

### Title:

\*\*Mendoza and Sangguniang Barangay of Balatasan vs. Mayor Villas and Others [G.R. No. 183409]\*\*

### Facts:

In the 2007 barangay elections in Barangay Balatasan, Bulalacao, Oriental Mindoro, Constancio F. Mendoza was elected as Punong Barangay (village chief), while Liwanag Herato was elected as Barangay Kagawad (councilor). However, Mendoza's legitimacy was challenged by losing candidate Thomas Pajanel via a petition for quo warranto filed with the Municipal Trial Court (MTC) of Mansalay-Bulalacao, resulting in Mendoza's disqualification by the MTC on February 23, 2008. Due to this disqualification, Herato was proclaimed as the successor.

On February 28, 2008, Mayor Enrilo Villas administered the Oath of Office to Herato and directed municipal departments to recognize Herato's authority via Memorandum No. 2008-03-010. Despite Mendoza's pending appeal at the Commission on Elections (COMELEC), the mayor continued to recognize Herato. Following advice from the Department of the Interior and Local Government (DILG), which opined that Mendoza should hold the position pending finality of his disqualification case, Mendoza attempted to act in his official capacity.

Despite this, the Bulalacao municipal administration issued a directive to the Land Bank of the Philippines (LBP) on April 23, 2008, not to honor transactions made by Mendoza. LBP responded by halting all transactions involving Barangay Balatasan's funds.

In retaliation, Mendoza and the Sangguniang Barangay of Balatasan filed a Petition for Mandamus with Damages and Prayer for Preliminary Mandatory Injunction on May 5, 2008, with the RTC in Roxas, Oriental Mindoro. They sought to compel LBP to release barangay funds. In response, respondents filed answers and a Motion to Dismiss, supported by a COMELEC Resolution dated September 8, 2008, disqualifying Mendoza for having served three consecutive terms.

On February 2, 2009, the RTC dismissed the petition, and a subsequent motion for reconsideration was denied on March 17, 2009. This led Mendoza and the Sangguniang Barangay to directly file a petition with the Supreme Court.

### Issues:

1. **\*\*Jurisdiction and Procedural Matters\*\***: Whether the Supreme Court should entertain the

petition despite procedural defects and premature filing.

2. **Mootness and Justiciability**: Whether the controversy had become moot and academic given the change in circumstances with the 2010 barangay elections.
3. **Disqualification and Succession**: The legitimacy of Mendoza's and Herato's claims to the position of Punong Barangay.

### ### Court's Decision:

1. **Jurisdiction and Procedural Matters**: The Court exercised its discretion and liberality to treat the defective petition under Rule 45 because it primarily raised legal questions.
2. **Mootness and Justiciability**: The petition was ultimately dismissed as moot and academic due to the conduct of the 2010 barangay elections. The supervening event meant that any declaration would have no practical effect since Mendoza's term had expired.
3. **Disqualification and Succession**: Although the petition was deemed moot, the Court implicitly recognized the importance of following procedural hierarchies and the exhaustion of appropriate remedies in lower courts before approaching the Supreme Court.

### ### Doctrine:

**Mootness Doctrine**: A case becomes moot when it ceases to present a justiciable controversy due to supervening events, rendering adjudication unnecessary since any decision would have no practical effect.

### ### Class Notes:

- **Hierarchy of Courts**: Direct resort to the Supreme Court should be avoided unless exceptional reasons exist.
- **Moot and Academic Doctrine**: Enforces judicial efficiency by ensuring only live controversies are addressed.
- **Mandamus**: A remedy directed to compel the performance of a ministerial duty where there is no other plain, speedy, and adequate remedy.

### ### Historical Background:

This case is contextualized within routine election disputes and the administrative dynamics in Philippine local government units. The resolution underscores compliance with hierarchy and the procedural expectations in election-related litigations. It demonstrates the practical implications of term expiration in assessing election controversies and the limited scope of judicial intervention when a matter ceases to retain practical relevance.