Title:
Andy Quelnan vs. VHF Philippines, Inc.

Facts:
This case revolves around an ejectment suit filed by VHF Philippines, Inc. (respondent) against Andy Quelnan (petitioner), pertaining to a condominium unit in Manila. The Metropolitan Trial Court (MeTC) of Manila issued a decision on November 23, 1992, in favor of the respondent due to the petitioner's failure to file an answer, deeming service through petitioner's wife as valid. As the decision went unclaimed despite multiple notices, it became final and executory. Subsequently, writs of execution were served to the petitioner's wife on May 18, 1993.

Upon learning about the ejectment suit and the judgment against him, Quelnan filed a Petition for Relief from Judgment with the Regional Trial Court (RTC) on May 24, 1993, claiming he was unaware of the suit due to his wife's actions during a marital squabble, leading to the RTC setting aside the MeTC's decision. The respondent's motion for reconsideration was denied, prompting a direct petition to the Supreme Court which was remanded to the Court of Appeals (CA). The CA reversed the RTC's decision, reinstating the MeTC's original judgment based on the procedural lapse regarding the timelines for filing a petition for relief.

Issues:
1. When is a party deemed to have knowledge of an adverse decision sent via registered mail that remained unclaimed?
2. Does the presumption of completeness of service under Rule 13, Section 10 of the 1997 Rules of Civil Procedure apply concerning the 60-day filing period for a petition for relief from judgment under Rule 38, Section 3?

Court's Decision:
The Supreme Court denied Quelnan's petition, upholding the CA's decision. It held that the 60-day period for filing a petition for relief should be reckoned from when the party is presumed to have knowledge of the judgment, which, in this case, was five days after the first notice given by the postmaster. The Court emphasized strict compliance with the specified periods for filing a petition for relief due to its equitable nature. Since Quelnan filed his petition well beyond the allowed period, his appeal was invalid. The Court also rejected the argument that excusable negligence was present due to the petitioner's wife's actions, stating that a failure to claim registered mail does not constitute excusable neglect.

Doctrine:
The Supreme Court reiterates the doctrine of finality of judgments, emphasizing that judgments must become final at some definite date by law. Moreover, it underscored the presumption of completeness of service by registered mail, which becomes effective upon actual receipt by the addressee or five days after the first notice from the postmaster, whichever is earlier.

Class Notes:
– **Finality of Judgments:** A fundamental principle that judgments of courts must become final at a determined time mandated by law to prevent endless litigation.
– **Rule 38, Section 3 of the Rules of Court:** Petitions for relief from judgment must be filed within 60 days from knowledge of the judgment and not more than six months after such judgment or order was entered.
– **Rule 13, Section 10 of the 1997 Rules of Civil Procedure:** Service by registered mail is complete upon actual receipt by the addressee or after five days from the date he received the first notice of the postmaster, whichever is earlier.
– **Duty of a Litigant:** The responsibility to promptly act upon notices received related to legal proceedings and the consequences of failing to claim registered mail as it pertains to the service of court decisions or orders.

Historical Background:
The backdrop of this case highlights the stringent procedural requirements in Philippine jurisprudence for appealing court decisions, particularly in civil cases like ejectments. It underscores the balance courts must achieve between ensuring finality in litigation and allowing for relief in exceptional circumstances where justice demands flexibility in procedural rules. This case further demonstrates the significance of understanding procedural laws and the severe implications of non-compliance.