

Title:

****Reyes et al. v. Enriquez et al. (G.R. No. 158011, June 28, 2005)****

Facts:

- ****Ownership and Heirship Claims:****
- ****Dionisia Reyes and Anacleto Cabrera**** were co-owners of Lot No. 1851, having a total area of 2,017 square meters in Talisay, Cebu.
- Upon the death of Dionisia Reyes, her heirs ****Faustino Reyes, Esperidion Reyes, Julieta C. Rivera, and Eutiquio Dico, Jr.**** (Petitioners) executed an **Extrajudicial Settlement with Sale** on April 17, 1996.
- On March 21, 1997, a **Segregation of Real Estate and Confirmation of Sale** was executed by said petitioners and the heirs of Anacleto Cabrera.
- Through these documents, TCT No. RT-35551 (T-8070) was cancelled, and new TCTs were issued to the respective heirs.

- ****Respondents' Claims:****
- ****Peter B. Enriquez****, for himself and as attorney-in-fact for his daughter ****Deborah Ann C. Enriquez****, claimed that Anacleto Cabrera co-owned 1,051 square meters of the land with his wife ****Patricia Seguera Cabrera****.
- The Spouses Cabrera's heirs, Etta (Peter's wife and Deborah Ann's mother), succeeded in interest as per their claim. Etta became the sole owner of the one-half share after Graciana's share was transferred to her.
- Upon Etta's death, the estate was settled extrajudicially, with Peter and Deborah Ann becoming the new owners.
- On June 19, 1999, Peter and Deborah Ann sold 200 square meters of the land to ****Spouses Dionisio and Catalina Fernandez**** (co-respondents).

- ****Discovery of Documents:****
- Upon trying to register their purchase, Spouses Fernandez found conflicting documents:
 1. Affidavit by Anacleto Cabrera (March 16, 1957) indicating Cabrera's share was approximately 369 sq. m.
 2. Affidavit by Dionisia Reyes (July 13, 1929) indicating Cabrera held only 1/4 of the property.
 3. Extrajudicial Settlement with Sale (April 17, 1996).
 4. New certificates of title issued to petitioners.
 5. Segregation and Confirmation deed (March 21, 1997).

- **Legal Actions and Procedural Posture:**

- Respondents filed a complaint to annul or nullify the aforementioned documents and claimed they were fraudulent.
- RTC dismissed the complaint, claiming respondents must first be declared heirs in a special proceeding.
- CA reversed RTC's decision and remanded the case for further proceedings.
- Petitioners sought review in the Supreme Court under Rule 45.

Issues:

1. **Main Issue:**

- Whether respondents need to institute a special proceeding to establish their heirship before filing an ordinary civil action to nullify the conflicting documents and cancel the TCTs.

Court's Decision:

- **Special Proceeding Requirement:**

- The Supreme Court ruled affirming that respondents must first be declared heirs in a special proceeding before they can seek nullification of documents and TCTs in an ordinary civil action.

- Based on the Rules of Court, only real parties in interest can prosecute or defend an action. Since respondents' claims hinge on their status as heirs, this status needs proper judicial recognition.

- **Real Party in Interest Principle:**

- The Supreme Court underscored that for an ordinary civil action to ensue, the plaintiffs must establish a real and substantial interest in the matter, which respondents had not yet judicially established as heirs.

- **Consistency with Prior Rulings:**

- Echoing its decisions in cases like *Heirs of Guido Yaptinchay v. Del Rosario*, the SC reiterated that heirship claims must be adjudicated in special proceedings, thereby dismissing civil suits filed without such prior adjudication.

Doctrine:

- **Doctrine Reiterated:**

- The rule established is that a declaration of heirship is prerequisite for heirs seeking to recover property, cancel certificates of title, or annul related documents in ordinary civil actions. This must be determined through a special proceeding.

Class Notes:

- **Key Elements/Concepts:**
- **Real Party in Interest:**
- To prosecute or defend an action, a party must have a direct, substantial interest in the litigation.
- **Special Proceeding vs. Ordinary Civil Action:**
- Special Proceeding: Judicial recognition of status, rights, or facts (e.g., heirship).
- Ordinary Civil Action: Enforcement, protection of a right, prevention/redress of a wrong.
- **Requisites for Heirship Declaration:**
- Heirship must be established to substantiate claims over decedent's property in civil actions.

- **Statutory Citations:**
- Sec. 1 (a), Rule 1, Rules of Court.
- Sec. 1(c), Rule 1, Rules of Court.
- Sec. 2, Rule 3, Rules of Court.

Historical Background:

- **Context:**
- This ruling sits within the broader context of Philippine property and succession law, establishing procedural clarity on how inheritance claims are to be judicially recognized before substantive issues concerning property disputes can be addressed effectively in civil courts.