

****Case Title:**** Valiao v. Republic of the Philippines

****Facts:****

1. On August 11, 1987, petitioners filed an application for registration of title over a parcel of land (504,535 sq.m.) in Barrio Galicia, Municipality of Ilog, Negros Occidental, at the Regional Trial Court (RTC) of Kabankalan.
2. On June 20, 1988, private oppositors Macario Zafra and Manuel Yusay filed a Motion to Dismiss on grounds of the land not being declared alienable and disposable, res judicata barring the registration, and lack of factual or legal basis.
3. On August 24, 1988, the Republic opposed the application, claiming the lack of open, continuous, exclusive, notorious possession since June 12, 1945, the land being part of the public domain, and a prior judgment in a cadastral case.
4. The RTC denied the Motion to Dismiss on July 3, 1989, and the trial ensued.
5. Petitioners claimed ancestral possession since 1916 through their uncle Basilio Millarez, substantiated by a Spanish handwritten Deed of Sale, with tax declarations dating back to 1976.
6. The RTC granted the application on December 15, 1995, ordering the registration of the land in petitioners' names, with specific exceptions for sold rights and valid fishpond permits.
7. Aggrieved, the private oppositors and the Republic appealed to the Court of Appeals (CA).
8. The CA reversed the RTC's decision on June 23, 2005, citing res judicata and implicit inalienability of the land since it was part of a prior cadastral judgment and lacked classification as alienable.
9. Petitioners filed a motion for reconsideration, which the CA rejected on November 17, 2005.
10. A petition for review on certiorari to the Supreme Court followed.

****Issues:****

1. Whether Lot No. 2372 is alienable and disposable land of the public domain.
2. Whether prescription can be claimed by the applicants on Lot No. 2372.
3. Whether res judicata from the CA's prior decision bars the present application for registration.
4. Whether the applicants' possession through their predecessors-in-interest is sufficient to sustain their claim for prescription.

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

The Supreme Court affirmed the CA's decision denying the application for land registration,

focusing on the following resolutions:

1. ****Alienability of the Land:**** The court found that petitioners failed to provide incontrovertible evidence that the land in question had been classified as alienable and disposable by the government. No positive act such as a presidential proclamation, executive order, administrative action, or legislative act was established.
2. ****Claim of Prescription:**** Under the Regalian Doctrine, public land is presumed to belong to the state unless proven otherwise through reclassification or an alienation act by the state. Even presumptive possession since 1916 could not convert this into private land without such reclassification.
3. ****Res Judicata:**** The court acknowledged a prior cadastral decision wherein Lot No. 2372 was ruled as public land belonging to the Republic, thus barring another claim. This previous judgment was final and conclusive over the parties involved concerning the same land.
4. ****Sufficiency of Possession:**** The court determined that petitioners' evidence of possession, primarily an oral testimony unsupported by relevant tax declarations or other substantial evidence, was insufficient to meet the requirements for prescription under Section 14 of the Property Registration Decree. The evidence provided failed to demonstrate continuous, open, exclusive, notorious possession under a bona fide claim since June 12, 1945.

****Doctrine:****

1. ****Regalian Doctrine:**** All lands of the public domain belong to the State; unless proved reclassified as alienable and disposable, they remain inalienable.
2. ****Requirement for Confirmation of Imperfect Title:**** Proof of land as alienable and disposable and evidence of possession since June 12, 1945, under a bona fide claim of ownership, is mandatory.

****Class Notes:****

1. ****Regalian Doctrine:**** All lands are state property unless reclassified. No possession time can alter inalienable status without official act.
2. ****Requirements per PD 1529:**** For land registration, applicants must prove:
 - Land status as alienable and disposable via official act.
 - Open, continuous, exclusive, and notorious possession since June 12, 1945 or before under a bona fide claim.

3. **Res Judicata in Land Cases:** Prior final judgments on land classification by cadastral courts are conclusive and preclude subsequent conflicting claims.

Historical Background:

This case showcases the nuanced conflict between private land claims and public land doctrine within the Philippine legal system. The entrenched Regalian Doctrine, requiring statutory reclassification of public lands, intersects with historical land possession claims. This litigation exemplifies the stringent requirements under PD 1529 for land registration to transition public lands to private ownership, ensuring protection of state lands from indiscriminate appropriation.