

****Title:**** Manuela Grey Alba et al. vs. Anacleto R. de la Cruz

****Facts:**** This case involves a dispute over the possession and registration of land situated in the Barrio of Talampas, Municipality of Baliuag, Province of Bulacan, Philippines. Manuela, Jose, Juan, and Francisco, surnamed Grey y Alba, heirs of Doña Segunda Alba Clemente and Honorato Grey, deceased, filed a petition on December 18, 1906, for the registration of approximately 52 hectares of agricultural land used for rice and sugar cane, valued at \$1,000 United States currency. On February 12, 1908, the Court of Land Registration decreed the registration of the land in the names of the four petitioners as co-owners, subject to the usufructuary right of Vicente Reyes, widower of Remedios Grey y Alba.

Anacleto Ratilla de la Cruz filed a motion on June 16, 1908, seeking a revision of the case, claiming he was the absolute owner of two parcels within the petitioners' land, alleging malicious and fraudulent procurement of the decree by the petitioners. The Court reopened the case upon this motion. After hearing additional evidence, the court amended its former decree on November 23, 1908, excluding the two parcels claimed by de la Cruz. The petitioners appealed the decision insisting the decree was not obtained through fraud and that they rightfully owned the disputed parcels.

****Issues:****

1. Whether the trial court erred in reopening the case and modifying its decree dated February 12, 1908.
2. Whether the two parcels of land described in the appellee's motion belong to the petitioners or the appellee.

****Court's Decision:**** The Supreme Court reversed the decision of the lower court. It stated that the decree of February 12, 1908, should not have been modified on the grounds of fraud because the petitioners believed in good faith that Anacleto de la Cruz occupied the two parcels as their tenant, not as an owner. The Court determined that "fraud" in this context must mean actual or moral fraud, not merely constructive or legal fraud, and that specific, intentional acts to deceive and deprive another of their rights must be proven.

****Doctrine:**** The case reiterates that the registration decree is conclusive against all persons, including the State, and that it cannot be reopened due to the absence, infancy, or other disability of any person affected thereby, except on grounds of fraud obtained by actual or moral fraud. Furthermore, it underscores that specific and intentional acts to

deceive must be proven for a registration decree to be modified on the grounds of fraud.

****Class Notes:****

- Registration decree under the Land Registration Act is conclusive against all, subject only to the exceptions stated therein.
- Actual or moral fraud, as opposed to constructive or legal fraud, is required to reopen a case and modify its decree.
- The importance of providing the names and addresses of all occupants of land in the registration application is underlined, although failure to do so can be superseded by “to all whom it may concern” through publication.

****Historical Background:**** The dispute over land registration and ownership in the Philippines underscores the application and interpretation of the Land Registration Act (Act No. 496), mirroring the complexities landowners face regarding land tenure and the legal requisites for land registration. This case reflects the early challenges and interpretations of land ownership, registration processes, and the rigorous standards for alleging and proving fraud in the alteration of a registration decree, set against the backdrop of the Philippines’ evolving land registration system influenced by the Spanish Torrens system.