

Title: The Heirs of the Late Jesus Fran and Carmen Mejia Rodriguez vs. Hon. Bernardo LL. Salas, Concepcion Mejia Espina, and Maria Mejia Gandiongco

Facts:

Remedios M. Vda. de Tiosejo died on July 10, 1972, leaving behind a last will and testament executed on April 23, 1972, bequeathing her properties to collateral relatives and designating Rosario Tan or Jesus Fran as executor. Jesus Fran filed a petition for the probate of Remedios' will on July 15, 1972. The respondents, sisters of the deceased, initially expressed intent to file opposition but subsequently withdrew it. The probate judgment was rendered on November 13, 1972, admitting the will to probate and appointing Jesus Fran as executor. Following compliance with procedural requirements, including publication of notice to creditors and submission of an inventory of the estate, a Project of Partition was submitted and approved by the court on September 10, 1973, leading to the closure of the proceedings.

Years later, on October 1, 1979, the respondents filed an Omnibus Motion for Reconsideration of the probate judgment, alleging, among others, forgery of the will and non-notification of certain proceedings. Despite oppositions, the motion was set for hearing, and on June 2, 1980, the trial court issued an order finding the testatrix's signature forged, declaring the will void, and converting the proceedings into intestacy.

Issues:

1. Whether the trial court lost jurisdiction over the probate proceedings due to the finality of the probate judgment.
2. Whether the probate judgment and subsequent orders could be annulled based on the grounds raised by the respondents.
3. Whether the reception of evidence by the Clerk of Court is void for non-compliance with procedural rules.
4. Whether the petition for probate was properly filed even without the original will attached.

Court's Decision:

The Supreme Court held that the trial court committed grave abuse of discretion amounting to lack of jurisdiction in granting the Omnibus Motion for Reconsideration, setting aside the probate judgment, declaring the will a forgery, and ordering the conversion of the testate proceedings into intestacy proceedings. The decision was rooted in the following findings:

1. Private respondents, by withdrawing their opposition, effectively participated in the

probate proceedings, rendering moot any claims of non-notification.

2. The probate judgment had become final and the trial court no longer had jurisdiction to revisit its decision through an Omnibus Motion for Reconsideration filed significantly later.

3. The delegation of evidence reception to the Clerk of Court did not violate any legal or procedural principle.

4. The petition for probate was properly filed and the non-attachment of the original will did not nullify the proceedings.

Doctrine:

1. A probate judgment becomes conclusive with respect to the due execution of the will and cannot be impugned on any of the grounds authorized by law, except fraud, in any separate action or proceeding.

2. The rule of finality of judgments, which mandates that final judgments should be accorded respect and should not be disturbed, reinforces stability in judicial determinations.

Class Notes:

- **Final Judgment Principle:** Once a judgment becomes final and executory, it is no longer subject to appeal or review except on the ground of extrinsic fraud.

- **Probate Proceedings:** In probate proceedings, the court's primary role is to validate the will's authenticity and ensure its proper execution according to law.

- **Clerk of Court as Evidence Receiver:** The reception of evidence by the Clerk of Court in uncontested cases or when delegated by the judge does not invalidate the proceedings provided it is conducted within the bounds of the law.

- **Attachment of Original Will:** The non-attachment of the original will to the petition for probate does not per se nullify the proceedings, provided the due process is observed and the contents of the will are not disputed.

Historical Background:

This case highlights the procedural intricacies in probate law in the Philippines and the principles guarding the finality of judgments. It underscores the importance of adhering to procedural deadlines and the consequences of failing to contest a will within prescribed periods. It also illustrates the judiciary's reluctance to overturn final decisions except under exceptional circumstances, thereby preserving the integrity and finality of judicial determinations.