

### Title: \*Heirs of Francisca Medrano vs. Estanislao de Vera\*

### Facts:

The subject of this case is a 463-square meter parcel of land in Pangasinan, originally owned by Flaviana De Gracia, who died intestate in 1980. Her heirs, Hilaria Martin-Paguyo and Elena Martin-Alvarado, waived their rights to the land in favor of Francisca Medrano in 1982. Medrano built a bungalow on the property and some of Hilaria and Elena's children affirmed this waiver through documents. However, not all heirs agreed, leading Medrano to file a complaint in 2001 for quieting of title and related claims against several defendants, including the heirs who did not agree to the waiver. During the proceedings, Estanislao De Vera, claiming to have acquired the rights from some defendants, intervened. The trial court's treatment of De Vera's involvement and subsequent decisions led to this case being brought before the Supreme Court.

### Issues:

1. Whether De Vera, as a transferee pendente lite, could participate in Civil Case No. U-7316 without filing a motion to intervene.
2. Whether De Vera is bound by the judgment against his transferors.
3. Whether it was proper for the CA to take cognizance of respondent's Petition for Certiorari and Mandamus.

### Court's Decision:

The Supreme Court affirmed the CA's decision, sustaining that the trial court gravely abused its discretion in refusing to allow De Vera to participate in the case and mandating him to file a motion to intervene. It held that:

1. De Vera's participation in the trial should have been permitted based on due process considerations, given that his interests were derived from and directly aligned with the defendants who transferred their rights to him.
2. De Vera was not independently bound by the judgment against his transferors, as the trial court's approach failed to recognize that De Vera should have been treated as having joined as a party-defendant upon his intervention.
3. The Supreme Court agreed with the CA that ordinary appeal was not an adequate remedy for De Vera; hence, his certiorari petition was appropriate given the circumstances.

### Doctrine:

The principle elucidated is that a transferee pendente lite's interest is not independent of or severable from the interests of the transferors. When such a transferee has filed an answer

or otherwise participated in the proceedings, the trial should proceed with their inclusion and active participation. Additionally, a petition for certiorari under Rule 65 is deemed proper when ordinary appeal would not provide a speedy and adequate remedy.

### Class Notes:

- **Transferee Pendente Lite**: A person who acquires interest in a property under litigation during the pendency of the case. They are not considered independent parties; their rights and obligations in the suit are aligned with those of the transferor.
- **Due Process in Civil Proceedings**: Even non-original parties, when their interests are substantially aligned with a current party, must be afforded the opportunity to participate fully in the proceedings to ensure fairness and equity.
- **Remedy of Certiorari under Rule 65**: Appropriate in instances where the aggrieved party has no other speedy and adequate remedy; particularly used to correct errors of jurisdiction or grave abuse of discretion by lower courts.

### Historical Background:

The dispute centers on property inheritance and the complications arising from informal waivers and subsequent transfers of rights among family members and third parties. Such cases are not uncommon in the Philippines due to familial traditions, informal transactions, and issues surrounding intestate succession, highlighting the importance of clear legal documentation and the rigorous application of due process in property disputes.