Title: Pedro Lim v. Perfecto Jabalde

Facts:

Pedro Lim initiated a specific performance action on 29 August 1968 against Perfecto Jabalde to compel Jabalde to execute a deed of reconveyance for seven parcels of land in Cebu City. This stemmed from a previous case wherein to satisfy a court-ordered writ of execution for support arrears against Laurence D. Abella, the Provincial Sheriff of Cebu levied Abella's right of repurchase under a deed of sale with right to repurchase with Jabalde. Lim, having won the bid for this right at a public auction, sought to exercise the right to repurchase these lands from Jabalde. Jabalde refused, citing an extension he purportedly granted to Abella. Following Lim's deposit of the repurchase price with the court after Jabalde's refusal to repurchase, Lim filed the specific performance case. The trial proceeded on a stipulation of facts, leading to a 21 January 1969 decision in Lim's favor, which ordered Jabalde to execute the conveyance deed.

Jabalde's repeated motions for reconsideration were denied, and upon Lim's motion, the court issued a writ to execute its decision. Jabalde's motion to quash the writ was denied, and subsequent motions and evidentiary submissions attempting to invalidate the execution sale were rejected by the trial court initially but inexplicably granted on a motion that effectively constituted a fourth attempt at reconsideration. The trial court annulled its decision, prompting Lim to appeal. The Court of Appeals certified the appeal to the Supreme Court, recognizing only questions of law were involved.

Issues:
1. Whether the trial court had jurisdiction to reopen a case after its decision became final and executory, based on allegations of irregularities in the execution of its judgment.
2. Whether such alleged irregularities can be considered "new facts and circumstances" warranting the reopening of the case.
3. Whether the stipulation of facts during pre-trial, which did not contest the validity of the auction sale and subsequent events, precluded Jabalde from raising issues relating to the execution sale.

Court's Decision:
The Supreme Court set aside the trial court's order that reopened the case, reinstating its decision dated 21 January 1969. The Supreme Court held that no new facts emerged after the judgment became final that would render execution unjust or impossible. The alleged irregularities were already in existence and could have been raised during the trial.

Furthermore, the trial court had lost jurisdiction once its decision became final and executory, with limited exceptions not applicable in this instance. Additionally, the stipulation of facts during pre-trial was binding and precluded contradictory evidence.

Doctrine:
1. Once a decision becomes final and executory, the trial court loses jurisdiction over the case except for matters related to its execution.
2. Judicial admissions made during pre-trial cannot be contradicted unless shown to have been made through palpable mistake.

Class Notes:
– **Finality of Judgment**: Once a court's decision is final and executory, it is unalterable and can only be executed, subject to exceptions like clerical errors or supervening events which make execution impossible or unjust.
– **Judicial Admissions**: Statements made by a party during judicial proceedings, like stipulations of fact during pre-trial, are binding and cannot be later contradicted unless proven to have been made under a mistake or misunderstanding.
– Relevant Legal Provisions:
– Revised Rules of Court, Section 2, Rule 129 (Judicial Admissions).
– Revised Rules of Court, Rule 37 (Grounds for New Trial and Reconsideration).

Historical Background:
This case underscores the importance of the doctrine of finality of judgment in Philippine jurisprudence, ensuring stability in legal proceedings and respect for court decisions. The dispute emerged from intertwined legal actions involving property rights and obligations, reflecting the complexity of legal disputes and the procedural mechanisms in Philippine courts aimed at resolving such issues.