CHERRY MARIE G. ALFARO AND SPOUSES PAUL UY AND ANNA LYNN REVIS UY, PETITIONERS, VS. SPOUSES MERLA AGUILA AND DIMAS AGUILA, RESPONDENTS.

G.R. No. E-05073, August 11, 2026

Ponente: DIMAAMPAO, J.

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DIMAAMPAO, J.:

Impugned in this Petition for Review on Certiorari[1] are the April 24, 2025[2] and the December 4, 2025[3] Resolutions of the Court of Appeals (CA) in CA-G.R. SP No. 188245. The April 24, 2025 Resolution denied the Motion for Extension of Time to file Petition for Review filed by petitioners Cherrie Marie G. Alfaro (Alfaro) and spouses Paul Uy and Anna Lynn Revis Uy (spouses Uy) and merely noted their Petition for Review that challenged the Regional Trial Court's reversal of the Municipal Trial Court in Cities's (MTCC) Decision declaring, inter alia, that the transfer certificate in the name of spouses Merla P. Aguila and Dimas Aguila (spouses Aguila), null and void. On the other hand, the December 4, 2025 Resolution denied Alfaro and spouses Uy's (Alfaro et al.) motion for reconsideration[4] thereof.

The salient facts follow.

Alfaro et al. lodged a complaint for annulment of title with recovery of damages against spouses Aguila and the Registry of Deeds of Isabela before the MTCC of Cauayan City, Isabela.

Alfaro et al. averred that the land they respectively owned is situated in Barrio Nungnungan, Municipality of Cauayan City, Isabela and was formerly covered by Transfer Certificate of Title (TCT) No. EP-019130, registered in the name of Ricardo Mauricio.[5]

Subsequently, said parcel of land was subdivided into two lots, Lots 10-A and 10-B, with an area of 15,000 square meters each. Thereafter, spouses Uy and Alfaro acquired Lots 10-A and 10-B and became the registered owners thereof under TCT No. T-336807 and TCT No. 035-2016002170, respectively.[6]

On May 19, 1998, Alfaro erected a building over Lot 10-B, along the provincial road. In January 2016, spouses Aguila filed a complaint for recovery of possession with prayer for the issuance of writ of preliminary mandatory injunction with damages against spouses Edna and Renato Alfaro, asserting that such building encroached on Lot 11, a property registered in their name under TCT No. No. 035-2014004922 with an area of 517 square meters. In said case, spouses Aguila averred that TCT No. 035-2014004922 was derived from TCT No. T-392254 in the name of Spouses Ma. Theresa Uy and Ronald Uy which in tum, cancelled TCT No. T-392118 in the name of Ricardo Mauricio. Spouses Aguila further avowed that TCT No. T-392118 cancelled TCT No. EP-019130.[7]

Given the foregoing, it is clear that Lot 11 could not originate from TCT No. EP-019130, as well. Consequently, the following are spurious documents, viz.:

- TCT No. T-392118 in the name of Ricardo Mauricio;

- TCT No. T-392254 in the name of [s]pouses Ma. Theresa Uy and Ronald Uy;

- TCT No. 035-2014004922 in the name of [s]pouses Aguila; and

- Tax Declaration No. 15-01-0045-00066 in the name of [s]pouses Aguila.[8]

The invalidity of the foregoing TCTs and tax declaration is bolstered by the certification issued by the Department of Agrarian Reform dated May 15, 2014, which establishes that while Lot 10, Psd-2-02-013755 (OLT) was issued with TCT No. EP-019130, Lot 11, Psd-2-02-013755 (OLT) with an area of 517 square meters has not yet been issued with emancipation patent.[9]

Perforce, Alfaro et al. prayed that the aforesaid documents be nullified and spouses Aguila be ordered to pay moral damages, attorney's fees, other expenses and costs of suit.[10]

