

**\*\*Title:\*\*** Calimag v. Heirs of Macapaz: A Case on Annulment of Deed of Sale and Filiation

**\*\*Facts:\*\*** The property dispute centers around a parcel of land in Makati City, co-owned by Virginia D. Calimag and Silvestra N. Macapaz. After Silvestra's death in 2002, a Deed of Sale was allegedly executed in 2005 in favor of Calimag, leading to the transfer of title solely to her name. This act was contested by Anastacio P. Macapaz, Jr. and Alicia Macapaz-Ritua, claiming to be Silvestra's heirs. They filed a civil action for the annulment of the deed and cancellation of the title, asserting it was a forgery as Silvestra had passed away before its execution.

In defense, Calimag questioned the respondents' legal standing, alleging they were illegitimate and thus barred from inheriting under Article 992 of the Civil Code. The trial court sided with the respondents, finding the deed a forgery and recognizing their legal standing as heirs. The Court of Appeals (CA) affirmed this decision, albeit modifying the awarded damages.

**\*\*Issues:\*\***

1. Was the Deed of Sale dated January 18, 2005, forged?
2. Do the respondents have the legal standing to challenge the validity of the deed and the subsequent title in their capacity as heirs?

**\*\*Court's Decision:\*\***

1. **\*\*Regarding Forgery\*\***: The Supreme Court did not delve into this issue explicitly as it was not contested by Calimag beyond the initial findings of the lower courts. Both the RTC and CA concluded the deed to be a forgery, a fact Calimag did not challenge before the Supreme Court.
2. **\*\*Respondents' Legal Standing as Heirs\*\***: The Court affirmed the findings of the CA and RTC, declaring that the respondents had legal standing as heirs. Despite Calimag's challenge based on the respondents' alleged illegitimacy, the Court found sufficient evidence of the respondents' legitimate filiation through the existence of a marriage between their parents and their birth certificates.

**\*\*Doctrine:\*\*** The Supreme Court reiterated the principle that marriage can be proven by means other than the marriage certificate, including birth certificates and evidence of cohabitation. Furthermore, it clarified that illegitimacy can only be contested in a direct

action by an interested and related party, not as a defense in property disputes.

**\*\*Class Notes:\*\***

1. **\*\*Forgery in Civil Cases\*\***: The party alleging forgery must provide conclusive evidence. When uncontested, lower court findings may be upheld.
2. **\*\*Legal Standing of Heirs\*\***: Heirs have the right to contest actions affecting the estate, regardless of challenges to legitimacy, provided there is sufficient evidence of their status.
3. **\*\*Proof of Marriage\*\***: Marriage certificates are primary evidence but not the sole means; cohabitation, birth certificates, and other documents can also establish a marriage.
4. **\*\*Article 992 of the Civil Code\*\***: Bars illegitimate children from inheriting from their legitimate relatives but does not prevent them from challenging transactions affecting their potential inheritance.

**\*\*Historical Background:\*\*** This case highlights the evolving standards for proving familial relations and ownership rights in property disputes. It underscores the importance of documenting significant life events such as marriages and births within the legal framework to avoid protracted legal disputes.