

Title: Tomas Averia, Jr. vs. The Honorable Milagros V. Caguioa, Judge; and Veronica Padillo (G.R. No. L-64533)

Facts:

- Initial Proceedings:** A deed of sale concerning a parcel of land (Lot No. 2810-B of the Lucena Cadastre) was sought to be registered in the Regional Trial Court (RTC) of Lucena City by respondent, Veronica Padillo.
- Petitioner's Objection:** Tomas Averia, Jr., the petitioner, opposed the registration, asserting that there was an antecedent contract to sell that affected the land in question. He argued that the RTC, acting as a cadastral court, did not have the jurisdiction to adjudicate on contested claims under Section 112 of Act 496, the Land Registration Act.
- Ex Parte Hearing and Lower Court Decision:** Ignoring the petitioner's opposition, the RTC held an ex parte hearing and subsequently approved the registration based solely on the evidence presented by Padillo.
- Petition for Certiorari and Prohibition:** Averia, Jr. filed a petition for certiorari and prohibition with a preliminary injunction in the Supreme Court, contesting the jurisdiction of the RTC to rule on the registration due to the contentious nature of the claim.
- Citing Fojas v. Grey:** The petitioner relied on the precedent that in cases involving conflicts or substantial objections, the cadastral court, under Section 112 of the Land Registration Act, does not have jurisdiction, as the matter should be resolved through more comprehensive judicial proceedings.
- Developments in Law:** The Supreme Court recognized that the Land Registration Act had been superseded by the Property Registration Decree (P.D. No. 1529) in 1979, which expanded the jurisdiction of RTCs, thereby allowing them to handle petitions after original registration, including contentious cases.

Issues:

- Jurisdiction of the RTC:** Whether the RTC, acting as a cadastral court, had the jurisdiction to order the registration of a deed of sale despite the existence of a substantial dispute over an antecedent contract to sell.
- Due Process in Trial Court Proceedings:** Whether the RTC deprived the petitioner of due process by proceeding ex parte and not considering his evidence or allowing him the opportunity to elevate the jurisdictional issue to the Supreme Court.

Court's Decision:

1. **Jurisdiction of the RTC:**

- The Supreme Court analyzed Section 2 of the Property Registration Decree (P.D. No. 1529), which extended the jurisdiction of RTCs to hear and determine all questions arising from applications or petitions for land registration, not limited by the absence of disputes.
- Thus, the Court resolved that the RTC had jurisdiction to rule on the registration despite the existence of substantial objections, as the law no longer required “unanimity among the parties” for the court to proceed.

2. **Due Process Concerns:**

- The Supreme Court held that the RTC should have deferred its proceedings to provide the petitioner an opportunity to elevate the jurisdictional issue to the Supreme Court, ensuring due process.
- The decision of the RTC was set aside, and the case was remanded for a new trial, where all interested parties, including the petitioner, would be given the opportunity to present their evidence.

Doctrine:

1. **Expanded Jurisdiction under P.D. No. 1529:** The Property Registration Decree grants RTCs the jurisdiction to resolve all matters arising from land registration applications or petitions, irrespective of disputes or substantial objections.
2. **Due Process:** Courts must ensure that all parties are given a fair opportunity to present their evidence, especially when a party indicates an intention to contest jurisdictional competencies.

Class Notes:

1. **Extended RTC Jurisdiction:** P.D. No. 1529, Section 2, grants RTCs authority not just over uncontested land registration cases but also over those involving disputes.
 - **Quote:** “Courts of First Instance shall have exclusive jurisdiction... with power to hear and determine all questions arising upon such applications or petitions.”
2. **Due Process in Judicial Proceedings:** All parties must have the chance to present their case and evidence, especially when procedural and jurisdictional challenges are raised.
 - **Case Application:** RTC should refrain from conclusively settling matters in an ex parte manner when there are substantial objections or when denial of such objections results in a due process violation.

Historical Background:

Initially, under Section 112 of the Land Registration Act, RTCs acting as cadastral courts had limited jurisdiction to grant summary relief only in undisputed cases. The Property Registration Decree (P.D. No. 1529) shifted this paradigm by eliminating those restrictions and granting broader jurisdiction to RTCs to resolve all disputes relating to land registration, aligning with the principles of the Torrens system, thereby reducing multiplicity of suits and ensuring expedient resolution of land title issues. This evolution reflects a legislative intent to streamline registration proceedings and adapt to complexities inherent in land disputes.