Refuting the avowals of Alfaro et al., spouses Aguila maintained that the instant complaint was filed by persons who are not real parties-in-interest. Alfaro et al. have no legal right over Lot 11 since it is separate and distinct from their lots. Likewise, since more than one year has lapsed from the time the title was registered in their name, such title has become indefeasible. Moreover, since they relied on a clean title when they purchased the subject land, they are innocent purchasers for value.[11]

In due course, the MTCC rendered the Decision,[12] declaring the aforesaid documents null and void and ordering the spouses Aguila to pay Alfaro et al. the sum of PHP 30,000.00 as attorney's fees and costs of suit.[13]

Taking umbrage at the MTCC's disposition, spouses Aguila interposed an appeal before the RTC insisting that Alfaro et al. are not the real parties-in-interest. Besides, the MTCC erred in ruling that they are not innocent purchasers for value.

In resolving the appeal,[14] the RTC brushed aside spouses Aguila's failure to file their memorandum pursuant to Section 7 (b), Rule 40[15] of the Revised Rules of Court, pronouncing that such procedural lapse was not done with intent to delay or prejudice Alfaro et al.[16] As for the substantive issue, the RTC dismissed the complaint decreeing that Alfaro et al., failed to show sufficient interest to ask for the annulment of the title of Lot 11 which is adjacent to their properties.[17] In addition, spouses Aguila were innocent purchasers for value.[18] Thus—

> RULING
> After careful review of the issues and arguments presented, the Court finds that [Alfaro et. al] are not the real parties in interest in this case and have no standing to file the action for annulment of title. The Complaint in Civil Case No. 20-4092 has no cause of action against [spouses Aguila] and as such, the appeal is GRANTED
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> The Decision of the MTCC-Cauayan City, Isabela, dated September 21, 2022, is hereby REVERSED and SET ASIDE. The Complaint is DISMISSED for lack of standing and legal basis.
>
> SO ORDERED.[19] (Emphasis in the original)

To assail the RTC Decision, Alfaro et al. turned to the CA for succor. Still and all, due to their counsel's heavy workload, Alfaro et al. requested for an extension of time to file a petition for review.[20]

In the April 24, 2025 Resolution, the CA denied Alfaro et al.'s Motion for Extension of Time to File Petition for Review and dismissed the instant case. Thus, it merely noted the Petition for Review which was subsequently filed.[21]

Alfaro et al. moved for the reconsideration thereof.[22] All the same, in the December 4, 2025 Resolution, the CA denied the said motion decreeing that there was no compelling reason to extend the reglementary period.[23]

Alfaro et al. now come before this Court asserting that the CA erred in denying the motion for extension of time

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to file the Petition for Review despite the valid reasons given for such extension. Moreover, the CA failed to consider that — one, spouses Aguila's appeal should have been dismissed for not complying with Rule 40, Section 7(b) of the Rules of Court, as amended, two, spouses Aguila are not innocent purchasers for value; and three, Alfaro et al. are real parties-in-interest since they are in possession of the subject property.[24]

The Petition must necessarily fail.

First off, Rule 42, Section 1 of the Rules of Court as amended,[25] reads, in part—

> SECTION 1. How Appeal Taken; Time for Filing. — ... Upon proper motion and the payment of the full amount of the docket and other lawful fees and the deposit for costs before the expiration of the reglementary period, the Court of Appeals may grant an additional period of fifteen (15) days only within which to file the petition for review[.] (Emphasis supplied)

From the foregoing, it is evident that the grant of motion for extension of time is discretionary on the part of the CA. Here, the Court finds it within the discretionary power of the CA to pronounce that "heavy workload" is not a compelling reason to extend the reglementary period set forth by law. Indeed, it bears emphasizing that heavy workload, standing alone, is hardly a compelling or meritorious reason to allow extensions of time to file pleadings.[26]

