REPUBLIC OF THE PHILIPPINES
SUPREME COURT
Manila

SECOND DIVISION

NOTICE

Sirs/Mesdames:

Please take notice that the Court, Second Division, issued a Resolution dated **16 March 2022** *which reads as follows*:

"G.R. No. 245321 (*Heirs of Evaristo Tiotioen, namely: Ildefonso Tiotioen, Concepcion Tiotioen-Diaz, Heirs of Nancy Tiotioen-Ogoy, namely: Judy Ann T. Ogoy, Joel T. Ogoy, Josephine O. Batario, and Joyce O. Dela Cruz all herein represented by Joel T. Ogoy, and Heirs of Filomina Tiotioen Dulnuan, namely: Francis Sylvester Dulnuan, Mary Jo Karla T. Dulnuan, Laurel Ann T. Dulnuan, Marie Evaflor D. Bayedbed, all herein represented by Francis Sylvester Dulnuan v. Municipality of La Trinidad, Benguet, represented by then Mayor Nestor Fongwan and now by the current Mayor Romeo K. Salda, and the Republic of the Philippines, represented by the Department of Environment and Natural Resources*). – This Court resolves the Petition for Review on *Certiorari*[1] under Rule 45 of the Rules of Court assailing the Decision[2] dated April 30, 2018 and the Resolution[3] dated February 15, 2019 of the Court of Appeals (CA) in CA-G.R. CV No. 99376. The CA reversed the August 30, 2001 Decision[4] of the Regional Trial Court (RTC) of La Trinidad, Benguet in Land Registration Case No. 93-LRC-0008 granting the application for registration of land title filed by applicant Evaristo Tiotioen (Evaristo).

On September 6, 1993, Evaristo filed a second application[5] for Judicial Confirmation and Registration over two (2) parcels of land particularly described under Plan PSU-230646 as Lot 1, consisting of 123,935 sq. m., and Lot 2, consisting of 56,553 sq. m. situated in Barrio Pico, La Trinidad, Benguet

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1 *Rollo*, pp. 11-36.
2 Id. at 40-58. Penned by Associate Justice Renato C. Francisco, with the concurrence of Associate Justices Magdangal M. De Leon and Rodil V. Zalameda (now a Member of the Court).
3 Id. at 73-74. Penned by Associate Justice Rodil V. Zalameda (now a Member of the Court), with the concurrence of Associate Justices Fernanda Lampas-Peralta and Henri Jean Paul B. Inting (now a Member of the Court).
4 Id. at 96-112. Penned by Judge Benigno M. Galacgac.
5 Id. at 90-95.

(subject properties).[6] Evaristo averred that he inherited the subject properties from his father-in-law, Bando Tumpao (Tumpao), who was a member of the *Ibaloi* tribe of Benguet. Even before the last world war, Evaristo alleged that Tumpao had been in possession and occupation of the subject properties, having continuously cultivated the same with his wife and children.[7] Evaristo married Tumpao's daughter, Flora, and thereafter, helped in cultivating the subject properties with his in-laws. Tumpao had the subject properties surveyed by Engr. Santiago A. Santiago (Engr. Santiago), which was later approved by the Director of Lands in 1972. On March 14, 1964, Tumpao executed a Deed of Transfer over the subject properties in favor of Evaristo.[8] Since then, Evaristo claimed that he has been in actual, open, continuous, exclusive, and notorious possession and occupation of subject properties in the concept of an owner in fee simple for the last 50 years.[9]

Evaristo's application was opposed by respondents Republic of the Philippines, represented by the Director of Lands through the Office of the Solicitor General (OSG), and the Municipality of La Trinidad, Benguet (collectively, respondents) on the ground that the subject properties were inalienable, as they were located within Puguis communal forest.[10]

LRC Case No. N-371

Records show that on October 13, 1973, Evaristo filed a prior application[11] for registration over the subject properties docketed as LRC Case No. N-371 (LRC Record No. N-44841) before the then Court of First Instance (CFI) of Baguio, Branch IV. The Bureau of Forest Development and the Municipality of La Trinidad, Benguet filed their respective oppositions on the ground that the area covered was entirely within a forest reserve which had not yet been released for disposition and that Evaristo possessed no registrable title over the same whether in fact or in law.[12]

On July 31, 1982, the CFI rendered a Decision[13] granting Evaristo's application. The Director of Lands and the Director of Forest Development appealed before the CA. On September 3, 1997, the CA rendered a Decision, the dispositive portion of which reads:

> WHEREFORE, in view of the foregoing premises, WE REVERSE the appealed judgment granting the application of Evaristo Tiotioen in the light of the failure of the latter to submit as evidence in court the required original tracing cloth plan. Consequently, the

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6 Id. at 41-42.
7 Id. at 99.
8 Id.
9 Id. at 42.
10 Id. at 43.
11 Id. at 90-95.
12 Id. at 80.
13 Id. at 80-89.

