

Title

****Cristina F. Reillo et al. vs. Galicano E.S. San Jose et al.****

Facts

This case originated from the petitioners' (Cristina F. Reillo, Leonor F. Puso, Adelia F. Rocamora, Sofronio S.J. Fernando, Efren S.J. Fernando, Zosimo S.J. Fernando, Jr., and Ma. Teresa F. Piñon) dispute over the rightful ownership and partition of a parcel of land enrolled under TCT No. M-94400, which was previously under TCT No. 458396 in the names of spouses Quiterio San Jose and Antonina Espiritu Santo. Following the deaths of Quiterio, Antonina, and two of their children, an Extrajudicial Settlement Among Heirs with Waiver of Rights was executed, allegedly without the knowledge and consent of the remaining heirs including respondents (Heirs of Quiterio San Jose and Antonina Espiritu Santo: Galicano, Victoria, Catalina, and Maribeth), transferring title exclusively to Ma. Teresa F. Piñon.

Respondents filed a complaint for annulment of title and deed of extrajudicial settlement, partition, and damages. The petitioners responded, denying falsification and asserting that the settlement was lawful while simultaneously filing a counter-petition for partition of additional lands allegedly possessed by respondents.

Following motions and replies focusing on procedural matters such as the propriety of a judgment on the pleadings and the payment of docket fees for the counter-petition, the RTC ruled in favor of respondents, ordering the annulment of the disputed extrajudicial settlement and TCT No. M-94400, and directing a partition of the land in accordance with intestate succession laws. The CA affirmed this decision, leading to the current petition for review.

Issues

1. Whether judgment on the pleadings was properly granted by the RTC and affirmed by the CA.
2. Whether petitioners' right to due process was violated in dismissing their counter-petition for partition over nondisbursement of docket fees.
3. Whether the RTC's order for the partition of the land in accordance with intestate laws without requiring publication was lawful and proper.

Court's Decision

The Supreme Court denied the petition, affirming the CA's and RTC's decisions. The Court held that:

1. Judgment on the pleadings was correctly granted as petitioners' answer admitted material allegations of the complaint by not denying the existence of other heirs entitled to the property.
2. The Counter-Petition was permissive, thus requiring the payment of docket fees for jurisdictional purposes. Petitioners failed to fulfill this obligation despite the opportunity to do so, and the Court cannot be blamed for this omission.
3. The order of partition pursuant to intestate laws was deemed proper. The nullification of the contested deed and subsequent title necessitated reverting the property to the estate and division among all legal heirs without requiring publication as argued by petitioners.

Doctrine

1. **Judgment on the Pleadings** - Appropriate when there is no genuine issue of fact raised in the pleadings, allowing the court to render judgment based on those pleadings.
2. **Intestate Succession** - A fraudulent and vicious extrajudicial partition that excludes legitimate heirs is null and void, and property should be partitioned according to intestate succession laws.
3. **Payment of Docket Fees** - Necessary for court jurisdiction over permissive counterclaims, and failure to pay such fees cannot be remedied by faulting the court system.

Class Notes

- **Extrajudicial Settlements** must include all heirs to be valid; excluding any heirs renders the settlement void.
- **Judgment on the Pleadings** occurs when an answer fails to raise an issue against the complaint's material allegations.
- **Partition Actions** require all stakeholders to be named and properly served; the process follows the rules on intestate succession when no will is present.
- **Docket Fees** for permissive counterclaims are essential for court jurisdiction; omission to pay results in dismissal of the claim.

Historical Background

In the context of Philippine family and inheritance law, the case reiterates the importance of inclusivity and fairness in the extrajudicial settlement process among heirs. It underscores the significant procedural safeguards designed to prevent the disenfranchisement of lawful heirs and mandates adherence to elemental due process and substantive law in the partition and distribution of estates.