

****Angelina Dayrit, represented by Julie E. Dayrit vs. Jose I. Norquillas, et al.****

****Facts:****

Angelina Dayrit was the registered owner of two parcels of land in Bolisong, El Salvador, Misamis Oriental. One parcel was covered by Original Certificate of Title No. P-13388 and the other by Transfer Certificate of Title (TCT) No. T-1804. In 1993, these parcels were placed under the Comprehensive Agrarian Reform Program (CARP), leading to the cancellation of Dayrit's titles and the issuance of Certificates of Land Ownership Awards (CLOA) to the respondents. Angelina filed for the annulment of these CLOAs before the Department of Agrarian Reform Adjudication Board (DARAB) and also applied for an exemption from CARP coverage.

While the annulment case was pending, Angelina claimed that respondents surreptitiously entered and refused to vacate the property, prompting her to file a forcible entry complaint.

At the Municipal Circuit Trial Court (MCTC), Angelina prevailed, with the court ordering the respondents to vacate the land. The decision was upheld by the Regional Trial Court (RTC). However, the Court of Appeals (CA) later overturned these rulings, stating that the DARAB had jurisdiction over the matter as it was linked to an agrarian dispute.

Angelina filed a petition for review on certiorari with the Supreme Court (SC), contesting the CA's decision.

****Issues:****

1. Whether the MCTC has jurisdiction over the complaint for forcible entry.
2. Whether the case is an agrarian dispute falling under the jurisdiction of the DARAB.

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

The Supreme Court denied the petition and ruled that the MCTC had no jurisdiction over the case. The Court emphasized the following key points:

1. ***Jurisdiction by Law:** Jurisdiction is determined by the allegations in the complaint and conferred by law. The case in question involved an agrarian dispute;
2. ***Clarification of Jurisdiction:** The decision relied on the Comprehensive Agrarian Reform Law (CARL) and its amendment (RA 9700) that provide the DARAB with primary jurisdiction over agrarian disputes;
3. ***Application of David vs. Cordova and Chailese Development Co., Inc. vs. Dizon:** In contrast to David where the dispute was not agrarian, it was relevant here given that both

elements of an agrarian dispute were present;

4. ***Findings on Agrarian Dispute:*** The respondents' consistent claims and the subsisting CLOAs indicated an agrarian dispute. Also, Angelina had filed petitions with the DARAB related to the same land and parties, acknowledging the agrarian nature of the dispute.

****Doctrine:****

The doctrines established or reiterated by this case include:

1. ****Primacy of DAR jurisdiction in Agrarian Disputes:**** The DARAB has primary and exclusive original jurisdiction over any matter involving the implementation of agrarian reform, including possession issues that are intricately linked with agrarian disputes.
2. ****Mandatory Referral Mechanism:**** Section 50-A of RA 6657 mandates that cases with allegations involving agrarian disputes be referred to the DAR for initial determination, even if a regular court originally has jurisdiction over the matter.

****Class Notes:****

Key elements and concepts for this case include:

- ****Agrarian Dispute (defined by Sec. 3(d) RA 6657):**** Involves issues on tenurial arrangements, compensation for acquired lands, and conditions for ownership transfer from landowner to tenant farmer.
- ****Jurisdiction of Regular Courts:**** Exclusive original jurisdiction over forcible entry does not apply to disputes involving agrarian reform as defined by law.
- ****Exclusive Jurisdiction of DAR:**** Reinforced by RA 9700, stressing automatic referral to DAR when agrarian dispute elements are present.

****Historical Background:****

This case occurs within the broader context of the Philippine Comprehensive Agrarian Reform Program (CARP), enacted to address the equitable distribution of agricultural lands among landless farmers and tenants. Conflicts over whether disputes fall under regular court jurisdiction or the DAR have been prevalent, reflecting ongoing tensions in the agrarian reform process. The SC's decision aims to clarify these jurisdictional boundaries, ensuring that agrarian disputes receive proper adjudication within the specialized framework of the DAR.