repetitive Filings:** The Court concluded that the petitioners' incessant filings were frivolous and constituted an abuse of the judicial process. The principle that every litigation must come to an end was highlighted, reflecting on the undue delay and injustice suffered by the respondents due to the petitioners' actions.

3. **Counsel's Duty:** The Supreme Court reminded the petitioners' counsel, Atty. Belinda M. Nagui, of her duty to advise her clients on the merit of their case and to prevent unduly impeding the administration of justice through frivolous litigation.

Doctrine:

- **Doctrine of Immutability of Judgment:** Once a judgment becomes final and executory, it becomes immutable and unalterable. Any attempt to alter or revisit such judgment must be struck down to uphold the principle of finality.

- **Ethical Conduct of Lawyers:** Lawyers must exercise their duty to the court and ensure justice is not unduly impeded. Frivolous litigation and repeated filings to delay the finality of judgments are frowned upon and may be subject to sanctions.

Class Notes:

- **Finality of Judgment:** Once final and executory, a judgment cannot be subject to further modification or reversal, regardless of the goal behind the sought changes.

- **Principle:** Ensures litigation concludes definitively, preventing endless legal battles.

- **Ethical Obligations:** Lawyers are required to act ethically by discouraging frivolous litigation and advising clients to accept final judgments to facilitate the just administration of justice.

- **Relevant Citation:** *Spouses Aguilar v. The Manila Banking Corporation*, emphasizing the limited nature of access to courts post-judgment.

Historical Background:

- **Doctrine Development:** The case reiterates the long-standing principle of the immutability of final judgments in the Philippine judicial system. This doctrine is crucial in maintaining legal certainty and preventing perpetual litigation, which could undermine the efficiency and integrity of the judicial process.

- **Judicial Efficiency:** The emphasis on preventing abuse of judicial resources reflects broader historical concerns over litigation as a tool for delaying justice, an issue addressed by multiple reforms and prominent proclamations by the Supreme Court to enhance judicial efficiency.

This case serves as a reminder for students of both the importance of finality in litigation and the ethical responsibilities of legal practitioners to uphold justice over the interests of prolonged litigation.