

JAIME P. CORPIN, PETITIONER, VS. AMOR S. VIVAR AND THE HONORABLE COURT OF APPEALS, RESPONDENTS.

G.R. No. 137350. June 19, 2000

Ponente: KAPUNAN, J.

Read online (full-text search, related cases, audio case brief): <https://batas.org/library/g-r-no-137350/>

KAPUNAN, J.:

This is a petition for review on certiorari under Rule 45 seeking the reversal of the Decision of the Court of Appeals, Fifteenth Division, dated September 23, 1998 in CA-G.R. SP No. 46881[1] and its Resolution dated January 20, 1999[2] denying petitioner Jaime P. Corpin's motion for reconsideration.

Petitioner is the registered owner of a parcel of land located at Tabang, Guiguinto, Bulacan covered by Transfer Certificate of Title No. T-299732 issued by the Register of Deeds of Bulacan. Private respondent Amor S. Vivar is in possession of said parcel of land.

On March 16, 1996, petitioner filed with the Municipal Trial Court of Guiguinto, Bulacan a complaint[3] for ejectment against private respondent. The latter refused to vacate the said lot, claiming that he is a tenant of petitioner. In his Answer with Motion to Dismiss,[4] private respondent averred that the municipal trial court had no jurisdiction over the case since it involved a landlord-tenant relationship. Hence, the same should have been filed with the Department of Agrarian Reform instead.

However, since the Answer was filed out of time, the municipal trial court issued an Order, dated October 17, 1996 declaring that the case was deemed submitted for judgment as may be warranted by the allegations in the complaint.

Thereafter, the municipal trial court rendered a Decision, dated November 25, 1996[5] ordering private respondent to vacate the land in dispute. The dispositive portion of said decision states:

Wherefore, all the foregoing considered, judgment is hereby rendered, ordering

- a. The defendant and all those claiming rights under him to vacate the premises covered by Transfer Certificate of Title No. 299732 of the Registry of Deeds of Bulacan, and to surrender possession thereof to the plaintiff;
- b. The defendant to pay the plaintiff, the amount of P22,000, representing reasonable rentals for the use of the property from December, 1995 to the date of the judgment;
- c. he defendant to pay to the plaintiff such amount of rentals at P2,000 per month, that may become due after the date of herein judgment;
- d. The defendant to pay to the plaintiff the amount of P10,000 as attorney's fees plus P5,000 as litigation expenses.

SO ORDERED.[6]

Aggrieved, private respondent appealed the aforementioned decision to the Regional Trial Court of Guiguinto,

Bulacan. He submitted thereto the following documents to support his claim that he is a tenant in petitioner's lot:

1. Pagtitibay dated February 21, 1996 signed by Angel Torres, Chairman of the Barangay Agrarian Reform Council (BARC) who certified during a meeting between petitioner and private respondent before the BARC, petitioner offered to private respondent the amount of P25,000.00 as financial assistance should private respondent leave petitioner's lot;[7]
2. Affidavit of Dr. Teodoro Placido dated April 22, 1996 stating that petitioner mentioned to him sometime in 1992 that private respondent is his tenant;[8]
3. Sinumpaang Salaysay of Ambrosio T. Mendoza dated April 22, 1996 declaring that private respondent became petitioner's tenant in 1983;[9]
4. Sinumpaang Salaysay of private respondent dated April 22, 1996 asserting that he has been a tenant in petitioner's lot since 1983 up to said date;[10]
5. Letter dated March 25, 1995 written by Mr. Purisimo A. Gamba, Junior Statistician of the Department of Agrarian Reform in Guiguinto-Balagtas, Bulacan addressed to the Municipal Agrarian Reform Officer of Balagtas, Bulacan stating that per his findings, private respondent has been a tenant of petitioner for about fourteen (14) years;[11]
6. Patunay dated March 24, 1997 issued by Mr. Angel Torres, Chairman of the BARC of Tabang, Guiguinto, Bulacan declaring that private respondent has been a tenant in petitioner's lot in Tabang, Guiguinto, Bulacan which is planted with mangoes since 1983;[12]
7. Certification dated June 07, 1994 issued by Mr. Sotero J. Balagtas, Barangay Chairman of Tabang, Guiguinto, Bulacan that private respondent deposited the amount of P5,025.00 as proceeds from the sale of mangoes harvested from petitioner's lot, and of said amount, petitioner's share is in the amount of P2,512.50;[13] and
8. Certification dated February 23, 1995 issued by Mr. Sotero J. Balagtas, Barangay Chairman of Tabang, Guiguinto, Bulacan that private respondent deposited the amount of P6,182.50 as proceeds from the sale of mangoes harvested from petitioner's lot.[14]

On August 4, 1997, the Regional Trial Court of Guiguinto, Bulacan, Branch 13, rendered its Decision reversing the judgment of the municipal trial court and dismissing petitioner's complaint for lack of jurisdiction.[15]

