

****Title:**** Heirs of Tolentino vs. Heirs of Ramon Tolentino – Application of Judicial Stability Doctrine Digest)

****Facts:****

Spouses Doroteo Tolentino and Engracia Dela Cruz owned a parcel of land in San Vicente, Pili, Camarines Sur, registered under OCT No. RO 529 (263). Their children were Ramon, Angeles, Rafael, Carmen, and Mercedes.

1. On August 25, 1977, Ramon filed a petition for reconstitution of OCT No. RO 529 (263) on the grounds of its loss and destruction, requesting a new title in his name before the Court of First Instance (CFI) of Pili, Camarines Sur, Branch VI.
2. The CFI granted the petition on January 20, 1978, ordering the issuance of a new title in Ramon's name. Consequently, TCT No. 3153 was issued to Ramon.
3. Thirty-four years later, on August 29, 2012, Mercedes and the heirs of Angeles and Rafael (petitioners) questioned the issuance of TCT No. 3153, alleging co-ownership of the property as heirs of the original owners. They claimed an Agreement of Partition was executed after TCT No. 3153 was issued, ensuring each sibling's share.
4. The petitioners noted that only Ramon received compensation for the portion of land under agrarian reform, while their possession of allocated portions remained undisturbed until one of Ramon's heirs claimed exclusive ownership.
5. Remigio Manchus and Antonio Tolentino, heirs of Ramon, filed an Answer, claiming exclusive ownership by Ramon, asserting other siblings received properties elsewhere.
6. On February 22, 2013, the RTC of Pili, Camarines Sur, Branch 33, annulled the CFI order, declaring it invalid regarding the issuance of a title to Ramon due to lack of jurisdiction.
7. The RTC reiterated its decision on April 15, 2013, denying the Motion for Reconsideration filed by Remigio and Antonio. They subsequently filed a Petition for Certiorari with the Court of Appeals (CA), docketed as CA-G.R. SP No. 130055.
8. The petitioners filed a Motion for Summary Judgment on June 10, 2013, for the declaration of the January 20, 1978 Order's invalidity regarding the transfer to Ramon.
9. On May 9, 2014, the RTC validated the January 20, 1978 Order only for reconstitution while voiding the title issuance to Ramon.

10. Consolidating the appeals, the CA reversed the RTC, emphasizing the doctrine of non-interference among co-equal courts, quashing the RTC's orders, and dismissing the petitioners' complaint for annulment of the title. ^{Digest)}

11. Dissatisfied, the petitioners moved for reconsideration, which the CA denied on November 23, 2016, prompting the current petition.

****Issues:****

1. Whether the CA erred in dismissing the petitioners' complaint for annulment of title by applying the doctrine of non-interference.

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

The Supreme Court upheld the CA's decision, affirming the application of judicial stability:

1. ****Doctrine of Judicial Stability:**** The SC highlighted that the RTC's annulment of the CFI's order violated the doctrine of judicial stability, which prevents concurrent courts from modifying each other's decisions. The CFI's reconstitution and subsequent issuance of the title were within its jurisdiction, limiting other courts, including the RTC, from altering its decision.

2. ****Invalidation of RTC Orders:**** The SC agreed with the CA that the RTC's February 22, 2013, and May 9, 2014 Orders were void due to their attempt to invalidate and amend a co-equal court's order, consequently dismissing the annulment petition lodged by the petitioners.

3. ****Jurisdiction over Annulment:**** The SC underscored that actions for annulment of judgments of the RTC, including quasi-judicial bodies, reside exclusively within the CA's jurisdiction as per B.P. Blg. 129.

****Doctrine:****

- ****Doctrine of Judicial Stability:**** Ensures courts of equal jurisdiction cannot interfere with each other's decisions.

- ****Non-Interference:**** A court with jurisdiction over a case maintains authority to execute and control its judgment, barring other concurrent courts from modifying it.

- ****Judicial Annulment Jurisdiction:**** Exclusive authority of CA to annul RTC judgments and orders (B.P. Blg. 129).

****Class Notes:****

Key Legal Principles:

1. **Judicial Stability Doctrine:** Concurrent courts do not modify each other's decisions.
- Applied to prevent RTC from annulling a CFI's order.
2. **Jurisdictional Authority:** Original jurisdiction for annulment lies with the CA per B.P. Blg. 129.
3. **Non-interference Principle:** Courts manage executive authority over their judgments.

Historical Background:

This case is situated in the broader context of Philippine property law and judicial administration, reinforcing stability and predictability in the execution of court orders. The case illustrates the importance of proper jurisdictional authority and the immutability of judicial decisions across concurrent courts, fostering orderly legal processes and preventing conflicting rulings.

Legal Statutes Involved:

- **Batasang Pambansa Blg. 129, Section 9(2):** Confers CA with exclusive original jurisdiction over annulment of RTC's judgments/orders.