> appealed judgment is set aside and vacated and the application for registration is ordered dismissed without prejudice. No costs.
>
> SO ORDERED. [14]

Aggrieved, Evaristo filed before this Court a Petition for *Certiorari* docketed as G.R. No. 81161. The consequent dismissal of the application without prejudice was affirmed in our August 15, 1988 Resolution.[15]

During trial, Evaristo died.[16] Thus, petitioners, who are Evaristo's legal heirs, continued with the application for registration of land title. At the trial, the following pieces of documentary evidence, *inter alia,* were presented to support petitioners' claim over the subject properties: the original tracing cloth plan, approved survey plan, the technical description, an *Agreement Re Surface Rights* dated August 2, 1937; and Series of Tax Declarations starting 1963.[17] Likewise, testimonial evidence from immediate family members, neighbors, the surveyor, and DENR officials regarding the procedure for approval of survey plans were presented.

In opposition, respondents submitted Administrative Order dated September 16, 1922 issued by the then Secretary of Agriculture and Natural Resources establishing four (4) communal forests in La Trinidad, Benguet, one of which is Puguis communal forest; Land Use Plan Map of the Municipality of La Trinidad; Land Classification Map Nos. 3170 and 3049; and Map/Survey Plan of Communal Forest of La Trinidad, Benguet,[18] to prove that the subject properties are located within Puguis communal forest and hence, inalienable.

On August 30, 2001, the RTC rendered a Decision[19] granting the application, the dispositive portion of which reads:

> WHEREFORE, the Court, finding that the Applicants have shown their adverse, continuous and notorious possession and in the concept of owners of the land applied for since time immemorial, and thus their title thereto is proper to be confirmed, and is hereby confirmed.
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> The applicants, namely: NICOLAS TIOTIOEN, single; ILDEFONSO TIOTIOEN, married to Adelina Tiotioen; CONCEPCION TIOTIOEN-DIAZ, married; NANCY TIOTIOEN-OGOY, married and FILOMENA TIOTIOEN-

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[14] *See* RTC Decision, p. 3. Id. at 98.
[15] Id. at 98-99.
N.B. The only issue resolved in the Petition before the Supreme Court was whether the CA committed a reversible error when it reversed the lower court's decision on the sole ground that the failure to submit as evidence the required original tracing cloth plan would result in the denial of an application of registration.
[16] Id. at 43-44.
[17] Id. at 106.
[18] Id. at 107.
[19] Id. at 96-112.

> DULNUAN, married; [a]ll of legal age, Filipinos and residents of Pico, La Trinidad, Benguet are hereby declared owners pro indiviso of a parcel of land situated at Pico, La Trinidad, Benguet containing an area of ONE HUNDRED TWENTY THREE THOUSAND NINE HUNDRED THIRTY FIVE (123,935) SQUARE METERS for Lot 1 and FIFTY SIX THOUSAND FIVE HUNDRED FIFTY THREE (56,553) SQUARE METERS for Lot 2. The subject land is particularly described in the Original Tracing Cloth Plan (Exh. "AA-1"), Survey Plan (Exh. "A"), and in the Technical Description (Exhs. "B" & "B-2), subject to the claim of oppositor Santiago A. Santiago as per agreement with the applicants and when the decision becomes final and executory, let a final decree be issued for the issuance of title accordingly.
>
> SO ORDERED.[20]

The RTC held that based on the documentary and testimonial evidence presented, petitioners and their predecessors-in-interest have been in open, continuous, exclusive and notorious possession and occupation of the subject properties for at least thirty (30) years preceding the filing of their application.

