

****Title:** Astudillo v. Board of Directors of People’s Homesite and Housing Corporation et al., G.R. No. L-26824 (1976)******

****Facts:****

1. ****Application and Approval****:

- On December 28, 1957, Ramon P. Mitra, on behalf of his minor son, Ramon Mitra Ocampo, applied to purchase Lot 16, Block E-155, East Avenue Subdivision from the People’s Homesite and Housing Corporation (PHHC).
- On January 3, 1958, PHHC approved Mitra’s application.

2. ****Payments and Sales Contract****:

- Mitra made an initial payment of P840, equivalent to 10% of the lot’s price.
- On September 9, 1961, PHHC and Mitra executed a contract of conditional sale for the lot.
- Mitra completed the payments totaling P9,000+.
- On February 18, 1965, the final deed of sale was executed to Mitra, and Transfer Certificate of Title No. 89875 was issued on March 1, 1965.

3. ****Astudillo’s Claim****:

- Peregrina Astudillo had been residing on Lot 16 since 1957, constructing a residential shanty there. She admitted to squatting on the lot continuously.
- On February 24, 1963, Astudillo requested PHHC’s administrative committee to cancel Mitra’s award and re-award the lot to her, which was not acted upon.
- On May 3, 1965, Astudillo filed a petition for certiorari and mandamus in the Court of First Instance of Rizal, challenging the lot’s sale to Mitra and seeking its sale to her instead.

4. ****Lower Court Proceedings****:

- Respondents filed motions for summary judgment, assuming there was no genuine issue of material fact.
- Astudillo opposed the motion.
- Lower court dismissed her petition, labeling her a mala fide squatter and ruling that certiorari and mandamus were inappropriate remedies.
- Astudillo appealed to the Supreme Court.

****Issues:****

1. Whether the lower court erred in ruling that certiorari and mandamus were not appropriate remedies to challenge the sale.

2. Whether Astudillo had a right to question the PHHC's award and compel a sale of Lot 16 to her.
3. Whether the sale to Mitra was in violation of the Anti-Graft and Corrupt Practices Law and the constitutional provision against financial interest in government contracts by a Senator or Representative.

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

1. ****Certiorari and Mandamus****:

- The Court upheld that certiorari and mandamus were not appropriate remedies.
- PHHC's actions were corporate and proprietary, not decisions of judicial nature requiring jurisdictional correction.
- Mandamus could not compel PHHC to sell the lot to Astudillo, as it was not a ministerial duty.

2. ****Right to Question Award****:

- The Court ruled Astudillo had no cause of action to annul the sale to Mitra or compel PHHC to sell the lot to her.
- As a squatter, she held no possessory or ownership rights over Lot 16.
- PHHC's actions did not breach any of her legal rights.

3. ****Anti-Graft and Corrupt Practices Law and Constitution****:

- The Court did not delve deeply into constitutional and anti-graft claims since Astudillo had no standing to raise these issues.
- As this was not the proper forum for such allegations, they need not be resolved here.

****Doctrine:****

1. ****Squatter's Rights****:

- Squatters hold no legal possessory rights and cannot claim entitlement to property sales or challenge property awards (Bañez v. Court of Appeals; Kempis v. Gonzales).

2. ****Certiorari and Mandamus Restrictions****:

- Certiorari addresses jurisdictional errors in judicial decisions, not corporate actions (Rule 65, Rules of Court).
- Mandamus can only compel ministerial duties, not contractual obligations (Quiogue v. Romualdez).

****Class Notes:****

1. ****Squatter's Rights****:
 - No possessory or proprietary rights.
 - Cannot compel the government to sell occupied land.

2. ****Certiorari (Rule 65, Section 1)****:
 - Applies to jurisdictional errors by judicial entities.
 - Not applicable to administrative or corporate actions.

3. ****Mandamus (Rule 65, Section 3)****:
 - Compels performance of ministerial duties.
 - Cannot enforce private contractual obligations not fully performed by either party.

****Historical Background:****

This case took place during a time of heightened government focus on squatter incidents in the Philippines. The ruling reflected ongoing legal challenges in dealing with unauthorized occupations and the legislative measures aimed at addressing housing issues among low-income segments. The merging and restructuring of housing authorities (e.g., PHHC into National Housing Authority) were part of broader efforts to better manage urban housing needs.