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Title

****Spouses Gonzalo T. Dela Rosa & Cristeta Dela Rosa vs. Heirs of Juan Valdez and Spouses Potenciano Malvar & Lourdes Malvar****

Facts

In Civil Case No. 00-6015, *Manila Construction Development Corporation of the Philippines (MCDC) filed a complaint before the Regional Trial Court (RTC) of Antipolo City for quieting of title and nullification of transfer certificates of title regarding Lot 4, Psd-76374 in Barrio Sta. Cruz, Antipolo City, Rizal, covering 103 hectares* (the subject property). The defendants included the Spouses Gonzalo and Cristeta Dela Rosa and individuals surnamed De la Cruz. Complaints-in-intervention were filed by North East Property Ventures, Inc. (NEPVI) and the Spouses Juan and Apolinaria Valdez and the Spouses Potenciano and Lourdes Malvar. The Malvars claimed the land through a Deed of Absolute Transfer/Conveyance from the Valdezes, executed on September 6, 2001.

The RTC carefully evaluated the claims and issued an Order on December 16, 2002, granting a writ of preliminary mandatory injunction to place the Valdezes and Malvars in possession of the subject property during the pendency of the case. The Dela Rosas' motion for reconsideration was denied on February 28, 2003.

Aggrieved, the Dela Rosas filed a Petition for Certiorari with the Court of Appeals (CA-G.R. SP No. 76081), arguing grave abuse of discretion by the RTC. The Court of Appeals dismissed the petition. The subsequent motion for reconsideration by the Dela Rosas was also denied.

The case progressed to the Supreme Court via a Petition for Review on Certiorari under Rule 45, with a request for a Temporary Restraining Order (TRO) and/or Preliminary Injunction, challenging the decisions and resolution of the Court of Appeals. The Supreme Court issued a TRO on October 8, 2003, maintaining the status quo pending its final decision.

Issues

1. ****Grave Abuse of Discretion****: Whether the Court of Appeals erred in affirming the RTC's issuance of the writ of preliminary mandatory injunction, allegedly amounting to grave abuse of discretion.
2. ****Evaluation of Evidence****: Whether the Court of Appeals properly appreciated the

exhibits supporting the writ of preliminary mandatory injunction, which the Dela Rosas contend were fake or non-existent.

3. **Prejudgment Allegation**: Whether the issuance of the writ constituted a prejudgment of the case despite the absence of a trial on the merits.

4. **Consideration of Reconsideration Argument**: Whether the Court of Appeals erred in dismissing the arguments raised in the motion for reconsideration by not examining the factual findings of the RTC.

Court's Decision

1. **Grave Abuse of Discretion**: The Supreme Court found that the RTC did not commit grave abuse of discretion as its issuing the writ of preliminary mandatory injunction was based on substantial evidence, including Sales Patent No. 38713 issued to Juan Valdez, which indicated a clear legal right. Thus, the Court of Appeals did not err in upholding the RTC's decision.

2. **Evaluation of Evidence**: The Court ruled that the RTC's thorough evaluation of evidence supporting the Valdezs' and Malvars' claims was justified. The sales patent and subsequent transfers evidenced legitimate claims over the property whereas the Dela Rosas' claims were questionable, being based on a nullified title.

3. **Prejudgment Allegation**: The issuance of the preliminary injunction by the RTC did not constitute a prejudgment on the case's merits. Preliminary injunctions are provisional remedies and do not resolve the main issues of ownership and possession permanently.

4. **Consideration of Reconsideration Argument**: The appellate court did not err in its approach. The RTC's findings used to grant the writ were interlocutory and aimed only at temporary possession during trial, with thorough explanations addressing issues raised during reconsideration.

Doctrine

The Supreme Court reiterated the principles on when writs of preliminary mandatory injunction can be issued: only in cases where there is a clear legal right free from substantial doubt, to preserve the status quo, not as final determination on the merits. The case iterated the necessity of substantial evidence and judicial discretion in granting provisional remedies.

Class Notes

- **Preliminary Injunction**: A legal tool to preserve the status quo pending a final decision by the court. It can be prohibitory (stopping an act) or mandatory (requiring positive action).

- ****Clear Legal Right****: For injunctive relief to be granted, the applicant must demonstrate a clear and existing legal right without significant contradictions.
- ****Grave Abuse of Discretion****: Occurs when judicial power is exercised whimsically or arbitrarily.
- ****Provisional Remedy****: Indicates measures to protect potential final relief without deciding the case's merits.

Relevant Legal Provisions:

- ****Rule 58 of the Rules of Court****:
- Grounds for a preliminary injunction (Section 3)
- Types of injunctions and their application

Historical Background

The case context lies in the Philippine legal tradition of resolving contentious land ownership through quieting of titles. Historically, this allows courts to address conflicts stemming from property disputes, particularly important in addressing issues from land reforms and settlement rights, distinguishing bona fide titles from spurious claims.