In any case, the petition for review is devoid of merit. The RTC properly ruled that Alfaro et al. are not the real parties-in-interest. Indeed, the mere fact that Alfaro et al. are the owners of the land adjacent to Lot 11 does not give them the right to ask for the annulment of the title covering such realty registered in the names of Spouses Aguila. While they may have an interest over the land in question such is a mere incidental interest and not the material interest contemplated under the law, i.e., a material interest in issue that is affected by the questioned act or instrument.[27]

A final word. The certificate of title of spouses Aguila, i.e., TCT No. 035-2014004922 covering Lot 11, originated purportedly from TCT No. EP-019130. All the same, in view of the certification of the Department of Agrarian Reform that TCT No. EP-019130 was issued for Lot 10, while no emancipation patent has yet been issued for Lot 11, there appears to be a valid issue anent the chain of titles of spouses Aguila' s certificate of title.

This being so, notwithstanding the dismissal of the complaint of Alfaro et al. as they are not real parties-in-interest, the Court deems it proper to furnish a copy of this Decision to the Department of Agrarian Reform and the Land Registration Authority for appropriate action.

ACCORDINGLY, the Petition for Review on Certiorari is DENIED. The April 24, 2025 and December 4, 2025 Resolutions of the Court of Appeals in CA-G.R. SP No. 188245, are AFFIRMED.

Let a copy of this Decision be furnished to the Department of Agrarian Reform and the Land Registration Authority for appropriate action.

SO ORDERED.

Caguioa, (Chairperson), Gaerlan, and Singh, JJ., concur.
Inting,[*] J., on official business.

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[*] On official business.

[1] E-rollo, pp. 5-33.

[2] Id. at 35-37. Penned by Associate Justice Maria Elisa Sempio Diy with the concurrence of Associate Justices Bonifacio S. Pascua and Eduardo S. Ramos, Jr. of the Special Eleventh Division, Court of Appeals, Manila.

[3] Id. at 39-42. Penned by Associate Justice Maria Elisa Sempio Diy with the concurrence of Associate Justices Bonifacio S. Pascua and Eduardo S. Ramos, Jr. of the Former Special Eleventh Division, Court of Appeals, Manila.

[4] Id. at 43-50.

[5] See id. at 54, MTCC Decision.

[6] See id. at 54-55, MTCC Decision.

[7] Id. at 55.

[8] Id. at 55-56.

[9] Id. at 56.

[10] Id.

[11] Id.

[12] Id. at 54-61. The Decision dated September 21, 2022 was penned by Presiding Judge Mary Jane Socan–Soriano of MTCC of Cauayan City.

[13] Id. at 60-61.

[14] Id. at 62-74. The Decision dated November 18, 2024 was penned by Presiding Judge Reymundo L. Aumentado of Branch 20, RTC, Cauayan City.

[15] SECTION 7. Procedure in the Regional Trial Court. —

> . . . .
>
> (b) Within fifteen (15) days from such notice, it shall be the duty of the appellant to submit a memorandum which shall briefly discuss the errors imputed to the lower court, a copy of which shall be furnished by him to the adverse party. Within fifteen (15) days from receipt of the appellant's memorandum, the appellee may file his memorandum. Failure of the appellant to file a memorandum shall be a ground for dismissal of the appeal.

[16] E-rollo, p. 65.

[17] Id. at 66-68.

[18] Id. at 69-70.

[19] Id. at 74.

[20] See id. at 35, CA Decision.

[21] Id. at 37.

[22] Id. at 43-50.

[23] Id. at 39-42.

[24] Id. at 16, Petition for Review on Certiorari.

[25] A.M. No. 19-10-20-SC (2024), Re: 2019 Proposed Amendments to the 1997 Rules of Civil Procedure.

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[26] Sioland Development Corp. v. Fair Distribution Center Corp., 945 Phil. 542, 552 (2023) [Per C.J. Gesmundo, First Division].

[27] Caro v. Sucaldito, 497 Phil. 879, 888 (2005) [Per J. Callejo, Sr., Second Division].

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