

****Title:** Multinational Village Homeowners Association, Inc. vs. Court of Appeals and Multinational Realty and Development Corporation******

****Facts:****

1. The dispute centers on a road connecting Multinational Village in Parañaque, Metro Manila, to Ninoy Aquino Avenue.
2. On March 15, 1989, Multinational Realty and Development Corporation (MRDC) filed a complaint against Multinational Village Homeowners' Association, Inc. (MVHAI) and G-Man Security Agency in the Regional Trial Court (RTC) of Makati.
3. MRDC alleged ownership of the road and claimed that it had allowed MVHAI to use the road, where MVHAI set up a guardhouse manned by G-Man Security Agency.
4. MRDC claimed the defendants were preventing it from using the road to transport construction materials for developing adjacent lots, seeking an injunction and damages.
5. On April 4, 1989, Judge Job B. Madayag issued preliminary injunctions prohibiting MVHAI from blocking MRDC's use of the road and ordered the removal of the guardhouse.
6. MVHAI filed a motion to dismiss on July 20, 1989, citing lack of jurisdiction and *litis pendentia*, which was denied on October 3, 1989.
7. MVHAI sought certiorari from the Court of Appeals (CA), which was denied on January 29, 1991.
8. MVHAI then petitioned the Supreme Court, challenging the RTC's jurisdiction and alleging forum-shopping due to a pending administrative case before the Housing and Land Use Regulatory Board (HLURB).

****Issues:****

1. Whether the RTC had jurisdiction over the complaint filed by MRDC.
2. Whether the pending administrative case at the HLURB constituted *litis pendentia*, barring the civil case.
3. Whether the civil case filed by MRDC constituted forum-shopping.

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

1. ****Jurisdiction of the RTC:****
 - The Supreme Court ruled that RTC had proper jurisdiction since the complaint involved a direct assertion of ownership over the disputed road property, which is within the RTC's domain.
 - The Court emphasized that jurisdiction is determined by the allegations in the complaint, not by defenses or motions by the defendant.

2. **Litis Pendentia:**

- The requisites for litis pendentia, which include identical parties, rights asserted and relief sought, and a possible res adjudicata effect, were not met.
- The administrative and civil cases did not share identical causes of action; the administrative case involved failure to provide amenities, while the civil case concerned property rights over the road.

3. **Forum-shopping:**

- The Court found no forum-shopping by MRDC. The administrative case's decree was acceptable to MRDC, and there was no evidence of MRDC seeking contradictory judgments in different forums.
- The civil action arose due to specific conduct (obstruction of road use) by MVHAI, necessitating a separate judicial remedy.

Doctrine:

- Jurisdiction is determined solely by the plaintiff's allegations in the complaint, not by the defendant's responses or motions.
- The principle of litis pendentia requires complete identity of parties, subject-matter, and causes of action between the two cases.
- Forum-shopping involves seeking favorable outcomes in different forums but does not apply when claims are distinct and have arisen from subsequent different wrongful acts.

Class Notes:

- **Jurisdiction:** Based on complaint allegations, not defenses (Magay v. Estiandan).
- **Litis Pendentia:** Requires identity of parties, rights, and res adjudicata potential (Olayvar v. Olayvar).
- **Forum-shopping:** Involves seeking favorable judgments in different forums for the same cause (Villanueva v. Adre).

Historical Background:

- The case reflects the clarification of judicial and administrative jurisdiction boundaries during the late 1980s in the Philippines, especially regarding land use and property disputes.
- The decision underscored the importance of judicial boundaries and was significant in establishing the practical application of litis pendentia and forum-shopping doctrines in Philippine jurisprudence.