Subsequently, petitioner filed a petition for review of the Regional Trial Court's Decision with the Court of Appeals. He asserted that the Regional Trial Court erred in finding that a landlord-tenant relationship exists between him and private respondent because, among others, the Regional Trial Court considered the memorandum and the documents attached thereto submitted by private respondent even though these were not presented before the municipal trial court.[16]

On September 21, 1998, the Court of Appeals rendered the assailed Decision dismissing the petition for lack of merit.[17] The appellate court upheld the Regional Trial Court's finding that the municipal trial court erred in disregarding the Answer filed by private respondent even though the same was belatedly filed because said pleading raised the issue of the municipal trial court's jurisdiction, an issue which must be resolved by said court despite the late filing of private respondent's Answer. The Court of Appeals, likewise, affirmed the Regional Trial Court's ruling that the municipal trial court had no jurisdiction over the case, stating that under Rule 40, Section 7 of the Revised Rules of Court, the former may decide the case on the basis of the entire record of the proceedings had in the court of origin and such memoranda as are filed.[18]

Hence, this Petition which makes the following assignment of errors:

1. The Honorable Court of Appeals erred in its interpretation of Section 7, Rule 40 of the Revised Rules of Court as It considered all the documents submitted by the Private Respondent for the first time together with the memorandum.
2. The Honorable Court of Appeals erred in ruling that there was a landlord-tenant relationship between the parties.[19]

We find that the Court of Appeals was correct in holding that the municipal trial court should not have disregarded private respondent's Answer but should have proceeded to determine whether or not it had jurisdiction over the subject matter of the case:

It was error for the municipal trial court to disregard the answer of respondent on the sole premise that it was belatedly filed. The answer raised the issue of jurisdiction which the court could not just gloss over because, if, after hearing, it turned out that it really did not have jurisdiction over the case because it involved an agrarian dispute, then its decision excluding and ejecting respondent from the premises would have been a complete nullity.[20]

In the case of *Bayog vs. Natino*[21] which the appellate court cited, we held that the metropolitan circuit trial court, which dismissed defendant's Answer for having been filed out of time and decided the case based on the allegations in the complaint, should not have disregarded defendant's Answer and should have heard and received the evidence for the purpose of determining whether or not it had jurisdiction over the case.

The *Bayog* case also involved a complaint for ejectment. Defendant therein filed his Answer beyond the reglementary period, but alleged in said pleading that the metropolitan circuit trial court had no jurisdiction over the subject matter of the case because the lot in question involved an agricultural lot owned by plaintiff and tenanted by defendant. Defendant therein attached to his Answer the Agricultural Leasehold Contract between him and plaintiff and the Certificate of Agricultural Leasehold issued in his favor. This Court considered said documents as sufficient to show the municipal circuit trial court's lack of jurisdiction over the case.[22]

In the case at bar, however, we do not find the documents submitted by the parties as sufficient to have enabled the Regional Trial Court to thoroughly resolve the issue of whether or not the municipal trial court acquired jurisdiction over the subject matter of the case. The Court notes that the following documents attached by private respondent to the memoranda which he submitted to the Regional Trial Court were not even submitted to the municipal trial court: (1) Letter dated March 25, 1995 written by the Junior Statistician of the Department of Agrarian Reform in Guiguinto and Balagtas, Bulacan addressed to the Municipal Agrarian Reform Officer of Balagtas, Bulacan;[23] (2) Patunay dated March 24, 1997 issued The BARC Chairman of Tabang, Guiguinto, Bulacan;[24] (3) Certification dated June 07, 1994 issued by the Barangay Chairman of Tabang, Guiguinto, Bulacan;[25] and (4) Certification dated February 23, 1995 issued by the Barangay Chairman of Tabang, Guiguinto, Bulacan.[26] The Regional Trial Court should not have considered the aforementioned in rendering its Decision since said documents were only presented before it on appeal, and were not previously filed with the municipal trial court in the original case.

What were presented to the municipal trial court were limited to the following: (1) Pagtitibay dated February 21, 1996 signed by Angel Torres, Chairman of the BARC of Tabang;[27] (2) Affidavit of Dr. Teodoro Placido dated April 22, 1996;[28] (3) Sinumpaang Salaysay of Ambrosio T. Mendoza dated April 22, 1996;[29] and (4) Sinumpaang Salaysay of private respondent dated April 22, 1996.[30]

Considering the foregoing, it is clear that there is a need to conduct a hearing whereby both parties may present evidence which may shed light on the issue of the municipal trial court's jurisdiction over the case.

Consequently, the Regional Trial Court's finding that there exists a landlord-tenant relationship between petitioner

and respondent, which was based on the documents attached by private respondent to his memoranda in the Regional Trial Court but not presented to the municipal trial court, must be set aside due to insufficiency of evidence.

