

Title:

Marissa Benitez-Badua vs. Court of Appeals, Victoria Benitez-Lirio, and Feodor Benitez Aguilar (G.R. No. 30862, May 29, 1992)

Facts:

Spouses Vicente Benitez and Isabel Chipongian owned various properties until Isabel's death on April 25, 1982, and Vicente's subsequent death on November 13, 1989. Vicente died intestate, which led to a contest over the administration of his estate. On September 24, 1990, Victoria Benitez-Lirio (Vicente's sister) and Feodor Benitez Aguilar (nephew) filed for the issuance of letters of administration before the RTC of San Pablo City, alleging that Marissa Benitez Badua, who was raised by the deceased couple, was not their biological or legally adopted child and hence not an heir.

Marissa opposed, claiming she was the legitimate daughter and sole heir. Both parties submitted evidence, with Marissa presenting birth and baptismal certificates naming Vicente and Isabel as her parents, as well as their income tax returns and school records.

Private respondents relied heavily on testimonial evidence including that from Vicente's 77-year-old sister, Victoria, who testified how her brother and Isabel, unable to have children, had looked for a baby to adopt.

The RTC dismissed the private respondents' petition, recognizing Marissa as the legitimate daughter and sole heir. The Court of Appeals reversed this decision, stating Marissa was not the biological daughter and therefore not an heir.

Issues:

1. Were the provisions of the Family Code concerning legitimacy erroneously applied by the RTC?
2. Did the Court of Appeals commit grave abuse of discretion by favoring testimonial evidence over documentary evidence?
3. Did the decision contravene established statutory or jurisprudential principles on prescription or laches?

Court's Decision:

The Supreme Court affirmed the Court of Appeals' decision, agreeing that the Family Code articles referring to impugning legitimacy were inapplicable as the case raised the question of whether Marissa was the biological child of the couple, not whether her legitimacy as their child was in question.

1. **Application of Family Code:** The Supreme Court held that Articles 164, 166, 170, and 171 of the Family Code govern cases where a husband denies a child as his own, which is distinct from the case at hand where the issue was whether the child was born to the couple. These provisions do not apply when the central issue is proving whether a person was indeed born to a couple or adopted by them, as in Marissa's case.
2. **Evaluation of Evidence:** The Supreme Court agreed with the appellate court's evaluation that the testimonial evidence presented by the respondents showed the improbability of Isabel being Marissa's biological mother. Notably, evidence such as Isabel's childless background, the peculiar registration of Marissa's birth, and a supportive rearing without legal adoption were determinatively persuasive.
3. **Documentary Evidence:** The court discussed the rebuttable nature of civil registry documents (her birth certificate) under Article 410 of the Civil Code. This effectively implied that strong contradictory evidence could dispute the prima facie presumption these documents carry. The Deed of Extra-Judicial Settlement executed by Vicente admitting Isabel died without descendant contradicted Marissa's claim convincingly.

Doctrine:

1. **Prima Facie Evidence of Civil Registry:** The Civil Registry documents are treated as prima facie evidence but are subject to rebuttal by strong and convincing contrary evidence.
2. **Applicability of Family Code Articles:** Articles of the Family Code concerning the legitimacy of children do not apply to cases where the dispute centers on the question of whether the individual was born to or adopted by the parents in question.

Class Notes:

- **Legitimacy and Presumption:** Articles 164, 166, 170, and 171 of the Family Code deal specifically with cases where the legitimacy of children born during a marriage is contested, highlighting the weight of marital presumption and restrictive grounds for impugning legitimacy.
- **Adoption and Legal Heirship:** Registration of birth alone does not confer the status of a child or heir if not supported by legal adoption.
- **Civil Registry Documents:** While considered prima facie evidence (Art. 410 Civil Code), the factual content can be challenged with substantial evidence.

Historical Background:

The case situates itself within the context of legal reforms under the Family Code of the

Philippines, which became effective in 1988. It entails the legal interpretation of legitimacy amidst posthumous inheritance disputes, reflecting societal changes and legal strictures concerning adoption, family composition, and inheritance rights without formal adoption procedures.