

****Title: Almendra v. Intermediate Appellate Court, G.R. No. 69069 (1992)****

****Facts:****

Aleja Ceno, married twice, had children from both marriages. Her first marriage was to Juanso Yu Book, resulting in three children. The entire family moved to China, where Juanso died. Aleja and her daughter Bernardina later returned to the Philippines. Aleja subsequently partitioned her first conjugal property in Leyte, resulting in four lots in a 1970 judgment.

Aleja later married Santiago Almendra and acquired several more properties, which included a piece of land inherited by Aleja and another inherited by Santiago. Even after Santiago's death, Aleja sold parts of these properties to her children, Angeles and Roman, for specific amounts, evidenced by notarized deeds of sale executed in 1973.

After Aleja's death in 1975, several of her children filed a complaint in 1977 to annul the sales, partition the properties, and account for their produce.

****Procedural History:****

1. ****Lower Court (Court of First Instance of Leyte)**** - Declared the deeds of sale null and void for being simulated, ordered partition of properties, and appointed a commissioner for it (April 30, 1981).
2. ****Intermediate Appellate Court**** - Reversed the lower court's decision, upheld the validity of the deeds of sale, and ordered partition of only the "undisposed" properties (February 20, 1986). The plaintiffs' motion for reconsideration was denied.
3. ****Supreme Court**** - Reviewed the case through a petition for certiorari.

****Issues:****

1. ****Validity of Deeds of Sale****:
 - Were the deeds of sale valid despite the uniformity in price and alleged absence of full consent due to alleged undue influence?
 - Could Aleja have legally disposed of specific portions of undivided properties?
2. ****Partition of Properties****:
 - Should the properties have been partitioned before Aleja could sell particular portions of them?

****Court's Decision:****

1. **Validity of Deeds of Sale**:

- **Uniformity of Price and Influence**:

The Supreme Court upheld the deeds of sale as valid. It emphasized that notarized documents hold presumptive evidentiary value unless strong, conclusive evidence proves otherwise. The notary public's testimony of Aleja's active participation and signing of the deeds, and the actual monetary transaction observed, affirmed the sales' legitimacy. Petitioners failed to prove the sales were secured through fraud or undue influence.

- **Specific Pointers of Sale**:

On the validity of the sale of undivided properties, Aleja could not have sold specific portions (i.e., the hilly portion) because she owned only an ideal share of the conjugal property without proof of prior partition after Santiago's death. Thus, her sale to Angeles was valid only regarding her proportionate (ideal) share.

The sale of paraphernal property inherited exclusively by Aleja (from her father) was not in question and thus valid. Similarly, the property acquired through Civil Case No. 4387 that Aleja owned (Lot No. 6366) was valid for sale.

2. **Partition of Properties**:

- The Supreme Court ordered the preparation and approval of a partition project for properties not deemed sold under its decision. Post-mortem estate partition could then account for ungiven shares.

Doctrine:

1. **Presumption of Regularity of Notarized Documents**:

- Notarized deeds carry the presumption of regularity and due execution unless challenged by clear and convincing evidence.

- **Independent Ownership and Sale Limits**:

- Owners of undivided interests in property can only sell their ideal proportionate share and not specific parts absent partition.

Class Notes:

- **Key Concepts**:

- **Scarefully Isolated Ideal Shares**:

- Owners hold an abstract share before partition.

- **Paraphernal Property**:

- Property inherited exclusively by a spouse not subject to conjugal rules.

- **Requirements for Validity**:
- **Clear Evidence of Fraud**:
- Overcome notarized deeds' presumption of validity with clear evidence.
- **Mutual Consent in Family Sales**:
- Consideration adequacy includes familial context.

Historical Background:

This case demonstrates familial property disputes in the Philippines, emphasizing the balance between formal legal evidences, like notarized documents, and familial relationships' inherent complexities. It also provides insight into the legal treatment of partitioned and non-partitioned properties in estate adjudications, reflecting local legal and social norms around inheritance and property rights distribution among multiple heirs.