

**\*\*Title:\*\***

Francisco Bernarte, et al. v. Court of Appeals, et al.

**\*\*Facts:\*\***

1. **\*\*Initial Complaint and Parties:\*\***

- On October 5, 1989, Estrella Arastia, representing herself and the heirs of Teodorica Reinales Arastia, Letecia Arastia-Montenegro, and Juanita Arastia, filed a complaint under Section 73(b) of Republic Act No. 6657 (Comprehensive Agrarian Reform Law of 1988) against petitioners (Francisco Bernarte and others) before the Regional Trial Court (RTC) of San Fernando, Pampanga, Branch 48, acting as a Special Agrarian Court. This was docketed as Agrarian Case No. 2000.

- Petitioners, organized as Anibang Manggagawa sa Agricultura (A.M.A.), allegedly intruded on 210 hectares of land in Lubao, Pampanga. They burned sugarcane plants, cultivated small portions, leading to the land's abandonment by civil lessee Rustico Coronal.

2. **\*\*Respondent's Allegation:\*\***

- Arastia claimed no tenancy relationship per the Department of Agrarian Reform's (DAR) definite findings.

3. **\*\*First Motion and Injunction:\*\***

- Petitioners moved to dismiss the complaint, asserting jurisdiction lay with the Department of Agrarian Reform Adjudication Board (DARAB) per Republic Act No. 6657, Section 50.

- On November 2, 1989, the RTC denied this motion, issued a writ of preliminary injunction, and on April 25, 1990, again denied petitioners' reconsideration motions.

4. **\*\*Writ of Preliminary Injunction:\*\***

- Orders enforced the issuance, backed by police officers.

5. **\*\*Petition for Certiorari:\*\***

- Filed on July 17, 1991 (G.R. No. 100663), questioning RTC's jurisdiction. Dismissed by the Supreme Court on July 31, 1991, due to non-compliance with Circular No. 1-88.

6. **\*\*DARAB Case No. 161-P'89:\*\***

- On November 29, 1989, petitioners filed a case against Arastia with DARAB alleging illegal eviction and destruction of property, seeking damages and an injunction.

- BARCs confirmed petitioners' possession of the land.

- DARAB issued orders favoring petitioners on December 7, 1990.

7. **Writ of Preliminary Injunction Execution by Petitioners:**

- Resumed occupation based on DARAB's writ. Resulted in police reminder of the RTC's earlier injunction, and subsequent arrest for resistance on October 8, 1992.

8. **Criminal Charges:**

- Petitioners charged with direct assault on agents of authority (Criminal Case No. 5999), later transferred to Regional Trial Court Guagua (Criminal Case No. 3171).

9. **Habeas Corpus Petition:**

- Filed and contested before the Court of Appeals and eventually the Supreme Court.

**Issues:**

1. **Conflict of Jurisdiction:**

- Does the Regional Trial Court or the Department of Agrarian Reform Adjudication Board have jurisdiction over Agrarian Case No. 2000?

2. **Validity of Arrest:**

- Was the arrest of the petitioners legal considering their reliance on the DARAB's writ?

3. **Effect of Non-compliance Dismissal:**

- Does dismissal of an initial certiorari petition for technical non-compliance validate the questioned lower court order?

**Court's Decision:**

1. **Jurisdiction:**

- The RTC's assumption of jurisdiction was valid as the complaint's allegations are the determinant, and it had not been juridically voided.

2. **Validity of Arrest:**

- The arrest was lawful as petitioners resisted the RTC's writ, causing immediate criminal conduct under Sec. 5(a), Rule 113. The pending charges and bail posting further legitimized their continued detention.

3. **Effect of Non-compliance Dismissal:**

- The dismissal with non-compliance constituted a judgment on the merits, invoking res judicata, preventing re-litigating of the RTC's jurisdiction.

**Doctrine:**

- Jurisdiction is primarily determined from the complaint's allegations.

- Dismissal for technical reasons (Circular No. 1-88) is tantamount to res judicata on the substantive issue.
- An arrest without a warrant is lawful if an offense has just been committed and witnessed by officers.

**\*\*Class Notes:\*\***

- **\*\*Jurisdiction Determination:\*\*** Focus on complaint's allegations (Petitioner's defensive contentions not determinative).
- **\*\*Res Judicata Effect:\*\*** Technical dismissals can operate substantively (see Circular No. 1-88).
- **\*\*Arrest Without Warrant:\*\*** Sec. 5(a), Rule 113—personal knowledge of the immediate commission of a crime validates warrantless arrests.
- **\*\*Agrarian Law Application:\*\*** Courts must assess specific allegations and existing relations to confirm jurisdiction (refer to R.A. 6657).

**\*\*Historical Background:\*\***

- Post-EDSA Revolution: Redistributive agrarian reframing influenced numerous property disputes involving assertion of tenancy and ownership rights.
- Implementation of Comprehensive Agrarian Reform Law aimed to recalibrate land ownership, often leading to jurisdictional contests between regular courts and DAR.