

**\*\*Title:\*\*** \*Villanueva-Mijares et al. vs. The Court of Appeals et al.\*

**\*\*Facts:\*\***

This case revolves around a dispute over a piece of real property, originally owned by Felipe Villanueva. After Felipe's death, his estate, particularly a parcel of land in Estancia, Kalibo, Capiz, was inherited by his eight children, including Leon Villanueva. In 1952, one sibling, Pedro, delineated his share. Subsequently, it was discovered Leon had purchased the shares of four siblings (Simplicio, Nicolasa, Fausta, and Maria Baltazar, Benito's wife) through a Deed of Sale in 1946, only registered in 1971. Leon also executed a partition in favor of his children, the petitioners, leading to them obtaining titles for their shares.

The respondents, who are descendants of Felipe, contested Leon's acquisition and the partition, arguing the transactions were obtained through fraudulent means. They filed a case for partition, annulment of documents, and reconveyance with damages at the Regional Trial Court of Kalibo, Aklan (Civil Case No. 2389). The trial court ruled in favor of the petitioners, leading the respondents to appeal to the Court of Appeals (CA-G.R. CV No. 27427), which overturned the trial court's decision, recognizing the respondents' co-ownership rights to a portion of the property. The petitioners then brought the case to the Supreme Court, citing errors they believed were committed by the appellate court.

**\*\*Issues:\*\***

1. Whether the appellate court erred in not dismissing the respondents' claim based on laches, estoppel, prescription, and res judicata.
2. Whether the appellate court erred in declaring the Deed of Sale of August 25, 1946, unenforceable against the private respondents because it was an unauthorized contract.

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

The Supreme Court denied the petition, affirming the appellate court's decision. The High Court held that:

1. The respondents' action was not barred by laches, estoppel, prescription, or res judicata. The case revolves around an implied trust, and the respondents acted within a reasonable time once they became aware of their uncle's betrayal.
2. The Deed of Sale executed by Maria Baltazar was indeed unenforceable against her children. Under the law at the time, she had no authority to sell her minor children's inheritance without court approval.

**\*\*Doctrine:\*\***

The Court reiterated the doctrines concerning implied trusts, stating that actions based on implied or constructive trusts have a prescriptive period of ten years from the date the alleged fraudulent registration was made. It also highlighted the legal incapacity of parents to sell property belonging to their minor children without judicial authorization.

**\*\*Class Notes:\*\***

- **\*\*Implied Trusts:\*\*** Actions for reconveyance based on implied or constructive trusts must be filed within ten years from the fraudulent registration of the property.
- **\*\*Legal Capacity to Sell Minor's Property:\*\*** Parents or legal guardians require judicial approval to sell or manage property owned by minors.
- **\*\*Laches and Estoppel:\*\*** Not applicable where the parties are unaware of their rights being infringed upon or are unable to act within a reasonable time frame.
- **\*\*Prescription:\*\*** The period starts from the moment the fraud becomes known or should have been known.
- **\*\*Res Judicata:\*\*** Does not apply to actions for reconveyance based on implied trust where property was registered through fraud.

**\*\*Historical Background:\*\***

The case reflects the complex dynamics of inheritance laws in the Philippines, particularly how property rights are affected by the death of a landowner, the subsequent actions of the heirs, and the legal remedies available to parties claiming ownership rights. It underscores the transition from the Old Civil Code to the New Civil Code and its impact on property and inheritance laws, focusing on the protection of minors' property rights.