

Title: Rodriguez vs. Rodriguez: A Case on Ownership, Possession, and Validity of Title

Facts:

The case revolves around a property dispute concerning a five-door apartment in Makati City, Philippines, previously owned by Juanito Rodriguez. On October 27, 1983, Juanito executed a will (“Huling Habilin at Testamento”), allocating specific apartments to his live-in partner Cresenciana Tubo Rodriguez and his children. Subsequently, on June 14, 1984, Juanito sold the property to Cresenciana, who then became the registered owner under TCT No. 150431.

On September 20, 2001, Cresenciana filed an unlawful detainer case against Juanito’s children, alleging they had leased the apartments without her consent. The defendants countered, claiming co-ownership by succession and questioned the validity of the sale due to alleged undue influence on their seriously ill father.

The Metropolitan Trial Court (MTC) dismissed the ejectment suit, siding with the defendants based on the deemed simulated deed of sale and a prior Partition Agreement recognizing co-ownership according to the will. Cresenciana appealed to the Regional Trial Court (RTC), which reversed the MTC’s decision citing Cresenciana’s conclusive evidence of ownership via the certificate of title. The defendants then appealed to the Court of Appeals (CA), which reinstated the MTC’s decision, emphasizing the MTC’s authority to resolve ownership issues provisional to possession determination.

Dissatisfied, Cresenciana took the matter to the Supreme Court, arguing that her registered ownership granted her possession rights and that ownership questions should not be raised in an ejectment case unless intertwined with possession issues.

Issues:

1. Whether the Court of Appeals erred in reversing the RTC’s decision and reinstating the MTC’s decision that dismissed the ejectment suit.
2. Whether the issue of ownership can be determined in an ejectment case.
3. Whether the probate of the will and the Partition Agreement affect Cresenciana’s registered ownership.

Court’s Decision:

The Supreme Court sided with Cresenciana, reversing the CA’s decision and reinstating the RTC’s decision. The Court clarified that an action for unlawful detainer focuses on possession de facto rather than ownership. However, when ownership is raised as a defense,

the court may provisionally rule on it to resolve possession issues.

In this case, the Supreme Court found that Cresenciana presented preponderant evidence of her ownership and right to possession based on the valid deed of sale and her certificate of title. The Court deemed the will and the Partition Agreement legally ineffective, as the will had not been probated. The Court emphasized that the resolution on the issue of ownership was provisional, not affecting the separate case questioning the deed of sale's validity.

Doctrine:

1. A certificate of title serves as conclusive evidence of ownership and is not subject to collateral attack in an ejectment case.
2. The resolution of ownership in an ejectment case is provisional and does not prejudice an action involving the title to the property.
3. A will must be probated to have any legal effect on the disposition of the testator's property.

Class Notes:

- An action for unlawful detainer focuses on the question of who is entitled to physical or material possession of a property (possession de facto).
- Ownership can be provisionally resolved in an ejectment case if intertwined with possession but does not preclude a separate action for title determination.
- A Torrens title (certificate of title) is indefeasible and conclusive evidence of ownership, except in direct proceedings challenging the title.
- The validity of a will and its provisions, including a Partition Agreement made pursuant to it, depend on its probate as per Article 838 of the Civil Code.

Historical Background:

This case highlights the interplay between property law principles, specifically the distinction between possession and ownership, and the procedural requirements for challenging a registered title in the Philippines. It underscores the importance of probating a will to effectuate the testator's intentions regarding property disposition post-mortem, balancing the summary nature of ejectment proceedings with substantive ownership disputes that may arise.