

### Title: Skunac Corporation and Alfonso F. Enriquez vs. Roberto S. Sylianteng and Caesar S. Sylianteng

### Facts:

The dispute involves two parcels of land situated in Pujalte Subdivision, San Juan City, previously registered under Luis A. Pujalte in 1945. The Sylianteng siblings, Roberto and Caesar, claimed ownership through a June 1983 deed of sale from their mother, Emerenciana, who purportedly acquired the lots from Luis Pujalte in 1958. Conversely, Skunac Corporation and Alfonso F. Enriquez, argued their title originated from Romeo Pujalte, Luis's sole heir, who sold the lots to them in 1992 after obtaining reconstituted titles. The Regional Trial Court of Pasig favored Skunac and Enriquez, a decision reversed by the Court of Appeals (CA), which found in favor of the Syliantengs. The CA's denial prompted the petitioners to appeal to the Supreme Court, challenging the CA's decisions and raising multiple legal issues regarding the validity of sales and titles.

### Issues:

1. Whether the CA erred in applying the Civil Code's double sale provisions.
2. Whether the existence of a sale between Luis Pujalte and Emerenciana Sylianteng was proven.
3. Whether TCT No. 42369, purportedly issued to Emerenciana Sylianteng, should be declared null and void.
4. Whether petitioners are the lawful owners since they allegedly acquired the lots from Luis Pujalte's sole heir, Romeo Pujalte.
5. Whether the CA erred in awarding damages to the respondents.

### Court's Decision:

The Supreme Court upheld the CA's decision, rejecting the petition for review. It clarified that the issue primarily involved questions of fact rather than law, given the conflicting factual findings of the RTC and CA. The court detailed the transactions and the authenticity of the documents involved, emphasizing the validity of the deed of sale between Luis Pujalte and Emerenciana and, consequently, the title of the respondents. The court further noted Romeo Pujalte's failure to prove heirship conclusively affected the legitimacy of the petitioners' title to the lots. Additionally, it held that petitioners could not be considered buyers in good faith as the title they based their claim on indicated prior transactions involving the same properties.

### Doctrine:

The Supreme Court reiterated the rules surrounding the double sale of registered lands under Article 1544 of the Civil Code, stating that it does not apply when properties are sold by different vendors. It also underscored principles regarding the notarization of documents, the presumption of regularity, and priority in time strengthens the right of ownership in cases of double sale.

### ### Class Notes:

- **Double Sale of Registered Lands:** Article 1544 of the Civil Code applies only when properties are sold by the same vendor to different vendees.
- **Notarization of Documents:** A notarized document is a public document with a presumption of regularity, admissible in evidence without further proof of its execution.
- **Presumption of Regularity in Performance of Official Duties:** Government officials are presumed to have regularly performed their duties unless proven otherwise.
- **Good Faith in Purchases:** Buyers of registered lands are generally not expected to look beyond the title. However, annotations on the title that indicate potential defects or prior transactions require further investigation by the buyer to maintain good faith.
- **Priority in Time:** In cases of double sale, the earlier buyer typically has a better right, especially when both have registered their sales.

### ### Historical Background:

This case illustrates the complexities surrounding land ownership disputes in the Philippines, especially those involving reconstituted titles and claims of inheritance. It reflects the significance of the Torrens system in establishing indefeasible titles but also highlights potential pitfalls when transactions involve parties with questionable claims.