

****Title:**** Spouses de Ocampo, et al., vs. Federico Arlos, et al.

****Facts:****

1. On April 14, 1977, Federico Arlos and Teofilo Ojerio filed an application for registration (Land Registration Case No. N-340) to confirm their titles to three parcels of land in Cabcaben, Mariveles, Bataan. This land included Lot 1 (111,333 square meters) and Lot 2 (63,811 square meters).
2. Spouses Geminiano and Amparo de Ocampo and Pedro and Crisanta Santos opposed the application, claiming co-ownership of Lots 1 and 2 based on Transfer Certificates of Title (TCT Nos. T-43298 and T-44205) obtained through sales patents.
3. The Republic of the Philippines also opposed the application, stating that the lands belong to the public domain.
4. On February 20, 1981, the Arlos and Ojerio spouses filed Civil Case No. 4739 to cancel the titles of various parties, including the de Ocampos and Santos.
5. On July 31, 1991, RTC, Branch 1, Balanga, Bataan consolidated Civil Case No. 4739 with the land registration case.
6. The trial court ruled in favor of canceling the sales patents and TCTs of the de Ocampos and Santos, confirming title in favor of Arlos and Ojerio.
7. The Court of Appeals affirmed this decision.

****Issues:****

1. Whether the Court of Appeals erred in disregarding the Supreme Court's prior decision (G.R. No. 64753) validating petitioners' titles.
2. Whether the Court of Appeals properly ordered the cancellation of petitioners' Sales Patents and TCTs.
3. Whether the Court of Appeals correctly ruled that petitioners committed misrepresentation in their application for Sales Patent.
4. Whether the Court of Appeals erred in awarding attorney's fees to respondents.

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

1. ****Registration of Respondents' Title:****

- The court emphasized that for a land title to be confirmed under Section 48 of the Public Land Act, the land must be alienable and disposable. The land in question was formerly a U.S. military reservation and only became disposable in 1971. Therefore, respondents' claim that they or their predecessors had occupied the land since 1947 could not be validated by

law.

2. **Cancellation of Petitioners' Titles:**

- The court held that the cancellation of a title issued via a government grant is between the grantor (government) and grantee (petitioners), and can only be initiated by the Solicitor General. Thus, respondents were not the appropriate party to file the suit. Since respondents could not demonstrate superior title, the registration of petitioners' titles remained valid.

3. **Misrepresentation and Fraud:**

- The trial court's finding of fraudulent representation by petitioners was deemed insufficient to cancel the patents and titles without the appropriate action being initiated by the state, and respondents' claims were thus inadequate to pursued this.

4. **Awarding Attorney's Fees:**

- As a consequence of the reversed decisions on main issues, the award for attorney's fees in favor of respondents was also overturned.

Doctrine:

- Only the Office of the Solicitor General may institute actions for the reversion of public lands improperly alienated.

- Under the Public Land Act, occupation of military reservation lands prior to their reclassification as alienable does not ripen into ownership.

Class Notes:

- **Public Land Act:** Essential law governing applications for confirmation of title to public lands. Section 48(b) requires 30-year possession and the land being alienable.

- **Reversion vs. Reconveyance:** Reversion suits involve reclaiming improperly titled land by the state, while reconveyance involves correcting titles between private parties.

- **Doctrine of Indefeasibility:** A Torrens title becomes indefeasible after a set period unless challenged by the state.

Historical Background:

This case arises from a common issue in the Philippines concerning land ownership over areas previously classified as public domain or military reservations. The transformation of such lands into private ownership often involves complex legal layers, reflecting tensions

between historical land use, government reclassification, and land administration practices. This context underlies many land title disputes in the country, highlighting the evolving jurisprudence in land registration and reversion.