

Title: **Tortal v. Taniguchi**

Facts:

1. **Marriage and Property Acquisition:** On June 8, 1999, Jerson E. Tortal married Chizuru Taniguchi. The couple lived in a house and lot in BF Homes, Parañaque City, registered under Tortal's name with Taniguchi as his spouse on Transfer Certificate of Title (TCT) No. 142089.
2. **Petition for Nullity of Marriage:** On April 11, 2000, Taniguchi filed for nullification of her marriage to Tortal at the Regional Trial Court, Parañaque City, docketed as Civil Case No. CV-00-0149.
3. **Annulment Decision:** On August 25, 2003, the Regional Trial Court granted the annulment, declaring the marriage void and awarding the house and lot exclusively to Taniguchi. The decision became final and executory on October 14, 2005.
4. **Collection Case and Compromise Agreement:** Concurrently, Sevillana P. Sales filed a collection case against Tortal, resulting in a compromise agreement in the Regional Trial Court, Calauag, docketed as Civil Case No. C-1262.
5. **Levy and Auction of Property:** On December 3, 2003, the house and lot were levied and auctioned to Sales pursuant to the compromise judgment.
6. **Complaint for Annulment of Levy and Sale:** Taniguchi filed for annulment of the levy and sale on May 24, 2005, leading to Civil Case No. 05-0198 in Parañaque City, asserting her property rights as awarded by the annulment decision.
7. **Injunction:** On September 14, 2005, a preliminary injunction against the Register of Deeds of Parañaque was issued preventing any transfer of TCT No. 142089 to Sales.
8. **RTC Decision on Levy and Sale:** On October 28, 2011, the Parañaque RTC made the injunction permanent and nullified the levy and sale to Sales, awarding damages to Taniguchi.
9. **Appeals to Court of Appeals:** Tortal and Sales appealed the RTC decision, which were dismissed by the Court of Appeals on December 13, 2013, and May 14, 2014, upholding the nullification of the sale.

10. **Petition for Review:** Tortal filed a Petition for Review on Certiorari before the Supreme Court, alleging improper service of summons in the annulment case and questioning Taniguchi's capacity as a foreigner to own property in the Philippines.

Issues:

1. **Jurisdiction and Validity of Marriage Annulment:** Whether the Regional Trial Court had jurisdiction to annul Tortal's marriage due to alleged improper service of summons.
2. **Ownership of Property by a Foreign National:** Whether Taniguchi, being a foreign national, could legally own property in the Philippines.
3. **Res Judicata and Annulment of Judgment:** Whether the finality of the annulment decision could be contested in subsequent proceedings related to the property levy and auction sale.

Court's Decision:

1. **Jurisdiction and Procedure:** The Supreme Court ruled against Tortal, affirming that the challenge to jurisdiction due to improper summons should have been brought as a separate annulment of judgment under Rule 47, rather than in ancillary proceedings.
2. **Doctrine of Res Judicata:** The Court upheld the doctrine of res judicata, noting that the annulment decision, having become final and executory, was conclusive of the property's ownership and was binding in subsequent litigation.
3. **Foreign Ownership:** The Court found that issues regarding Taniguchi's nationality and property ownership were not properly raised and litigated in earlier proceedings, and therefore, could not be revisited.

Doctrine:

- **Annulment of Judgment:** Under Rule 47, lack of jurisdiction and extrinsic fraud are grounds for annulment. An improper challenge to a prior judgment is barred under res judicata once the judgment becomes final.
- **Res Judicata:** A final judgment or order is conclusive and bars relitigation of issues that were decided or could have been raised in that proceeding.

Class Notes:

- **Key Concepts:** Jurisdiction, service of summons, res judicata, annulment of judgment, Rule 47, property ownership by foreigners.

- **Statutory Provisions:** Rules of Court, Rule 47, Sections 1-3.

Historical Background:

This case occurred in the context of a legal system grappling with issues of property rights, particularly in the context of foreign ownership, and procedural rules governing judgments' finality. It underscores the importance of proper judicial procedure and the doctrines that ensure the certainty and finality of legal decisions in contentious marital and property relations.