

LAND BANK OF THE PHILIPPINES, PETITIONER, VS. PRESENT: CORAZON M. VILLEGAS, RESPONDENT.

G.R. No. 180384. March 26, 2010

Ponente: ABAD, J.

Read online (full-text search, related cases, audio case brief): <https://batas.org/library/g-r-no-180384/>

ABAD, J.:

These consolidated cases[1] are about the jurisdiction of a Regional Trial Court (RTC), acting as a Special Agrarian Court, over just compensation cases involving agricultural lands located outside its regular territorial jurisdiction but within the province where it is designated as agrarian court under the Comprehensive Agrarian Reform Law of 1988.

The Facts and the Case

Petitioner Land Bank of the Philippines (Land Bank) filed cases for determination of just compensation against respondent Corazon M. Villegas in Civil Case 2007-14174 and respondent heirs of Catalino V. Noel and Procula P. Sy in Civil Case 2007-14193 before the RTC of Dumaguete City, Branch 32, sitting as a Special Agrarian Court for the province of Negros Oriental. Respondent Villegas' property was in Hibaiyo, Guihulngan City, Negros Oriental, while respondent heirs' land was in Nangca, Bayawan City, Negros Oriental. These lands happened to be outside the regular territorial jurisdiction of RTC Branch 32 of Dumaguete City.

On September 13, 2007 RTC, Branch 32 dismissed Civil Case 2007-14174 for lack of jurisdiction.[2] It ruled that, although it had been designated Special Agrarian Court for Negros Oriental, the designation did not expand its territorial jurisdiction to hear agrarian cases under the territorial jurisdiction of the RTC, Branch 64 of Guihulngan City where respondent Villegas' property can be found.

On November 16, 2007 RTC, Branch 32 also dismissed Civil Case 2007-14193 for lack of jurisdiction. It pointed out that RTC, Branch 63 of Bayawan City had jurisdiction over the case since respondent heirs' property was within the latter court's territorial jurisdiction.

Petitioner Land Bank moved for the reconsideration of the dismissal of the two cases but RTC, Branch 32 denied both motions.[3] Aggrieved, Land Bank directly filed this petitions for certiorari[4] before this Court, raising a purely question of law.

Sole Question Presented

The sole question presented in these cases is whether or not an RTC, acting as Special Agrarian Court, has jurisdiction over just compensation cases involving agricultural lands located outside its regular jurisdiction but within the province where it is designated as an agrarian court under the Comprehensive Agrarian Reform Law of 1998.

The Court's Ruling

The RTC, Branch 32 based its order on Deputy Court Administrator (DCA) Zenaida Elepaño's opinion that single sala courts have jurisdiction over agrarian cases involving lands located within its territorial jurisdiction. An RTC branch acting as a special agrarian court, she claimed, did not have expanded territorial jurisdiction. DCA Elepaño said:

x x x [B]eing a single sala court, the Regional Trial Court, Branch 64, Guihulngan, Negros Oriental, has jurisdiction over all cases, including agrarian cases, cognizable by the Regional Trial Court emanating from the geographical areas within its territorial jurisdiction.

Further, the jurisdiction of the Special Agrarian Courts over agrarian cases is co-extensive with its territorial jurisdiction. Administrative Order No. 80 dated July 18, 1989, as amended by Administrative Order No. 80A-90 dated February 23, 1990, did not expand the territorial jurisdiction of the courts designated as Special Agrarian Courts.[5]

Respondent Villegas[6] adopts DCA Elepaño's view. Villegas points out that the designation of RTC, Branch 32 as a Special Agrarian Court did not expand its territorial jurisdiction. Although it has been designated Special Agrarian Court for the Province of Negros Oriental, its jurisdiction as an RTC did not cover the whole province.

Respondent Villegas adds that, in hearing just compensation cases, RTC, Branch 64 in Guihulngan City should be no different from the situation of other single sala courts that concurrently hear drugs and family-related cases even as the Supreme Court has designated family and drugs courts in Dumaguete City within the same province. Further, Guihulngan City is more than 100 kilometers from Dumaguete City where RTC, Branch 32 sits. For practical considerations, RTC, Branch 64 of Guihulngan City should hear and decide the case.

For their part, on June 19, 2009 respondent heirs of Noel informed[7] the Court that petitioner Land Bank had already paid them for their land. Consequently, they have no further interest in the outcome of the case. It is not clear, however, if the trial court had already approved a settlement.

