

**Title:** Ocampo v. Ocampo, G.R. No. 153859, October 31, 2001

**Facts:**

1. **Origin of Dispute:**

- Petitioners are the heirs of Jose Ocampo and Juana Llander-Ocampo, who had ten children.
- Upon their parents' death, petitioners claim that their parents' property, a residential/commercial land in Nabua, Camarines Sur, became co-owned among the siblings.
- Fidela Ocampo, one of the siblings, allegedly conveyed the property solely to Belen Ocampo-Barrito via a Deed of Donation Inter Vivos.

2. **Initial Legal Actions:**

- Petitioners initially filed a complaint for partition and damages against Fidela Ocampo and Felicidad Ocampo, claiming co-ownership.
- A supplemental complaint was filed, including Belen Ocampo-Barrito and Vicente Barrito, challenging the validity of the Deed of Donation Inter Vivos on grounds of alleged fraud and undue influence.

3. **Defendants' Arguments:**

- Belen Ocampo-Barrito asserted she obtained the property legitimately through a sequence of ownership transfers traced back to Adolfo Ocampo, then to Felix Ocampo, who sold it to Fidela in 1953.
- Fidela Ocampo confirmed her absolute ownership over the property and the authenticity of the donation to Belen.

4. **RTC Decision (October 30, 1996):**

- The RTC found in favor of Belen Ocampo-Barrito, upholding her and her husband Vicente Barrito as the sole owners of the property.
- Petitioners' complaints were dismissed for lack of evidence and prescription.
- Petitioners were ordered to pay damages and attorney's fees.

5. **CA Decision (October 31, 2001):**

- The CA affirmed the RTC decision but deleted the awards for damages and attorney's fees.

6. **Supreme Court Petition:**

- Petitioners appealed to the Supreme Court under Rule 45 of the Rules of Court.

**\*\*Issues:\*\***

1. **\*\*Co-ownership Proof:\*\***

- Whether the evidence presented proves co-ownership of the property.
- Whether Fidela's acknowledgment of co-ownership establishes the petitioners' claim.

2. **\*\*Validity of Deed of Donation Inter Vivos:\*\***

- Whether the Deed of Donation executed in favor of Belen Ocampo-Barrito was entered in bad faith.

3. **\*\*Admissibility and Weight of Evidence:\*\***

- Whether the photographs, testimonial evidence, and acknowledgment of co-ownership suffice to establish petitioners' co-ownership claim.
- Whether the evidence of respondents is consistent and credible.

4. **\*\*Chinese Custom Claim:\*\***

- Alleged custom of placing property in the name of the eldest unmarried child and its impact on ownership claims.

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

1. **\*\*Co-ownership Proof:\*\***

- The Supreme Court upheld that no substantial evidence of co-ownership was presented by the petitioners.
- The reliance on the Acknowledgement of Co-ownership was insufficient against documentary evidence presented by Belen.

2. **\*\*Validity of Deed of Donation Inter Vivos:\*\***

- The deed was found valid. The court noted that there was a legitimate transfer of ownership from Fidela to Belen.
- Petitioners did not provide evidence of fraud, coercion, or undue influence that would invalidate the deed.

3. **\*\*Admissibility and Weight of Evidence:\*\***

- The photographs and other proofs presented by petitioners were found inconclusive.
- The testimonies of petitioners' witnesses were viewed as insufficient against the robust documentary proofs of Belen.

4. **\*\*Chinese Custom Claim:\*\***

- The Court dismissed this claim due to lack of substantial evidence to prove the existence and practice of the alleged custom in that area.

**\*\*Doctrine:\*\***

1. **\*\*Burden of Proof:\*\***

- In a civil case, the burden of proving an allegation lies with the party making the claim, based on a preponderance of evidence.  
- The party seeking partition must sufficiently prove their title and nature of their ownership.

2. **\*\*Co-ownership:\*\***

- Co-ownership cannot be presumed; it must be proven by cogent evidence.

3. **\*\*Validity of Contracts:\*\***

- Donative deeds, like any contract, are binding if they fulfill elements of a valid donation - consent, subject matter, and cause.

**\*\*Class Notes:\*\***

1. **\*\*Ownership and Transfer of Property:\*\***

- A title certificate and tax declarations are significant pieces of evidence of ownership.  
- Evidentiary requirements for proving ownership include tracing the succession of title and presenting substantial proof.

2. **\*\*Contracts:\*\***

- Essential requisites for donations and property conveyances must be met to validate such acts.  
- Mortgages require an absolute owner to affirm the validity of a contract.

3. **\*\*Burden of Proof:\*\***

- The party making a claim must supply preponderant evidence to prevail.

4. **\*\*Legal Presumptions:\*\***

- Certificates of Title enjoy a presumption of validity unless proven otherwise.

**\*\*Historical Background:\*\***

- The case underscored the importance of judiciary adherence to procedural and

substantive legal standards in resolving property disputes.

- It highlighted the evidentiary burdens in co-ownership claims and emphasized the supremacy of documentary evidence over general allegations and custom-based arguments.