

Title: Arlyn Pineda vs. Julie C. Arcalas

Facts:

- **Property Details**: The dispute centers around three parcels of land, originally portions of Lot No. 3762, registered under TCT No. T-52319, in Santa Cruz, Laguna.
- **Transfer and Claims**:
- **Original Owners**: Spouses Mauro Lateo and Encarnacion Evangelista.
- **Initial Sale**: Sold to Victoria Tolentino.
- **Arcalas' Lawsuit**: Julie Arcalas filed a case for Sum of Money against Victoria Tolentino, winning a favorable judgment on September 9, 1997.
- **Purchase by Pineda**: On December 15, 1997, Arlyn Pineda bought the property from Victoria Tolentino but did not register the sale.
- **Enforcement Mechanism**: Arcalas levied the subject property to enforce the judgment, and the Notice of Levy was registered on January 12, 1999.
- **Subsequent Legal Actions**:
- **Affidavit Filings**: Pineda filed an Affidavit of Title and Third Party Claim but the Quezon City RTC quashed it.
- **Registered Sales and Further Claims**:
- **Pineda's Claim**: Filed another Third Party Claim with adverse notice registered on February 2, 2000.
- **Arcalas' Auction Purchase**: Alongside Leonardo Byron P. Perez, Jr., Arcalas bought the property at an auction and registered it on February 3, 2000.

Procedural Posture:

1. **RTC Laguna Proceedings**: Arcalas moved to cancel Pineda's adverse claim. The RTC ruled in favor of Arcalas, based on res judicata, ordering the annotation's removal.
2. **Appeal to Court of Appeals**: Pineda appealed the RTC ruling but failed to file the required appellant's brief leading to the dismissal of her appeal.
3. **Motions for Reconsideration**: Pineda filed two motions for reconsideration post-dismissal, both denied due to failure to comply with procedural requirements.
4. **Certiorari Petition to Supreme Court**: Pineda filed a special civil action for certiorari under Rule 65.

Issues:

1. **Validity of Levy vs. Purchase**: Whether the levy on alias writ of execution by the Quezon City RTC in Civil Case No. Q-96-27884 exempted the portion bought by Pineda from Victoria Tolentino.

2. **Possession as Equivalence to Title**: Whether Pineda's possession of the property, absent registration, equated to ownership.

Court's Decision:

1. **Dismissal of Certiorari Petition**: The Supreme Court upheld the appellate court's dismissal of Pineda's appeal due to her counsel's failure to file an appellant's brief, reiterating the necessity of compliance with procedural rules.
2. **Ownership and Registration**: The court ruled that, under the Property Registration Decree (Presidential Decree No. 1529), registration is the operative act affecting third parties. Hence, Arcalas' registered levy had precedence over Pineda's unregistered deed.
3. **Res Judicata**: The finality of the earlier Quezon City RTC order, which quashed Pineda's third-party claim, invoked res judicata in the later Laguna RTC case.
4. **Possession Not Curing Registration Defect**: Mere possession by Pineda did not offset the lack of registration, and Arcalas did not have knowledge of Pineda's claim of possession before the levy was registered.

Doctrine:

1. **Property Registration Decree (PD 1529)**: Emphasized Acts of Registration over Possession (Sections 51 and 52).
2. **Res Judicata**: Principles applying where a final judgment by a competent court concluded identical issues between the same parties.
3. **Priority of Registered Liens**: Affirmed precedence of registered liens over unregistered property transactions.

Class Notes:

- **Property Registration Decree**:
- **Section 51**: Registration as the operative act to convey.
- **Section 52**: Constructive notice upon registration.
- **Res Judicata**: Binding effect of final judgments on future disputes.
- **Procedural Compliance**: Mandatory nature of procedural rules for appeals (Rule 44, Section 7 and Rule 50, Section 1 of the Rules of Court).

Historical Background:

- **Development of Land Title Cases**: This case exemplifies enforcement mechanisms through writs and the critical role of registration in property disputes within Philippine jurisprudence.
- **Procedural Rigor**: Illustrates courts' strict adherence to procedural rules to prevent

dilatory tactics and ensure just and efficient resolution of cases.