

Title: Balibago Faith Baptist Church, Inc. vs. Faith in Christ Jesus Baptist Church, Inc.

Facts:

1. **Contract of Loan:** On March 7, 1990, Philippine Baptist S.B.C., Inc. (PBSBC) lent money to Balibago Faith Baptist Church, Inc. (BFBC) to purchase a parcel of land (Lot 3, Blk. 35), making BFBC the possessor for its religious activities.
2. **Occupation by Respondents:** Reynaldo Galvan, later forming Faith in Christ Jesus Baptist Church, Inc. (FCJBC), began attending BFBC's services and asserted control over the property.
3. **Recognition by LCSBC:** On September 5, 2001, Luzon Convention of Southern Baptist Churches, Inc. (LCSBC) validated BFBC and its pastor's right to the property.
4. **Demand Letter:** On September 4, 2002, BFBC demanded FCJBC vacate the property and pay PHP 10,000.00 per month starting October 2001. FCJBC ignored this demand.
5. **Complaint Filed:** On September 24, 2003, BFBC and PBSBC filed for unlawful detainer and damages against FCJBC and Galvan.
6. **Procedural Posture:**
 - **MTC Decision:** On February 9, 2004, the Municipal Trial Court (MTC) ruled in favor of BFBC, identifying the case as one of forcible entry.
 - **RTC Decision:** Both parties appealed to the Regional Trial Court (RTC), which on April 19, 2006, affirmed the MTC's decision. FCJBC's motion for reconsideration was denied on November 24, 2006.
 - **CA Decision:** FCJBC then petitioned the Court of Appeals (CA), leading to the March 5, 2010 decision that dismissed the unlawful detainer complaint and reversed the lower courts' decisions.
 - **Petition for Review:** BFBC and PBSBC petitioned the Supreme Court under Rule 45 to reverse the CA decision.

Issues:

1. **Jurisdiction:** Determining whether the MTC had jurisdiction over the case.
2. **Nature of the Action:** Whether the case is one of unlawful detainer or forcible entry.
3. **CA's Consideration:** Whether it was proper for the CA to consider and resolve issues not initially raised by the parties.

Court's Decision:

1. **Jurisdiction and Nature of Action:**
 - The Supreme Court found that the MTC miscategorized the action. The allegations indicated FCJBC's possession was illegal from the start, aligning more with forcible entry.

- The allegations failed to meet the requirements for unlawful detainer, as BFBC and PBSBC failed to demonstrate any tolerance or permission for FCJBC's possession.
- The complaint did not specify how and when FCJBC's entry was effected, making it void in laying grounds even for forcible entry. Lack of specifics on dispossession is crucial, as it strips the court's summary jurisdiction in ejectment cases.

2. **CA's Authority**:

- The CA's consideration of jurisdiction was proper as jurisdictional issues can be raised at any stage. The tribunal emphasized that jurisdiction loss is fundamental, rendering any associated court decision void.

Doctrine:

- **Distinction Between Forcible Entry and Unlawful Detainer**: Clear differentiation in the legal standards and requirements, particularly concerning the legality of initial entry and the timelines for filing respective complaints.
- **Jurisdictional Allegations**: Ejectment complaints must specify jurisdictional facts and clear actionable grounds to establish court authority.
- **Permissive Occupation**: Without allegations showing tolerance or contractual permission, claims cannot be based on unlawful detainer.
- **Ejectment Jurisdiction**: Deficient complaints necessitate full-blown actions rather than summary ejectment proceedings.

Class Notes:

- **Unlawful Detainer**:
 - Legal initial possession turning illegal after a demand to vacate.
 - Filed within one year from the last demand.
 - Elements: (1) Contractual/Tolerated possession; (2) Terminative notice; (3) Continued illegal possession causing deprivation; (4) Timely action post-demand.
- **Forcible Entry**:
 - Illegal occupation from the outset.
 - Detailed description of possession acquisition.
- **Statutory Basis**: Section 1, Rule 70 of the Rules of Court.

Historical Background:

- The case arose from intra-church disputes over property rights and congregational split. Such issues often reflect deeper organizational conflicts within religious communities and historical precedents in church property litigations. The legal analysis signifies the vital role of clear, factual pleading in property disputes and jurisdiction determination.