

Title: Baranda and Hitalia v. Judge Gustilo, et al. (G.R. No. L-67661, 248 Phil. 205)

Facts:

- Initial Filings and Writs:** Eduardo S. Baranda and Alfonso Hitalia initially filed a petition for reconstitution of title for Lot No. 4517, Sta. Barbara Cadastre, covered by Original Certificate of Title (OCT) No. 6406. OCT No. 6406 was cancelled, and Transfer Certificate of Title (TCT) No. 106098 was issued in their names.
- Refusal and Opposition:** Gregorio Perez, Maria P. Gotera, and Susana Silao, who also had TCT No. 25772 over the same land, refused to honor the writ of possession issued by the court. The court found TCT No. 25772 fraudulently acquired and ordered enforcement of the writ of possession. A writ of demolition was subsequently issued.
- Court of Appeals and Supreme Court Petitions:** Perez and Gotera filed a petition for certiorari and prohibition with the Court of Appeals, which was denied. They then filed a petition for review on certiorari with the Supreme Court (G.R. No. 62042), which was ultimately denied, and the decision became final on March 25, 1983.
- Intermediate Appellate Court Litigation:** Baranda and Hitalia contended that further litigation in Civil Case No. 00827 was merely a delay tactic. This led to a Supreme Court directive disallowing the Intermediate Appellate Court from taking cognizance of the resolved issues and dismissing the petition in Civil Case No. 00827.
- Implementation Orders and Challenges:** The Regional Trial Court (RTC) of Iloilo, chaired by Judge Tito Gustilo, issued orders reaffirming the validity of TCT No. 106098, and declared TCT No. 25772 null and void. However, challenges by the Acting Registrar of Deeds argued a pending related mandamus action disrupted implementation.
- Subsequent Actions in RTC and Supreme Court:** Despite multiple RTC orders to implement the Supreme Court resolutions, further motions and orders addressing the registration of titles and cancellation of a lis pendens notice on Lot No. 4517 continued to cause procedural delays.
- Final Appeal to Supreme Court:** Baranda and Hitalia filed a certiorari and prohibition petition against Judge Gustilo to compel the proper implementation of the Supreme Court decisions, essentially seeking the cancellation of notice of lis pendens on their titles.

Issues:

1. **Validity of the TCTs and Enforcement of the Writs**: Whether the trial court's orders for the implementation of writs of possession and demolition, cancellation of TCT No. 25772, and validation of TCT No. 106098 should be enforced notwithstanding new litigation.
2. **Lis Pendens Cancellation**: Whether the notice of lis pendens should be canceled despite pending litigation in the Court of Appeals on a related matter.
3. **Role of the Register of Deeds**: The ministerial duty of the Acting Register of Deeds in registering, annotating, or cancelling deeds and notices as ordered by the court.

Court's Decision:

1. **Validity and Enforcement**: The Supreme Court reaffirmed the validity of its final decisions in G.R. No. 62042 and G.R. No. 64432, directing immediate enforcement of orders issued therein, including writs of possession and demolition. The RTC's orders consistent with the Supreme Court's resolutions were upheld.
2. **Cancellation of Lis Pendens**: The Supreme Court held that the pending appeal in Civil Case No. 15871 did not preclude canceling the lis pendens on petitioner's titles. The actions taken to delay enforcement were recognized as maneuvers to obstruct finalized and binding judgments, so the cancellation was mandated.
3. **Ministerial Role of Register of Deeds**: Emphasizing the mandatory nature of the Register of Deeds' duties, the Supreme Court invalidated actions taken to delay or obstruct the proper registration of judicial orders.

Doctrine:

- **Finality of Judgment Enforcement**: Courts cannot entertain new actions or ancillary motions meant to delay the implementation of final and executory judgments.
- **Ministerial Duties of Registrar**: Registers of Deeds must act ministerially, meaning any court directive for annotations or cancellations must be promptly followed without exercising judicial discretion.
- **Lis Pendens Principles**: Although generally protective, judicial discretion can override editorial delays or misuse when overriding final judgments.

Class Notes:

- **Final Judgment**: Once a decision is final and executory, there should be no further

legal maneuvers to delay its implementation.

- **Registrar Duties (PD No. 1529, Sec. 10)**: Registration of deeds is a ministerial act, and any doubts should be referred to the Land Registration Authority.
- **Lis Pendens**: Generally used to protect real rights during litigation but can be canceled before final judgment if it's shown to be malicious or unnecessary (PD No. 1529, Sec. 77, Civil Code).
- **Court Discretion**: Courts have the discretionary power to cancel a notice of lis pendens to prevent undue delay tactics or harassment.

Historical Background:

The historical context revolves around property disputes exacerbated by fraudulent titles and delayed enforcement mechanisms, underscoring the judicial system's efforts to quell illegal ownership claims and streamline property rights enforcement. The decision reiterates the judiciary's role in ensuring the resoluteness of final judgments against dilatory litigation tactics in property disputes.