

Title: Dolores L. Hachang and Bernardo J. Hachang vs. Atty. Basilio H. Alo

Facts:

Bishop Sofronio Hachang passed away on April 3, 1937, leaving a last will and testament that bequeathed his estate. Relevant to this case, his will assigned half of his estate to his parents and the other half, including a specific lot located in San Juan, Rizal (the subject lot), to his sister Dolores. The lot subsequently became the focus of legal contestation.

The will was admitted to probate shortly after the Bishop's death, but the estate proceedings were archived in 1957 without final adjudication of the properties. In 1971, a Transfer Certificate of Title (TCT) over the subject lot was issued for Basilio H. Alo, the respondent and son of Dolores. In 1999, the petitioners (Dolores L. Hachang and Bernardo J. Hachang, grandchildren of Bishop Sofronio's siblings) challenged this TCT, claiming it was fraudulently secured.

The petitioners argued that since there was no final decree of distribution, the subject lot should pass through intestate succession to Bishop Sofronio's parents' estate, from which they claim to derive rights as descendants. The Quezon City Regional Trial Court (RTC) dismissed the petition due to the petitioners having no cause of action, leading to the petitioners' appeal to the Court of Appeals (CA), which affirmed the RTC's decision.

Issues:

1. Whether the petitioners have a legal interest or a cause of action in the subject property.
2. Whether the will's probate is conclusive as to the validity of its intrinsic provisions.
3. Whether only a final decree of distribution of the estate vests title on the properties from the estate on the distributees.

Court's Decision:

The Supreme Court denied the petition based on the following grounds:

1. The Court reaffirmed the principle that successional rights are vested immediately at the moment of death. As such, title over specific properties bequeathed through a will passes on to the heirs directly, and the petitioners have no claim over the subject lot, which was devised specifically to Dolores Hachang Alo, the mother of the respondent.
2. The Supreme Court emphasized the sanctity of a testator's wishes as expressed in a duly probated will, favoring testate over intestate succession. The settlement proceedings being archived did not invalidate the dispositions in the will, and there was no basis for the

petitioners' assertion of intestate succession.

3. Regarding the final decree of distribution, the court explained that heirs, legatees, and devisees become owners pro-indiviso immediately upon the testator's death, negating the need for a final decree to vest title in specific properties that were already designated in the will.

Doctrine:

- The rights to succession are transmitted from the moment of death; ownership over the inheritance vests immediately in the heirs as specified in the will without the need for adjudication when a specific devise or legacy is made.
- A testator's will, when duly probated and valid in its extrinsic and intrinsic aspects, takes precedence over intestate succession, and its provisions should be respected and executed as much as possible.
- The fundamental requirements of a cause of action are the plaintiff's legal right, a correlative obligation of the defendant, and an action by the defendant that infringes upon the rights of the plaintiff.

Class Notes:

- Principle of immediate vesting of inheritance (Spanish Civil Code, Art. 657; Civil Code, Art. 777).
- Favor towards testate versus intestate succession consistent with respect for the decedent's freedom of disposition (Spanish Civil Code, Art. 763; Civil Code, Art. 842).
- Cause of action requires a right in favor of plaintiff, obligation on defendant, and violation of the plaintiff's right by the defendant.
- Real party in interest is the person who stands to be benefited or injured by the judgment in an action.

Historical Background:

- The laws in effect at the time of Bishop Sofronio's death (1937) were the 1889 Spanish Civil Code and the 1901 Code of Civil Procedure, not the 1949 Philippine Civil Code.
- The Spanish Civil Code held sway in the Philippines until the enactment of the Civil Code of the Philippines in 1950.
- The archival of estate proceeding was a procedural outcome not uncommon in the earlier part of the 20th century when the completion of estate settlements would often be significantly delayed or unresolved due to various practical limitations and complexities.