

****Title:**** Rosita U. Alberto vs. Heirs of Juan A. Pantí

****Facts:****

1. The case originated from a Petition for Cancellation of Adverse Claim filed by the Heirs of Juan A. Pantí against Rosita U. Alberto and the Register of Deeds (RD) of Catanduanes.
2. The Heirs of Pantí alleged that the late Juan A. Pantí owned a 16,210-square-meter parcel of land, including Original Certificate of Title (OCT) No. 157. On May 19, 2008, Alberto annotated an Affidavit of Adverse Claim on the title, which the heirs contested as without legal basis.
3. Alberto, one of the heirs of Congressman Jose M. Alberto, claimed that her parents bought the land from the Heirs of Pantí in 1966, though no formal deed of sale was executed. She stated their family had possessed the property for over 40 years, substantiated by acknowledgment receipts from 1966.
4. Heirs of Pantí argued no complete sale occurred as only two partial payments were made, and within a five-year inalienability period due to its free patent status; thus, the supposed sale was contrary to law. They emphasized the absence of a complete contract of sale and questioned Alberto's claim as mere implied trust.
5. The RTC decided in favor of Alberto, upholding the adverse claim as adequately founded. On appeal, the Court of Appeals (CA) reversed this ruling, directing the annotation's cancellation after reiterating that Alberto's claim failed to meet legal registration standards.

****Issues:****

1. ****Whether there was a valid basis for the cancellation of the adverse claim annotated by Alberto on OCT No. 157.****

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

1. ****Factual/Legal Basis of Adverse Claim:****

The Supreme Court outlined that legal provision for registering an adverse claim is only applicable if no other legal pathways (such as those for implied trusts) are available under the Property Registration Decree (PD 1529). The alleged "implied trust" should have been registered under Section 68, not as an adverse claim under Section 70 of PD 1529. The

court held this invalidated the adverse claim as registered by Alberto.

2. **Lapse of Time and Lack of Payment:**

The Court found that despite partial payments in 1966, the lack of a formal deed of sale and the realization of a condition (full payment) necessary to perfect the sale negated Alberto's claim over the property. Her family possessed it than over 40 years but delayed formal action (allegations recorded only in 2008).

3. **Registered Land and Prescription:**

It reaffirmed that no title contrary to a registered owner's can be acquired by prescription or possession. Hence, adverse possession claims were unfounded in this setting and held no legal effect against the Heirs of Panti as titleholders.

4. **Laches:**

Alberto's invocation of laches against the Heirs of Panti was rejected, as neither factually detailed in the adverse claim nor did the proceedings' trajectory justify such equitable relief. Further, laches wasn't a legitimate basis for their adverse claim.

Doctrine:

- **Registration and Implied Trusts:** Claims of interest by reason of implied trusts must be registered under Section 68 of PD 1529, not as adverse claims under Section 70 if another mechanism is present.
- **Adverse Claims and Registered Land:** Adverse claims are only viable if no other statutory registration method is provided. Titles under registered land law cannot be undermined by prescription or possessory claims.

Class Notes:

1. **Adverse Claim:** Protects non-registered interests temporarily; limited under registered land system.
2. **Implied Trusts:** Requires specific registration under Section 68, impacting strategic filing decisions.
3. **Sales and Conditions:** In property dealing, only fulfilled conditions move to contract execution and legal holding (receipts without full payment do not suffice).

4. **Land Law Limitations:** Registered land titles sustain strong statutory protections against adverse holdings.

5. **Releases of Title Claim:** Regular reevaluation of land registration practices and timely dispute resolution remain critical for long-term property ownership assertions.

Historical Background:

- This case illuminates persistent issues in Philippine land law where historical inertia and inheritance sporadically interact over decades, often enlightening on traditional registration flaws. The matter recalls property law evolution since land title registration inception in Land Registration Act (1902) through to PD 1529 (1978), underlining challenges in bridging informal land possession practices with formal, statutory frameworks. The judgment reflects efforts towards refining clarity in conflict resolution alongside enduring ownership rights against this historical matrix.