

JENNIEFER L. JUMAO-AS, PETITIONER, VS. ZENAIDA CRISOSTOMO, MARICHU CRISOSTOMO[,] JOHN DOES AND JANE DOES, AND ANY AND ALL OTHER PERSONS ACTING ON THEIR BEHALF AND INTEREST, RESP...

G.R. No. 279378, April 07, 2026

Ponente: SINGH, J.

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SINGH, J.:

Before the Court is a Petition for Review on Certiorari[1] (Petition) under Rule 45 of the Rules of Court filed by petitioner Jenniefer[*] L. Jumao-as (Jeniefer) assailing the Decision,[2] dated August 16, 2024, and the Resolution,[3] dated March 17, 2025, of the Court of Appeals (CA) in CA-G.R. CV No. 119403. The CA affirmed the Decision,[4] dated July 12, 2021, and the Order,[5] dated April 20, 2022, of Branch 292, Regional Trial Court, Malabon City (RTC), in Civil Case No. CV-2609-MAL, which dismissed Jenniefer's Complaint for Injunction and Enforcement of Easement of Right of Way.

The Facts

The present case originated from a Complaint for Injunction and Enforcement of Easement of Right of Way (Complaint), dated July 17, 2019, filed by Jenniefer against respondents Zenaida Crisostomo (Zenaida), Marichu Crisostomo (Marichu), John Does and Jane Does, and any and all other persons acting on their behalf and interest (collectively, Zenaida, et al.).[6]

In her Complaint, Jenniefer alleged that she is the registered owner of five parcels of land, covered by Transfer Certificate of Title (TCT) Nos. 007-2018000857, 007-2018000858, 007-2018000859, 007-2018000860, and 007-2018-000861, all situated in Barangay Niugan, Malabon City.[7]

Jeniefer averred that she acquired the five parcels of land from Norman Fulgencio (Norman), who, in turn, obtained the properties from Bernabe Gozon (Bernabe), the late brother of Zenaida.[8]

Jeniefer, Zenaida, et al., and Floredeliz Borja (Floredeliz) are adjoining lot owners as shown by a subdivision plan prepared by Godofredo R. Villasenor (Villasenor), a Geodetic Engineer, according to a survey he conducted on August 15, 1982.[9]

Specifically, Jenniefer's properties are situated at the corner of Calle M. Aquino and a supposed road lot, described as Lot 2-1-7. The said road lot, with an area of 402 square meters, is registered in the names of Zenaida and Bernabe, among others, under TCT No. M-9835. According to Jenniefer, Lot 2-1-7 is used as an access road to all the lots contained in the subdivision plan, even before her acquisition of the five properties.[10]

In the meantime, Jenniefer built townhouses in one of her properties along Lot 2-1-7.

Jeniefer further averred that, on May 1, 2019, Zenaida, et al. blocked her access to Lot 2-1-7 by erecting steel poles, claiming that the lot is private property. Jenniefer, argued that Zenaida, et al.'s act violated the easement

constituted on the said lot, which was indicated and inscribed on TCT No. M-9835. Jenniefer ultimately claims that Lot 2-1-7 is a servient estate in the easement of right of way, with the adjoining lots as dominant estates.[11]

Jeniefer referred the matter to the barangay for conciliation, but the same was unfruitful. Thus, Jenniefer filed her Complaint praying for the following reliefs: (1) the issuance of a Temporary Restraining Order (TRO) and a Writ of Preliminary Injunction (WPI) enjoining Zenaida, et al. from committing acts violative of the easement of right of way supposedly constituted over Lot 2-1-7; (2) the issuance of a permanent injunction after due hearing; and (3) the award of actual, moral, and exemplary damages of PHP 1 million each, as well as PHP 500,000.00 in attorney's fees and costs of suit.[12]

In their Answer to Jenniefer's Complaint, Zenaida, et al. argued that Jenniefer had no cause of action against them since no easement of right of way was annotated on TCT No. M-9835. Zenaida, et al. further claim that Jenniefer still has access to Calle M. Aquino Street, a public road, and she only chose to use Zenaida, et al.'s properties as ingress and egress.[13]

