

****Title:**** Elizabeth B. Ramos et al. vs. National Commission on Indigenous Peoples (NCIP) et al.

****Facts:****

The dispute involves land located in Malalag, Davao del Sur.

1. Bae Lolita Buma-at Tenorio applied for a Certificate of Ancestral Land Title (CALT) in favor of the Egalan-Gubayan clan, resulting in the issuance of CALT No. R11-MAL-1104-000045 for 845.5278 hectares, later amended to exclude some areas, eventually covering 645 hectares.
2. In the 1920s, the land was leased to Orval Hughes. After his death, his heirs filed individual sales applications, which the Office of the President (OP) awarded 399 hectares to 133 oppositors in an Amended Decision on August 20, 1957. The remaining 317 hectares went to the Hughes heirs.
3. The Hughes heirs challenged the 1957 Amended Decision, culminating in the Supreme Court ruling G.R. No. L-62664 (1987), which found the Hughes heirs guilty of forum shopping.
4. Petitioners, heirs of the original 133 oppositors, alongside the Egalan-Gubayan clan, became embroiled in multiple legal battles concerning the enforcement of the 1957 decision and the recognition of ancestral land claims.
5. On December 19, 2008, following a Writ of Execution by the DARAB, DARAB Sheriff issued a Notice to Vacate to the Egalan-Gubayan clan, commanding them to vacate 399 and 317 hectares awarded to other parties.
6. In February 2009, the Egalan-Gubayan clan's minors filed for an injunction with the NCIP to prevent the DARAB's Writ of Execution and Notice to Vacate. The RHO granted a TRO but eventually dismissed the case for forum shopping and lack of jurisdiction on July 17, 2009.
7. Respondents appealed to the NCIP, which issued a 20-day TRO and subsequently a WPI on August 14, 2009. The NCIP overturned the RHO's decision on February 18, 2010, declaring no forum shopping and jurisdiction over the matter, granting a permanent injunction against the DARAB's enforcement actions.

****Issues:****

1. Did the NCIP commit grave abuse of discretion in ruling against forum shopping?
2. Did the IPRA constitute a supervening event invalidating previous legal decisions?
3. Did the NCIP have jurisdiction over the dispute between Indigenous Peoples and non-Indigenous entities?
4. Was the issuance of injunctive relief by the NCIP appropriate under the circumstances?

Court's Decision:

1. **Forum Shopping:** The Supreme Court ruled that the NCIP erred in finding no forum shopping, as there was legal identity of interest between the parties involved.
2. **Supervening Event:** The Court found that the assertion of IPRA as a supervening event was inappropriate, as previous rights established by final judgments should not be altered due to the passage of a new law.
3. **NCIP's Jurisdiction:** Citing *Unduran v. Aberasturi*, the Court ruled that the NCIP lacks jurisdiction over disputes involving non-ICC/IP parties, nullifying NCIP's decision.
4. **Injunctive Relief:** The NCIP had no jurisdiction to issue an injunction, thus making the injunction against the DARAB's execution moot.

Doctrine:

- **Jurisdiction over ICCs/IPs Disputes:** The NCIP's jurisdiction under the IPRA is limited to disputes arising between parties belonging to the same ICC/IP, with limitations when involving/non-ICCs/IPs under customary laws.
- **Finality of Decisions:** Existing legal rights established by final decisions cannot be dismissed or affected by subsequent legislation without clear legislative intent.

Class Notes:

- **Indigenous Peoples Rights Act (IPRA):** Stipulates jurisdiction of NCIP over intra-ICC/IP disputes pending resolution of traditional conflict mechanisms.
- **Doctrine of Finality and Res Judicata:** Ensures past decisions remain unaffected by retrospective changes unless explicitly legislated.
- **Hierarchy of Courts:** Reiterates jurisdiction and procedural propriety, underscoring direct recourse to the Supreme Court's exceptional nature.

Historical Background:

- The portion of Philippine history involving indigenous land rights highlights the post-colonial legislative changes aimed at recognition and protection of cultural communities. The introduction of the IPRA represents efforts to solidify ancestral domain claims amidst ongoing disputes with private and governmental entities over land use and ownership tracing back to colonial tenancy arrangements.