Aggrieved, respondents filed an appeal before the CA. They asserted that petitioners failed to prove that the subject properties were alienable and disposable; and that their title was registrable.[21]

On April 30, 2018, the CA rendered a Decision[22] reversing the trial court. The appellate court ruled that petitioners failed to comply with the legal requirements for registration either under Section 14 (1) or 14 (2) of Presidential Decree No. 1529 (PD 1529).[23]

The appellate court held that petitioners could not anchor their claim that the subject properties were alienable and disposable on the basis of a survey plan and the surveyor's assertion alone.[24] Applying the doctrine enunciated in *Republic v. T.A.N. Properties (T.A.N. Properties)*,[25] the appellate court noted that petitioners failed to present any document from the Secretary of the Department of Environment and Natural Resources (DENR) and a certification from the Provincial Environment and Natural Resources Office (PENRO) or Community Environment and Natural Resources Office (CENRO) attesting that the subject properties form part of the alienable and disposable lands of the public domain.

Likewise, the appellate court observed that petitioners asserted possession and occupation of the subject properties in the concept of an owner since 1929, when their predecessor-in-interest Tumpao declared the subject

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[20] Id. at 111-112.
[21] Id. at 49-50.
[22] Id. at 40-58.
[23] Id. at 53.
[24] Id. at 55.
[25] 578 Phil. 441-452 (2008).

properties for taxation as evidenced by Tax Declaration No. 163.[26] However, at the same time, petitioners adduced evidence which belied their claim. The *Agreement Re Surface Rights* dated August 2, 1937 executed by Tumpao in favor of a certain Rudolf N. Kappel for the exploration of mineral rights over the subject properties clearly stated that Tumpao occupied the subject properties as a mere lessee with the government as the lessor.[27] Thus, the possession of petitioners' predecessor-in-interest, Tumpao, was not in the concept of an owner. Consequently, Evaristo's application could not be granted pursuant to Section 14(1) of PD 1529. Similarly, even under Section 14(2) of PD 1529, petitioners' application would fail. Petitioners failed to present any government act or declaration converting the subject properties to patrimonial properties of the State.[28] Consequently, even if petitioners and their predecessors have been in possession of the subject properties for 50 years by the time Evaristo filed the second application in 1993, acquisitive prescription has not begun to run against the State.[29]

Petitioners moved for reconsideration, which was denied in a Resolution[30] dated February 15, 2019.

Hence, this Petition.

Petitioners allege that the appellate court erred in applying *T.A.N Properties* which imposed stringent guidelines in establishing the alienability and disposability of land when the applicable case law were *Republic v. Serrano*[31] *(Serrano)* and *Republic v. Vega*[32] *(Vega)*. In these cases, despite the absence of a CENRO certification and a certified true copy of the original classification by the DENR Secretary, the Court therein granted the applications for registration of title. Finally, petitioners contend that the subject properties are ancestral land, and have been cultivated by them and their predecessors for at least three generations.[33]

In their Comment,[34] respondents maintain that petitioners failed to rebut the presumption that all lands are part of the public domain with clear and convincing evidence. Similarly, petitioners failed to prove that they have possessed the subject properties in the manner and for the length of time required by law. While petitioners claim possession over the subject properties since 1929 when their predecessor Tumpao first declared the subject

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26 *Rollo*, p. 55.
27 Id.
28 Id. at 57.
29 Id.
30 Id. at 73-74.
31 627 Phil. 350, 362 (2010).
32 654 Phil. 511, 528 (2011)
33 *Rollo*, 35.
34 Id. at 340, 351.

properties for taxation purposes, this covered an area over 48 hectares. Lastly, respondents underscore that it is clearly stated in the *Agreement Re Surface Rights* submitted into evidence by petitioners that Tumpao held the subject properties as a mere lessee.

The case presents one principal issue: Did the CA correctly reverse the Decision of the RTC granting Evaristo's application?

The Court rules in the affirmative.

Preliminarily, it bears pointing out that Evaristo failed to specify the exact legal basis in his application for land registration and merely implied that his claim was for registration and confirmation based on his possession and occupation of the subject properties.[35] Similarly, no specific provision under PD 1529 was identified by the RTC when it granted the application. Its mention of Evaristo's possession over the subject properties, when tacked with his predecessor, "since time immemorial"[36] seems to indicate an application under Section 14(1) of PD 1529. The appellate court, for its part, delineated the differences between paragraphs 1 and 2 of Section 14, but decided to apply both clauses and in so doing, determined that petitioners were not entitled to registration under either provision.

