SOTERO DIOLA, FELIXBERTO CUBERO, JUDY U. LIM, MANUEL R. LAHOZ, AND NERISSA C. NATIVIDAD, PETITIONERS, VS. LAGUNA WEST MULTI-PURPOSE COOPERATIVE, INC., RESPONDENT.

G.R. No. 278514, July 07, 2026

Ponente: DIMAAMPAO, J.

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DIMAAMPAO, J.:

This is a Petition for Review on Certiorari[1] under Rule 45 of the Rules of Court filed by petitioners Sotero Diola, Felixberto Cubero, Judy U. Lim, Manuel R. Lahoz, and Nerissa C. Natividad (Diola et al.), assailing the Decision[2] and the Resolution[3] of the Court of Appeals (CA) in CA-G.R. SP No. 180923.

The assailed rulings sustained the Decision[4] of Branch 6 of the Regional Trial Court (RTC) of Tanauan City, Batangas, which granted respondent Laguna West Multi-Purpose Cooperative, Inc.'s (Laguna West) Amended Petition for Mandamus[5] against the Register of Deeds of Tanauan City, Batangas.

Antecedents
In 1996, Laguna West embarked on a series of Joint Venture Agreements (JVAs) with agrarian reform beneficiaries over several parcels of land in Tanauan City, Batangas. These agreements were aimed at transforming the landholdings into housing, commercial, and/or industrial developments. To safeguard its interests, Laguna West registered the JVAs and secured their annotations on the beneficiaries' respective transfer certificates of title (TCTs).[6]

Laguna West subsequently learned that the beneficiaries had sold the subject lands to Diola et al., leading to the cancellation of the beneficiaries' TCTs and the issuance of new titles in favor of the latter. Notably, the annotations of the JVAs were conspicuously omitted from the newly issued TCTs.[7]

On July 27, 2006, Laguna West sent a letter to the Register of Deeds of Tanauan City, Batangas, formally demanding the inscription of the JVAs on the TCTs issued in the name of Diola et al. When the Register of Deeds failed to act on this demand, Laguna West filed several petitions before the RTC, praying for their annotations.[8] In a series of identical Orders,[9] the RTC dismissed the individual petitions, holding that court intervention was unnecessary because Laguna West failed to demonstrate that the Register of Deeds had refused to discharge its duty under Section 59 of Presidential Decree No. 1529.[10]

Laguna West thereafter filed the subject petition for mandamus, beseeching that the Register of Deeds be compelled to carry over the omitted adverse claims to the pertinent TCTs.[11]

After being impleaded as indispensable parties, Diola et al. filed their Comment[12] and moved to terminate the proceedings on several grounds. First, they contended that the mandamus petition was filed out of time. Since there was no order explicitly denying Laguna West's demand, the 60-day reglementary period should be reckoned from the expiration of 15 days from the time it was received by the Register of Deeds. Second, they argued that Laguna West failed to exhaust administrative remedies, having neither move<l for="" reconsideration="" nor="

elevated="" the="" matter="" en consulta to the Land Registration Authority. Lastly, they maintained that the JVAs were void for violating the proscription against the transfer of lands conferred through certificates of land ownership award.[13]

Ruling of the RTC
The RTC conducted a hearing on the affirmative defenses raised by Diola et al. and thereafter issued an Order denying the same. This ruling was later affirmed by the CA via the action for certiorari filed by Diola et al. in CA-G.R. SP No. 150402.[14] In due course, the RTC rendered the Decision granting the Amended Petition for Mandamus and disposing as follows:

> WHEREFORE, premises considered, the petition is GRANTED. Let a Writ of [Mandamus] be issued directing the respondent Register of Deeds of Tanauan City, Batangas, to carry over and annotate the adverse claims of [Laguna West], appearing in [the] following cancelled titles with their respective adverse claim entry numbers, to their respective succeeding titles.
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> SO ORDERED.[15] (Emphasis in the original)

