

Title:

****Concorde Condominium, Inc. v. Baculio et al. (G.R. No. 202664)****

Facts:

1. ****Initial Filing****:

- On April 16, 2012, Concorde Condominium, Inc. (CCI) filed a Petition for Injunction with Damages before the Regional Trial Court (RTC) of Makati, targeting New PPI Corporation, its President Augusto H. Baculio, Asian Security and Investigation Agency, and various officials from the Makati City government.

2. ****Litigation Against Misrepresentation and Demands****:

- Concorde Condominium sought to enjoin Baculio and New PPI Corporation from misrepresenting ownership and to prevent them from pushing for the building's demolition.
- The petition also challenged the security deployment by the Asian Security and Investigation Agency and requested restraints on city officials from acting upon Baculio's letters.

3. ****Case Hearing and Court Orders****:

- On April 24, 2012, the RTC initiated hearings to consider a temporary restraining order (TRO), where preliminary testimonies were given.
- The RTC ordered Makati City officials to inspect and report on the building's structural and fire deficiencies by April 25, 2012.

4. ****Motion by Baculio and New PPI****:

- Baculio and New PPI Corporation filed an Urgent Motion to Re-Raffle the case on April 25, claiming jurisdiction was improper for a Special Commercial Court.
- On April 26, the RTC denied their motion for procedural noncompliance. Subsequent motions to dismiss and vacate orders followed on May 8, 2012.

5. ****RTC Dismissal****:

- The RTC ruled on June 28, 2012, that the case did not involve an intra-corporate controversy and dismissed it for lack of jurisdiction as a Special Commercial Court.
- CCI's subsequent motion for reconsideration was denied.

6. ****Petition to Supreme Court****:

- CCI filed a Petition for Review on Certiorari under Rule 45, questioning the jurisdictional ruling.

Issues:

1. **Jurisdiction**:

- Whether the RTC of Makati City Branch 149, designated as a Special Commercial Court, had jurisdiction to entertain an ordinary civil action for injunction and damages.

2. **Intra-Corporate Relations**:

- Whether the case constituted an intra-corporate controversy as defined under Section 5 of Presidential Decree No. 902-A and therefore within the scope of Special Commercial Courts.

Court's Decision:

1. **Jurisdiction Clarification**:

- The Supreme Court clarified that RTCs, including Special Commercial Courts, retain general jurisdiction and the power to hear ordinary civil actions such as the Petition for Injunction with Damages filed by CCI.

2. **Nature of the Case**:

- The Court established that the petition involved ordinary civil disputes concerning property ownership and rights, and not intra-corporate matters. Therefore, jurisdictional dismissal by the RTC was erroneous.

3. **Reinstatement**:

- The Supreme Court reversed and set aside the RTC's Orders, reinstating the case for continued proceedings under Branch 149 of the RTC of Makati City.

Doctrine:

- **General Jurisdiction of Special Commercial Courts**: Special Commercial Courts, despite their specific designation, continue to possess general jurisdiction to hear and decide cases of all nature, including ordinary civil cases, emphasizing that procedural machinery should not limit statutory conferral of jurisdiction.

- **Nature of Action**: Determination of court jurisdiction depends on the substance of the case and the claims made by the plaintiff, not on the designated procedural track.

Class Notes:

- **Jurisdiction Determination**: Jurisdiction is statute-conferred and based on the nature of claims.

- **Procedural Conduct**: Judges should re-assess misfiled cases to ensure proper jurisdiction is applied without unnecessary procedural dismissals.

- **B.P. 129**: RTC's jurisdiction includes cases where the subject matter is incapable of

pecuniary estimation.

Historical Background:

- **P.D. No. 902-A to R.A. No. 8799**: Transitioned intra-corporate controversy jurisdiction from the SEC to RTCs, highlighting procedural refinements for specialized courts like Special Commercial Courts in the Philippine judicial system.
- **SSC Designation**: Part of procedural measures aiming at timely and specialized resolution of commercial disputes, but their scope includes broad judicial functions transcending specialized assignments.