It cannot be overemphasized that before the Court proceeds to an examination of whether an applicant has sufficiently adduced evidence of open, continuous, exclusive and notorious possession and occupation of the property in question, it must first be proven that the land belongs to the alienable and disposable lands of the public domain.[37] Whether an applicant seeks registration under Section 14 (1) based on possession or Section 14 (2) based on prescription, he/she must first prove to the court that the land applied for is alienable and disposable. The burden of proving that the property is an alienable and disposable land of the public domain falls on the applicant, not the State.[38] As will be further discussed below, petitioners failed to overcome this burden.

In *T.A.N. Properties*, the Court laid down the rule that to prove that land is alienable and disposable, an applicant must present: (1) a PENRO or CENRO certification and (2) a certified true copy of the original classification made by the DENR Secretary as proofs that the land is alienable and disposable otherwise, the application must be denied. However subsequently, the Court in *Serrano* held that a certification by the DENR Regional Technical

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35 Id. at 52-53.
36 Id. at 111.
37 *Republic v. Philippine National Police,* G.R. No. 198277, February 8, 2021.
38 *Republic v. Spouses Noval,* 818 Phil. 298, 306 (2017).

Director annotated on the subdivision plan constituted substantial compliance with the legal requirement that the land must be proven to be alienable and disposable. Further, in the case of *Vega,* the applicants therein were found to have substantially complied with this legal requirement even without an approval from the DENR Secretary and a CENRO certification. In *Vega,* it was concluded that the requirement to show that the subject land was indeed alienable and disposable was met, considering that apart from the Investigation Report and testimony of Special Investigator Gonzales from CENRO, the applicants also presented a subdivision plan approved by the DENR which expressly indicated that the subject land was alienable and disposable. It bears stressing, however, that the Court in *Vega* and its subsequent rulings[39] clarified that the rule on substantial compliance applies *pro hac vice*[40] at the discretion of the courts, provided that the following conditions were met: (1) the absence of effective opposition from the government; and (2) there has been a positive act of government to show the nature and character of the land. Moreover, this exception may only be claimed if the trial court in a given case rendered its decision on the application for land registration prior to June 26, 2008, the date of the promulgation of *T.A.N. Properties.*

Inasmuch as the RTC's Decision in this case was rendered on August 30, 2001 or before the promulgation of *T.A.N. Properties*, the Court cannot grant the registration of the subject properties because the conditions cited in *Vega* are not present in this case.

In *Republic v. De Tensuan,*[41] *(De Tensuan)* the Court was emphatic that while the stringent requirements under *T.A.N. Properties* may have been relaxed in some cases and the rule on substantial compliance was accepted in its stead, the latter exception cannot be applied when there is effective opposition from the government, thus:

> While we may have been lenient in some cases and accepted substantial compliance with the evidentiary requirements set forth in *T.A.N. Properties*, we cannot do the same for Tensuan in the case at bar. **We cannot afford to be lenient in cases where the Land Registration Authority (LRA) or the DENR oppose the application for registration on the ground that the land subject thereof is inalienable.** In the present case, the DENR recognized the right of the LLDA to oppose Tensuan's Application for Registration; and the LLDA, in its Opposition, precisely argued that the subject property is part of the Laguna Lake bed and, therefore, inalienable public land. **We do not even have to evaluate the evidence presented by the LLDA given the Regalian Doctrine. Since Tensuan failed to present satisfactory proof that the subject property is alienable and disposable, the burden**

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[39] *Republic v. Herederos de Ciriaco Chunaco Disteleria Incorporada,* G.R. No. 200863, October 14, 2020; *Republic v. Caraig*, G.R. No. 197389, October 12, 2020; and *Republic v. Bautista,* 843 Phil. 16 (2018).

[40] See *Highpoint Development Corp. v. Republic*, 842 Phil. 1135, 1140 (2018), where *pro hac vice* is defined as a Latin term meaning "for this one particular occasion."

