

Title: Parel vs. Prudencio: A Case of Disputed Property Ownership

Facts:

The legal battle began when Simeon Prudencio filed a complaint against Danilo Parel with the Regional Trial Court (RTC) in Baguio City for recovery of possession and damages on February 27, 1992. Prudencio claimed sole ownership of a two-storey residential house, alleging completion of its construction using his own funds in 1975, and temporary occupancy granted to Parel's parents, which was later unrightfully extended by Parel post his parents' migration to the U.S. in 1986. Despite demands, Parel refused to vacate, prompting the lawsuit. Prudencio sought monthly rentals since April 1988 and damages.

In response, Parel contended co-ownership of the house, stating his parents, particularly his father Florentino (an awardee of the land by then Mayor Luis Lardizabal for lowly-paid government employees), contributed financially to the house's construction, challenging Prudencio's eviction efforts and claims of sole ownership.

The RTC, on December 15, 1993, favored Parel, recognizing co-ownership based on Florentino's contributions to the construction and declaring Prudencio unable to evict. Prudencio appealed to the Court of Appeals (CA), which on March 31, 2000, reversed the RTC's decision, affirming Prudencio's sole ownership and ordering Parel to vacate and pay back rentals and attorney's fees. Unsatisfied, Parel elevated the case to the Supreme Court, contesting the CA's findings and seeking reversal based on alleged factual errors and the failure to formally offer documentary evidence which he claimed supported his stance of co-ownership.

Issues:

1. Whether the CA erred in establishing Prudencio as the sole owner of the property, countering the RTC's findings of co-ownership.
2. The appropriateness of the CA ordering Parel to vacate the property and pay monthly rentals and attorney's fees to Prudencio.
3. The impact of the procedural fault of not formally offering documentary evidence on the case's outcome.

Court's Decision:

The Supreme Court affirmed the CA's decision, aligning with the latter's findings that Prudencio presented convincing evidence of sole ownership, primarily the affidavit by Parel's father against his interest. It highlighted the affidavit's significance, the consistent

payment of real estate taxes by Prudencio, and the invalidity of Parel's claim due to no formal offer of documentary evidence. The Court underlined that tax declarations and payments bolstered the claim of ownership. The testimony from Parel and his witnesses was deemed inadequate to establish co-ownership.

**Doctrine:**

The case reiterated the doctrine that declarations against one's interest, especially in matters of property ownership, hold substantial evidential weight. It also underscored the procedural necessity of formally offering documentary evidence for it to be considered in court, marking the strict adherence to procedural rules as crucial in judicial proceedings.

**Class Notes:**

- Declarations against interest are considered highly reliable evidence in disputes.
- Formal offer of evidence is mandatory for the evidence to be considered by the court.
- Tax declarations and receipts, while not incontrovertible proofs of ownership, are significant indicators of one's claim over a property.
- The burden of proof can shift during the trial; however, the initial party must establish their case on the preponderance of evidence.

**Historical Background:**

The progression of the case from the RTC to the Supreme Court mirrors the legal system's layers in handling property disputes. It reflects the judicial process's complexity, especially when familial relationships and informal agreements come into play, juxtaposed against the backdrop of property laws and procedural requirements in the Philippines.