

Title: Jesus Ma. Cui vs. Antonio Ma. Cui and Romulo Cui (G.R. No. L-16294)

Facts:

The dispute concerns the office of the Administrator of Hospicio de San Jose de Barili, a charitable institution created by Don Pedro Cui and Dona Benigna Cui. The founding couple passed away by 1929, thus initiating a chain of successions for the administrator position. Under Act No. 3239, the founders initially managed the Hospicio, to be succeeded posthumously by designated relatives in a specified order, eventually to the oldest male descendant of certain nephews, with preference for those holding professional titles.

Plaintiff-appellee Jesus Ma. Cui, holding a Bachelor of Laws degree but not a licensed lawyer, and defendant-appellant Antonio Ma. Cui, a barred then reinstated lawyer, both claimed rightful administratorship based on their lineage and academic qualifications. Antonio assumed the role, following Dr. Teodoro Cui's resignation, through a signed agreement ("convenio"). Jesus, unaware of these developments, filed a demand letter and initiated this action upon non-compliance.

Romulo Cui, the intervenor-appellant, a lawyer and a grandson of Vicente Cui (another mentioned nephew), also claimed entitlement to the position based on the founders' deed of donation and interpreted the succession to follow a lineage approach.

Procedurally, the case evolved from CFI to the Supreme Court after a series of legal maneuvers, letters, and unprosecuted claims, uncovering a background of judicial and extrajudicial contests over the administratorship dating back to at least 1932.

Issues:

1. Does the term "titulo de abogado" require membership in the Bar or merely the academic degree of Bachelor of Laws for eligibility as administrator?
2. Is Antonio Ma. Cui disqualified to hold the office of administration due to prior disbarment despite his reinstatement?
3. Has the plaintiff's action in quo warranto become barred by prescription or laches?
4. Can intervenor Romulo Cui's claim to the administratorship prevail over Antonio Ma. Cui's claim?

Court's Decision:

1. The Court interpreted the term "titulo de abogado" to necessitate not just the degree but formal membership in the Bar, defining a lawyer as an officer of the courts empowered to practice law.

2. Antonio's reinstatement as a lawyer was recognized as a restoration of moral character, meeting the required moral standard for administration.
3. The Court found Jesus's claim barred by laches, given his inaction following earlier litigations, the one-year limitation for the quo warranto action, and the time since his right to hold office had arisen.
4. The Court rejected Romulo's claim, finding no textual basis for a lineage-based approach to succession and considering that Antonio, being closer in descent and older, was preferred.

Doctrine:

In the Philippines, the term "titulo de abogado" implies formal admission to the Bar, justifying one for the legal profession, beyond mere academic qualifications (Bachelor of Laws). Furthermore, the one-year limitation period for actions in quo warranto commences from when the right to the office arises, not from the time an incumbent assumes said office. A reinstatement to the Bar denotes a recognition of moral character at par with the initial admittance standard.

Class Notes:

- "titulo de abogado" means licensed membership in the Philippine Bar, not just holding a law degree.
- Reinstatement to the Bar signifies moral rehabilitation.
- Actions in quo warranto against a public official must be filed within one year after the plaintiff's right to the office has arisen (Section 16, Rule 66).
- The legal doctrine of laches may bar a claim not timely pursued, despite technical compliance with statutory periods.

Historical Background:

This case highlights the intricacies of succession and qualifications for an administrative position within a charitable institution in the Philippines during the early to mid-20th century. It underscores the judicial and societal value placed on professional qualifications and moral character for public positions. Moreover, it illustrates the legal interpretation challenges surrounding a unique succession issue premised on the founders' private deed, set against the backdrop of evolving case law and succession within a prominent Filipino family.