

### Title: Spouses Galang vs. Spouses Reyes

### Facts:

The legal battle between Spouses Crispin and Caridad Galang and Spouses Conrado S. Reyes and Fe de Kastro Reyes (later substituted by their legal heir, Hermenigildo K. Reyes) revolves around the annulment of Original Certificate of Title (OCT) No. P-928. The dispute began when the Reyeses filed a case with the Regional Trial Court (RTC) of Antipolo, Rizal, alleging that through fraudulent means, the Galangs acquired a certificate of title over a piece of land that was formerly the bed of Marigman Creek. This creek purportedly dried up and changed its course due to natural events, inadvertently affecting the land owned by the Reyeses.

The case escalated through various legal channels, with the RTC initially dismissing the Reyeses' complaint due to lack of cause of action and erroneously chosen remedy, concluding that the Galangs obtained the title through proper legal procedures and that any allegations of fraud were unsubstantiated.

Dissatisfied, the Reyeses appealed to the Court of Appeals (CA), which reversed the RTC's decision and ordered the cancellation of OCT No. P-928 and the reconveyance of the land to the Reyeses. The CA held that based on evidence, the land in dispute was indeed part of the abandoned creek bed and thus should belong to the Reyeses. The Galangs contested this decision but were denied, prompting them to seek redress from the Supreme Court (SC).

### Issues:

The Supreme Court was tasked with determining:

1. Whether the Reyeses could initiate an action for the annulment of a Free Patent Title and reconveyance of land;
2. Whether the Reyeses successfully established their claim over the disputed land.

### Court's Decision:

The Supreme Court held that the Reyeses had the standing to file an action for annulment of title and reconveyance, differentiating between actions for reversion (which would require the government to act) and actions for annulment of title based on prior ownership claims, where private individuals have the standing.

However, on the matter of proving their ownership and the fraudulent registration by the Galangs, the Supreme Court agreed with the RTC and found the evidence presented by the Reyeses insufficient. The Supreme Court noted that the Reyeses failed to convincingly demonstrate that the land was the dried-up bed of Marigman Creek acquired through natural accretion. Without substantial proof of the creek's alleged natural course change and the ensuing dry bed's reclassification into private land, the Supreme Court could not overrule the existing title held by the Galangs.

Thus, the Supreme Court granted the petition filed by the Galangs, effectively reversing the decision of the CA and affirming the RTC's dismissal of the complaint for lack of merit.

### ### Doctrine:

1. **Ownership through Accretion**: The principle stipulates that land which emerges as a result of a river's natural change in course belongs, ipso facto, to the owner of the property the new course traverses. For one to claim ownership of an abandoned river or creek bed through accretion, they must unequivocally demonstrate the natural change of course.
2. **Standing in Annulment of Title Actions**: Private individuals have the standing to file actions for annulment of title and reconveyance if they assert a prior right of ownership over the land before the disputed title's issuance.

### ### Class Notes:

- **Principle of Accretion** (Art. 461, Civil Code): Ownership of land gained through natural accretion does not automatically transfer unless it is clearly established that the change occurred naturally, and the original and new courses of water can be definitively identified.
- **Fraud in Land Titles** requires clear, convincing evidence to annul, proving actual and deliberate deception intended to deprive another of their rightful ownership. Mere allegations or preponderance of evidence are insufficient.
- **Standing to Sue**: In land title disputes, individuals asserting ownership rights predating the issuance of a contested title have the legal standing to initiate annulment and reconveyance actions without involving the state.

### ### Historical Background:

The case illustrates the complexities inherent in property law, particularly regarding the

acquisition and dispute of land titles in the Philippines. It underscores the reliance on the Torrens system for land registration, which presumes regularity and correctness unless proven otherwise through incontrovertible evidence. The decision reiterates the judiciary's stance on not easily unsettling registered titles without substantial proof of fraud or procedural irregularities.