

Title: LEOPOLDO C. LEONARDO vs. VIRGINIA TORRES MARAVILLA and LEONOR C. NADAL as represented by FE NADAL VENTURINA

Facts:

1. The case involves a 1,151.80 square meter lot in Pasay City, covered by Transfer Certificate of Title (TCT) No. 2355 (34515) in the name of Mariano Torres y Chavarria.
2. Petitioner Leopoldo C. Leonardo claims ownership based on a sale dated September 29, 1972, from Eusebio Leonardo Roxas, who allegedly purchased it from Mariano Torres y Chavarria on August 28, 1972.
3. On September 14, 1972, Roxas asked the Register of Deeds to register the deed of sale, but registration was withheld due to a pending case involving the title, which ultimately was resolved on September 21, 1972 in favor of Torres.
4. The petitioner later requested registration on October 6, 1972, but failed to produce the owner's duplicate certificate for TCT No. 2355 (34515), leading to denial on October 19, 1972.
5. On November 13, 1972, Leonardo registered an affidavit of adverse claim, and the original TCT No. 2355 (34515) was located on May 18, 1993.
6. On May 20, 1993, petitioner annotated his adverse claim and subsequently filed a complaint on September 6, 1993.
7. Respondents, successors of Mariano Torres y Chavarria, contested the claim on the grounds of long-term possession and allegations of forged sale documents.
8. The trial court dismissed the complaint based on prescription and laches on February 1, 1996.
9. The Court of Appeals affirmed the dismissal on November 26, 1999, and denied reconsideration on May 19, 2000.

Issues:

1. Whether petitioner's complaint is barred by prescription under Article 1144 of the Civil Code.
2. Whether petitioner's action is barred by laches.
3. Whether the petitioner's affidavit of adverse claim impacted the statute of limitations.
4. Whether the loss of the original TCT prevented actionable pursuit by the petitioner.

Court's Decision:

1. ****Prescription****: The Supreme Court held that petitioner's cause of action, based on a written contract, prescribes in ten years as per Article 1144 of the Civil Code. The action, initiated in 1993, was time-barred since it was filed 21 years after the cause of action

accrued in 1972.

2. **Laches**: The Court reiterated the doctrine of laches, emphasizing petitioner's delay of over two decades to assert his rights. Such inaction was deemed unreasonable, barring recovery.
3. **Adverse Claim**: The filing of an adverse claim in 1972 did not toll the prescription period. The Court noted that simply annotating an adverse claim without diligent actions to enforce rights does not impede the statute's progression.
4. **Loss of TCT**: The Court clarified that the inability to locate the original title was not an obstacle to judicially or extrajudicially asserting property rights in a timely manner.

Doctrine:

1. **Article 1144 of the Civil Code**: Actions upon a written contract must be brought within ten years from when the right of action accrues.
2. **Laches**: Neglecting to assert a right for an unreasonable time, resulting in the presumption of abandonment.
3. **Adverse Claim**: Comprehensive steps need to be taken beyond filing an adverse claim to toll the prescriptive period.

Class Notes:

- **Prescription (Article 1144)**: Legal actions based on written contracts prescribe in 10 years.
- **Laches**: Delayed assertion of one's rights can preclude legal remedy.
- **Adverse Claim**: Filing does not toll the prescriptive period; proactive measures are essential.
- **Article 1155**: Interruptive acts of prescription consider court filings, written demands, or acknowledgments by the debtor.
- **Real Actions on Immovables**: Governed by distinct timelines for asserting property rights (Art. 1141 inapplicable to this case as clarified).
- **Effect of Public Instrument Sale**: Presumptive but non-conclusive delivery unless possession is taken.

Historical Background:

This case underscores the complexities involved in property transactions in the Philippines, particularly the legal pertinence of adverse claims and actions based on presumed delivery. The historical burden of proving continued interest and the timeliness of asserting property rights reflect jurisprudential efforts to balance equitable relief with statutory adherence.