

****Case Title:**** Genalyn D. Young v. Spouses Manuel Sy and Victoria Sy

****Facts:****

The case originated from a Complaint for Nullification of Second Supplemental Extra-Judicial Settlement, Mortgage, Foreclosure Sale, and Tax Declaration filed by Genalyn D. Young (petitioner). Young contested an extra-judicial partition executed by her mother, adjudicating an unregistered parcel of land solely in favor of the mother, without court approval, as Young was a minor at the time. The land was mortgaged, foreclosed, and sold to Manuel Sy (one of the respondents). Subsequently, a tax declaration was issued in Sy's name.

1. ***G.R. No. 157955 (Re: Supplemental Complaint)*:** Petitioner filed a Motion to Admit Supplemental Complaint to assert her right to exercise legal redemption as a co-owner after Sy consolidated the title. The RTC denied the motion, and Young filed a Petition for Certiorari and Mandamus under Rule 65, which the CA denied. This led to the Petition for Review on Certiorari under Rule 45 before the Supreme Court.

2. ***G.R. No. 157745 (Re: Non-Suit)*:** While the Supplemental Complaint case was pending, the RTC continued the trial. Young moved to cancel a hearing due to illness, but the motion was denied as improper, and the case was dismissed for non-suit. Young's Motion for Reconsideration and subsequent appeal were also denied. Young filed a Petition for Certiorari, which the CA denied, prompting the second Petition for Review on Certiorari under Rule 45 to the Supreme Court.

****Issues:****

1. ***G.R. No. 157955***

- Whether the RTC gravely abused its discretion by denying the admission of the Supplemental Complaint.
- Whether the CA erred in upholding the RTC's decision and ruling no abuse of discretion occurred.
- Whether the case is moot and academic.
- Whether petitioner engaged in forum shopping.

2. ***G.R. No. 157745***

- Whether the RTC erred in dismissing the complaint for non-suit.
- Whether the CA erred in affirming the RTC's dismissal.
- Whether petitioner engaged in forum shopping.

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

1. *G.R. No. 157955:* The Supreme Court found merit in Young's petition, ruling the RTC and CA erred by denying her Supplemental Complaint, which sought to exercise her legal redemption right and was intertwined with the original complaint. The supplemental facts justified an enlarged relief related to the original cause concerning the co-ownership challenge.

2. *G.R. No. 157745:* The Court ruled against Young, finding she indeed engaged in forum shopping by filing both certiorari and appeal, seeking similar relief from the same set of facts. The dismissal of the case as a non-suit was considered a final order, appropriate for appeal, not certiorari.

****Doctrine:****

A supplemental pleading is permitted if related to matters arising after the original complaint. Forum shopping, identified by overlapping parties, issues, and relief, constitutes abuse and is prohibited. The remedy against final orders must typically follow the prescribed appeal rather than alternative avenues like certiorari.

****Class Notes:****

- ****Supplemental Pleading:**** Aids existing complaints by setting out developments post-filing, without introducing entirely new causes. Governed by Section 6, Rule 10 of the Rules of Court.
- ****Forum Shopping:**** Simultaneous/successive suits with overlapping parties/issues; constitutes malpractice and warrants dismissal. Legal processes emphasize exclusive, not cumulative, remedies.
- ****Final Orders and Certiorari:**** A final order, implying an order on merits, is challengeable through standard appeals, not certiorari, unless under exceptional circumstances.

****Historical Background:****

The case touches on legislative balances between maintaining procedural efficiency and ensuring substantive rights within Philippine jurisdiction. The legal context reflects Civil Code provisions on co-ownership duties and redemption rights, highlighting young individuals' property rights, a topic historically understated in contingencies surrounding minors. The latter reflects shifts towards more protective and individual-focused interpretations post-1987 Constitution, emphasizing the rights of individuals, particularly the ability to recover or protect rights potentially overlooked due to age at the time of

original agreements.