Zenaida, et al. also sought the award of PHP 1 million as attorney's fees, PHP 500,000.00 as moral damages, and costs of suit by way of counterclaim.[14]

On August 16, 2019, the RTC issued an Order denying Jenniefer's prayer for TRO, ruling that she has not established her entitlement to the use of the right of way over Lot 2-1-7.[15]

According to the RTC, it was not shown that Lot 2-1-7 is part of the city's road network, or that the lot was donated to Jenniefer. The RTC further observed that, while steel posts were erected along Jenniefer's property perpendicular to Calle M. Aquino, Lot 2-1-7 is still accessible to residents and occupants of its adjoining lots.[16]

On January 6, 2021, Zenaida, et al. filed a Motion to Dismiss, manifesting that Jenniefer has already voluntarily constituted an opening within her properties serving as an alley to and from the public road. Thus, they argued that Jenniefer had no more cause of action against them.[17]

Jeniefer opposed Zenaida, et al.'s Motion to Dismiss, arguing that the same is a prohibited pleading, and that her voluntary act of creating an opening in her property to access the public road does not mean she is waiving her right over the existing easement of right of way constituted over Lot 2-1-7.[18]

On April 19, 2021, the RTC denied Zenaida, et al.'s Motion to Dismiss for lack of merit. Zenaida et al. then opted not to present evidence on their behalf.[19]

The Ruling of the RTC

In a Decision, dated July 12, 2021, the RTC dismissed Jenniefer's Complaint for lack of merit:

WHEREFORE, in light of the foregoing premises, the above-entitled complaint for injunction with enforcement of right of way is hereby DISMISSED for lack of merit.

SO ORDERED.[20] (Emphasis in the original)

According to the RTC, Jenniefer failed to prove that Zenaida, et al. acceded to her use of Lot 2-1-7 as an access road, and that Lot 2-1-7 is part of Malabon City's road network, or that the same was donated to her or to the local government. Thus, the RTC held that Zenaida, et al.'s act of erecting steel poles on the lot was valid, considering that there was no enforceable right of way over the same.[21]

Jeniefer filed a Motion for Reconsideration of the RTC Decision, and Zenaida, et al. also filed a motion praying for the grant of their counterclaims. The RTC denied Jenniefer's Motion for Reconsideration and dismissed Zenaida, et al.'s counterclaim in an Order, dated April 20, 2022.

Aggrieved, Jenniefer appealed to the CA.

The Ruling of the CA

In a Decision, dated August 16, 2024, the CA denied Jenniefer's appeal:

ACCORDINGLY, the present appeal is DENIED. The Decision[,] dated July 12, 2021, and Order[,] dated April 20, 2022, of [Branch 292, Regional Trial Court, Malabon City], in Civil Case No. CV-2609-MAL, are hereby AFFIRMED.

IT IS SO ORDERED.[22] (Emphasis in the original)

According to the CA, the burden of proof to show the existence of a right of way falls upon Jenniefer, the owner of the dominant estate who seeks the imposition of the easement. Thus, Jenniefer cannot rely solely on Zenaida, et al.'s failure to submit rebuttal evidence to establish her claim for an easement of right of way over Lot 2-1-7.[23]

The CA further ruled that Jenniefer is not entitled to a legal or compulsory right of way since: (1) she failed to prove that her properties had no adequate outlet to a public highway; (2) she failed to indicate in her Complaint or manifest during trial that she was willing to indemnify Zenaida, et al. for the right of way; (3) her properties are not cut-off or isolated; and (4) the supposed right of way constituted over Lot 2-1-7 was not established at the point least prejudicial to the servient estate, if it could be classified as that.[24]

The CA also held that there is no voluntary easement of right of way in Jenniefer's favor as there is no contract or agreement to this effect. The CA noted that TCT No. M-9835 does not have any annotation that Lot 2-1-7 bears an easement of right of way as regards the estates surrounding it. Further, even assuming that a servitude was previously constituted over Lot 2-1-7, the registration of the supposed servient estate without the annotation of such voluntary easement effectively extinguishes such easement.[25]

Additionally, the CA ruled that while Lot 2-1-7 was described as a road lot in a subdivision plan, the same is still considered private property until it is conveyed to the government, or expropriated, or transferred to another private individual.[26]

Lastly, the CA held that an easement of right of way over Lot 2-1-7 could not have been constituted by prescription, since an easement of right of way is intermittent or discontinuous.[27]

In a Resolution, dated March 17, 2025, the CA denied Jenniefer's Motion for Reconsideration for lack of merit.

