

Title: Heirs of Geronimo Restrivera et al. vs. Salvador De Guzman et al. and TRICOM Development Corporation

Facts:

Initial Complaint:

1. **June 26, 1994**: Petitioners filed a complaint for maintenance of peaceful possession with a request for a preliminary injunction against the heirs of Pedro Ermitaño.
2. **Earlier Similar Complaint**: Leonarda Mercado and others filed a similar complaint, leading to the consolidation of the cases by the PARAD.

Decisions and Appeals:

3. **December 12, 1995**: PARAD ruled against petitioners, denying them status as bona fide tenants, and directed them to vacate the property.
4. **Appeals**: Petitioners and Leonarda Mercado et al. appealed to the DARAB, leading to Case Nos. 6086 and 6060 respectively.

Additional Filings:

5. **January 29, 1998**: TRICOM filed for intervention, claiming purchase interest in the disputed land.
6. **September 29, 1998**: DARAB denied TRICOM's motion for intervention initially.
7. **October 5, 1998**: DARAB issued a Joint Decision reversing PARAD's decision, declaring the petitioners bona fide tenants and granting them peaceful possession.

Intervention and Subsequent Decisions:

8. **October 20, 1998**: TRICOM filed motions for reconsideration and for substitution as a party defendant.
9. **November 11, 1998**: Petitioners filed for execution of the now allegedly final DARAB Decision.
10. **March 4, 1999**: DARAB granted TRICOM's intervention motion and withheld its decision's effectivity, pending full determination of all parties' rights.

Later Developments:

11. **April and June 1999**: Petitioners filed urgent motions for execution, which DARAB denied.
12. **October 4, 1999**: TRICOM argued the land was industrial and not covered by CARP.
13. **December 27, 1999**: DARAB issued a modified decision instructing petitioners to vacate the property in favor of TRICOM.

Court of Appeals:

14. **June 1999**: Petitioners sought mandamus in the Court of Appeals for the execution of the DARAB decision.
15. **July 31, 2000**: The Court of Appeals affirmed the DARAB's modified decision.
16. **December 26, 2000**: Petitioners' motion for reconsideration was denied by the Court of Appeals.

Issues:

1. **Finality of October 5, 1998 Decision**: Whether the Decision was final and executory despite the March 4, 1999 Resolution holding its effectivity in abeyance due to TRICOM's intervention.
2. **Validity of TRICOM's Intervention**: Whether TRICOM's intervention in DARAB Case No. 6060 equated to an intervention in DARAB Case No. 6086.
3. **Nature of the December 27, 1999 DARAB Decision**: Whether this decision was merely a follow-through of the March 4, 1999 Resolution.
4. **Necessity for Motion for Reconsideration**: Whether petitioners' failure to file a motion for reconsideration of the December 27, 1999 DARAB Decision was fatal.
5. **Grave Abuse of Discretion**: Whether DARAB committed grave abuse of discretion in its decisions.

Court's Decision:

Finality of the Decision:

1. **Finality Issue**: The Court held that the October 5, 1998 Decision never became final due to the March 4, 1999 Resolution, which suspended its effectivity because TRICOM's motion for intervention was pending before final judgment.

Validity of TRICOM's Intervention:

2. **Intervention Validity**: The Court upheld DARAB's discretion in granting TRICOM's motion to intervene. The motion was timely filed before the final judgment.

Nature of the Modified Decision:

3. **Modification Validity**: The December 27, 1999 Decision was considered a legitimate follow-through initiative based on the March 4, 1999 Resolution, which was necessary to harmonize with justice and to appropriately assess all substantive rights.

Motion for Reconsideration:

4. **Procedural Requirement**: The Court deemed the petitioners' failure to file a motion

for reconsideration as procedural. However, given the circumstances, this omission was fatal to their cause.

Grave Abuse of Discretion:

5. **Abuse of Discretion**: The Court found no grave abuse of discretion by DARAB in allowing TRICOM to intervene, suspending and subsequently modifying its October 5, 1998 Decision.

Doctrine:

1. **Intervention Right**: Intervention is permitted when a party clearly demonstrates a legal interest before the final judgment.
2. **Court's Discretion**: The trial court has broad discretion to allow interventions when the intervenor's rights are substantially affected by the litigation outcome.
3. **Modification of Decisions**: Courts can modify their decisions to align with justice, even after issuance.

Class Notes:

1. **Rule 19, Section 1 (1997 Rules of Civil Procedure)**: Intervention criteria and timing.
 - Legal interest must be actual, material, and immediate.
 - Intervention should not unduly delay or prejudice adjudication.
2. **Legal Authorities**:
 - **Cariño vs. Ofilada**: Defines legal interest needed for intervention.
3. **Procedural Posture**:
 - Motion for reconsideration is necessary before elevating findings to a higher court.

Historical Background:

- **Agrarian Reform Context**: The case reflects the broader land reform efforts under the Comprehensive Agrarian Reform Program (CARP) in the Philippines, where land ownership conflicts arise between heirs of original landowners and tenants. The case displays the complexities in resolving agricultural land disputes post-CARP implementation, emphasizing tenants' rights and land allocation transitions to corporative entities.