

Title:

Roa v. Heirs of Eborá, et al., G.R. No. 133545

Facts:

This case involves a dispute over the ownership of Lot 18026-A in Cagayan de Oro City. Santiago Eborá and his heirs were in continuous possession of the land which was mistakenly included by Chacon Enterprises in its application for original registration, leading to various legal conflicts over ownership.

1. **Initial Litigation:**

- **Complaint and Counter-complaint:** Chacon Enterprises filed a complaint for recovery of possession of Lot 18026-A. The Eborá heirs countered with a complaint for reconveyance.
- **RTC and CA Rulings:** The Regional Trial Court (RTC) ruled in favor of Chacon Enterprises. Upon appeal, the Court of Appeals (CA) reversed this decision in favor of the Eborá heirs.
- **Supreme Court Decision:** Finally, the Supreme Court in G.R. Nos. L-46418-19 ruled in favor of the Eborá heirs on September 29, 1983.

2. **Subsequent Sale and Assignment:**

- **Conveyance:** The Eborá heirs sold Lot 18026-A to their co-heir, Josefa Eborá Pacardo, and her husband Rosalio Pacardo on June 3, 1977, who immediately assigned the property to Digno Roa, married to petitioner Lydia Roa.
- **Registration:** The deeds of sale and assignment were recorded in the title's certificate. A new Transfer Certificate of Title (TCT) No. T-24488 was issued to Digno Roa on August 11, 1977.

3. **Conflicting Titles:**

- **Confirmation and Further Adjudication:** On January 31, 1983, the Eborá heirs confirmed the previous sale and assignment. Curiously, on October 8, 1987, they executed another adjudication of the lot among themselves, and several sub-lots were sold to various respondents, resulting in multiple new TCTs.
- **Petition by Lydia Roa:** Following the death of Digno Roa, Lydia Roa filed a petition for annulment and cancellation of TCT No. 48097 and its derivative titles in 1994.

4. **RTC Ruling on the Second Petition:**

- The RTC declared several TCTs stemming from TCT No. 48097 as invalid but upheld the validity of subsequent TCTs held by respondents who were deemed innocent purchasers for

value.

- Lydia Roa then filed the current petition for review on certiorari with the Supreme Court.

Issues:

1. Whether respondents are innocent purchasers for value.
2. Which party holds the superior right to Lot 18026-A, given conflicting titles and the principle of good faith.

Court's Decision:

1. **Innocent Purchasers for Value:**

- The court acknowledged that the respondents were indeed innocent purchasers for value. They paid fair value for the property and relied on existing valid titles without any notice of defects.

2. **Superior Right:**

- Applying the doctrine from Sanchez v. Quinio, the Supreme Court found that Lydia Roa's title had superiority. The court emphasized that once the Ehora heirs sold the land to Josefa Pacardo and she subsequently assigned it to Digno Roa, they lost all their rights over the property.

- All transactions made by the Ehora heirs after this assignment, including the adjudication in 1987 and subsequent sales, were without any legal basis. Thus, the derivative titles stemming from these transactions were invalid.

Doctrine:

1. **First in Time, Stronger in Right:** The case reinforces the doctrine that an earlier validly issued title cannot be divested by a later issued title, even if held by an innocent purchaser for value.
2. **Protection of Innocent Purchasers:** The Court notes that while one dealing with registered land can rely on the title, such trust is not absolute when a valid, unchallenged prior title exists.

Class Notes:

1. **Conflicting Claims Over Registered Land:**

- Ensure awareness of any existing titles and claim history.

2. **Innocent Purchaser for Value:**

- Defined as one who buys property by relying on a valid certificate of title without knowledge of any adverse claims.

3. **Prior Valid Title Supersedes Later Invalid Title:**

- First valid title holds true legally over any subsequently issued titles from an invalid base.

4. **Case Law Citations:**

- C.N. Hodges v. Dy Buncio & Co., Inc., Sanchez v. Quinio, etc.

Historical Background:

This case underscores the ongoing importance of proper land registration and title verification in the Philippines. The Torrens system of land registration is intended to stabilize land ownership, yet disputes frequently arise due to errors in registration and fraudulent claims. This decision not only clarifies some aspects of ownership conflicts but also reinforces the principle that prior valid titles take precedence, vital in maintaining public trust in the Torrens system.