

Title: Ramirez vs. Elomina, G.R. No. 205462, July 28, 2020

****Facts:****

1. On May 11, 1994, Leticia C. Ramirez (Ramirez) was issued Original Certificate of Title (OCT) No. P-4884 pursuant to Free Patent No. 043404-94-1330 over a parcel of land (Lot No. 922, Cad-455-D) located in Laguna.
2. On July 11, 2000, Felomino Elomina (Felomino) filed a protest against the issuance of the free patent to Ramirez, asserting that said property has been possessed by him as an owner since birth and not by Ramirez nor her predecessor-in-interest, Delfin Torinos.
3. The City Environment and Natural Resources Office (CENRO) conducted an investigation and found that the Elomina family lived on the property, contrary to Ramirez's claims.
4. On December 29, 2003, the Department of Environment and Natural Resources (DENR) cancelled Ramirez's free patent and declared the property reverted to the public domain.
5. On December 12, 2005, Felomino, through his attorney-in-fact Federico Elomina, filed a case for reconveyance of title and damages at the Regional Trial Court (RTC) of Biñan, Laguna.
6. Ramirez filed a Motion to Dismiss on grounds of forum shopping, which was denied by the RTC. In her Answer, she also raised affirmative defenses including lack of cause of action and prescription.
7. On March 13, 2008, the RTC dismissed Felomino's complaint for lack of merit, reasoning that Felomino failed to prove his title, was not the real party-in-interest, and the action had prescribed.
8. Felomino appealed to the Court of Appeals (CA) which reversed the RTC's decision on October 12, 2011, declaring Felomino the lawful owner and ordering Ramirez to reconvey the property.
9. On November 3, 2011, Ramirez filed a Motion for Reconsideration which was denied on December 21, 2011, due to late filing, making the CA's decision final and executory.
10. The CA issued a Resolution for entry of judgment on May 25, 2012.

****Issues:****

1. Whether Felomino has the standing as the real party-in-interest.
2. Whether the action for reconveyance is barred by prescription.
3. Whether the appellate court's denial of Ramirez's Motion for Reconsideration for untimeliness and issuance of an Entry of Judgment constituted grave abuse of discretion.

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

1. ****Real Party-in-Interest:****

- The CA ruled that Felomino was the rightful occupant and possessor, making him the real party-in-interest. Ramirez's assertion that Felomino has no standing was deemed incorrect as he had been in possession of the property for over 70 years.

2. **Prescription:**

- The CA found that the action for reconveyance based on fraud does not prescribe if the holder of the title is not in possession of the property. Since Felomino was in continuous possession and Ramirez never occupied the land, the CA held that the action had not prescribed.

3. **Grave Abuse of Discretion:**

- The Supreme Court (SC) upheld the appellate court's decision, ruling that there was no grave abuse of discretion in denying Ramirez's Motion for Reconsideration due to late filing. The SC emphasized the importance of adhering to procedural rules and found Ramirez's reasons insufficient for relaxing such rules.

Doctrine:

- The SC reiterated the doctrine that actions for reconveyance based on fraud are imprescriptible when the person seeking reconveyance is in possession of the property.
- Estoppel and the importance of procedural timelines were underscored, promoting an orderly administration of justice.

Class Notes:

- **Real Party-in-Interest:** Essential for a party to have a direct interest in the subject matter of the litigation.
- **Prescription:** Actions to reconvey property due to fraud are not subject to prescription if the plaintiff is in possession of the property.
- **Certiorari:** Available only for addressing grave abuse of discretion, not mere errors of judgment.
- **Procedural Timelines:** Strict adherence to procedural rules is mandated, with exceptions allowed only under compelling circumstances.

Historical Background:

The case reflects the Philippine judicial system's emphasis on procedural rigor and safeguarding occupant rights in land disputes. It also demonstrates the complex interactions between administrative and judicial adjudications over land titles in the context of Philippine property law, echoing issues of land ownership and possession common in a

country with significant agrarian history.