

Title: Rolando Santos vs. Constanca Santos Alana

Facts:

Petitioner Rolando Santos and respondent Constanca Santos Alana are half-blood siblings who are both claimants to a 39-square meter lot in Sta. Cruz, Manila, previously owned by their deceased father, Gregorio Santos. Prior to his death on March 10, 1986, Gregorio executed a deed of donation in favor of Rolando. The donation, made on January 16, 1978, and accepted on June 30, 1981, was duly annotated on Gregorio's title. Additionally, a purported deed of absolute sale from Gregorio to Rolando was also executed on April 8, 1981. Subsequently, a new certificate of title, TCT No. 144706, was issued in Rolando's name.

Constanca filed a complaint for partition and reconveyance with the Regional Trial Court of Manila on January 11, 1991. She contested the validity of the donation, claiming she was deprived of her legitime (a portion of an inheritance guaranteed to certain heirs under Philippine law), and was unaware of Gregorio's alleged sale of the property to Rolando.

The trial court ruled the deed of absolute sale void, as it lacked the signatures of the parties and was not registered. It held the deed of donation valid but inofficious since it impaired Constanca's legitime. Both parties were directed to settle Gregorio's estate and partition it accordingly.

Upon appeal, the Court of Appeals affirmed the trial court's decision, emphasizing the validity of the deed of donation and the inofficiousness of the donation which deprived Constanca of her legitime. This led Rolando to petition to the Supreme Court under Rule 45.

Issues:

1. Whether the deed of donation executed by Gregorio Santos in favor of Rolando Santos is inofficious, thus impairing the legitime of Constanca Santos Alana.
2. Whether the claim of Constanca Santos Alana is barred by prescription.

Court's Decision:

1. Inofficiousness of the Donation: The Supreme Court affirmed that the deed of donation is inofficious. Under Article 752 of the Civil Code, a donation is inofficious if it exceeds what a person may give by will, impairing the legitime of compulsory heirs. In this case, the property, which was the only asset of Gregorio at his death, was entirely donated to Rolando, thus depriving Constanca of her legitime as a compulsory heir.

2. Prescription: The Supreme Court held that the action for reduction of inofficious donations is subject to the general ten-year prescriptive period for actions based on obligations created by law, as provided under Article 1144 of the Civil Code. The ten-year period commences from the death of the donor, the point at which the net estate can be ascertained, and legitimes can be determined. Constanca's claim was filed within the prescriptive period, considering Gregorio's death in 1986 and her filing of the suit in 1991.

Doctrine:

In the context of inofficious donations, Article 752 of the Civil Code provides that no person may give or receive, by way of donation, more than he may give or receive by will. Such an inofficious donation shall be reduced insofar as it exceeds the portion that may be freely disposed of by will, respecting the legitime of compulsory heirs.

Class Notes:

- Compulsory heirs are entitled to a legitime, which is a portion of the inheritance that cannot be deprived by testamentary disposition or donation (Articles 887 and 888 of the Civil Code).
- The validity and efficacy of deeds of donation and sale hinge on proper execution and adherence to formal requirements, such as signatures and registration.
- The inofficiousness of a donation can only be established upon the death of the donor because it is then that the value of their estate can be determined (Article 752 and 771 of the Civil Code).

Historical Background:

The case exemplifies the intersection of succession law and property rights, pivotal in Philippine civil law tradition. The legitimacy and validity of transfers through donations are carefully weighed against the perpetuation of the legally mandated shares of heirs, illustrating the balance between the freedom to dispose of one's property and the protection given to compulsory heirs under Philippine law. This case reaffirms the intention of lawmakers to preserve the right to legitimate successions, even against the backdrop of freely executed acts such as donations and property sales.