

****Title:** Torres v. Aruego, 818 Phil. 524 (2011)**

****Facts:****

1. On March 7, 1983, Antonia F. Aruego (Antonia) and Evelyn F. Aruego (Evelyn), represented by their mother and guardian ad litem Luz M. Fabian, filed a complaint for “Compulsory Recognition and Enforcement of Successional Rights” against Jose E. Aruego, Jr. and five minor children of Gloria A. Torres, represented by their father and guardian ad litem Justo M. Torres, Jr.
2. Plaintiffs claimed to be the illegitimate children of the deceased Jose M. Aruego, who passed away on March 30, 1982, and asserted rights to his estate.
3. The estate included various real properties and shares in the University Stock Supply, Inc.
4. Defendants denied the allegations and challenged the children’s claims to kinship.
5. The Regional Trial Court (RTC) ruled on June 15, 1992:
 - Declaring Antonia as an illegitimate daughter of Jose Aruego.
 - Declaring Evelyn was not an illegitimate daughter.
 - Listing specific properties as part of Jose Aruego’s estate.
 - Granting Antonia the right to a share equal to half of a legitimate child’s share.
6. Defendants’ motion for partial reconsideration was denied, and their notice of appeal was dismissed as untimely.
7. Defendants filed a Petition for Prohibition and Certiorari with the Court of Appeals (CA), which was dismissed. Their subsequent petition to the Supreme Court was also denied.
8. The court issued a writ of execution for the June 15, 1992 decision; Antonia filed a motion for partition, which was granted after due processes.
9. Petitioners filed another verified complaint in 1998 to nullify a deed of absolute sale executed by Antonia.
10. The case went through various stages, ultimately deferring to the issue of pending cases, but the CA determined no prejudicial question existed, enabling the motion for partition to proceed.

****Issues:****

1. Whether the June 15, 1992 decision, which had attained finality, could be reviewed or modified.
2. Whether there were compelling circumstances that warranted a departure from the doctrine of immutability of judgments.

3. Whether the terms of the 1992 decision regarding the estate of Jose Aruego were unclear and open to interpretation.

Court's Decision:

1. **Immutability of Final Judgments:**

The Supreme Court affirmed the applicability of the doctrine of immutability of final judgments. The June 15, 1992 decision was final and executory and could no longer be altered.

2. **Exceptions to the Doctrine:**

The court found none of the recognized exceptions (clerical errors, nunc pro tunc entries, void judgments, or circumstances which render the execution unjust) applicable. Petitioners could not introduce new evidence in a case that was already decided.

3. **Interpretation of Final Judgment:**

The court rejected the petitioners' argument regarding unclear terms in the 1992 decision. The properties explicitly enumerated in the dispositive portion of the decision were deemed part of the estate of Jose Aruego.

4. **Res Judicata:**

The court ruled the 1992 decision addressed necessary issues—including the estate properties—and should have been contested at the appropriate stage.

Doctrine:

- **Finality of Judgments:** Once a judgment becomes final, it is immutable and unalterable, except for clerical errors, nunc pro tunc entries, void judgments, and judgments unjust to enforce due to changed circumstance post-finality.
- **Not the Caption but Substance:** The nature of the legal action is determined by its allegations, not the title.

Class Notes:

- **Immutability of Final Judgments** (PCSO v. Madame X, G.R. No. 175036): No modification except clerical errors, nunc pro tunc entries, void judgments.
- **Doctrine of Res Judicata:**
 - Must be considered on the merits.
 - Finality is further reinforced by the participation of the parties in trial advocacy.

– ****Failure to Timely Appeal****: Neglect by counsel binds the client.

****Historical Background:****

This case exemplifies the judicial efficiency and the legal principle of finality—intended to bring closure to litigations and ensure justice administration efficiently. It showcases Philippine jurisprudence standards in inheritance disputes, particularly validating the rights of illegitimate children and illustrating stringent adherence to procedural rules, notably in appeals and final judgments.