

Title: Suprema T. Dumo vs. Republic of the Philippines

Facts:

The case entails a land dispute between the heirs of Marcelino Espinas and the heirs of Bernarda Trinidad, in particular, Suprema T. Dumo. Marcelino Espinas purchased a parcel of land in Paringao, Bauang, La Union, and executed dominion acts, including appointing a caretaker, affirming ownership via affidavit, and paying realty taxes. However, the heirs of Bernarda Trinidad counterclaimed the same land, executing a “Deed of Partition with Absolute Sale” in 1987. Notably, Espinas had his registration application for this land dismissed earlier, a decision that the Court of Appeals upheld, finalizing in 1980.

Procedural Posture:

Espinas’ heirs filed a complaint for recovery against Trinidad’s heirs, leading to Dumo moving to dismiss based on *res judicata*, which the RTC denied. Dumo also assessed land registration for two parcels linked to her late mother, Trinidad. The RTC consolidated the registration case with the recovery complaint from Espinas’ heirs. The RTC sided with Espinas’ heirs and dismissed Dumo’s land registration due to insufficient registerable title. Challenging the RTC’s decision, Dumo appealed to the CA, which partially affirmed and modified the lower court’s judgment. Dumo proceeded to raise the matter to the Supreme Court via a petition for review.

Issues:

1. Whether the CA erred by addressing unraised issues like the applicant’s possession commencing on June 12, 1945 or earlier.
2. Whether the requirement of proof of possession starting June 12, 1945 is necessary for Dumo’s land application.
3. Whether the CA failed to consider the evidence proving the land’s alienable and disposable status.
4. Whether Dumo’s right to due process got violated by the CA.

Court’s Decision:

1. Review of Unraised Issues:

The Court emphasized that possession and classification as alienable and disposable are elementary to land registration applications. Thus, reviewing such key qualifications did not constitute a breach of due process and correctly fell under the CA’s remit.

2. Proof of Title and Prescription:

The Court asserted that a land registration applicant must establish the land is alienable and that possession is held since June 12, 1945 under Section 14(1) of PD 1529. Given Dumo and her predecessors' possession dating only to 1948, she failed to meet this criterion. The Court refuted Dumo's claims under Section 14(2), emphasizing the absence of explicit evidence reclassifying the land as patrimonial property.

3. Land's Classification as Alienable and Disposable:

The Court reaffirmed that to disprove the presumption of land as public domain, clear evidence like a certified classification promulgated by the DENR Secretary or President is crucial. Dumo's submissions did not meet such standards.

4. Due Process and Evidentiary Standards:

Dumo's argument on process violation lacked substance as the CA's analysis remained legal and procedural, focusing rightly on law-mandated requisites for land registration.

Doctrine:

PD No. 1529 Section 14 mandates stringent proof of possession from June 12, 1945 or earlier for land registration, emphasizing the public dominion presumption and requirement for corroborating documentation on land classification from authorized state entities.

Class Notes:

Key Elements/Concepts:

- Judicial confirmation of imperfect title requires clear evidence on alienability and disposability.
- Open, continuous, exclusive, and notorious possession should date back to June 12, 1945 or earlier (Section 14(1) of PD No. 1529).
- Proof necessitates certified copies of land classification by the DENR Secretary.
- Prescriptive rights require the land to be explicitly reclassified as patrimonial property (Article 422, Civil Code).

Historical Background:

This case underscores the intricate conflict surrounding property registration in the Philippines, balancing historical dominion concepts and statutory requirements. Historical burden shifting from individual claims to institutional responsibility (DENR certifications) exemplifies evolving jurisprudence and state intervention in land distribution and classification.