

****Title: Rivera vs. Heirs of Villanueva Case****

****Facts:****

- ****1927-1980****: Pacita Gonzales and Romualdo Villanueva lived together without the benefit of marriage due to Villanueva's prior marriage to Amanda Musngi.
- ****April 20, 1963****: Amanda Musngi died.
- ****July 3, 1980****: Pacita Gonzales passed away intestate.
- ****August 8, 1980****: Villanueva and his daughter Angelina executed a deed of extrajudicial partition with sale concerning Gonzales' estate.
- ****Post-1980****: Petitioners (Gonzales' relatives) filed a case for the partition of Gonzales' estate, annulment of titles, and damages (Case No. SD-857) at the Regional Trial Court (RTC), Santo Domingo, Nueva Ecija, Branch 37.
- RTC dismissed the complaint, ruling Gonzales wasn't married to Villanueva, and Angelina was her illegitimate daughter and sole heir.
- ****Appeal to CA****: Petitioners appealed; the Court of Appeals (CA) affirmed the RTC's decision.

Petitioners challenged the CA's ruling, primarily on the question of Angelina's filiation status established in another case (SD-144), arguing it should be res judicata in SD-857.

****Issues:****

1. Whether SD-144's findings on Angelina's filiation are res judicata in SD-857.
2. The determination of Angelina's real status related to Gonzales.
3. Whether properties acquired by Gonzales and Villanueva during their cohabitation were co-owned.

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

1. ****Res Judicata (Issue 1)****:
 - ****Ruling****: The Court held that the decision in SD-144 did not meet the requirements for res judicata as there was no identity of parties and causes of action between the cases. SD-144 concerned letters of administration, while SD-857 was about partition and annulment of titles.
2. ****Angelina's Filiation (Issue 2)****:
 - ****Ruling****: The Court found the CA erred in concluding Angelina was Gonzales'

illegitimate daughter based solely on her birth certificate. Examination revealed she was listed as “adopted.” The Court emphasized that birth registration does not establish legal adoption or legitimate status.

- Consequently, the Court declared Angelina was neither the legitimate nor the adopted daughter of Gonzales, invalidating her participation in the estate partition.

3. **Ownership of Properties (Issue 3)**:

- **Ruling**: Villanueva and Gonzales’ relationship was adulterous prior to Musngi’s death, which nullified presumptions of co-ownership for properties acquired during that period. Lacking evidence of Gonzales’ contribution, these properties were deemed owned solely by Villanueva.

- **Post-1963 Properties**: Properties registered solely in Gonzales’ name or co-registered after 1963 were governed by co-ownership under Article 144. Evidence of individual title established Gonzales’ sole ownership of certain properties.

Doctrine:

- **Res Judicata** requires final judgment, same parties, subject matter, and causes of action.

- **Filiation by Birth Certificate**: Registration as a child of parents in a birth certificate does not confer legitimacy or adoption status.

- **Adulterous Cohabitation Property**: Excludes co-ownership unless clear evidence of contribution.

Class Notes:

- **Res Judicata Elements**: Finality of judgment, jurisdiction, judgment on merits, identity of parties/matters (Art. 403, Civil Code).

- **Filiation Presumptions**: Only prima facie evidence, needs additional proof (Art. 410, Civil Code).

- **Property Rules for Cohabitation**: Adulterous relationships exclude presumed co-ownership (Art. 144, Civil Code). Proof of contribution is essential (Juaniza v. Jose; Agapay v. Palang).

Historical Background:

The case contextualizes the complex interplay between cohabitation laws, property rights, and family code adjustments during an era transitioning from Spanish-influenced marital

laws to contemporary post-independence Philippine statutory laws. The decision highlights the judicial progression in handling property disputes arising from long-term extramarital cohabitation.