"Jurisdiction" is the court's authority to hear and determine a case. The court's jurisdiction over the nature and subject matter of an action is conferred by law.[8] In this case, the law that confers jurisdiction on Special Agrarian Courts designated by the Supreme Court in every province is Republic Act (R.A.) 6657 or the Comprehensive Agrarian Reform Law of 1988. Sections 56 and 57 are the relevant provisions:

SEC. 56. Special Agrarian Court. - The Supreme Court shall designate at least one (1) branch of the Regional Trial Court (RTC) within each province to act as a Special Agrarian Court.

The Supreme Court may designate more branches to constitute such additional Special Agrarian Courts as may be necessary to cope with the number of agrarian cases in each province. In the designation, the Supreme Court shall give preference to the Regional Trial Courts which have been assigned to handle agrarian cases or whose presiding judges were former judges of the defunct Court of Agrarian Relations.

The Regional Trial Court (RTC) judges assigned to said courts shall exercise said special jurisdiction in addition to the regular jurisdiction of their respective courts.

SEC. 57. Special Jurisdiction. - The Special Agrarian Courts shall have original and exclusive jurisdiction over all petitions for the determination of just compensation to landowners, and the prosecution of all criminal offenses under this Act. The Rules of Court shall apply to all proceedings before the Special Agrarian Courts unless modified by this Act.

The Special Agrarian Courts shall decide all appropriate cases under their special jurisdiction within thirty (30) days from submission of the case for decision.

The law is clear. A branch of an RTC designated as a Special Agrarian Court for a province has the original and

exclusive jurisdiction over all petitions for the determination of just compensation in that province. In *Republic v. Court of Appeals*,^[9] the Supreme Court ruled that Special Agrarian Courts have original and exclusive jurisdiction over two categories of cases: (1) all petitions for the determination of just compensation to landowners, and (2) the prosecution of all criminal offenses under R.A. 6657.

By "special" jurisdiction, Special Agrarian Courts exercise power in addition to or over and above the ordinary jurisdiction of the RTC, such as taking cognizance of suits involving agricultural lands located outside their regular territorial jurisdiction, so long as they are within the province where they sit as Special Agrarian Courts.

R.A. 6657 requires the designation by the Supreme Court before an RTC Branch can function as a Special Agrarian Court. The Supreme Court has not designated the single sala courts of RTC, Branch 64 of Guihulngan City and RTC, Branch 63 of Bayawan City as Special Agrarian Courts. Consequently, they cannot hear just compensation cases just because the lands subject of such cases happen to be within their territorial jurisdiction.

Since RTC, Branch 32 of Dumaguete City is the designated Special Agrarian Court for the province of Negros Oriental, it has jurisdiction over all cases for determination of just compensation involving agricultural lands within that province, regardless of whether or not those properties are outside its regular territorial jurisdiction.

WHEREFORE, the Court GRANTS the petitions, SETS ASIDE the orders of the Regional Trial Court, Branch 32 of Dumaguete City dated September 13, 2007 and October 30, 2007 in Civil Case 2007-14174, entitled *Land Bank of the Philippines v. Corazon Villegas*, and its orders dated November 16, 2007 and December 14, 2007 in Civil Case 2007-14193, entitled *Land Bank of the Philippines v. Heirs of Catalino V. Noel and Procula P. Sy*, which orders dismissed the cases before it for lack of jurisdiction. Further, the Court DIRECTS the Regional Trial Court, Branch 32 of Dumaguete City to immediately hear and decide the two cases unless a compromise agreement has in the meantime been approved in the latter case.

SO ORDERED.

Carpio, (Chairperson, Second Division), Brion, Del Castillo, and Perez, JJ., concur.

[1] Resolution dated April 9, 2008 consolidating G.R. 180384 with G.R. 180891.

[2] Rollo (G.R. 180384), pp. 33-34.

[3] *Id.* at 35; rollo (G.R. 180891), p. 34.

[4] Civil Case 2007-14174 docketed as G.R. 180384; Civil Case 2007-14193 docketed as G.R. 180891.

[5] Rollo (G.R. 180384), p. 77.

[6] *Id.* at 124-130; 463-472.

[7] Manifestation, rollo (G.R. 180891), pp. 128-129.

[8] *Spouses Atuel v. Spouses Valdez*, 451 Phil. 631, 641 (2003).

[9] 331 Phil. 1070, 1075 (1996).

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.