

Title: Pasion vs. Melegrito (548 Phil. 302)

Facts:

1. **Filing of Complaint for Forcible Entry** (4 February 1999) - Simplicio R. Melegrito, represented by Anselma Timones, filed a forcible entry complaint against Filipina M. Bueno, Divina M. Bueno, and Regina M. Bueno (the Bueno sisters) in the 5th Municipal Circuit Trial Court (MCTC) of Gerona, Tarlac. The complaint alleged that the Bueno sisters built a two-story concrete residential structure on Melegrito's land without his consent and refused to vacate despite notice and demand.
2. **MCTC Judgment** (22 July 1999) - The MCTC ruled in favor of Melegrito, ordering the Bueno sisters to vacate the property, pay attorney's fees and damages representing monthly rent, and cover the costs of the suit.
3. **RTC Appeal** (13 December 1999) - The Bueno sisters appealed the MCTC's decision to the Regional Trial Court (RTC) of Tarlac, Branch 63. The RTC reversed the MCTC's decision and dismissed the case.
4. **Court of Appeals Review** (16 June 2000) - Melegrito appealed to the Court of Appeals (CA) which reversed the RTC's decision and reinstated the MCTC's judgment.
5. **Execution of MCTC Judgment** (28 June 2001 & 12 September 2002) - The MCTC issued a writ of execution, followed by a writ of demolition, after the Bueno sisters failed to comply with the judgment.
6. **Nora Bueno Pasion's Complaint** (4 November 2002) - Nora Bueno Pasion, the agricultural tenant and sister of the Bueno sisters, filed an injunction suit to prevent the demolition of the structure, claiming ownership of and occupation of the house as a reconstructed family home.
7. **RTC Temporary Restraining Order (TRO) & Denial of Injunction** (7 November 2002 & 10 December 2002) - The RTC of Tarlac, Branch 65 issued a temporary restraining order but later denied the preliminary injunction.
8. **Petition for Certiorari** (8 January 2003) - Pasion filed a Petition for Certiorari under Rule 65 with the CA asserting the judge of the RTC Branch 65 abused discretion by allowing the demolition.
9. **Court of Appeals Decision** (5 May 2004) - The CA denied Pasion's petition, holding she was not the owner of the house to be demolished.
10. **Motion for Reconsideration** (15 December 2004) - Denied by the CA.
11. **Supreme Court Petition** - Subsequently, Pasion filed a petition for review with the Supreme Court under Rule 45.

Issues:

1. **Main Issue:** Whether the RTC's denial of Pasion's prayer for an injunction to stop the demolition of the building to which she claims ownership was tenable.
2. **Sub-Issue:** Whether Pasion's claim of ownership and occupation over the structure gives her a right to be protected by injunction despite not being a party in the original forcible entry case.

Court's Decision:

1. **Denial of Injunction Justified:** The Supreme Court upheld the CA's findings that Pasion didn't qualify for the injunction as she did not demonstrate a clear right to the property that needed protection. The evidence indicated the structure was built by her sisters, the defendants in the original forcible entry case.
2. **Petitioner Bound by Judgment:** Pasion, as a relative of the Bueno sisters, fell into the category of persons who can be bound by the ruling against their family members in an ejectment suit.
3. **Principle of Equitable Estoppel Applied:** The principle of equitable estoppel prevented Pasion from asserting ownership over the house, given that she had not raised any claims or taken necessary actions to protect her interest earlier in the proceedings.
4. **Execution of Final Judgment:** The court reiterated that respondents as prevailing parties in Civil Case No. 1243-99 had the right to have the MCTC's judgment executed. The implementation of the writ of demolition was a ministerial duty of the court.

Doctrine:

1. **Ejectment Judgment Binding on Non-Party Relatives:** Even a non-party who is a relative of the ejectment judgment defendants can be bound by the judgment.
2. **Equitable Estoppel:** A party that, by silence or inaction, leads another to believe a fact may later be estopped from asserting a contrary fact. (Sec. 2(a), Rule 131)
3. **Execution of Final Judgment:** Once a judgment becomes final and executory, execution is a matter of right and the issuance of the writ is a ministerial function.

Class Notes:

- **Injunctions:** A writ of preliminary injunction requires clear proof of a right to be protected and that the act being enjoined violates that right.
- **Estoppel in Pais:** Silence or inaction that misleads others can be grounds for estoppel.
- **Summary Procedure:** Intervention may be prohibited, but affected parties can file separate actions to assert rights.
- **Execution of Judgments:** Execution follows as a matter of right upon finality of judgment (Rule 39, Sec. 1).

****Historical Background:****

This case showcases the rigid application of procedural rules in property disputes and the significant impact of family relations on the enforcement of court judgments. It underscores the judiciary's efforts to balance equitable principles and procedural fairness amid conflicting claims of ownership and possession, aligning with longstanding doctrines of finality and execution of decisions.