[41] 720 Phil. 326 (2013).

of evidence did not even shift to the LLDA to prove that the subject property is part of the Laguna Lake bed. [42] (Emphasis and underscoring supplied)

Briefly, in *De Tensuan,* the applicant filed an application for land registration pursuant to Section 14(1) of PD 1529. In support thereof, the applicant presented a Certification issued by the CENRO-DENR which verified that "said land falls within alienable and disposable land under Project No. 27-B L.C. Map No. 2623 under Forestry Administrative Order No. 4-1141 dated January 3, 1968." Likewise submitted into evidence was an Investigation Report prepared by a DENR Land Investigator stating, among others, that the land was covered by a duly approved survey plan; that the land was within the alienable and disposable zone classified under Project No. 27-B, L.C. Map No. 2623; that the land was not reserved for military or naval purposes; and was not covered by a previously issued patent. These notwithstanding, the Court in *De Tensuan,* did not accept substantial compliance with the evidentiary requirements in establishing alienability and disposability even if the trial court therein rendered its decision on October 18, 2004, or before the promulgation of *T.A.N. Properties*, because of the opposition of the Laguna Lake Development Authority on the ground that the property was inalienable. The Court's ruling in *De Tensuan* was later reiterated in *Republic v. Bautista*.[43]

To recall, this is not the first time Evaristo's application for land registration was opposed by the government. Evaristo first applied for registration in 1973 which was opposed by the Bureau of Forest Development and the Municipality of La Trinidad. Similar to the present case, Evaristo's application was disputed on the ground that the subject properties were inalienable as these were forest land, specifically, within the Puguis communal forest.

Assuming *arguendo* there was no effective opposition from the government, the Court nonetheless finds that the totality of the evidence on record failed to establish that there was a positive act on the part of the government declaring that the subject properties are alienable and disposable as required in *Vega.* While petitioners concede that there is no certification stating that the subject properties were alienable and disposable, petitioners insist that the surveyor, Engr. Santiago, made an extensive research and testified based on DENR procedures for approval of survey plans that the area covered by the subject property was entirely within the alienable and disposable zone outside any kind of reservation.[44] Further, petitioners underscore that the survey plan over the subject properties would not have been approved by the Bureau of Lands if it fell within the Puguis communal

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[42] Id. at 343.
[43] 843 Phil. 16, 25 (2018).
[44] *Rollo,* pp. 31-32.

forest as claimed by the respondents.[45] They insist that from the moment that the Bureau of Lands approved the survey plan of the subject properties and issued a corresponding PSU number, it stamped an *imprimatur* on the status of the classification of the land.[46]

The Court disagrees.

The fact that the land has been privately surveyed is not sufficient to prove its classification or alienable character. While the conduct of a survey and the submission of the original tracing cloth plan are mandatory requirements for applications for original registration of land under PD 1529, they only serve to establish the true identity of the land and to ensure that the property does not overlap with another one covered by a previous registration.[47] These documents do not, by themselves, prove alienability and disposability of a property. Moreover, unlike *Vega,* the approved survey plan in this case does not even contain an annotation that the subject properties have been classified as alienable and disposable. Rather, it only bears an annotation that "THIS SURVEY IS OUTSIDE F.R. 20, IT IS ALSO OUTSIDE ANY CIVIL OR MILITARY RESERVATION xxx"[48] and an attestation that "the survey appears to have been made in accordance with existing regulations of the Bureau of Lands…"[49] To recall, the only testimony regarding the survey plan came from Engr. Santiago, who prepared the same and his assurance that the subject properties were outside any civil reservation and forest reservation according to the Control Base Map.[50]

All told, the alienable and disposable character of the land must be proven by clear and incontrovertible evidence to overcome the presumption of State ownership of the lands of public domain under the Regalian doctrine and the burden of proof in overcoming such presumption is upon the person applying for registration.[51] Since the rule is explicit in that the applicant bears the burden of proving that the land is alienable and disposable, the burden of proof is not shifted even if the government does not present countervailing evidence.[52] Even on the assumption that there is some controversy with regard to the exact metes and bounds of Puguis communal forest, the Court finds its pronouncement in the case of *De Tensuan* instructive. In that case, the Court likewise ruled that since the applicant failed to provide satisfactory proof that the property was alienable and disposable, the burden of evidence did not even shift to the government to prove that the property fell within the Laguna Lake

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45 Id. at 28.
46 Id. at 34.
47 *Republic v. Nicolas,* 819 Phil. 31, 48 (2017).
48 *Rollo,* p. 55.
49 Id. at 312.
50 See RTC Decision, p. 9, quoting the cross-examination testimony of Engr. Santiago; id. at 103.
51 *Republic v. Caraig,* supra note 39; *Republic v. San Lorenzo Development Corp.,* G.R. No. 220902, February 17, 2020.
52 *Republic v. Spouses Dela Cruz,* G.R. No. 220868, June 15, 2020.

bed. Applied to the present case, the burden of evidence to prove that the entire area covered by the subject properties fell within the Puguis communal forest never shifted to the respondents. Nevertheless, the Court notes that respondents presented land classification maps covering the communal forests of La Trinidad, Benguet which show that the subject properties fall within Puguis communal forest, yet these were dismissed by the trial court on the ground that these were approved subsequent to the survey plan submitted by Evaristo.[53] To the mind of this Court, the said land classification maps would constitute the most recent appraisal of the classification of the subject properties and should not have been cursorily dismissed by the trial court on such ground.