Accordingly, the Court hereby GIVES DUE COURSE to the Petition and SETS ASIDE the Decision of the Court of Appeals, dated September 23, 1998 in CA-G.R. SP No. 46881 and its Resolution, dated January 20, 1998, as well as the Decision of the Regional Trial Court, dated November 25, 1996 in Civil Case No. 26-M-97 and the Decision of the municipal trial court, dated November 25, 1996 in Civil Case No. 870. The records of the instant case are hereby remanded to the Municipal Trial Court of Guiguinto, Bulacan for hearing on the issue of jurisdiction.

SO ORDERED.

Davide, Jr., C.J., (Chairman), Puno Pardo, and Ynares-Santiago, JJ., concur.

[1] Jaime P. Corpin, Petitioner, versus Amor S. Vivar, Respondent; Rollo, pp. 43-49.

[2] Id., at 56.

[3] Id., at 31.

[4] Id., at 33.

[5] Id., at 38-39.

[6] Id., at 39.

[7] Amended Comment, Rollo, pp. 114, 123; Decision of the Regional Trial Court dated November 25, 1996, Id., at 41-42; Decision of the Court of Appeals dated September 21, 1998, Id., at 47.

[8] Amended Comment, Id., pp. 114, 124; Decision of the Regional Trial Court dated November 25, 1996, Id., at 41-42.

[9] Amended Comment, Id., at 114, 125.

[10] Id., at 114, 126.

[11] Amended Comment, Id., at 114-115; Decision of the Regional Trial Court dated November 25, 1996, Id., at 41-42; Decision of the Court of Appeals dated September 21, 1998, Id., at 47.

[12] Ibid.

[13] Amended Comment, id., at 115; Decision of the Regional Trial Court dated November 25, 1996, id., at 41-42; Decision of the Court of Appeals dated September 21, 1998, id., at 47.

[14] Amended Comment, id., at 115; Decision of the Regional Trial Court dated November 25, 1996, id., at 41-42; Decision of the Court of Appeals dated September 21, 1998, id., at 48.

[15] Decision of the Regional Trial Court of Guiguinto, Bulacan dated November 25, 1996; id., at 42.

[16] see Decision of the Court of Appeals, Fifteenth Division, dated September 21, 1998, Id., at 44-45.

[17] Decision of the Court of Appeals dated September 21, 1998, Id., at 49.

[18] Id., at 45-47.

[19] Petition, Id., at 24.

[20] Decision of the Court of Appeals dated September 21, 1998, Id., at 45.

[21] 258 SCRA 378, 393-394 (1996), per Davide, Jr., J.

[22] Ibid.

[23] Amended Comment, Rollo, pp. 114-115; Decision of the Regional Trial Court dated November 25, 1996, Id., at 41-42; Decision of the Court of Appeals dated September 21, 1998, Id., at 47.

[24] Ibid.

[25] Amended Comment, Id., at 115, Decision of the Regional Trial Court dated November 25, 1996, Id., at 41-42; Decision of the Court of Appeals dated September 21, 1998, Id., at 47.

[26] Amended Comment, Id., at 115; Decision of the Regional Trial Court dated November 25, 1996, id., at 41-42; Decision of the Court of Appeals dated September 21, 1998, id., at 48.

[27] Amended Comment, Id., at 114, 123; Decision of the Regional Trial Court dated November 25, 1996, Id., at 41-42; Decision of the Court of Appeals dated September 21, 1998, id., at 47.

[28] Amended Comment, Id., at 114, 124; Decision of the Regional Trial Court dated November 25, 1996, Id., at 41-42.

[29] Amended Comment, Id., at 114, 125.

[30] Id., at 114, 126.

ABOUT BATAS.ORG

Study smarter at BATAS.org

The Philippine bar review and law-school companion built around how your brain actually remembers.

The complete Philippine law library - free for everyone.

More than 100,000 Supreme Court decisions, Republic Acts, and executive issuances - full-text searchable, browsable by category and year, and always free. No paywall, no login. This PDF came from it.

Audio case-brief lectures.

Any decision becomes a podcast-style lecture - facts, issues, ruling, and doctrine - with read-along highlighting and a hands-free presentation mode. Study while commuting, working out, or resting your eyes.

Bar review built on the science of memory.

Complete, sequenced courses for all eight bar subjects, narrated like podcasts and reinforced with retrieval practice and spaced review - the study techniques with the strongest evidence behind them.

The full law-school curriculum.

One subscription unlocks the entire J.D. curriculum - every subject, every lesson, with your progress tracked down to the paragraph so you can pick up exactly where you left off, on any device.

Mock exams that tell you where you stand.

Timed multiple-choice exams graded instantly, with per-subject score breakdowns and focus suggestions that point you at your weakest topics first.

A study planner that keeps you on pace.

Set your schedule and BATAS tells you every day whether you are on track for bar day - and exactly which lesson to take next.

Start free at <https://batas.org>

The law library is free forever - and your first lesson is one click away.

The text of this document is an official public record and remains in the public domain. Formatting, presentation, and compilation © 2026 batas.org.

Downloaded free from the batas.org Law Library. Share it freely - the library is free for every law student, bar reviewee, and practitioner.