

**\*\*Title\*\*:** C.T. Torres Enterprises, Inc. vs. Hon. Romeo J. Hibionada et al, G.R. No. L-75882

**\*\*Facts\*\*:**

C.T. Torres Enterprises, Inc. (Petitioner) acted as an agent for Pleasantville Development Corporation, selling a subdivision lot on an installment basis to Efren Diongon (Respondent). Upon completion of installment payments, Diongon demanded the delivery of the certificate of title for the land. When neither C.T. Torres Enterprises nor Pleasantville complied, Diongon filed a complaint for specific performance and damages in the Regional Trial Court (RTC) of Negros Occidental. This case was docketed as Civil Case No. 3514.

Both defendants, C.T. Torres Enterprises and Pleasantville, responded with an answer including counterclaims and cross-claims. Diongon filed a reply and answered the counterclaims. During pre-trial proceedings, which included submission of trial briefs by Pleasantville and Diongon, C.T. Torres Enterprises filed a motion to dismiss the case for lack of jurisdiction, arguing that the Housing and Land Use Regulatory Board (HLURB) was the proper forum.

The motion to dismiss was opposed by Diongon and was eventually denied by the RTC on September 17, 1987, with the court asserting that the jurisdiction was vested in regular courts, not the HLURB. The petitioner filed for certiorari with the Supreme Court to contest the RTC's denial of the motion to dismiss.

**\*\*Issues\*\*:**

1. Whether the Regional Trial Court had jurisdiction over the complaint for specific performance and damages or whether the jurisdiction belonged to the Housing and Land Use Regulatory Board (HLURB).

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

The Supreme Court settled the jurisdictional issue, ruling that the RTC erred in taking cognizance of Diongon's complaint. The Court held:

1. **\*\*Exclusive Jurisdiction of HLURB\*\*:** Under P.D. No. 1344, HLURB (formerly National Housing Authority under P.D. No. 957) holds the exclusive jurisdiction to hear and decide complaints involving specific performance of contractual and statutory obligations by subdivision lot buyers against developers.

2. **\*\*Quasi-Judicial Powers of Administrative Agencies\*\*:** The Court confirmed that administrative agencies vested with quasi-judicial powers, such as the HLURB, can

adjudicate disputes traditionally under the purview of regular courts, especially in matters requiring specialized knowledge and swift resolutions.

3. **Prematurity of Certiorari**: The Supreme Court dismissed the respondents' argument that the petition was premature due to the absence of a motion for reconsideration of the RTC's order. The Court clarified that jurisdictional issues could be raised directly before the Supreme Court without needing a prior motion for reconsideration.

**Doctrine**:

The Supreme Court reasserted the doctrine that specific performance cases involving subdivision lots fall within the exclusive jurisdiction of the HLURB as mandated by P.D. No. 1344. Administrative agencies are granted adjudicatory powers for efficient regulatory oversight, given their specialized expertise.

**Class Notes**:

- **Jurisdiction**: Enumerate the precise language of P.D. No. 1344, which grants exclusive jurisdiction to the HLURB over specific types of disputes in the real estate sector.
- **Administrative Law**: Understand the principles behind the delegation of judicial functions to administrative bodies for specialized and prompt dispute resolution.
- **Judicial Review**: Note the conditions under which certiorari can be directly filed without a prior motion for reconsideration, especially in cases questioning jurisdiction.

**Historical Background**:

The proliferation of real estate developments and the corresponding grievances from buyers necessitated the enactment of regulatory laws such as P.D. No. 957 and P.D. No. 1344. These laws aimed to protect buyers from unscrupulous practices and ensure developers' compliance with their obligations. The establishment of HLURB provided a quasi-judicial body to handle such specific disputes, reflecting a broader trend in administrative law to create specialized bodies for efficient governance and oversight.