

Title: Villeza v. German Management and Services, Inc.

Facts:

1. **Initial Forcible Entry Case**: Ernesto Villeza filed a forcible entry case against German Management and Services, Inc. (hereinafter “German Management”) in the Metropolitan Trial Court of Antipolo City (MeTC). The court ruled in favor of Villeza, and the decision became final and executory on October 5, 1989.
2. **Motion for Issuance of Writ of Execution**: On May 27, 1991, Villeza filed a Motion for Issuance of Writ of Execution with the MeTC.
3. **Motion to Defer Resolution**: Villeza requested to defer the resolution on February 27, 1992, due to his permanent assignment in Iloilo.
4. **MeTC Order**: On February 28, 1992, the MeTC held in abeyance the resolution of the motion for issuance of the writ until Villeza’s return.
5. **Denial of Motion for Lack of Interest**: After a lack of movement for three years, the MeTC denied Villeza’s pending motion for lack of interest in an order dated January 9, 1995.
6. **Motion for Reconsideration**: On May 29, 1998, Villeza filed a Motion for Reconsideration, asserting his continued interest in the issuance of the writ after retiring from his job in Iloilo.
7. **Issuance of Writ**: On October 8, 1998, the MeTC issued a writ of execution.
8. **Opposition and Motion to Quash**: German Management filed an Opposition with Motion to Quash the writ. The MeTC granted the motion on June 3, 1999, citing that judgments not enforced within five years must be enforced by independent action as per Section 6, Rule 39 of the 1997 Rules of Civil Procedure.
9. **Complaint for Revival of Judgment**: On October 3, 2000, Villeza filed a Complaint for Revival of Judgment with the MeTC.
10. **Motion to Dismiss**: German Management moved to dismiss the complaint, contending that more than ten years had elapsed from the finality of the judgment (October 5, 1989) to the filing of the revival complaint (October 3, 2000), thus it was barred by Article 1144 of the Civil Code.

11. **MeTC Decision**: On March 29, 2001, the MeTC denied Villeza's appeal, affirming the motion to dismiss.

12. **RTC and CA Appeals**: Villeza appealed to the Regional Trial Court (RTC) and then to the Court of Appeals (CA), both of which affirmed the MeTC's decision.

13. **Supreme Court Petition**: Villeza filed a Petition for Review on Certiorari under Rule 45 of the Rules of Court.

Issues:

1. **Timing and Prescriptive Period**: Whether the 10-year prescriptive period under Article 1144 of the Civil Code was tolled during the period that Villeza requested the suspension of the issuance of the writ of execution.

2. **Effect of Suspension**: Whether the suspension or deferment of the issuance of the writ of execution requested by the prevailing party impacts the computation of the prescriptive period.

Court's Decision:

1. **Ten-Year Prescriptive Period**: The Supreme Court held that Article 1144 (3) of the Civil Code and Section 6, Rule 39 of the Rules of Court clearly establish a ten-year prescriptive period for the revival of judgments.

2. **No Tolling**: The Court ruled that the petitioner's request for suspension or deferment of the writ's issuance does not toll the prescriptive period. The Court distinguished the cases cited by Villeza, stating they involved delays caused by the losing party, unlike Villeza's case where the delay was self-imposed.

3. **Equity and Exceptions**: The Court acknowledged that while there exist exceptions allowing for an extension due to equity considerations, Villeza's situation does not qualify. The delay was solely attributable to Villeza's actions, and thus, the general rule on the statute of limitations applies.

4. **Affirmed Dismissal**: The Supreme Court affirmed the CA decision, effectively dismissing Villeza's petition for being time-barred.

Doctrine:

1. **Statute of Limitations**: Once a judgment becomes final, it can be enforced within five years by motion; afterward, it must be enforced by independent action within ten years of

the finality of the judgment. Extensions and exceptions in enforcement are only considered when delays are attributable to acts of the losing party.

Class Notes:

- ****Prescriptive Period for Judgments****: Based on Article 1144 (3) of the Civil Code: An action upon a judgment must be brought within ten years from the date of finality.
- ****Rule 39, Section 6 of the Rules of Court****: A judgment can be executed by mere motion within five years; beyond that, it must be executed by independent action within the ten-year statutory limit.
- ****Equitable Exceptions****: Rules may be liberally interpreted when strict compliance results in injustice, but exceptions are narrowly tailored.

Historical Background:

The context of this case dates back to a forcible entry dispute between private parties, highlighting procedural intricacies in the enforcement and revival of judgments within the Philippine legal system. This case illustrates the judiciary's balancing act between ensuring diligent prosecution and allowing exceptions in extraordinary circumstances for equitable relief. The approach taken by the Supreme Court aligns with the doctrinal emphasis on the finality and enforceability of judgments within specific statutory timeframes, shaped by precedents that clarify the practical limits of these rules.