

**\*\*Title:\*\*** Heirs of Arturo Reyes vs. Elena Socco-Beltran

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

The dispute revolves around a 360-square-meter parcel of land in Dinalupihan, Bataan, originally part of a larger tract owned by the spouses Marcelo Laquian and Constanca Socco. Upon Constanca Socco's death, the land was divided among her heirs, with the contested Lot No. 6-B apparently adjudicated to Elena Socco-Beltran per an unnotarized 1965 extrajudicial settlement. No title was issued for the lot in Socco-Beltran's name. In 1998, Socco-Beltran applied to purchase the lot from the Department of Agrarian Reform (DAR), an action protested by the heirs of Arturo Reyes who claimed possession since 1954 based on a contract to sell by Miguel Socco, another heir of Constanca Socco, and continuous occupation.

The DAR initially recommended approval of Socco-Beltran's application but ultimately dismissed her petition, favoring the Reyes heirs and ordering the processing of documents for their title issuance. Socco-Beltran's motion for reconsideration led to an appeal to the DAR Secretary, which reversed the Regional Director's order and approved Socco-Beltran's application. The Reyes heirs appealed to the Office of the President, which affirmed the DAR Secretary's decision. The Reyes heirs' subsequent motion for reconsideration failed due to procedural issues, prompting an appeal to the Court of Appeals. The Court of Appeals upheld the Office of the President's decision, leading to the Reyes heirs' petition for review to the Supreme Court under Rule 45.

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

1. Whether the Reyes heirs' claim of possession since 1954 grants them better right over the lot.
2. The legal standing of the Reyes heirs to acquire the property, considering allegations of landlessness.
3. The validity of rights transferred to Myrna Socco by Miguel Socco.
4. The challenge to Myrna Socco's nationality and its implications for property ownership rights.

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

The Supreme Court found that the Reyes heirs could not derive title from the 1954 contract to sell by Miguel Socco, who had no ownership rights at the time. It concluded that the sale's conditionality and the absence of actual possession negated the Reyes heirs' claim. The Court also addressed the question of possession, finding the evidence provided by the

Reyes heirs insufficient to support a claim of acquisitive prescription. Despite acknowledging the DAR Secretary's flawed order allowing Socco-Beltran to apply to purchase property she already owned through inheritance, the Court affirmed the appellate court's decision but withheld confirmation of the title's validity in Myrna Socco-Arizo's name pending the determination of lawful heirs.

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

- A contract to sell property by a party who does not have ownership at the time of agreement renders the contract ineffective in transferring property rights.
- Actual possession necessary for acquisitive prescription must be open, continuous, exclusive, and notorious.
- Administrative and judicial findings are given great respect if supported by evidence.

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

- **\*\*Ownership Transfer Conditions:\*\*** Ownership cannot be transferred if the seller is not the owner at the time of sale.
- **\*\*Acquisitive Prescription:\*\*** Requires open, continuous, exclusive, and notorious possession for the period required by law (30 years for public agricultural land).
- **\*\*Administrative Decisions:\*\*** Given significant deference when supported by evidence.
- **\*\*Legal Procedural Requirements:\*\*** Strict compliance with procedural rules, such as timeliness in filing motions for reconsideration, is crucial.

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

The case underscores the complexities involved in property disputes in the Philippines, particularly regarding ancestral land and the criteria for acquisitive prescription. It highlights the challenges faced in proving ownership and possession, especially when original documents and formal titles are lacking, an issue not uncommon in many regions. This dispute also reflects on the procedural intricacies that can arise in administrative and judicial processes, illustrating how multiple levels of review from local agrarian offices to the Supreme Court can impact the final resolution of property claims.