

### Title:

Heirs of Remegia Y. Feliciano vs. Spouses Aurelio and Luz Zaldivar: A Case of Property Reconveyance and Title Nullification

### Facts:

This case involves a property dispute where Remegia Y. Feliciano, represented posthumously by her heirs, contested the Transfer Certificate of Title (TCT) No. T-17993 owned by the Spouses Aurelio and Luz Zaldivar, which covers a portion of land originally under Feliciano's TCT No. T-8502. The contested property, 243 square meters in size, is located in Cagayan de Oro City, Philippines.

Remegia alleged that through fraudulent means, the Zaldivars obtained the title to a portion of her property originally leased to Pio Dalman, Aurelio's father-in-law. She claimed no sale transaction took place either to Dalman or Ignacio Gil, a supposed intermediary in the transaction. The case progressed from the Regional Trial Court (RTC) of Cagayan de Oro City, which ruled in favor of Feliciano, to the Court of Appeals (CA), which reversed the RTC's decision, leading to this petition for review by the Supreme Court of the Philippines.

### Issues:

1. Whether the Court of Appeals erred in dismissing the heirs' appeal for procedural non-compliance.
2. Whether the lower court obtained jurisdiction over the issuance of a new title despite the existing owner's copy not being lost.
3. Estoppel and laches - whether the petitioner's claim to the property was barred by estoppel or laches due to delayed action.
4. Ownership - whether the respondents can be considered the absolute owners of the property based on TCT No. 17993.
5. The adequacy of the appellate court's consideration of evidence and facts impacting ownership and title validity.

### Court's Decision:

The Supreme Court granted the petition, reversing the CA's decision and reinstating the RTC's ruling favoring Feliciano with modifications. The Court found:

- The CFI's issuance of a new owner's duplicate certificate without jurisdiction due to misrepresentation of the title's loss by Aurelio.
- The indefeasibility of the Torrens title does not apply when issued through fraudulent means.

- The CA's reliance on a Joint Affidavit of Confirmation of Sale was misplaced, given it was in English, a language not understood by Feliciano without evidence of fraud or mistake in its execution being rebutted.
- The defense of acquisitive prescription couldn't apply to registered land.
- The principle of laches hadn't set in against Remegia, who tolerated the occupation by respondents of the subject lot.

### Doctrine:

- Reconstitution of a title can only be made in the case of the original certificate's loss.
- A title obtained based on a void document can be annulled.
- The principle of indefeasibility of the Torrens title does not protect titles issued through fraudulent means.

### Class Notes:

- Jurisdiction: A court does not acquire jurisdiction over a case of reconstitution if the original certificate is not genuinely lost.
- Indefeasibility of Title: The Torrens system protection does not extend to titles procured by presenting fraudulent documents.
- Acquisitive Prescription: Registered land cannot be acquired by prescription as against the person with a registered title.
- Laches: The defense of laches is not applicable if the possession of the property by another party was tolerated by the owner.

### Historical Background:

This case exemplifies the complexities of property disputes in the Philippines, particularly involving registered lands under the Torrens system. It highlights the implications of fraudulent activities on the sanctity of land titles and the judicial avenues for rectifying such instances, underscoring the paramount importance of protecting property rights within the legal framework of the Philippines.