

****Title: Fernandez, et al. v. Maravilla****

****Facts:****

1. ****Initial Petition and Contestation:****

- On August 25, 1958, Herminio Maravilla filed a petition with the Court of First Instance of Negros Occidental for the probate of the will of his deceased wife, Digna Maravilla, who died on August 12, 1958. Herminio was named the universal heir and executor in the will.

- Pedro, Asuncion, and Regina Maravilla (siblings of the deceased) opposed the probate on September 30, 1958, claiming the will was not signed on each page by the testatrix in the presence of the attesting witnesses.

2. ****Special Administration:****

- On March 16, 1959, despite opposition from Digna's siblings, the court, upon Herminio's motion, appointed Herminio as the special administrator for the estate, noting all properties in the will were conjugal and that the properties could not be partitioned until further proceedings.

3. ****Probate Denial and Subsequent Actions:****

- On February 8, 1960, the court denied the probate, agreeing with the opposition on signing formalities.

- Following this, on February 17, 1960, Digna's siblings petitioned for the appointment of Eliezar Lopez as special co-administrator to protect their interests, given Herminio was no longer the sole beneficiary after the will was invalidated.

4. ****Respondent's Legal Maneuvering:****

- Herminio Maravilla filed a notice of appeal against the probate denial on February 26, 1960.

- On February 25, 1960, Digna's siblings sought Herminio's removal as special administrator for not filing an inventory, which Herminio countered by arguing the inventory requirement did not apply to special administrators.

- On subsequent dates, other devisees filed petitions for appointing additional special co-administrators.

5. ****Joint Hearing and Appeals:****

- A joint hearing on various petitions was held on March 5, 1960, and during this hearing, the court appointed Eliezar Lopez as special co-administrator, despite Herminio's objections regarding Lopez's full-time employment and potential conflicts.

- Herminio subsequently filed a petition for certiorari and prohibition with the Court of Appeals to annul Lopez's appointment, resulting in the Court of Appeals issuing a writ of preliminary injunction on March 9, 1960, and later revised for clarity on March 11, 1960.

6. **Court of Appeals Decision and Motion for Reconsideration:**

- On May 16, 1961, the Court of Appeals granted Herminio's petition, declaring Lopez's appointment null and void.
- Petitioners (siblings of the deceased) moved for reconsideration, which was denied, leading to their appeal to the Supreme Court.

Issues:

1. Whether the Court of Appeals had jurisdiction to issue writs of certiorari and prohibition.
2. Whether the appointment of Eliezar Lopez as special co-administrator was valid and necessary.

Court's Decision:

1. **Jurisdiction of the Court of Appeals:**

- The Supreme Court ruled that the Court of Appeals did not have jurisdiction as the value in controversy exceeded PHP 200,000, which placed it within the exclusive appellate jurisdiction of the Supreme Court per the Judiciary Act of 1948.
- The Supreme Court noted that the probate proceedings—valued at PHP 362,424.90—were already on appeal at the Court of Appeals, and any writs issued should be within the context of aiding their appellate jurisdiction.
- The procedural status and value should be considered as part of the entire estate's value, thus reinforcing exclusive jurisdiction by the Supreme Court.

2. **Appointment of Eliezar Lopez:**

- The Supreme Court found no necessity for appointing a special co-administrator, as the Rules of Court do not provide for such an appointment.
- The role of special administrator is designed to be temporary, subsisting until a regular executor or administrator is appointed. Herminio, being the husband and survivor with a primary interest in the estate, was best positioned to fulfill these duties.

Doctrine:

- The entire value of the estate is considered when determining jurisdiction in probate cases. For the Supreme Court, any matter involving controversy over an estate exceeding PHP 200,000 falls under its exclusive jurisdiction.
- Mandates regarding the appointment of administrators do not typically envisage the necessity for co-administrators outside exceptional circumstances.

Class Notes:

- **Probate Jurisdiction:** Appeals involving properties valued over PHP 200,000 are

exclusively under the Supreme Court's jurisdiction (Sec. 17, Judiciary Act of 1948).

- **Special Administrator Role:** The special administrator's role is interim and primarily intended to maintain the estate before regular appointment. No rule provision exists for special co-administrators (Sec. 2, Rule 75; Roxas v. Pecson).

- **Inventories and Duties:** Rule 84 (Sec. 1) outlines the requirement of inventory submission within three months; however, this rule's application can vary for special administrators based on case specifics.

Historical Background:

- The case underscores the delineation of jurisdictional authority between appellate courts and the Supreme Court. The context involved post-war legal reforms, where precise delineations for jurisdiction were critical to managing increased litigations and disputes involving significant estates. Moreover, the judiciary's clarification on probate law established key precedents for subsequent probate proceedings and appeals in the Philippines.