

****Title:**** Republic of the Philippines and The Director of Lands vs. Hon. Numeriano G. Estenzo, et al.

****Facts:****

Lot No. 4273 of the Ormoc Cadastre was declared public land by the Cadastral Court on September 28, 1940. On February 23, 1972, the private respondents, consisting of Tiburcio, Florencia, Fabian, and Gonzala Aotes, petitioned to reopen this decision under Republic Act (RA) 931 as amended by RA 6236, claiming ownership and possession by hereditary succession. They argued their nonappearance during the initial hearing was due to ignorance and excusable neglect and stated their long-term adverse, peaceful, and notorious possession of the land, evidenced by consistent tax payments.

The petitioners, Republic of the Philippines and The Director of Lands, opposed the motion on March 16, 1972, arguing the petitioners' claim was barred by the statute of limitations as per RA 931, which expired on December 31, 1968. However, the respondent judge overruled this opposition on May 9, 1972, setting the case for a June 24 hearing. Subsequently, on July 22, 1972, the respondent judge decided in favor of the Aotes family, voiding the 1940 decision and adjudicating the land to them. Dissatisfied, the petitioners sought review in the Supreme Court, arguing the trial court's lack of jurisdiction due to the expiration of the reopening period mandated by RA 931.

****Issues:****

The primary legal issue was whether RA 6236, extending the time to file applications for free patents and judicial confirmation of imperfect or incomplete titles until December 31, 1976, also extended the period to reopen cadastral proceedings.

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

The Supreme Court held that RA 6236 did not apply to the reopening of cadastral proceedings as it explicitly pertained only to the filing of applications for free patents and judicial confirmations of titles. It emphasized the principle of *expressio unius est exclusio alterius*, stating that the express inclusion of one scenario implies the exclusion of others not mentioned. Since RA 6236 did not explicitly extend the period for reopening cadastral cases, unlike its predecessor RA 2061, the extension did not apply. The court reasoned this omission indicated a clear legislative intent not to include cadastral reopenings in the extensions.

Therefore, the Supreme Court concluded the lower court had exceeded its jurisdiction by

entertaining and granting the petition for reopening after the legal timeframe had expired. The decision from 1940 declaring the land as public remained final and conclusive, supported by the principle of res judicata.

**Doctrine:**

The Supreme Court reasserted the doctrines of statutory construction, particularly *expressio unius est exclusio alterius* (the express mention of one thing excludes all others), and *res judicata* (a matter adjudged by a competent court and resolved as final cannot be litigated again between the same parties).

**Class Notes:**

- **Statutory Construction:** The interpretation of law by courts, employing various principles and maxims to elucidate legislative intent when statutes are ambiguous or silent on specific issues.
- Application: *Expressio unius est exclusio alterius* applied to RA 6236's silence on cadastral reopening as an indication of legislative intent to exclude it from the law's provisions.
- **Res Judicata:** A final judgment on the merits by a court of competent jurisdiction is conclusive regarding the rights of the parties and their privies in all other actions involving the same matter.
- Application: The 1940 Cadastral Court decision declaring the land public was not subject to reopening or challenge due to the principle of *res judicata*.

**Historical Background:**

The case highlights the complexities and nuances of land ownership and judicial processes in the Philippines. The original cadastral declaration in 1940, its contestation decades later, and the legislative changes over time illustrate the evolving legal landscape concerning land registration and claims. This decision underscores the importance of statutory deadlines and the finality of court decisions in providing stability and predictability in land ownership disputes.