

SUNBEAM CONVENIENCE FOODS INC., CORAL BEACH DEVELOPMENT CORP., AND THE REGISTER OF DEEDS OF BATAAN, PETITIONERS, VS. HON. COURT OF APPEALS AND THE REPUBLIC OF THE PHILIPPINES, R...

G.R. No. 50464. January 29, 1990

Ponente: SARMIENTO, J.

Read online (full-text search, related cases, audio case brief): <https://batas.org/library/g-r-no-50464/>

SARMIENTO, J.:

In this petition for review on certiorari, Sunbeam Convenience Foods Corporation (hereafter simply SUNBEAM) and Coral Beach Development Corporation (hereafter simply CORAL BEACH) bring to our attention the decision rendered by the Court of Appeals in "Republic of the Philippines v. Hon. Pedro T. Santiago, et al.," disposing as follows:

WHEREFORE, the writ prayed for is granted. The order of the respondent judge dated October 7, 1977, dismissing Civil Case No. 4062 is set aside, and respondent judge is ordered to require private respondents to file their answer to the complaint in said Civil Case No. 4062 and thereafter to proceed with the trial of the case on the merits and to render judgment thereon.[1]

The following facts stated by the respondent Court in its decision and restated by the petitioners in their petition are accurate:

(a) On April 29, 1963, the Director of Lands caused the issuance of a Sales Patent in favor of defendant Sunbeam Convenience Foods, Inc., over the parcels of land both situated in Mariveles, Bataan and more particularly described and bounded as follows:

Lot 1-Sgs-2409 (area 3,113,695 sq. m.)

Lot 2-Sgs-2409 (area 1,401,855 sq. m.)

(b) On May 3, 1963, the aforesaid Sales Patent was registered with the defendant Register of Deeds of Bataan who in turn issued Original Certificate of Title No. Sp-24 in favor of defendant Sunbeam Convenience Foods, Inc., for the two parcels of land above-described;

(c) Subsequently, Original Certificate of Title No. Sp-24 was cancelled and in lieu thereof, Transfer Certificate of Title No. T-12421 was issued over Lot 1, Sgs-2409, while Transfer Certificate of Title No. 12422 was issued over Lot 2, Sgs-2409, both in favor of defendant Coral Beach Development Corporation;

(d) On May 11, 1976, the Solicitor General in the name of the Republic of the Philippines instituted before the Court of First Instance of Bataan, an action for reversion docketed as Civil Case No. 4062.[2]

SUNBEAM and CORAL BEACH filed a Motion to Dismiss on the following grounds:

1. The Republic of the Philippines should have exhausted all administrative remedies before filing the case in court;

2. The title issued to SUNBEAM and CORAL BEACH had become indefeasible and imprescriptible;
3. The action for reversion was defective, having been initiated by the Solicitor General and not by the Director of Lands.[3]

The then Court of First Instance of Bataan dismissed the complaint in the Order of October 7, 1977,[4] adopting mainly the theory that since the titles sought to be cancelled emanated from the administrative act of the Bureau of Lands Director, the latter, not the courts, had jurisdiction over the disposition of the land.

The Solicitor General received the copy of the Order on October 11, 1977 and filed a Notice of Appeal dated October 25, 1977.[5] The Solicitor General then moved for an extension of thirty days within which to file the Record on Appeal and to pay the docket fee in order to perfect the appeal. This was to be followed by another motion for extension filed by the Solicitor General, resulting in the Court of Appeals granting the petitioner another extension of fifteen days from December 10, 1977. Finally before this period of extension lapsed, instead of an appeal, a petition for certiorari with the respondent Court of Appeals was filed.

According to the Solicitor General, the Court of First Instance committed grave abuse of discretion in dismissing the complaint and in —

- a. Not finding that since the lower court acted in a Motion to Dismiss, the correctness of its decision must be decided in the assumed truth and accuracy of the allegations of the complaint. The complaint alleges that the lands in question are forest lands; hence, inalienable.
- b. Finding that Lots 1 and 2 are alienable and disposable lands of the public domain under the jurisdiction of the Director of Lands despite clear and positive evidence to the contrary.
- c. Concluding that the complaint for reversion is defective as it was not initiated by the Director of Lands.
- d. Finding that the complaint for reversion states no cause of action for alleged failure of petitioner to exhaust administrative remedies.[6]

The Court of Appeals gave due course to the petition for certiorari, set aside the Order of Dismissal rendered by the Court of First Instance in Civil Case No. 4062, and ordered the presiding judge Hon. Pedro T. Santiago to receive the answers of the private respondents SUNBEAM and CORAL BEACH in the action for reversion.

Hence Sunbeam and Coral Beach filed this petition for review.

A review is not a matter of right but of sound judicial discretion, and is granted only when there are special and important reasons therefor. The following, while neither controlling nor fully measuring the Court's discretion, enumerates the premises for granting a review:

- (a) When the Court of Appeals has decided a question of substance, not theretofore determined by the Supreme Court or has decided it in a way probably not in accord with law or the applicable decisions of the Supreme Court; and
- (b) When the Court of Appeals has so far departed from the accepted and usual course of judicial proceedings or so far sanctioned such departure by a lower court as to call for supervision.[7]

We agree with the Court of Appeals' granting of the petition filed by the Republic of the Philippines charging the then Court of First Instance with grave abuse of discretion.

The filing of the Motion to Dismiss the complaint for reversion by SUNBEAM and CORAL BEACH on the ground of lack of cause of action, necessarily carried with it the admission, for purposes of the motion, of the truth of all material facts pleaded in the complaint instituted by the Republic.

An important factual issue raised in the complaint was the classification of the lands as forest lands. This material allegation stated in the Republic's complaint[8] was never denied specifically[9] by the defendants (petitioners herein) SUNBEAM and CORAL BEACH.

