

Title: **Filomena Soneja vs. Hon. Court of Appeals and Ramon Saura, Jr.**

Facts:

1. **Lease Agreement**: On July 1, 1995, Filomena Soneja entered into a lease contract with Ramon Saura, Jr. over a property at 966-F A.H. Lacson Street, Manila, with a monthly rent of Php5,500 for three years.
2. **Lease Expiry & Arrears**: After the lease expired in August 1998, Soneja remained in the property without paying rent, accumulating arrears of Php185,280 by 2001.
3. **Demands & Ejectment Proceedings**: Saura demanded payment and asked Soneja to vacate. Upon failure to comply, Saura filed an ejectment complaint referred to the Lupong Tagapamayapa, which failed to resolve the dispute amicably.
4. **MTCC Decision**: On December 5, 2001, the Metropolitan Trial Court (MTCC) ordered Soneja to vacate the premises and pay Php185,280 in arrears plus Php5,500 monthly until actual vacating, alongside Php10,000 attorney's fees.
5. **RTC Appeal & Execution Motion**:
 - Soneja appealed to the Regional Trial Court (RTC) on January 30, 2002.
 - Saura's motion for execution was granted on May 29, 2002, leading to the levy on Soneja's property in Catanduanes.
6. **Family Home Claim**: Soneja filed a motion to lift the levy, claiming the property was a family home exempt from execution according to the Family Code.
7. **RTC Denial**: The RTC denied the motion on August 6, 2002, citing lack of substantiation. Soneja's motion for reconsideration was also denied.
8. **RTC Dismissal of Appeal**: On January 20, 2003, the RTC dismissed Soneja's appeal for failure to file a required memorandum.
9. **CA Petitions**:
 - Filed a Rule 42 petition on March 12, 2003, which was ultimately denied by the CA on September 18, 2006.
 - Filed a Rule 65 petition on February 10, 2003, dismissed on March 3, 2003, for being late. Motion for reconsideration was also denied on November 19, 2003.
10. **Supreme Court Petition**: Soneja filed a Rule 65 petition before the Supreme Court questioning the CA's decisions.

Issues:

1. **Jurisdiction and Abuse of Discretion**: Whether the CA acted without or in excess of its jurisdiction or with grave abuse of discretion in upholding the RTC's decision denying the motion to lift or revoke the levy on the claimed family home.

Court's Decision:

Issue Analysis:

1. **Jurisdiction & Grave Abuse**:

- The Supreme Court affirmed the scope and proper use of certiorari petitions, meant for correcting jurisdiction errors, not errors of judgment.
- The CA's dismissal of the Rule 65 petition was justified, emphasizing no prima facie error by the RTC.

2. **Family Home Exemption**:

- Soneja claimed the Catanduanes property as a family home per Article 155 of the Family Code, warranting exemption from execution.
- RTC, after procedural due process with opportunity given to Soneja, found no sufficient proof substantiating the claim.
- Soneja's living arrangement with her married son occupying the property failed to convince courts of its protected status.

3. **Procedural Due Process**:

- The CA and RTC duly considered procedural requirements, and Soneja had avenues but failed in filing the required documents and timely motions, thus losing merits on procedural grounds.

Conclusion:

- The petition was denied for lacking merit. The RTC and CA decisions were upheld, emphasizing the procedural failings and the substantive lack of evidence related to the family home exemption claim.

Doctrine:

- **Certiorari Scope**: Limited to issues of jurisdiction and grave abuse of discretion, not for reviewing judgment errors.
- **Family Home Exemption**: Articles 152-155 of the Family Code specify exemptions from execution but require the property to be substantiated as an actively used family home.

Class Notes:

- **Certiorari (Rule 65)**: Proper for jurisdictional challenges, not judgment review.
- **Family Home (Art. 152-155, Family Code)**:
- **Art. 152**: Definition and constitution.
- **Art. 153**: Continues while any beneficiary resides.

- **Art. 154**: Beneficiaries include spouses, ascendants, descendants, etc.
- **Art. 155**: Exemptions to execution, except for specific debts.
- **Execution**: Property levy processes must respect family home protections and procedural fairness.

Historical Background:

- **Context**: This case exemplifies post-Family Code (1987) legal challenges in the Philippines, emphasizing protection mechanisms for family homes amid economic disputes, reflecting evolving social values around family security in property law.