

Title: Jose Uy and His Spouse Glenda J. Uy, and Gilda L. Jardeleza v. Court of Appeals and Teodoro L. Jardeleza

Facts:

- Initial Incident:** Dr. Ernesto Jardeleza, Sr. suffered a severe stroke on March 25, 1991, leaving him in a comatose state, incapable of administering his properties.
- Petition for Guardianship:** On June 6, 1991, Teodoro L. Jardeleza, son of Ernesto, filed a petition for guardianship (Special Proceeding No. 4689) at RTC Iloilo City, Branch 25, requesting the issuance of Letters of Guardianship in favor of Gilda L. Jardeleza, Ernesto's wife, to prevent loss of property.
- Second Petition Filed:** On June 13, 1991, Gilda L. Jardeleza filed another petition (Special Proceeding No. 4691) at RTC Iloilo City, Branch 32, seeking authorization to assume sole administration of the conjugal properties and sell Lot No. 4291 to cover mounting medical expenses.
- Court Order and Decision:** Branch 32 found Gilda's petition sufficient, set a hearing for June 20, 1991, and subsequently authorized Gilda to manage the properties and sell Lot No. 4291.
- Opposition and Motion Filed:** Teodoro filed a motion for reconsideration and sought to consolidate both special proceedings. He contested that summary proceedings were inappropriate and alleged conflicts of interests regarding the sale price and sentimental value of the property.
- Approval of Sale:** Despite pending reconsideration, Gilda sold Lot No. 4291 to her daughter Ma. Glenda Jardeleza Uy for P8 million and sought court approval for this deed.
- Inhibition and Re-raffle:** The presiding Judge inhibited herself, and the case was re-assigned to Branch 28, which denied Teodoro's motion for reconsideration and approved the sale.
- Court of Appeals Decision:** The CA reversed the lower court's decision, declaring the special proceeding and sale void, ruling that guardianship proceedings were required given Ernesto's condition.

Issues:

- Proper Procedure for Incapacitated Spouse:** Whether summary proceedings under Article 124 of the Family Code is applicable for an incapacitated spouse like Ernesto Jardeleza, Sr.
- Compliance with Due Process:** Whether the summary proceeding followed due process requirements, particularly in notifying and giving Ernesto an opportunity to be heard.

3. **Validity of the Sale**: Whether the sale of the conjugal property to Ma. Glenda Jardeleza Uy was validly conducted.

Court's Decision:

1. **Summary Proceedings vs Guardianship**:

- The Supreme Court affirmed that summary proceedings under Article 124 of the Family Code are not applicable when a spouse is incapacitated. The appropriate remedy is judicial guardianship under Rule 93 of the Revised Rules of Court.
- The incapacitated spouse should be provided due process including proper notification and opportunity to present objections.
- The trial court's decision lacked due process as Ernesto Jardeleza, Sr. was not adequately represented or notified, making the summary decision void.

2. **Compliance with Due Process**:

- The trial court failed to observe due process, not issuing a proper notice or opportunity for a hearing to Ernesto Jardeleza, Sr., thus rendering its decision void.

3. **Validity of the Sale**:

- Since the special proceeding under the lower court was void due to lack of due process, the approval of the sale of Lot No. 4291 was similarly invalid.

Doctrine:

- **Incapacitated Spouse and Conjugal Property**: An incapacitated spouse requires judicial guardianship proceedings under Rule 93 of the Revised Rules of Court rather than summary proceedings under the Family Code (Article 124).
- **Due Process in Special Proceedings**: Court decisions made without ensuring due process, such as lack of notification or hearing for incapacitated individuals, are void ab initio.

Class Notes:

- **Key Elements**:
- **Guardianship vs. Summary Proceedings**: Differentiate when to apply judicial guardianship versus summary proceedings under Family Code for property administration.
- **Article 124 of the Family Code**: Spouse's sole administration powers do not include disposition without court approval in case of incapacitated spouse.
- **Due Process**: Emphasize strict compliance with procedural due process, including notification and hearing requirements in special proceedings involving incapacitated

persons.

- **Relevant Statutes**:
- **Family Code, Article 124**: Administration of conjugal partnership property.
- **Rule 93, Revised Rules of Court**: Guardianship proceedings.
- **Rule 95, Revised Rules of Court**: Procedure for sale of a ward's estate.

Historical Background:

The case exemplifies the judicial evolution and necessary procedural safeguards in handling the property rights of incapacitated individuals within the Philippine legal framework. The decision underscores the adherence to due process and proper guardianship to protect the rights and interests of incapacitated spouses, marking a significant precedent in family and property law.