If it is true that the lands are forest lands, then all these proceedings become moot and academic. Land remains unclassified land until it is released therefrom and rendered open to disposition.[10]

Our adherence to the Regalian doctrine subjects all agricultural, timber, and mineral lands to the dominion of the State.[11] Thus before any land may be declassified from the forest group and converted into alienable or disposable land for agricultural or other purposes, there must be a positive act from the government. Even rules on the confirmation of imperfect titles do not apply unless and until the land classified as forest land is released in an official proclamation to that effect so that it may form part of the disposable agricultural lands of the public domain.[12]

The mere fact that a title was issued by the Director of Lands does not confer any validity on such title if the property covered by the title or patent is part of the public forest.[13]

The only way to resolve this question of fact as to the classification of the land is by remanding the case to the lower court for a full-dress trial on the issues involved.

Generally, the rules of procedure must be observed so that the efficient administration of justice is ensured. However, the rules of procedure should be viewed as mere tools designed to facilitate the attainment of justice.[14] They must lead to the proper and just determination of litigation, without tying the hands of the law or making it indifferent to realities.

Certiorari is one such remedy. Considered extraordinary, it is made available only when there is no appeal, nor any plain, speedy or adequate remedy in the ordinary course of the law.[15] The long line of decisions denying the petition for certiorari, either before appeal was availed of or specially in instances where the appeal period has lapsed, far outnumbers the instances when certiorari was given due course. The few significant exceptions were: when public welfare and the advancement of public policy dictate; or when the broader interests of justice so require, or when the writs issued are null,[16] or when the questioned order amounts to an oppressive exercise of judicial authority.[17]

We find nothing disagreeable with the action of the Court of Appeals to give due course to the petition considering that the issue affected a matter of public concern which is the disposition of the lands of our patrimony. No less than the Constitution protects this policy.¹⁸

We therefore find no compelling reason to disturb the findings of the appellate court, in the absence of a clear showing that the Court of Appeals has decided a question of substance in a manner inconsistent with jurisprudence, or that the respondent Court has departed from the accepted and usual course of judicial proceedings. In sum, no reversible error has been committed by the respondent court.

WHEREFORE, the petition is DENIED and the decision of the Court of Appeals is affirmed. Costs against the petitioners.

SO ORDERED.

Melencio-Herrera, (Chairman), Paras, Padilla, and Regalado, JJ., concur.

- [1] CA-G.R. No. SP-07196-R, October 7, 1978, Special Third Division: Alampay, Nestor B., J., ponente; Reyes, Luis B. and Busran, Mama D. JJ, concurring; rollo, 67.
- [2] Rollo, 55-56; 5-6.
- [3] Motion to Dismiss, Republic v. Sunbeam Convenience Foods, Inc., CFI (Balanga, Bataan V), Civil Case No. 4062; Original Record, 21-25.
- [4] Republic v. Sunbeam Convenience Foods, Inc., CFI (Balanga, Bataan V), Civil Case No. 4062, October 7, 1977; Original Record, 261.
- [5] Notice of Appeal, Republic v. Sunbeam Convenience Foods, Inc., CFI (Balanga, Bataan V), Civil Case No. 4062; Original Record, 363.
- [6] Petition for Certiorari, Republic of the Philippines v. Hon. Pedro T. Santiago, CA-G.R. No. SP-07196, R, 8; Original Record, 373.
- [7] Sec. 4, Rule 45, RULES OF COURT.
- [8] Republic of the Philippines, Plaintiff v. Sunbeam Convenience Foods, Inc., etc., Defendant, CFI (Balanga, Bataan V), Civil Case No. 4062; Original Record, 1.
- [9] Motion to Dismiss, Republic v. Sunbeam Convenience Foods, CFI (Balanga, Bataan V), Civil Case No. 4062; Original Record, 21 to 25; Defendants' Rejoinder to Opposition with Additional Ground to Dismiss, Republic v. Sunbeam Convenience Foods, CFI (Balanga, Bataan V), Civil Case No. 4062; Original Record, 44 to 54.
- [10] Director of Lands v. Court of Appeals, No. L-58867, June 22, 1984, 129 SCRA 692.
- [11] Sec. 2, Article XII, CONST.; Republic v. Court of Appeals, No. L-43938; Consolidated, Inc. v. Hon. Court of Appeals, No. L-44081; Atok Big Wedge Mining Company v. Hon. Court of Appeals, No. L-44092, April 15, 1988, 160 SCRA 231.
- [12] Director of Lands v. Court of Appeals, G.R. 83609, October 26, 1989.
- [13] Vallarta v. Intermediate Appellate Court, No. L-74957, June 30, 1987, 151 SCRA 679; Republic v. Court of Appeals, No. L-40402, March 16, 1987, 148 SCRA 488; Republic v. Court of Appeals, No. L-56077, February 28, 1985, 135 SCRA 165, 166.
- [14] Aznar III v. Bernad, No. L-81190, May 9, 1988, 161 SCRA 282, 283; Guballa v. Court of Appeals, et al., G.R. 78223; Mozar v. Court of Appeals, G.R. 79403, December 9, 1988.
- [15] Rule 65, RULES OF COURT, section 1.
- [16] Yu Cong Eng v. Trinidad, 47 Phil. 385, 390 (1925); Tirona v. Nanawa, No. L-22107, September 30, 1967, 21 SCRA 395, 400; Director of Lands v. Santamaria, 44 Phil. 594, 596 (1923) cited in 3 MORAN, COMMENTS ON THE RULES OF COURT, 170-172 (1980).
- [17] Acain v. Intermediate Appellate Court, No. L-72706, October 27, 1987, 155 SCRA 109. 18 Rollo, 67.

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.