

Title: *Alfelor v. Halasan*: A Case on Legal Heirship and Intervention in Partition Proceedings

Facts:

The legal quarrel began with a Complaint for Partition filed on January 30, 1998, by the heirs of the late spouses Telesforo and Cecilia Alfelor in the Regional Trial Court (RTC) of Davao City, aiming to divide the couple's estate. Among the plaintiffs were Teresita Sorongon and her children, Joshua and Maria Katrina Alfelor, who asserted their status as the surviving spouse and children, respectively, of Jose Alfelor, a predeceased child of Telesforo and Cecilia.

Subsequently, on October 20, 1998, Josefina H. Halasan filed a Motion for Intervention in the partition case, claiming to be Jose Alfelor's lawfully wedded wife prior to any marriage between Jose and Teresita, rendering Teresita's subsequent marriage to Jose void ab initio. Josefina's petition to intervene was founded on her assertion of being a compulsory heir to Jose's estate.

The matter escalated to testimonies and a disputed marriage contract. Teresita testified about her marriage to Jose, the acknowledgment by Jose's family of their union despite his alleged previous marriage to Josefina, and Josefina's long absence. The RTC, on September 13, 2002, denied Josefina's motion for intervention, questioning the authenticity of her marriage to Jose due to her non-appearance and failure to present corroborative witnesses or original documents to affirm the marriage.

Josefina filed a Motion for Reconsideration, which was denied, leading her to seek remedies from the Court of Appeals (CA) through a Petition for Certiorari. The CA, in a reversal of RTC's ruling, determined that Teresita's admissions in her pleadings and testimonies sufficed as evidence of Josefina's marriage to Jose, thereby granting Josefina's intervention.

Dissatisfied, Joshua and Maria Katrina Alfelor elevated the matter to the Supreme Court of the Philippines via a Petition for Review on Certiorari, challenging the CA's decision to allow Josefina's intervention.

Issues:

1. Whether or not judicial admissions by Teresita regarding Josefina's marriage to Jose were sufficient to allow Josefina's intervention.
2. The legal effect of Teresita's alleged knowledge of Jose's prior marriage on her and her children's heirship.
3. The applicability of rules on intervention under the circumstances presented in the

dispute over the estate.

Court's Decision:

The Supreme Court dismissed the petition, upholding the CA's decision to allow Josefina Halasan's intervention in the partition case. The Court concluded that Teresita's admissions both written and through testimony - unequivocally established the fact of Josefina's marriage to Jose. Thus, Josefina adequately demonstrated a legal interest in the litigation, warranting her status as an intervenor. The Court emphasized the doctrine that judicial admissions relieve the party who made the admission of their burden of further proof and are conclusive against them. The verdict reinforced the principles governing intervention and the significance of judicial admissions in litigation.

Doctrine:

Judicial admissions are conclusive upon the party making them and dispense with the need to prove the admitted facts. The Court elucidated on the criteria for intervention, stating that a person who demonstrates a legal interest in the matter in litigation, the success of any parties, or is situated to be adversely affected by a disposition of property in a court's custody, may, with the court's permission, intervene in the action.

Class Notes:

1. **Judicial Admissions**: Statements made by a party during judicial proceedings, explicitly acknowledging the truth of certain facts, which then become conclusive against the party making them, eliminating the requirement of proof for those facts.
2. **Rule on Intervention**: Under Section 1, Rule 19 of the Revised Rules of Court, a legal interest in the litigation or in the outcome for or against one or more of the parties is a fundamental criterion for intervention. The court must also consider whether the intervention will unduly delay or prejudice the adjudication of the original parties' rights or whether the intervenor's rights can be protected in a separate proceeding.
3. **Doctrine of Heirship**: The legal status as an heir is determined based on the legitimacy of one's relationship to the decedent under relevant laws, which in this case hinges on the validity of the marriage and the consequent legitimacy of offspring.
4. **Bigamy and Void Marriages**: Under Philippine law, a subsequent marriage contracted during the subsistence of a valid previous marriage is void ab initio, and does not produce legal heirs from this void marriage.

Historical Background:

The *Alfelor v. Halasan* case underscores the complexities of family law in the Philippines, specifically issues concerning marriage validity, heirship rights, and intervention in partition cases. It demonstrates the rigorous scrutiny applied by Philippine courts in validating marriages, adjudicating heirship, and safeguarding the lawful interests of rightful heirs in estate proceedings. This case further highlights the evolving interpretations and applications of family law principles to ensure justice and fairness in disputes involving marital relations and succession.