

### Title:

Quintos et al. vs Nicolas et al.: Co-ownership and Partition of Inherited Property

### Facts:

Petitioners Vilma Quintos, Florencia Dancel, and Catalino Ibarra, along with respondents Pelagia Nicolas, Noli Ibarra, Santiago Ibarra, Pedro Ibarra, David Ibarra, Gilberto Ibarra, heirs of Augusto Ibarra, and spouses Recto and Rosemarie Candelario, are siblings or descendants involved in a dispute over a 281 sqm. parcel of land in Camiling, Tarlac, inherited from their parents, Bienvenido and Escolastica Ibarra.

Upon the parents' death by 1999, an action for partition was brought by some siblings in 2002 (Civil Case No. 02-52), which was dismissed in 2004 due to non-appearance. A Deed of Adjudication transferring the property to all ten siblings was executed later in 2004. In 2007, 7/10 of the property was sold to the Candelarios. In 2009, the petitioners filed for Quieting of Title and Damages, claiming ownership due to possession and distribution from their parents, which was contested by the respondents.

The RTC dismissed the petitioners' complaint, recognizing co-ownership between the petitioners and the Candelarios. The decision was affirmed by the CA, leading to this petition for review by the Supreme Court.

### Issues:

1. Whether the petitioners proved ownership over the property.
2. Whether the respondents' counterclaim for partition is barred by laches or res judicata.
3. Whether the CA correctly approved the subdivision agreement for partitioning the property.

### Court's Decision:

The Supreme Court partially granted the petition. It held that the petitioners failed to prove ownership or equitable title to the property. The counterclaim for partition was not barred by prior judgment (res judicata) or by laches, since the dismissal of the earlier partition case did not equate to a determination of shares, allowing for a future action for partition.

The Court found error in the CA's approval of the Agreement for Subdivision for partition, as it was made without the consent of all parties. The case was remanded to the RTC for partitioning the property according to Rule 69 of the Rules of Court.

### Doctrine:

1. **Res Judicata in Partition Cases:** An action for partition may be brought any time by a co-owner, with prior case dismissal not barring a future action unless the co-owners' shares are definitively determined or partition is deemed improper.
2. **Exception to Dismissal Prejudice in Co-ownership:** The substantive right to partition under Article 494 of the Civil Code prevails over procedural dismissals with prejudice, except where co-ownership has been definitively dissolved.

### ### Class Notes:

- **Quieting of Title Requirements:** Plaintiff must have legal or equitable title or interest, and the cloud on the title must be shown invalid.
- **Res Judicata Elements:** Final judgment, on merits, by a competent court; identity of parties, subject matter, and cause of action.
- **Partition Right of Co-owners:** Article 494, Civil Code - Co-owners can demand partition anytime, barring certain exceptions.
- **Laches:** Defined as unreasonable delay in asserting one's right, potentially barring action if resulting in inequity.
- **Rule 69, Rules of Court:** Outlines the judicial procedure for partitioning co-owned property.

### ### Historical Background:

The case illustrates the complexities involved in disputes over inheritance among siblings, particularly in Philippine legal context where both statutory provisions and procedural rules govern the resolution of such disputes and the enforcement of co-owners' rights to seek partition.