

Title: Barangay Mayamot, Antipolo City vs. Antipolo City, Sangguniang Panglungsod of Antipolo, Barangays Sta. Cruz, Bagong Nayon, and Mambugan

Facts:

- Creation of Barangays:** In 1984, Batas Pambansa Bilang (BP Blg.) 787 to 794 established eight new barangays in Antipolo, now formally a city, adding to the pre-existing eight barangays.
- Boundary Delineation:** To map and integrate the territories, Resolution No. 97-80 was passed in 1989, commissioning the City Assessor to plot and delineate barangay boundaries based on BP Blg. 787 to 794.
- Resolution No. 97-89:** On the same day, the Sangguniang Bayan of Antipolo approved Resolution No. 97-89, which defined the territorial borders of the barangays as per the City Assessor's plans.
- Barangay Mayamot's Allegations:** In 1999, Barangay Mayamot filed for the annulment of Resolution No. 97-89, claiming that the resolution unjustly reduced its territory by half without proper consultation or a public hearing.
- RTC Decision:** The Regional Trial Court (RTC) dismissed the petition on August 1, 2006, asserting the resolution did not alter any territorial boundaries and was based on a cadastral survey and BP Blg. 787 to 794.
- Court of Appeals Decision:** The Court of Appeals affirmed the RTC's decision on January 30, 2009.
- Supreme Court Petition:** Barangay Mayamot petitioned the Supreme Court, maintaining their allegations.

Issues:

- Whether Resolution No. 97-89 altered the territorial boundaries of Barangay Mayamot without legal basis.
- Whether the RTC had jurisdiction over the boundary dispute.

Court's Decision:

- Jurisdiction:** The Supreme Court ruled that the RTC lacked jurisdiction over the boundary dispute since, under RA No. 7160 (Local Government Code of 1991), the Sangguniang Panlungsod or Sangguniang Bayan has the original jurisdiction to settle such disputes.
- Boundary Dispute Nature:** The Court determined the core of the issue was a boundary

dispute, which under RA No. 7160, mandates the initial resolution by the concerned sanggunian rather than the RTC.

3. **Resolution Validity:** The Supreme Court affirmed that Resolution No. 97-89 was a consequence of existing laws and did not inherently alter boundaries, instead providing a formal ratification of existing cadastral information.

Doctrine:

1. **Jurisdictional Mandate:** RA No. 7160 clearly delegates the settlement of boundary disputes between barangays in the same municipality to the respective Sangguniang Bayan/Panlungsod, delineating the RTC's role to an appellate capacity.

2. **Formal Resolution Necessity:** Minor adjustments or confirmations of existing boundaries do not require a plebiscite if they align with statutory provisions and cadastral survey results.

Class Notes:

- **Key Concepts:** Jurisdiction, boundary disputes, cadastral survey, statutory mandates, resolution validity.
- **Legislative Reference:** RA No. 7160 Sections 118-119, Local Government Code of 1991.
- **Application:** For boundary disputes, initial jurisdiction lies with the sanggunian; the RTC's involvement is strictly appellate.

Historical Background:

The case is set against the backdrop of administrative changes post-1984, when additional barangays were created in Antipolo. Through Resolution No. 97-89, the City aimed to resolve boundary ambiguities post-reorganization. The case exemplifies the procedural requirements and jurisdictional clarifications mandated by the 1991 Local Government Code, reflecting administrative evolution and decentralization policies in the Philippine local government structure.