

### Title:

Vicente Uriarte vs. Court of First Instance of Negros Occidental, Court of First Instance of Manila, Juan Uriarte Zamacona, and Higinio Uriarte

### Facts:

1. **November 6, 1961**: Vicente Uriarte filed a petition in the Court of First Instance of Negros Occidental (“Negros Court”) for the settlement of the estate of the deceased Don Juan Uriarte y Goite (Special Proceeding No. 6344), claiming to be his natural son and sole heir.
2. **November 13, 1961**: The Negros Court appointed the Philippine National Bank as the special administrator but it failed to qualify.
3. **December 19, 1961**: Higinio Uriarte opposed the petition, asserting that he was a nephew of the deceased and that the deceased left a Last Will in Spain.
4. **August 28, 1962**: Juan Uriarte Zamacona filed Special Proceeding No. 51396 in the Court of First Instance of Manila (“Manila Court”) for the probate of what he alleged to be the last will of Don Juan Uriarte y Goite, and subsequently moved to dismiss the Negros proceeding.
5. **April 19, 1963**: The Negros Court dismissed Special Proceeding No. 6344 on the grounds that there was a will and Vicente Uriarte had not been acknowledged as a natural son.
6. **April 15, 1963**: Vicente Uriarte filed an Omnibus Motion in the probate case in the Manila Court seeking intervention and dismissal of the case, which was denied on July 1, 1963.
7. **July 27, 1963**: Negros Court denied reconsideration of its decision.
8. **October 3, 1963**: Vicente filed a petition for certiorari (G.R. L-21938) and a writ of preliminary injunction in the Supreme Court, which was granted on October 24, 1963.
9. **April 22, 1964**: Vicente filed a supplemental petition for mandamus (G.R. No. L-21939), seeking to annul orders from the Negros Court.

### Issues:

1. **Jurisdiction**: Whether the Negros Court erred in dismissing Special Proceeding No. 6344 and whether the Manila Court erred in not dismissing Special Proceeding No. 51396 despite knowledge of prior proceedings.
2. **Probate Precedence**: Whether testate proceedings have precedence over intestate proceedings for the same estate.
3. **Venue**: Whether the Manila Court was the proper venue for probate given the pending intestate proceedings in the Negros Court.

4. **Procedural Lapses and Laches**: Whether Vicente Uriarte's delay in contesting the Manila Court's jurisdiction constituted laches.

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

1. **Jurisdiction**:

- The Supreme Court upheld the Manila Court's jurisdiction despite the Negros Court's earlier cognizance. Courts of First Instance in different locations where the deceased had property have concurrent jurisdiction.

2. **Probate Precedence**:

- The Supreme Court affirmed that probate proceedings take precedence over intestate proceedings, supporting the Manila Court's decision to proceed with the will probate.

3. **Venue**:

- While acknowledging that the Manila Court was not the proper venue compared to the Negros Court, the Supreme Court ruled the defect was procedural and waivable. Vicente's inaction and delay to challenge earlier indicated waiver and laches.

4. **Laches**:

- Vicente Uriarte's inaction constituted laches, barring him from challenging the Manila Court's proceedings after permitting them to advance significantly.

5. **Mandamus Petition**:

- Became moot as compelling the Negros Court to process an appeal would contravene the Supreme Court's ruling and encourage redundant litigation.

**### Doctrine:**

- **Probate Precedence Doctrine**: Probate matters where a will is involved take precedence over intestate proceedings even if first initiated.

- **Concurrent Jurisdiction Doctrine**: Courts of First Instance in various locations possessing estate properties of a non-resident decedent have concurrent original jurisdiction.

- **Laches Principle**: Failure to timely assert a right or contest a procedural defect constitutes waiver and precludes later objections.

**### Class Notes:**

- **Probate**: Legal process wherein a will is reviewed to determine whether it is valid and authentic.

- **Intestate**: Dying without a legal will.
- **Concurrent Jurisdiction**: Multiple courts have jurisdiction over the same matter.
- **Venue vs. Jurisdiction**: Venue concerns the location where a case should be heard, while jurisdiction concerns a court's power to decide a case.
- **Laches**: A legal doctrine where a plaintiff's undue delay can prevent them from seeking legal remedy.

### Historical Background:

- **Judiciary Act of 1948**: Original and exclusive jurisdiction over probate resides in Courts of First Instance.
- **Rule 75, Section 1 of the former Rules of Court**: Addresses venue for special proceedings concerning decedents' estates.

Given the era (1960s), this case reflects transitional tensions in Philippine probate law with emphasis on uniform and systematic procedural mandates to ensure estate settlements' orderly administration.