

Title:

Heirs of Tomas Dolleton, et al. vs. Fil-Estate Management Inc., et al., and Register of Deeds of Las Piñas City

Facts:

In October 1997, multiple heirs, including those of Tomas Dolleton, Heraclio Orcullo, and others, filed eight complaints for Quieting of Title and/or Recovery of Ownership and Possession, combined with Preliminary Injunction and Damages against Fil-Estate Management Inc. and associated respondents. They claimed a long-standing possession and cultivation of various parcels of land in Magasawang Mangga, Barrio Pugad Lawin, Las Piñas, Rizal, totaling several hectares. These were allegedly occupied by petitioners for over 90 years until forcibly ousted by armed men hired by respondents in 1991.

Petitioners argued that the titles held by respondents (TCTs derived from OCT No. 6122 in the name of Jose Velasquez) were invalid and spurious. They cited cases *Vda. de Cailles v. Mayuga* and *Orosa v. Migrino* to support that their claimed lands were not part of the adjudicated lands in these cases, which concerned a different portion of Lot 9, Psu-11411.

Respondents countered with a Motion to Dismiss, arguing prescription, laches, lack of cause of action, and *res judicata* based on final judgments in earlier cases. The RTC sided with respondents, dismissing the complaints and denying preliminary injunctions.

Upon appeal (CA-G.R. CV No. 80927), the Court of Appeals affirmed the RTC's decision, maintaining respondents' titles' indefeasibility and noting petitioners' claims were barred by both prescription and the nature of registered titles under the Torrens system.

The appellate court also noted the complaints improperly sought cancellation of respondents' titles by claiming said lands were not part of the titles held by respondents. Following a denied motion for reconsideration, petitioners brought the case before the Supreme Court.

Issues:

1. **Whether the complaints sufficiently stated a cause of action.**
2. **Whether the claims were barred by prescription.**
3. **Whether the claims were barred by laches.**
4. **Whether the claims were barred by *res judicata*.

Court's Decision:

The Supreme Court found merit in the petition and reversed the decisions of the lower courts.

****1. Cause of Action:******

- Petitioners alleged they possessed and paid taxes on the contested lands long enough for ownership by acquisitive prescription. Despite this, respondents forcibly ejected them. The Supreme Court held that these allegations sufficiently state a cause of action for recovery of possession (accion reivindicatoria). The primary issues of whether lands claimed were covered by respondents' titles need trial determination rather than dismissal.

****2. Prescription:******

- As the complaints primarily sought recovery of properties claimed by prescription, not annulment of titles registered to respondents, the one-year prescription period under P.D. No. 1529 or the 10-year period for reconveyance (Article 1456 of the Civil Code) did not strictly apply. The dispossession between 1991-1994 and complaints filed in 1997 fell within a plausible period for recovery claims. The Supreme Court determined prescription did not automatically appear on the complaint's face and needed trial evidence.

****3. Laches:******

- Laches requires evidence of unreasonable neglect to assert rights. Petitioners' claims of recent dispossession (1991) are immediate enough to prevent laches application without trial evidence. Thus, laches as grounds for dismissal was deemed invalid at the motion to dismiss stage.

****4. Res Judicata:******

- Vda. de Cailles and Orosa involved different parcels (Lot 9 Psu-11411 Amd-2), not directly the subject properties claimed by petitioners. Petitioners' claims about the land not part of these adjudicated cases negate identities of subject matter necessary for res judicata. The MTC's 1991 decision on different land holdings does not bar separate claims over allegedly erroneously excluded properties. Thus, the finality of the decision in earlier cases does not bar the current petitions.

Doctrine:

- Properly construed, claims for recovery of possession predicated on adverse dispossession require full factual trial assessments.

- Legal standard where laches or prescription defenses needing evidentiary basis should not adjudicate claims prematurely at the dismissal stage.

- Identity of subject matter is crucial for applying res judicata barring future claims.

Class Notes:

1. **Cause of Action Elements:**

- Right in favor of the plaintiff (ownership/possession).
- Obligation on the defendant not to violate such right.
- Violation of such right (forcible dispossession).

2. **Prescription:**

- Accion reivindicatoria - 10 years from dispossession.
- Review and reopening under P.D. 1529 - 1 year under fraud (Section 32).

3. **Laches:**

- Delay must be unreasonable, plus the party must have had a proper opportunity earlier.

4. **Res Judicata:**

- Identical parties, subject matter, and causes of action for 'bar by prior judgment.'
- Identity of issues for 'conclusiveness of judgment' without necessitating identical causes of action.

Historical Background:

This case intersects with pivotal property adjudication under the Torrens system within the context of Philippine land titling. Earlier landmark cases (Vda. de Cailles and Orosa) centered on land grants' legitimacy and transferees' rights, especially regarding historical agrarian holdings transitioned into modern regulatory frameworks. Given land disputes in rapidly developing urban areas like Las Piñas, the fair application of these decrees influences property rights continuity against adverse possession principles.