

Title: Galindez, Liberato, et al. v. Felomina Torres Salamanca-Guzman, et al.

Facts:

1. Respondents Felomina Salamanca-Guzman, Alejandro Collado, Vito M. Roldan, Erlinda M. Cariño, and the Heirs of Flora Medriano Villasista filed separate Complaints for Forcible Entry with a prayer for a Temporary Restraining Order and Injunction against petitioners Rolando Galindez, Daniel Liberato and others before the Municipal Trial Court in Cities (MTCC), San Jose City in 2014.
2. The complaints alleged ownership and possession of lands which were intruded upon by petitioners in November 2013 by means of force, strategy, or stealth. The lands were described as accretions adjoining their titled properties.
3. Petitioners answered with a Counterclaim, asserting that the contested lands were possessions of Ganado who was farming it since 1967, with the petitioners farming such lands as Ganado's hired helpers.
4. The MTCC dismissed the Complaints on November 7, 2014, for lack of evidence showing respondents' prior physical possession of the contested property.
5. Respondents appealed to the RTC, which affirmed the MTCC ruling, declaring petitioners had demonstrated prior possession through credible testimonies from neutral third parties.
6. The Court of Appeals reversed the RTC decision, holding that respondents had established, by preponderance of evidence, prior possession of the property and ordering petitioners to vacate the contested property.

Issues:

1. Whether the Court of Appeals erred in its factual and legal conclusions when it reversed the RTC decision.
2. Whether respondents were able to establish prior physical possession of the contested property by preponderance of evidence.
3. The appropriateness of considering evidence filed post-judgment by the MTCC and for the first time on appeal, specifically second Judicial Affidavits of BARC chairpersons and a Supplemental Affidavit and Certification.
4. Whether piecemeal presentation of evidence was permissible in this summary forcible entry case.

Court's Decision:

1. The Supreme Court granted the petition, reversing and setting aside the Decision of the Court of Appeals. It reinstated the Joint Decision of the MTCC, as affirmed by the RTC.
2. It held respondents failed to establish prior physical possession of the contested property.

Their claims and evidence mostly pertained to ownership, not possession, and were insufficient to disturb the petitioners' claim established by preponderant evidence.

3. The decision emphasized that forcible entry focuses on possession rather than ownership, critiquing the CA for its improper reception and reliance on post-judgment and new-on-appeal evidence that circumvented procedural rules.

4. The piecemeal presentation of evidence was condemned, stressing that parties must deliver a complete evidentiary package upfront barring court-sanctioned exceptions for clarification.

5. Recantation evidence such as the second judicial affidavits was viewed suspiciously, given its inconsistency without satisfactory explanation of change.

#### Doctrine:

- Doctrines of possession and preponderance in forcible entry cases, focusing on actual physical possession distinct from ownership and strict adherence to summary procedure rules concerning evidence presentation.
- The importance of the credibility of prior evidence over subsequent recantations, which are viewed with suspicion unless special circumstances suggests otherwise.

#### Class Notes:

- The critical elements of a forcible entry case are prior possession, unlawful deprivation through force, intimidation, threat, strategy, or stealth, and timing within one year of such deprivation.
- For evidence to be reconsidered validly post-trial, procedural rules under summary proceedings restrict additional submissions without express court orders for clarification.

#### Historical Background:

- The case illustrates a typical rural land dispute within Philippine jurisdiction where issues of accretion often complicate ownership and possession, against a historical backdrop of agrarian challenges and property rights under evolving legal interpretations.