

Title: ****Antonio B. Baltazar, et al. vs. Lorenzo Laxa (Probate of the Will of Paciencia Regala)****

Facts:

On September 13, 1981, 78-year-old Paciencia Regala (Paciencia), executed a will entitled “Tauli Nang Bilin o Testamento Miss Paciencia Regala” in Pampango dialect. The will was read to her and acknowledged in front of witnesses Dra. Maria Lioba A. Limpin, Francisco Garcia, and Faustino R. Mercado, with Judge Ernestino G. Limpin acting as notary public. Paciencia bequeathed all her properties to her nephew, Lorenzo R. Laxa, his wife, and children.

On April 27, 2000, four years after Paciencia’s death in the USA, Lorenzo filed a petition for probate of the will with the RTC of Guagua, Pampanga, seeking also the issuance of Letters of Administration in his favor. Petitioners, claiming interest in the properties, opposed the probate asserting that Paciencia was mentally incapable, was forced under duress, or was unduly influenced at the time of the will’s execution. They also argued that the properties were not owned by Paciencia.

Despite these contentions, no opposition arose after due publication, leading the RTC to order Lorenzo to present his evidence. He presented several witnesses, including Dra. Limpin and pertinent documents. Petitioners presented Rosie M. Mateo and Antonio Baltazar, who both suggested that Paciencia was of unsound mind and did not voluntarily execute the will.

RTC sided with petitioners, disallowing the notarial will. However, upon appeal, the CA reversed the RTC’s decision, finding the appeal meritorious and granting probate of the will.

Issues:

1. Whether the CA erred in allowing the probate of Paciencia’s will despite respondent’s alleged failure to comply with the necessary legal formalities.
2. Whether the CA made erroneous conclusions not supported by the evidence on record.
3. Whether the petitioners successfully proved that Paciencia was not of sound mind at the time the will was executed.

Court’s Decision:

In rejecting the petition, the Supreme Court assessed the extrinsic validity of the will and found that the will complies with formalities prescribed by law. The Court affirmed that forgetfulness does not equate to unsoundness of mind and that the burden of proving

mental incapacity rests upon the shoulders of the petitioners, which they failed to sufficiently establish. It also stated that bare allegations of duress or undue influence are insufficient to deny the probate.

Doctrine:

The decision reiterates the legal tenets regarding the probate of wills, particularly that a person is presumed of sound mind in creating a will unless proven otherwise (Article 800, New Civil Code). The execution of a will must comply with the formalities of the law, and a will is presumed to convey the testator's desires, which the state is duty-bound to enforce if legally tenable.

Class Notes:

Key aspects of this case are the presumption of soundness of mind in executing a will, the required formalities for a will's validity, and the burden of proof lying with those contesting the will's validity. Relevant statutory provisions include Articles 805, 806, 799, and 800 of the New Civil Code and Rule 75, Section 1 of the Rules of Court.

Historical Background:

This case emphasizes the cultural and familial bonds that can influence testamentary dispositions in the Philippines. It reflects a longstanding practice of benefaction and demonstrates how the law regards testamentary capacity and intent, against a backdrop of familial relationships and the inheritance of property.