In its Decision, the RTC brushed aside the issue regarding the validity of the subject JVAs, stating that jurisdiction on the administrative implementation of agrarian laws exclusively pertains to the Department of Agrarian Reform Adjudication Board.[16] As regards the procedural requirements of the petition for mandamus, the RTC ruled that these had already been raised as affirmative defenses and were accordingly denied. It nonetheless reiterated that, because the Register of Deeds' inaction was the very premise of Laguna West's mandamus petition, there was no judgment, order, or resolution from which notice could be reckoned.[17] On the substantive aspect, the RTC held that the Register of Deeds' failure to perform its ministerial duty to carry over the omitted adverse claim was an omission compellable by mandamus.[18]

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In the assailed Decision, the CA mirrored the RTC's determinations and affirmed its ruling in all material respects.[19] Thereupon, Diola et al. moved for reconsideration, but the same was denied in the now-assailed Resolution.[20]

Displeased, Diola et al. now seek recourse before this Court through the present Petition, maintaining that Laguna West lacks a clear legal right to demand the annotation, given the purported invalidity of the JVAs.[21]

Issue
May the Register of Deeds of Tanauan City be compelled by mandamus to carry over the omitted annotations to the pertinent TCTs?

Ruling of the Court
The Petition lacks merit.

Prefatorily, the instant Petition is fatally defective for failing to include a legible duplicate original or certified true copy of the assailed CA rulings, a flaw that renders it dismissible under Rule 45, Sections 4[22] and 5[23] of the Rules of Court. Yet, even if this Court were to excuse such procedural mishap, the Petition remains meritless.

Mandamus lies when a tribunal, corporation, board, officer, or person unlawfully neglects to perform an act specifically enjoined by law as a duty arising from an office, trust, or station; or excludes another from the use and

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enjoyment of a right or office to which the other is entitled.[24] For it to lie, the following requisites must be present: (i) the plaintiff has a clear legal right to the act demanded, or those rights which are founded in law, are specific, certain, clear, established, complete, undisputed or unquestioned, and are without any semblance or color of doubt; (ii) it must be the duty of the defendant to perform the act, because it is mandated by law; (iii) the defendant unlawfully neglects the performance of the duty enjoined by law; (iv) the act to be performed is ministerial, not discretionary; and, (v) there is no appeal or any other plain, speedy, and adequate remedy in the ordinary course of law.[25]

Section 59 of Presidential Decree No. 1529[26] provides that "[i]f, at the time of any transfer, subsisting encumbrances or annotations appear in the registration book, they shall be carried over and stated in the new certificate or certificates, except so far as they may be simultaneously released or discharged." This provision embodies the rule that encumbrances and annotations duly inscribed in the registration book adhere to the title and continue to bind the property notwithstanding its transfer, unless they have been validly released or discharged in accordance with law. Thus, where such encumbrances remain extant at the time of transfer, the Register of Deeds is under a mandatory and ministerial duty to carry them over to the transferee's certificate of title.[27]

Applying the foregoing, Laguna West possessed a clear legal right to require the annotation of its JVAs on the TCTs issued in the names of Diola et al. Correspondingly, the Register of Deeds had the ministerial obligation to carry over the existing annotations. Its inaction in this regard is therefore subject to compulsion through mandamus.

With respect to the issue concerning the validity of the JVAs, the Court adopts and quotes with approbation the following ruling of the CA:

> The Court likewise finds no merit in [Diola et al.'s] argument that the RTC could pass upon the validity of the subject JVAs. It is settled that jurisdiction over the subject matter is conferred by law and determined by the allegations in the complaint, including the character of the reliefs prayed for. The jurisdiction over the administrative implementation of agrarian laws exclusively belong to the Department of Agrarian Reform [(DAR)]. Section 50 of Republic Act No. 6657, as amended by [Republic Act] No. 9700, provides that the DAR is vested with primary jurisdiction to determine and adjudicate agrarian reform matters and shall have original jurisdiction over all matters involving the implementation of agrarian reform. Under Section 50-A of the same law, no court shall take cognizance of cases pertaining to the implementation of the CARP except those provided under Section 57 of [Republic Act] No. 6657.
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> [Diola et al.] have filed a complaint earlier with the RTC of Tanauan [City] for annulment of the JVAs against [Laguna West]. The RTC dismissed the complaint on the ground that the primary jurisdiction to determine the validity of the JVAs is with the Department of Agrarian Reform Adjudication Board (DARAB). [Diola et al.] elevated the case to the Supreme Court via a petition for review under Rule 45 entitled Cubero v. Laguna West Multi-Purpose Cooperative, Inc. docketed as G.R. No. 166833. In a [D]ecision dated November 30, 2006, the Supreme Court denied [Diola et al.'s] petition and held that since the controversy involving the subject JVAs involve the development and utilization of the subject agricultural lands, the case falls squarely within the jurisdictional ambit of the DAR[.][28]

