

Title: Uy v. Lacsamana, G.R. No. 206721

Facts:

1. **Initial Complaint:** On May 4, 1979, petitioner Luis Uy filed a complaint with the RTC of Pallocan West, Batangas City, for the declaration of nullity of documents and damages against Petra Rosca and Spouses Jose and Rosaura Lacsamana.

- Uy alleged he married Rosca in 1944, separated in 1973, and together they purchased a parcel of land (484 square meters) in 1964, evidenced by a Deed of Sale.

- Uy claimed Rosca, in bad faith, sold this property to the Lacsamana spouses for P80,000 without his knowledge.

2. **Rosca's Defense:** Rosca denied allegations, claiming she used her personal funds to purchase the property and denied ever being legally married to Uy.

3. **Lacsamana's Stance:** The Lacsamanas argued they were buyers in good faith and for value, relying on the title indicating Rosca as the owner.

4. **Death of Parties:** Uy died in 1981, and his daughters Lydia Uy Velasquez and Shirley Uy Macaraig substituted him. Rosca died in 1996, followed by Jose Lacsamana in 1991.

5. **Subsequent Sale:** On December 24, 1982, the Lacsamanas sold the property to Corazon Buena, who then became a respondent.

6. **Proceedings in Lower Courts:**

- **RTC Decision (April 21, 2009):** Ruled in favor of respondents, dismissing Uy's claim, stating no valid marriage existed between Uy and Rosca, and upheld the property sale.

- **Court of Appeals (CA) Decision (September 14, 2011):** Affirmed RTC's decision, finding respondents overthrew the presumption of marriage and upholding the validity of Rosca's property sale.

- **Motion for Reconsideration:** Denied by the CA on March 1, 2013.

Issues:

1. **Main Issue:** Whether the Deed of Sale executed by Rosca on April 18, 1979, in favor of the Lacsamanas, is valid without Uy's consent.

2. **Subsidiary Issues:**

- Whether Uy and Rosca were legally married, influencing the property's status.

- Whether the sale was simulated or lacked consideration.

- Whether the Lacsamanas and Buena were buyers in good faith.

Court's Decision:

1. **Legal Marriage:** The Supreme Court reiterated that Uy did not prove a valid marriage to Rosca, which undermined his claims about the property's conjugal nature.
 - **Evidence Considered:** Uy failed to produce a marriage certificate, and various documents (Uy's naturalization petition, sworn statements, affidavits) indicated he was not legally married to Rosca.
2. **Property Status:** Since there was no valid marriage, the property was Rosca's paraphernal property.
 - **Doctrine of Co-Ownership (Family Code Article 147):** This situation did not apply as Rosca demonstrated the property was acquired with her funds, evidenced through various deeds and affidavits.
3. **Validity of Sale:** The deed of sale by Rosca to the Lacsamana spouses was upheld.
 - **Consideration:** Uy failed to show that the sale lacked consideration or that the purchase price was unreasonably low. The transaction was supported by sale documents and mortgage releases.
 - **Good Faith Purchasers:** Both lower courts found that the Lacsamanas and subsequent buyer Buena were in good faith.
4. **Final Ruling:** The Supreme Court affirmed the CA's decision, dismissing Uy's petition and upholding the sale.

Doctrine:

- **Proof of Marriage:** The existence of a marriage can be inferred through various documents and testimonies but can be contradicted, especially in the presence of strong contrary evidence.
- **Property Acquired by Cohabiting Couples:** Under Article 147 of the Family Code, property acquired by cohabiting couples is presumed co-owned unless proven otherwise.
- **Property Registration:** The phrase "married to" on a property title is merely descriptive of the owner's civil status and does not confer ownership to the spouse.

Class Notes:

- **Key Elements:**
- **Proof of Marriage:** Requires testimonial or documentary evidence.
- **Ownership of Property:** Distinct between personal (paraphernal) and shared (conjugal).

- **Good Faith Purchase:** Buyers relying on Torrens titles are protected unless fraud is evident.
- **Relevant Statutes:**
- **Family Code of the Philippines:** Article 147 regarding property relations of cohabiting couples.
- **Rules of Court:** Rule 131 on presumptions and burden of proof.
- **Real Property Registration:** Titles under the Torrens system and implications of property ownership descriptors.

Historical Background:

- This case illustrates the tensions in property rights within unformalized marital unions in the Philippines, reflecting societal norms and legal intricacies concerning cohabitation and property claims. It highlights the rigorous proof required to establish marital claims and the rights of property owners under the Torrens system.