

****Title**:** Heirs of Placido Miranda vs. Court of Appeals and Others

****Facts**:**

1. Placido Miranda and his wife owned a 21-hectare land in Pawa-Talon and Guintoan, Palauig, Zambales.
2. Upon their death, the land was administered by their son, Maximo Miranda.
3. On November 5, 1957, Maximo sold the land to Agerico Miranda, the then Provincial Treasurer of Zambales.
4. On November 15, 1984, Free Patent Title No. 600198 (OCT No. P-7753), covering the land, was issued to Agerico's daughter, Charito Miranda, who resided in New Jersey, USA.
5. Agerico cultivated the land on Charito's behalf.
6. On December 28, 1991, the heirs of Placido Miranda entered the land, claiming rightful ownership and possession, alleging that Maximo was merely an administrator and not the owner.
7. The heirs alleged fraud in the sale and argued that Charito, as a foreign citizen, could not own land in the Philippines.
8. On January 24, 1992, private respondents filed an action for forcible entry in the MCTC of Masinloc and Palauig, Zambales, which was initially dismissed but later reinstated by the RTC.
9. On August 5, 1993, the MCTC ruled in favor of the private respondents, ordering the petitioners to vacate the land, a decision which was sustained by the RTC and the Court of Appeals.
10. Simultaneously, on June 2, 1992, the heirs filed a complaint for nullity of sale, annulment of title, and reconveyance with damages and partition.
11. The RTC dismissed this complaint on grounds of prescription. The heirs' certiorari petition against this dismissal was also dismissed by the Court of Appeals.

****Issues**:**

1. ****Prescriptive Bar**:** Whether the heirs' action to annul the sale was timely or barred by prescription.
2. ****Method of Adjudication in Ejectment Suits**:** Whether the summary procedure used by MCTC in the case of forcible entry was appropriate.
3. ****Certiorari vs. Appeal**:** Appropriateness of using certiorari instead of appeal for challenging the RTC dismissal for lack of prescription.

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

1. ****Prescriptive Bar**:** The Court found that the action was barred by both ordinary and extraordinary acquisitive prescription. Agerico Miranda had possessed the land for over 30 years, thus consolidating the title by extraordinary prescription. Accordingly, any action to annul the 1957 sale filed in 1992 was clearly prescribed.
2. ****Method of Adjudication in Ejectment Suits**:** The Court affirmed that the Revised Rules on Summary Procedure applied to all ejectment cases, regardless of questions of ownership. It found that summary procedure was correctly applied and thorough affidavits and position papers were properly considered without the need for oral testimony.
3. ****Certiorari vs. Appeal**:** The Court held that the petitioners should have appealed the RTC's final order dismissing their complaint rather than filing a petition for certiorari. The Court of Appeals was correct in dismissing the certiorari petition as this extraordinary remedy cannot substitute for an appeal.

****Doctrine**:**

1. ****Acquisitive Prescription**:** Both ordinary and extraordinary prescription principles dictate that if adverse possession exists for a requisite period, ownership is established, thereby barring subsequent annulment actions.
2. ****Summary Procedure**:** The Revised Rules on Summary Procedure apply to all ejectment cases, simplifying proceedings and expediting the resolution without a need for hearings.
3. ****Remedy of Appeal**:** The availability of appeal precludes the utilization of certiorari as a substitute; this procedural principle reinforces the mutual exclusiveness of these remedies.

****Class Notes**:**

1. ****Acquisitive Prescription**:**
 - Ordinary: Possession, by virtue of title and in good faith, for ten years (Civil Code Art. 1134)
 - Extraordinary: Continuous adverse possession without title or good faith for thirty years (Civil Code Art. 1137)
2. ****Summary Procedure**:**
 - Applicable to all ejectment cases, irrespective of ownership issues (Revised Rules on Summary Procedure)

- Adjudication relies primarily on affidavits and position papers, without oral hearings (Revised Rules on Summary Procedure § 10)

3. **Certiorari vs. Appeal**:

- Certiorari lies only when no appeal or other plain, speedy, or adequate remedy is available (Rule 65, Rules of Court)
- Must be used to correct acts of grave abuse of discretion, not merely errors in judgment or findings (Rule 65, Rules of Court)

Historical Background:

This case is significant within the Philippine legal context and history as it elucidates how adverse possession and procedural rules can decisively impact property disputes, especially considering the long-standing controversial nature of land titles and regulatory formalities in the Philippines. The case highlights court's inclination towards procedural efficiency, as seen in its endorsement of summary proceedings, and underscores procedural accuracy for managing appeal processes which aligns with the nation's efforts to refine legal systems amid growing property disputes.