

Title: Roman Catholic Archbishop of Caceres vs. Heirs of Manuel Abella

Facts:

The case revolves around a conflict over a one-hectare parcel of land situated beside the Peñafrancia Basilica in Naga City, covered under Tax Declaration No. 004.1152, claimed by the Roman Catholic Archbishop of Caceres (petitioner) and the Heirs of Manuel I. Abella (respondents). The petitioner argued the land was donated to it in 1981 by the respondents in exchange for monthly masses for the soul of Don Manuel I. Abella, a claim the respondents denied, stating the petitioner fenced and encroached upon the land without consent.

This legal dispute entailed a series of litigations beginning with a forcible entry case (Civil Case No. 8479) decided in favor of the Archbishop, a decision upheld by both the Regional Trial Court (RTC) and the Court of Appeals (CA). Parallely, while the appellate review of the forcible entry case was pending, the respondents initiated a "Quieting of Title" case (Civil Case No. 89-1802), which ultimately declared the respondents as the rightful owners. The Archbishop's motion for execution of the forcible entry case was denied by the trial court, leading to a petition for certiorari and mandamus, which was also denied, sustaining the validity of the trial court's order.

Issues:

1. Whether the final and executory judgment in the quieting of title case, which adjudicated the respondents as the land's owners, constitutes a supervening event that justifies the non-enforcement of the final judgment in the preceding forcible entry case.

Court's Decision:

The Supreme Court denied the petition, affirming the decisions of the Court of Appeals, which held that the judgment in the quieting of title case is a supervening event. It invalidated the enforceability of the judgment in the forcible entry case despite its finality. The Court stressed that any decision regarding ownership in an ejectment case is provisional and not conclusive. The conclusive ruling in the quieting of title case, which declared the respondents as the absolute owners, rendered the petitioner's claim for possession baseless. The Court criticized the petitioner for attempting to alter its theory on appeal, which was contrary to the principle of immutability of final judgments, highlighting that supervening events are exceptions to this principle.

Doctrine:

The principle of immutability of final judgments is subject to exceptions, such as supervening events - facts transpiring or circumstances developing after a judgment has become final and executory that materially affect the rights and obligations of the parties involved.

Class Notes:

- **Immutability of Final Judgments:** A legal principle indicating that a final judgment cannot be altered, amended, or reversed, subject to certain exceptions like supervening events.
- **Supervening Events:** Facts or developments occurring after a judgment has become final that substantially change the situation of the parties or their rights and obligations.
- **Provisional Determination of Ownership in Ejectment Cases:** In forcible entry or unlawful detainer cases, any determination regarding ownership by the court is only provisional and is aimed solely at resolving who has the better right to possess the property temporarily.

Historical Background:

This case exemplifies the complex legal disputes over property ownership and possession that can arise when formal documentation of agreements (such as donations) is lacking or contested. It underscores the Philippine judicial system's handling of such disputes, where decisions from ejectment cases and title quieting cases can intersect and lead to conflicting conclusions, necessitating a resolution based on principles such as the immutability of final judgments and the concept of supervening events.