Finally, the Court observes that while petitioners seek exemption from the strict application of *T.A.N. Properties,* in the same vein, they allege that the subject properties are ancestral land to which they have acquired a native title and therefore, the subject properties never became public land at all.

Nevertheless, the Court finds that the evidence on record belies their claim. As pointed out by the appellate court, even if they claim that their predecessor, Tumpao, belonged to the *Ibaloi* tribe, the earliest possession claimed by Tumpao was in 1929 when he declared the subject properties for tax purposes under Tax Declaration No. 163.[54] This hardly constitutes possession since time immemorial judging by the standard set by the Court in *Spouses Decaleng v. Philippine Episcopal Church,*[55] citing *Oh Cho v. Director of Lands,*[56] thus:

> The applicant failed to show that he has title to the lot that may be confirmed under the Land Registration Act. He failed to show that he or any of his predecessors in interest had acquired the lot from the Government, either by purchase or by grant, under the laws, orders and decrees promulgated by the Spanish Government in the Philippines, or by possessory information under the Mortgage Law (section 19, Act 496). All lands that were not acquired from the Government, either by purchase or by grant, belong to the public domain. **An exception to the rule would be any land that should have been in the possession of an occupant and of his predecessors in interest since time immemorial, for such possession would justify the presumption that the land had never been part of the public domain or that it had been a private property even before the Spanish conquest**. (*Carino vs. Insular Government*, 212 U.S., 449; 53 Law. ed., 594.) **The applicant does not come under the exception, for the earliest possession of the lot by his first predecessor in interest began in 1880.**[57] (Emphasis supplied).

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[53] *Rollo*, p. 110.
[54] Id. at 55.
[55] 689 Phil. 422 (2012)
[56] 75 Phil. 890 (1946).
[57] *Spouses Decaleng v. Philippine Episcopal Church*, supra at 449.

Notwithstanding the number of witnesses presented by petitioners, they did not provide any details on how Tumpao and his predecessors-in-interest originally came to possess the subject properties. Thus, there is no way for the Court to determine definitively that the subject properties did not become public land at all. Worse, Tumpao's possession of the subject properties in 1929 in the concept of an owner is even disputed considering that an *Agreement Re Surface Rights* executed by Tumpao in 1937 clearly described him as a mere lessee of the subject properties.

Considering petitioners' failure to prove that the subject properties is alienable and disposable, it becomes unnecessary for the Court to determine whether they have complied with the other requisites for original registration under either Section 14 (1) or 14 (2) of PD 1529.[58] Absent sufficient evidence as to the alienable and disposable character of the land applied for registration, petitioners' possession of the same, no matter how long, cannot ripen into a registrable title.

WHEREFORE, the present Petition for Review on *Certiorari* is **DENIED**. The Decision dated April 30, 2018 and Resolution dated February 15, 2019 of the Court of Appeals in CA-G.R. CV No. 99376 are **AFFIRMED**.

SO ORDERED." (Zalameda, *J.*, recused himself from the case due to prior participation in the Court of Appeals; M. Lopez, *J.*, designated additional Member per Raffle dated November 29, 2021)

By authority of the Court:

TERESITA AQUINO TUAZON
Division Clerk of Court
18 AUG 2022

[58] *Republic v. Bautista*, supra, note 43.

ATTY. MARY G. WAYAGWAG-GUIBAC (reg)
Counsel for Petitioners
Rm. 209, 2nd Floor, Dangwa Building
Rajah Matanda Street,
Baguio City

OFFICE OF THE SOLICITOR GENERAL (reg)
134 Amorsolo Street
1229 Legaspi Village
Makati City

MUNICIPAL LEGAL OFFICE (reg)
Counsel for Respondent Municipal of La Trinidad, Benguet
Municipal Hall, La Trinidad, Benguet

HON. PRESIDING JUDGE (reg)
Regional Trial Court, Branch 63
La Trinidad, Benguet
(Land Reg. Case No. 93-LRC-0008)

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