

Title: Peralta-Labrador v. Bugarin (Substituted by Consolacion Bugarin)

Facts:

- Initial Purchase and Possession:** Petitioner Lilia V. Peralta-Labrador purchased Cadastral Lot No. 2650, covering an area of 400 sq. m., in Sitio Caarosipan, Barangay Manglicmot, San Felipe, Zambales in 1976 from spouses Artemio and Angela Pronto. In 1977, she was issued Tax Declaration No. 10462 and duly paid the property taxes.
- Lot Segregation:** In 1990, road construction by the Department of Public Works and Highways segmented 108 sq. m. from Lot No. 2650, and Peralta-Labrador received Tax Declaration No. 02-2460R in 1991 for the segregated lot.
- Occupation by Respondent:** In 1994, respondent Silverio Bugarin allegedly forcibly occupied the 108 sq. m. lot and refused to vacate despite Peralta-Labrador's objections.
- Legal Proceedings:** Peralta-Labrador filed a "Recovery of Possession and Ownership" case on January 18, 1996, docketed as Civil Case No. 328, with the Municipal Trial Court (MTC) of San Felipe, Zambales.
- Respondent's Defense:** Bugarin's Answer with Counterclaims claims that the disputed area is part of his 4,473 sq. m. land, as per Original Certificate of Title (OCT) No. P-13011, which he has possessed since 1955. In his Amended Answer, he dropped the title claim and pleaded adverse possession and prescription defenses.
- Lower Court Rulings:** The MTC ruled in favor of Bugarin, declaring him the owner based on OCT No. P-13011 and dismissing Peralta-Labrador's complaint. The Regional Trial Court (RTC) affirmed the MTC decision.
- Appellate Court Decision:** Upon appeal, the Court of Appeals affirmed the RTC decision but modified it by deleting the MTC's declaration of ownership in favor of Bugarin as OCT No. P-13011 was not formally offered as evidence.
- Supreme Court Petition:** Peralta-Labrador filed a petition for review with the Supreme Court after her motion for reconsideration was denied by the appellate court.

Issues:

- Jurisdiction of MTC over the Case:** Whether the Municipal Trial Court had jurisdiction

over the action for forcible entry given that more than one year had passed from the alleged unlawful possession by the respondent.

2. **Proof of Prior Physical Possession and Ownership:** Whether Peralta-Labrador sufficiently proved her prior physical possession of the disputed lot and ownership thereof.

3. **Petitioner's Right to Relief:** Whether the petitioner's failure to file the complaint within the specified period or prove prior possession negates her right to recovery of the property.

Court's Decision:

1. **Jurisdiction:** The Supreme Court held that the Municipal Trial Court did not have jurisdiction because the complaint for forcible entry was filed two years after the alleged unlawful possession. According to Rule 70, §1 of the Revised Rules of Civil Procedure, forcible entry actions should be filed within one year. Hence, the proper remedy for Peralta-Labrador would have been an *accion publiciana* or *accion reivindicatoria* filed with the RTC.

2. **Proof of Possession and Ownership:** The Court determined that Peralta-Labrador did not provide sufficient evidence to prove that the 108 sq. m. disputed lot was part of her Cadastral Lot No. 2650. The petitioner failed to present an updated cadastral survey reflecting the new road segregation.

3. **Petitioner's Complaint Dismissed:** Due to the procedural lapse of not filing within the correct jurisdictional timeframe and the failure of substantial evidence to prove her case, the Supreme Court annulled and set aside the decisions of the lower courts and dismissed Peralta-Labrador's complaint.

Doctrine:

1. **Jurisdictional Limitation:** Jurisdiction based on timeliness is strictly applied in forcible entry cases. Actions must be filed within one year of unlawful deprivation of possession, or they are subject to dismissal.

2. **Burden of Proof in Property Claims:** The burden of proof rests on the plaintiff to establish prior physical possession and ownership, especially in property disputes.

3. **Non-Waivable Nature of Jurisdiction:** Jurisdiction over the subject matter cannot be waived and defects in jurisdiction can be challenged at any stage of the proceedings.

****Class Notes:****

- ****Key Concepts:**** Forcible Entry, Accion Publiciana, Accion Reivindicatoria, Jurisdiction, Burden of Proof.
- ****Statutory Provisions:**** Rule 70, §1 of the Revised Rules of Civil Procedure.
- ****Case Citation:**** Lopez v. David Jr., G.R. No. 152145, and Bongato v. Malvar, G.R. No. 141614.

****Historical Background:****

This case provides a pertinent example of the application of procedural rules to property disputes in the Philippines. It underscores the importance of timeliness and adherence to jurisdictional requirements in forcible entry cases. The procedural rigor ensures expeditious resolution of possession conflicts, reflecting a judicial preference for structured legal processes in such disputes, consistent with similar rulings in Philippine jurisprudence.