Dissatisfied with the CA's disposition of her appeal, Jenniefer filed the present Petition before the Court.

In her Petition, Jenniefer argues that the CA committed reversible error in failing to recognize the existence of a voluntary easement of right of way constituted over Lot 2-1-7, considering the "consistent designation and historical use of said lot as a road, as reflected in the subdivision plan and [TCT] No. M-9835[.]"[28]

The Issue

Did the CA err in ruling that there exists no legal or voluntary easement of right of way constituted over Lot 2-1-7?

The Ruling of the Court

The Court denies the Petition. The CA correctly found that Jenniefer failed to prove that she is entitled to either a legal or a voluntary easement over Lot 2-1-7.

Preliminarily, the Court notes that Jenniefer's prayer will require the Court to evaluate the pieces of evidence presented to and weighed by the RTC and further reviewed by the CA in order to reach a different conclusion, that is, that she is entitled to a right of way over Lot 2-1-7.

It is settled that factual questions are beyond the Court's jurisdiction in the present Petition for Review on Certiorari under Rule 45.[29] Verily, once it is clear that the issue invites a review of the evidence presented, the question posed is one of fact.[30] While Rule 45 is not absolute, none of the exceptions[31] which would allow the Court to review factual issues, exists in this case.[32]

In any case, Jenniefer failed to prove the existence of either a compulsory or a voluntary easement of right of way over Lot 2-1-7.

An easement is a burden imposed on one property, known as the servient estate, for the benefit of another property, known as the dominant estate, owned by a different person. It grants a limited right to use a specific portion or aspect of the servient estate, without transferring ownership or possession of that property.[33] The Civil Code provides:

Article 613. An easement or servitude is an encumbrance imposed upon an immovable for the benefit of another immovable belonging to a different owner.

The immovable in favor of which the easement is established is called the dominant estate; that which is subject thereto, the servient estate.

In an easement of right of way, a determinate portion of the servient estate is subjected to a burden allowing its use as a passage by the owner of the dominant estate. Such an easement is classified as a discontinuous easement, as its exercise depends upon the intermittent acts of persons who pass through the property, rather than upon continuous use.[34]

This classification is significant, as, under the Civil Code, discontinuous easements cannot be acquired by prescription and may be constituted only by title.[35] Accordingly, the burden rests upon Jenniefer to establish that the claimed easement of right of way was validly acquired by title, whether by agreement, or by filing a case for the conferment of a legal easement of right of way.

In this regard, the Court agrees with the CA that Jenniefer failed to establish the existence of any agreement with Zenaida granting her the claimed right of way, and that she is likewise not entitled to a compulsory legal easement of right of way under the Civil Code.

With respect to Jenniefer's claim of an implied agreement with Zenaida, et al., the Court notes that she presented no evidence to substantiate this assertion beyond her bare allegation. She merely relied on the supposed failure of Zenaida, et al. to present rebuttal evidence. It is axiomatic that an allegation is not equivalent to proof.[36] Consequently, in light of Jenniefer's failure to discharge her burden of proof, the Court is constrained to rule that no implied agreement existed creating a voluntary easement of right of way.

Similarly, the Court finds that Jenniefer is not entitled to a compulsory easement of right of way. In this regard, Articles 649 and 650 of the Civil Code provides:

Article 649. The owner, or any person who by virtue of a real right may cultivate or use any immovable, which is surrounded by other immovables pertaining to other persons and without adequate outlet to a public highway, is entitled to demand a right of way through the neighboring estates, after payment of the proper indemnity.

Should this easement be established in such a manner that its use may be continuous for all the needs of the dominant estate, establishing a permanent passage, the indemnity shall consist of the value of the land occupied and the amount of the damage caused to the servient estate.

In case the right of way is limited to the necessary passage for the cultivation of the estate surrounded by others

and for the gathering of its crops through the servient estate without a permanent way, the indemnity shall consist in the payment of the damage caused by such encumbrance.

