

****Title:****

Eugenio Basbas, et al., Petitioners, vs. Beata Sayson and Roberto Sayson, Jr., Respondents.

****Facts:****

1. ****Initial Petition (1976):**** Beata Sayson and her husband Roberto Sayson, Sr. filed a Petition for Registration of an agricultural land in Leyte on September 2, 1976.
2. ****Opposition and Initial Court Decision (1979):**** The Republic of the Philippines and Eugenio Basbas, Teofilo Aras, and Rufino Aras opposed the petition. The Court of First Instance (CFI) of Leyte adjudged the land to the Saysons on March 22, 1979.
3. ****Appeal:**** The oppositors appealed to the Court of Appeals (CA) which affirmed the CFI's decision on July 24, 1985. The decision became final on August 21, 1985.
4. ****Issuance but Non-Enforcement of Writs:**** A Writ of Possession was issued on November 21, 1985, but not enforced. An Alias Writ of Possession issued on April 6, 1989, was also not implemented due to the refusal of Eugenio Basbas, Sr. and his son. A relocation survey was conducted, and the RTC reaffirmed the original decision on September 13, 1989, ordering the respondents to vacate the property.
5. ****Complaint for Revival of Judgment (1995):**** With the order not being implemented within five years, Beata and Roberto Sayson, Jr. filed a Complaint for Revival of Judgment in 1995.
6. ****Procedural Complications:**** Several motions to dismiss were filed by the petitioners, arguing that the respondents had no cause of action and the judgment could not be revived. The pre-trial conference faced delays due to improper service of summons.
7. ****Pre-trial Conferences and Motions:**** After substitution of heirs and further pre-trial conferences, the RTC ordered judgment favoring the respondents based on admissions from the petitioners' answers.
8. ****RTC Ruling (2001):**** The court ordered the revival of the CA's July 1985 decision and the September 1989 order.
9. ****CA Ruling (2004):**** The petitioners' appeal was denied by the CA, affirming the RTC decision.

****Issues:****

1. Whether the RTC erred in granting the motion for judgment on the pleadings and/or summary judgment.
2. Whether the complaint for the revival of judgment states a valid cause of action.

3. Whether the September 13, 1989 order could be the subject of a revival action.
4. The validity and effect of the Special Power of Attorney executed by Beata Sayson empowering her son Roberto, Jr. to represent her in court.

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

1. ****Judgment on the Pleadings and Summary Judgment:****

- The Supreme Court concurred that judgment on the pleadings was improper as the petitioners' answer tendered issues.
- However, it stated that the issues were not genuine and could be resolved without a full-blown trial. This warranted a summary judgment.

2. ****Cause of Action:****

- The Supreme Court found the complaint valid. The RTC's September 13, 1989 order, despite not being the judgment itself, was part of implementing the final judgment from 1985.

3. ****Validity of Revival of Judgment:****

- It was proper to seek the revival of the judgment, including ancillary orders needed to implement the decision.

4. ****Special Power of Attorney:****

- The Supreme Court noted that although SPA was not authenticated, the son could independently as a co-owner pursue the action. Therefore, defects in the SPA would not bar the proceedings.

****Doctrine:****

- ****Rule 39, Sec. 6:**** A final and executory judgment may be enforced by action even after five years but within the statute of limitations.
- ****Summary Judgment:**** This is proper when there are no genuine issues of fact requiring a trial, as per Rule 34 of the Rules of Court.
- ****Co-Ownership Actions:**** A co-owner can independently bring an action for recovery of co-owned property.

****Class Notes:****

1. ****Rule 39, Sec. 6, Rules of Court:**** Execution by motion or independent action.
2. ****Judgment on the Pleadings (Rule 34):**** Appropriate when the answer fails to tender

any issue.

3. **Summary Judgment:** Issued when no genuine factual disputes exist.
4. **Effects of SPA:** Authentication is not critical if the representative has inherent rights independently.
5. **Co-Ownership:** Co-owners can act independently for the benefit of all co-owners.

Historical Background:

This case demonstrates the complexities and procedural hurdles in land registration disputes in the Philippines. The case spans decades, reflecting the enduring nature of land and property disputes in the country. The interplay of court orders, administrative delays, and the changing laws on land registration depict the legal landscape's evolution concerning property rights and judicial enforcement in the Philippines.