

Title: Heirs of Herminio Marquez v. Heirs of Epifania M. Hernandez

Facts:

The case revolves around a dispute over a 200-square-meter parcel of land in Matungao, Bulacan. The property was originally a part of a larger 1,417-square-meter lot owned by the spouses Sakay and spouses Cruz. From 1955, Epifania Hernandez and her children occupied the subject property and built a house with the owners' consent.

In 1967, Herminio Marquez purchased the larger property. In 1985, Herminio agreed to sell the 200-square-meter portion occupied by Epifania for P400.00 per square meter with full payment due before the end of that year. Epifania made an initial payment of P2,000.00 and additional payments through installments and checks. The remaining balance was settled from a joint account with Herminio at the Rural Bank of Del Pilar, Inc., which was later closed, resulting in payment from PDIC, which Herminio received.

After Epifania's death in 1995, her children executed an Extrajudicial Settlement of the Heirs stating the joint account as full payment for the property. In a separate document in 1994, Herminio transferred his rights over the 1,417-square-meter property to Alma Marie Marquez, his heir. When Marquez sought to evict the Hernandezes, they refused, leading to the filing of a complaint for specific performance and damages.

Issues:

1. Whether there was a valid contract of sale between Herminio Marquez and Epifania Hernandez over the property.
2. Whether the Court of Appeals erred in affirming the RTC's ruling that the nature of action is one for quieting of title.
3. Whether the Court of Appeals erred in affirming the RTC's ruling that the action filed by the Heirs of Hernandez is not barred by laches.

Court's Decision:

The Supreme Court denied the petition for review, affirming the lower court's rulings that a valid sale occurred between Herminio and Epifania. The Court further agreed that the complaint was indeed for the quieting of title, as it sought to remove the cloud over their equitable title stemming from Herminio's subsequent transactions affecting the property.

Doctrine:

The Court reiterated the doctrine that the character of an action is determined by the material allegations and the relief sought, not merely by the title given by the plaintiff.

Furthermore, an action for quieting of title is imprescriptible as long as the person asserting the right is in actual possession of the property.

Historical Background:

The legal conflict represents how title disputes can persist through changes in property ownership, transactions, and even after the death of original parties, impacting their heirs.

Class Notes:

- The ruling underscores the importance of material allegations and the relief sought in determining the nature of an action, rather than the title it is given.
- Ownership can be transferred through delivery, even lacking full payment, as possession signifies transfer of ownership (Art. 1458, Civil Code).
- Co-ownership: For the sale of a co-owned property, the consent of all co-owners is required for specific portions unless a partial partition occurs (Art. 493, Civil Code).
- Quiet Title: Actions for quieting of title do not prescribe while the plaintiff is in possession of the property (Art. 476, Civil Code).
- Laches: Delay in asserting a right does not always constitute laches if action is taken soon after a claim becomes known.

The ruling confirmed that the sale between Epifania and Herminio was valid, that the action filed by the heirs of Hernandez served to quiet title over the property they possessed, and the action was not barred by laches, given the consistent possession by Hernandez's heirs and swift legal action upon awareness of an adverse claim.