This easement is not compulsory if the isolation of the immovable is due to the proprietor's own acts. (564a)

Article 650. The easement of right of way shall be established at the point least prejudicial to the servient estate, and, insofar as consistent with this rule, where the distance from the dominant estate to a public highway may be the shortest.

Elaborating on the essential requisites for the grant of a compulsory right of way, the Court, in *Reyes v. Spouses Valentin*,^[37] ruled:

[T]he following requisites need to be established before a person becomes entitled to demand the compulsory easement of right of way:

1. An immovable is surrounded by other immovables belonging to other persons, and is without adequate outlet to a public highway;
2. Payment of proper indemnity by the owner of the surrounded immovable;
3. The isolation of the immovable is not due to its owner's acts; and
4. The proposed easement of right of way is established at the point least prejudicial to the servient estate, and insofar as consistent with this rule, where the distance of the dominant estate to a public highway may be the shortest.

An easement of right of way is a real right. When an easement of right of way is granted to another person, the rights of the property's owner are limited. An owner may not exercise some of his or her property rights for the benefit of the person who was granted the easement of right of way. Hence, the burden of proof to show the existence of the above conditions is imposed on the person who seeks the easement of right of way.^[38] (Emphasis supplied, citations omitted)

With respect to the first requisite, jurisprudence consistently holds that courts will compel the establishment of a right of way only upon a showing of absolute necessity. Thus, where a purportedly landlocked property may be provided with adequate access to a public road without the imposition of an easement upon neighboring property, the courts will not sanction the creation of a right of way.^[39]

Moreover, to sufficiently establish that an isolated lot has no adequate access to a public highway, the claimant must demonstrate the accessibility conditions of all immovables surrounding the lot. Stated differently, the evidence presented must rule out the existence of any other routes that may reasonably be considered adequate outlets to the public highway. Thus, in *Spouses Vargas v. Sta. Lucia Realty and Development, Inc.*,^[40] the Court ruled:

To prove the absence of an adequate outlet to a public highway, jurisprudence requires the claimant to allege and prove the accessibility circumstances of all the immovables surrounding the isolated lot. In *Sps. Mejorada v. Vertudazo*, we held that the first requisite had been met because the claimant was able to prove that "there is no other road which respondents could use leading to [the nearest public road] except the passageway on petitioners' property[;]" while in *Quimen v. CA*, the trial court found that the dominant estate was "totally isolated from the public highway[.]"

. . . .

In the case at bar, although the Spouses repeatedly claim that the route through VRC is the only access to the Outside Lot, this allegation is not supported by evidence which precludes the existence of "other roads which

they could traverse or [. . .] other adequate outlets which may lead to other roads." Stated differently, the Spouses' evidence does not prove that, in the Court's words, "there is no other road which they could use" other than the streets within VRC, or that the Outside Lot was "totally isolated from the public highway[.]" The sketch plans submitted by the Spouses clearly show that the Outside Lot is a rectangular parcel bounded on one side by VRC, and on the other three sides, by three other lots, denominated in the plans as Lot 10, PCS- 2587, Lot 9, PCS-2587, and Lot 14, PCS-2587.70 Following the aforementioned decisions of the Court, the Spouses should have alleged and proved the physical and geographical circumstances of these three adjacent lots, so that the courts may determine if these lots are adequate outlets for the Outside Lot. However, the sketch plans submitted by the Spouses focus solely on mapping their proposed route through VRC Lot, without providing the same level of mapping detail for Lots 9, 10, and 14 of PCS-2587. The Spouses' pleadings do not explain the absolute dearth of evidence on the accessibility circumstances of said lots. Instead, they simply harp on SLR's failure to adduce rebuttal evidence, and devote their efforts solely to arguing for their proposed right of way through VRC, which is not surprising, since, by their own admission, they bought the VRC Lot for the sole purpose of obtaining a right of way for their adjacent Outside Lot.[41] (Emphasis in the original, citations omitted)

Here, the Court finds that Jennieffer's property is not totally isolated by other immovables, as her properties are actually bounded on one side by a public highway, i.e., Calle M. Aquino.[42] Consequently, on the first requisite alone, Jennieffer's claim of a compulsory easement of right of way fails.

