

****Title:****

Jessie V. Pisueña vs. Heirs of Petra Unating and Aquilino Villar, represented by Salvador Upod and Dolores Bautista

****Facts:****

Jessie V. Pisueña (petitioner) filed a Petition for Review on Certiorari to contest the Court of Appeals' ruling which upheld a Regional Trial Court decision regarding the ownership of a disputed lot, Lot 1201, Cadastral 228 of Ivisan, Capiz. The proceedings had a protracted history involving multiple litigations and petitions.

1. The disputed lot, registered under Original Certificate of Title No. 18422, was initially owned by Petra Unating, who inherited it from her mother, Margarita Argamaso.
2. Petra Unating died in 1948 and her husband Aquilino Villar died in 1953, leaving two children, Felix Villar and Catalina Villar.
3. Felix and Catalina Villar, both deceased by 1967, sold the lot to Agustin Navarra in 1949 through a notarized "Escritura de Venta Absoluta."
4. Agustin Navarra's son-in-law, Jessie Pisueña, later acquired the lot through a Deed of Extrajudicial Partition and Deed of Sale in 1968.
5. In subsequent years, Dolores Bautista and Salvador Upod, representing the heirs of Petra Unating and Aquilino Villar, filed multiple cases for recovery, ejectment, title reconstitution, and damages against Pisueña to assert their claim over the land.
6. The RTC declared the Escritura de Venta Absoluta valid only for half of the lot, as it considered the property conjugal, making Felix and Catalina Villar owners of only half.

The legal dispute escalated to the Court of Appeals, which affirmed the RTC ruling, prompting Jessie V. Pisueña to seek recourse with the Supreme Court.

****Issues:****

1. Whether the disputed lot (Lot 1201) was conjugal or paraphernal property.
2. The validity and extent of ownership transfer through the "Escritura de Venta Absoluta."

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

****Paraphernal or Conjugal Property Issue:****

The Supreme Court revisited the background of the lot ownership:

1. The cadastral court's 1930 decision indicated that Petra Unating inherited the property from her mother.
2. The phrase "having inherited said lot from her mother Margarita Argamaso" was part of

the court's dispositive portion, not an observation (obiter).

3. The CFI's Reconstitution Case No. 1408 confirmed that the title included this finding, making the court's ruling conclusive and binding.
4. Therefore, the lot was paraphernal property of Petra Unating, not conjugal.

****Validity and Efficacy of the "Escritura de Venta Absoluta":****

1. The Escritura de Venta Absoluta was properly notarized and undisputedly transferred Felix and Catalina Villar's rights to Agustin Navarra.
2. At the time of the sale, Felix and Catalina transferred their two-thirds share of the lot - their inherited portion.
3. Upon the death of Aquilino Villar in 1953, Felix and Catalina inherited the remaining one-third share, retroactively validating the transfer of the entire lot to Navarra by operation of Article 1434 of the Civil Code.
4. Through Navarra's heirs, including Jessie Pisueña and Rosalie Navarra, the ownership of Lot 1201 was legally perfected.

****Doctrine:****

The Court reiterated the principle from Article 1434 of the Civil Code that any title acquired by a seller after the execution of a sale automatically transfers to the buyer by operation of law, reinforcing the rule's application to real property transactions.

****Class Notes:****

1. ****Paraphernal Property:**** Property inherited exclusively by one spouse and not included in the marital partnership unless explicitly provided.
2. ****Conjugal Property Presumption:**** Property acquired during the marriage is typically considered conjugal unless proven otherwise.
3. ****Article 1434 Civil Code:**** Ensures that any interest or title acquired by the seller post-transaction automatically benefits the buyer.
4. ****Cadastral Proceedings as In-Rem:**** Decisions in cadastral cases are binding on the whole world, affecting all parties with due process.

****Historical Background:****

Property disputes involving inherited land underscore the nuanced nature of land ownership and inheritance laws during different periods of Philippine history, requiring historical decisions by cadastral courts to be binding and influential in modern property jurisprudence.