In any event, Laguna West's Amended Petition for Mandamus does not call for the enforcement of the JVAs. It simply seeks to compel the Register of Deeds of Tanauan City, Batangas to carry over the omitted annotations to the relevant certificates of title.

In synthesis, the Court finds no cogent reason to disturb the findings and conclusions of both the CA and the RTC.

ACCORDINGLY, the Petition for Review on Certiorari is DENIED. The June 28, 2024 Decision and the January 30, 2025 Resolution of the Court of Appeals in CA-G.R. SP No. 180923 are AFFIRMED.

SO ORDERED.

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

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[*] On official business.

[1] Rollo, pp. 11-32.

[2] Id. at 34-48. The June 28, 2024 Decision was penned by Associate Justice Myra V. Garcia-Fernandez, with the concurrence of Associate Justices Tita Marilyn B. Payoyo-Villordon and Rex Bernardo L. Pascual of the Eighth Division, Court of Appeals, Manila.

[3] Id. at 67-68. Dated January 30, 2025.

[4] Id. at 300-308. The November 3, 2022 Decision in SP Civil Action No. 06-12-3288 was penned by Presiding Judge Jose Ricuerdo P. Flores.

[5] Id. at 98-110.

[6] Id. at 35.

[7] Id.

[8] Id. at 36.

[9] Id. at 218-226. The August 10, 24, and 26, 2004 Orders were penned by Judge Arcadio L. Manigbas.

[10] Id. at 36.

[11] Id. at 109.

[12] See id. at 37.

[13] Id. at 37-38.

[14] Id. at 15, 38-39.

[15] Id. at 308.

[16] Id. at 305.

[17] Id. at 306.

[18] Id. at 307.

[19] Id. at 41-47.

[20] Id. at 68.

[21] Id. at 19-20.

[22] SEC. 4. Contents of petition. — The petition shall be filed in eighteen (18) copies, with the original copy intended for the court being indicated as such by the petitioner, and shall (a) state the full name of the appealing

party as the petitioner and the adverse party as respondent, without impleading the lower court or judges thereof either as petitioners or respondents; (b) indicate the material dates showing when notice of the judgment or final order or resolution subject thereof was received, when a motion for new trial or reconsideration, if any, was filed and when notice of the denial thereof was received; (c) set forth concisely a statement of the matters involved, and the reasons or arguments relied on for the allowance of the petition; (d) be accompanied by a clearly legible duplicate original, or a certified true copy of the judgment or final order or resolution certified by the clerk of court of the court a quo and the requisite number of plain copies thereof, and such material portions of the record as would support the petition; and (e) contain a sworn certification against forum shopping as provided in the last paragraph of section 2, Rule 42.

[23] SEC. 5. Dismissal or denial of petition. — The failure of the petitioner to comply with any of the foregoing requirements regarding the payment of the docket and other lawful fees, deposit for costs, proof of service of the petition, and the contents of and the documents which should accompany the petition shall be sufficient ground for the dismissal thereof.

The Supreme Court may on its own initiative deny the petition on the ground that the appeal is without merit, or is prosecuted manifestly for delay, or that the questions raised therein are too unsubstantial to require consideration.

[24] See Guiao v. Philippine Amusement and Gaming Corp., 955 Phil. 40, 49 (2024) [Per J. Leonen, En Banc].

[25] See id.

[26] Presidential Decree No. 1529 (1978), Property Registration Decree.

[27] See Saberon v. Ventanilla, Jr., 733 Phil. 275, 299 (2014) [Per J. Mendoza, Third Division].

[28] Rollo, pp. 43-44.

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