As regards the second requisite, the records are bereft of any indication that Jennifer manifested that she was willing to indemnify Zenaida, et al. for the claimed right of way. As the CA pointed out, Jennifer neither mentioned in her Complaint her willingness to pay any indemnity, nor manifested such payment during trial.[43]

As regards the third requisite, the Court reiterates that Jennieffer's property is not isolated at all due to its adequate access to Calle M. Aquino.

Lastly, given Jennifer's clear access to a public highway, Lot 2-1-7 is clearly not the point least prejudicial to the servient estate. To repeat, the Court will compel the establishment of a compulsory right of way only when absolutely necessary, and such necessity is clearly absent in this case.

Given the absence of all the requisites, the Court rules that Jennieffer is not entitled to a legal easement of right of way.

Furthermore, there is no indication in either TCT No. M-9835 or the subdivision plan showing an easement of right of way covering Lot 2-1-7. The description of the property covered by TCT No. M-9835 reads as follows:

A parcel of land (Lot 2-1-7) (Road) of the subdivision plan (LRC) Psd-310673 approved as a non-subdivision project, being a portion of Lot 2-1, Psd-3583; L.R.C. GLRD No. 3850) situated in the Barrio of Niugan Municipality of Malabon Province of Rizal (Metro Manila) Island of Luzon. Bounded on the N. points 6 to 1 by Lot 2-1-5, and Lot 2-1-6, both of the subdivision plan; on the SE., points 1 to 2, by Calle M. Aquino; on the SW., points 2 to 3, by Lot 2-1-1 and Lot 2-1-2; on the SE., points 3 to 4, by Lot 2-1-2 and Lot 2-1-3; all of the subdivision plan; on the SW., points 4 to 5, by Tonsuya River; and on the NW., points 5 to 6, by Lot 2-1-4 and Lot 2-1-5; both of the subdivision plan. Beginning at a point marked "1" on plan being N.7 deg. 07'W., 188.34 m. from location Monument Bo. Of Tonsuya; thence S. 12 deg. 30'W., 4.50 m. to point 2; thence N.81 deg. 26'W., 44.00 m to point 3; thence S.75 deg. 53'W. 44.40 m. to point 4; thence N.21 deg. 04'W., 4.50 m. to point 5; thence S.75 deg. 52'E., 45.85 m. to point 6; thence S.81 deg. 26'E. 45.20 m. to this point of beginning; containing an area of [402] SQUARE METERS, more or less. All points referred to are indicated on the plan and are marked on the ground; as follows: points 2, 4, & 5 by Nail point 6, by on concrete and the rest by P.S. cyl. conc mons. 15 x 60 cm., bearings true; date of original survey, April 15, 1910, and that of the [sic] subdivision survey, executed by Godofredo R. Villasenor, Geodetic Engineer, on Aug 15, 1982.[44] (Emphasis supplied)

From the foregoing, it is clear that TCT No. M-9835 merely references the subdivision survey conducted by Villasenor, while the subdivision plan merely designates Lot 2-1-7 as a "road." [45] As correctly observed by the RTC and the CA, there is no indication that Lot 2-1-7 was either expropriated or donated to the government or the LGU. As such, it retains its character as private property, subject to the right of ownership of Zenaida, et al.

The fact that Lot 2-1-7 is designated as a "road" under the subdivision plan does not automatically grant a voluntary right of way in favor of the adjoining estates owned by Jenniefer. Verily, a property owner can constitute a road in his own property without necessarily granting a right of way to adjoining estates, especially when there are other access roads by which the owners of such adjoining lots can access a public road or highway.

In other words, the evidence presented by Jenniefer is simply not enough to establish with certainty that a voluntary easement of right of way in fact exists with Lot 2-1-7 as the servient estate.

At this point, it must be stressed that easements are primarily burdens on another person's property which, to an extent, limits such person's right to enjoy the property he owns. [46] Thus, courts should, at the very least, exercise caution and refuse to recognize an easement when proof of its existence is tenuous or doubtful.

Thus, the Court finds that the CA committed no error in ruling that there exists no easement of right of way, either legal or voluntary, over Lot 2-1-7.

