

Title:

Corazon D. Sarmienta, et al. vs. Manalite Homeowners Association, Inc. (MAHA)

Facts:

1. **Original Claim and Filing**: Manalite Homeowners Association, Inc. (MAHA) filed a complaint for “Forcible Entry/Unlawful Detainer” against AMARA W CIGELSALO Association (AMARA) and its members in the Municipal Trial Court in Cities (MTCC) of Antipolo City (Civil Case No. 104-00).
2. **Property Ownership**: MAHA asserted ownership of a property covered by TCT No. 222603 in Antipolo City and claimed that petitioners forcibly entered and occupied it, constructing temporary houses and an office building.
3. **Petitioners’ Response**: Petitioners denied forcible entry and claimed long-term possession of the land, purchased from Julian Tallano and later known as the Tallano Estate.
4. **MTCC Ruling**: The MTCC dismissed the case for lack of cause of action because MAHA failed to establish the jurisdictional requirement of prior physical possession.
5. **RTC Ruling**: MAHA appealed to the RTC, which reversed the MTCC ruling. The RTC determined that MAHA tolerated the petitioners’ occupation until they could comply with conditions of membership in MAHA, making it a case for unlawful detainer.
6. **CA Decision**: Petitioners appealed to the Court of Appeals (CA), which affirmed the RTC’s decision, interpreting the complaint as one for unlawful detainer rather than forcible entry.
7. **Supreme Court Petition**: Petitioners filed a petition for review on certiorari in the Supreme Court.

Issues:

1. **Nature of the Complaint**: Whether the allegations in the complaint are sufficient to constitute a case of forcible entry or unlawful detainer.
2. **CA’s Affirmation**: Whether the CA erred in affirming the RTC’s decision that construed the complaint as one for unlawful detainer.
3. **Jurisdiction Issues**: Whether the MTCC had jurisdiction over the case based on the nature of the complaint.

4. **Petitioners' Rights**: Whether petitioners have a superior right of possession over the property in question.

Court's Decision:

1. **Nature of the Action**:

- The Supreme Court reiterated that the nature of an action and which court has jurisdiction is determined by the complaint's allegations.
- The complaint clearly constituted unlawful detainer, fitting within Rule 70, Section 1 of the Rules of Civil Procedure.
- Allegations included MAHA's tolerance of petitioners' stay, subsequent illegal possession after demand to vacate, making it a matter of unlawful detainer.

2. **CA's Affirmation**:

- The Supreme Court agreed with the CA's assessment that although initially appearing to be forcible entry, subsequent tolerance by MAHA transitioned the case to unlawful detainer.
- The claim was within the one-year filing period from the notice to vacate, hence valid.

3. **Jurisdiction**:

- The jurisdiction was appropriately vested in the MTCC as it deals with unlawful detainer under Rule 70.
- Issues of title validity raised by petitioners were not pertinent to the ejectment case, as it dealt only with material possession, not ownership.

4. **Petitioners' Rights**:

- The Supreme Court found no merit in petitioners' claims of a superior right of possession.
- Actions implying petitioners were intruders tolerated by MAHA negate petitioners' claims of lawful possession.

Doctrine:

- **Implied Promise of Vacating**: A person who occupies land by tolerance of the owner and without any contract is bound by an implied promise to vacate upon demand.
- **Material Possession vs. Ownership**: Ejectment cases focus strictly on material possession without adjudicating on the ultimate title or ownership.

Class Notes:

- **Ejectment Cases (Rule 70, Sec. 1)**: Distinction between forcible entry (illegal possession from the start) and unlawful detainer (initially legal possession that became illegal).

- **Jurisdictional Allegations**: Complaints must clearly state facts fitting within Rule 70 for forcible entry or unlawful detainer.
- **Material Possession**: The focus in ejectment cases is on physical possession, not ownership disputes, which must be resolved in separate actions.

Historical Background:

This case reflects the ongoing urbanization and land disputes in burgeoning areas such as Antipolo City. It underscores ongoing tensions over land possession and the delineation of occupancy rights stemming from Philippine housing policies like the Community Mortgage Program (CMP). The case demonstrates the judicial effort to distinguish and appropriately classify disputes within the complex framework of land ownership and possession laws.