

Title: Igmidio Hidalgo and Martina Rosales vs. Policarpio Hidalgo, et al. and Hilario Aguila and Adela Hidalgo vs. Policarpio Hidalgo, et al.

Facts:

- Policarpio Hidalgo owned agricultural lands in Batangas.
- On September 27, 1963, and March 2, 1964, he sold some parcels to seven respondents.
- Spouses Igmidio Hidalgo and Martina Rosales and spouses Hilario Aguila and Adela Hidalgo were tenants on these lands but were not informed of the sale as required by Republic Act No. 3844.
- They filed for redemption within the prescribed period, arguing they were entitled to buy the land under the same terms.
- The Court of Agrarian Relations dismissed their actions, ruling the right of redemption only applied to agricultural lessees, not share tenants.

Issues:

1. Whether section 12 of the Agricultural Land Reform Code (Republic Act No. 3844) grants the right of redemption to share tenants.
2. Whether the lack of notice of intention to sell by the landowner affects the tenants' right to redeem.

Court's Decision:

- The Supreme Court reversed the lower court's decision. It held that share tenants are included in the right of redemption.
- It emphasized that the Agricultural Land Reform Code aimed to abolish share tenancy and replace it with an agricultural leasehold system.
- It clarified that all tenants working the land were intended to benefit from the right of redemption to promote owner-cultivatorship.

Doctrine:

- The right of redemption under Section 12 of Republic Act No. 3844 extends to share tenants.
- Agricultural share tenancy is abolished under the Act, hence share tenants are to be considered as having leasehold relations by operation of law.

Class Notes:

Key Elements:

- ****Right of Redemption****: The ability of tenants to buy the land they cultivate when sold to

a third party.

- **Agricultural Leasehold System**: A law replacing share tenancy to facilitate land ownership for tenants.
- **Notice Requirement**: Landowners must notify tenants before selling the property.

Statutory Provisions:

- **Section 12, RA 3844**: Right to redeem land sold without tenant's knowledge within two years from the sale registration.
- **Section 4, RA 3844**: Abolition of share tenancy.

Application:

- Share tenants are automatically considered leasehold tenants.
- Tenants can redeem land at a "reasonable price" as prescribed by the Code, promoting equitable land distribution and security of tenure.

Historical Background:

- The Agricultural Land Reform Code was enacted to reform Philippine agriculture, shifting towards owner-cultivatorship and eliminating exploitative share tenancy.
- The reforms were part of broader socio-economic policies intended to empower rural workers, stabilizing agricultural production and addressing rural poverty.