ACCORDINGLY, the Petition for Review on Certiorari is DENIED. The Decision, dated August 16, 2024, and the Resolution, dated March 17, 2025, of the Court of Appeals in CA-G.R. CV No. 119403 are AFFIRMED.

SO ORDERED.

Caguioa (Chairperson), Inting, Gaerlan, and Dimaampao, JJ., concur.

[*] Also referred to as "Jennifer" in some parts of the rollo.

[1] Rollo, pp. 3-17.

[2] Id. at 19-36. Penned by Associate Justice Eduardo S. Ramos, Jr. and concurred in by Associate Justices Apolinario D. Bruselas, Jr. and Perpetua Susana T. Atal-Paño of the Fourth Division, Court of Appeals, Manila.

[3] Id. at 38-41. Penned by Associate Justice Eduardo S. Ramos, Jr. and concurred in by Associate Justices Apolinario D. Bruselas, Jr. and Perpetua Susana T. Atal-Paño of the Former Fourth Division, Court of Appeals, Manila.

[4] Id. at 42-45. Penned by Judge Misael M. Ladaga.

[5] Id. at 46-48.

[6] Id. at 20-21.

[7] Id. at 20.

[8] Id. at 20-21.

[9] Id. at 21.

[10] Id.

[11] Id.

[12] Id. at 21-22.

[13] Id. at 22.

[14] Id.

[15] Id. at 22-23.

[16] Id. at 23.

[17] Id.

[18] Id.

[19] Id. at 24.

[20] Id. at 45.

[21] Id. at 43-44.

[22] Id. at 35-36.

[23] Id. at 29.

[24] Id. at 30-32.

[25] Id. at 33-34.

[26] Id. at 34.

[27] Id. at 34-35.

[28] Id. at 12.

[29] *Catan v. Vinarao*, 820 Phil. 257, 265 (2017) [Per J. Leonardo-De Castro, First Division].

[30] *Republic v. Caraig*, 887 Phil. 827, 838 (2020) [Per J. Hernando, Second Division].

[31] The general rule for petitions filed under Rule 45 admits exceptions, to wit: (1) When the conclusion is a finding grounded entirely on speculation, surmises or conjectures; (2) When the inference made is manifestly mistaken, absurd or impossible; (3) Where there is a grave abuse of discretion; (4) When the judgment is based on a misapprehension of facts; (5) When the findings of fact are conflicting; (6) When the Court of Appeals, in making its findings, went beyond the issues of the case and the same is contrary to the admissions of both appellant and appellee; (7) The findings of the Court of Appeals are contrary to those of the trial court; (8) When the findings of fact are conclusions without citation of specific evidence on which they are based; (9) When the facts set forth in the petition as well as in the petitioner's main and reply briefs are not disputed by the respondents; and (10) The finding of fact of the Court of Appeals is premised on the supposed absence of evidence and is contradicted by the evidence on record. *Miano v. Manila Electric Co.*, 800 Phil. 118, 123 (2016) [Per J. Leonen, Second Division].

[32] *Gatan v. Vinarao*, 820 Phil. 257, 265-266 (2017) [Per J. Leonardo-De Castro, First Division].

[33] See *Spouses Fernandez v. Spouses Delfin*, 898 Phil. 826 (2021) [Per J. Leonen, Third Division].

[34] Id. at 833.

[35] Id. at 834.

[36] Republic v. Estate of Hans Menzi, 512 Phil. 425, 456-457 (2005) [Per J. Tinga, En Banc].

[37] 753 Phil. 551 (2015) [Per J. Leonen, Second Division].

[38] Id. at 561-562.

[39] Spouses Vargas v. Sta. Lucia Realty and Development, Inc., 926 Phil. 578, 585 (2022) [Per J. Gaerlan, Third Division].

[40] 926 Phil. 578 (2022) [Per J. Gaerlan, Third Division].

[41] Id. at 586-590.

[42] Rollo, p. 30.

[43] Id. at 32.

[44] Id. at 106-107.

[45] Id. at 105.

[46] See Reyes v. Spouses Valentin, 753 Phil. 551, 568 (2015) [Per J. Leonen, Second Division].

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