

****Title:**** Longinos Javier vs. Segundo Javier et al.

****Facts:**** The core of this case revolves around a dispute concerning the ownership of a lot and the house built upon it, located at No. 521 Calle Real, Malate, Manila. The plaintiff, Longinos Javier, acting as the administrator of the estate of his deceased father, Manuel Javier, asserts ownership of the said land. The defendants, Segundo Javier and Isabel Hernandez, along with her son Manuel Ramon Javier, claim ownership of the house standing on the contested lot.

In 1860, the land was under the possession of Manuel Javier, Segundo Javier's father. Since then, it has been occupied by his children, who have not made any ownership claims to the land itself or have occupied it under the assertion of such a claim. During the proceedings, Manuel Ramon Javier, a defendant and witness, did not claim ownership of the land but indicated confusion regarding its ownership.

The case reached the Supreme Court following appeals from the decision rendered by the court below, which favored the plaintiff, awarding him possession of the property but allowing the defendants reasonable time to remove the house built thereon.

****Issues:****

1. Whether the action for the recovery of the possession of the property can be initiated by the administrator of the estate of the deceased or should be brought by all the heirs.
2. Whether the defendants can be considered possessors in good faith, and therefore not liable to pay rent.
3. Whether the defendants are entitled to reimbursement for the construction of the house on the basis of good faith possession.
4. The application of the principles of law relating to community property regarding the ownership of the house and the land.

****Court's Decision:****

The Supreme Court affirmed the decision of the lower court. It held:

1. The right of a judicial administrator to recover real property belonging to the estate is well established, affirming the plaintiff's capacity to initiate the action.
2. The defendants could not be considered possessors in good faith as they themselves believed the land belonged to the estate of Manuel Javier, and not to them.
3. The defendants were not entitled to reimbursement for the construction of the house as they were not possessors in good faith.

4. The argument that a community of property existed either due to the house's ownership or the heirs' shared ownership of the land was rejected. The decision did not recognize such a condition as creating a community of property under the relevant laws.

****Doctrine:****

The case reiterates the principle that a judicial administrator has the right to recover possession of real property belonging to an estate. Additionally, it highlights the definition of good faith possession under the Civil Code, specifying that mere belief in ownership does not constitute good faith if it contradicts the factual ownership of the property.

****Class Notes:****

- ****Judicial Administrator's Rights:**** A judicial administrator is authorized to initiate actions to recover property belonging to the estate (refer to the Alfonso vs. Natividad case).
- ****Possessor in Good Faith:**** Under the Civil Code, a possessor in good faith is one who possesses property under the belief of rightful ownership. Mere occupation with knowledge of another's ownership claim invalidates good faith status.
- ****Reimbursement for Improvements:**** Good faith possessors may be entitled to reimbursement for improvements made upon property (Civil Code, Art. 451 & 453). However, this entitlement is contingent upon the possessor's good faith status.
- ****Community of Property:**** Does not automatically arise from separate ownership of structures (house) and the land by different parties.

****Historical Background:****

This case underscores the complexities of property rights, inheritance laws, and the concept of good faith possession within the legal framework of the Philippines. It reflects the intricate interplay between Civil Code provisions and the customary practices pertaining to property ownership and inheritance among Filipino families, particularly in the context of familial estates and the role of judicial administrators in managing such estates.