

Title: Juan Sevilla Salas, Jr. vs. Eden Villena Aguila, G.R. No. 95322, March 16, 2012

Facts:

1. On September 7, 1985, Juan Sevilla Salas, Jr. (Salas) and Eden Villena Aguila (Aguila) were married. Their daughter, Joan Jiselle, was born on June 7, 1986.
2. Five months after the birth of their daughter, Salas left the conjugal home and ceased communication with Aguila and their child.
3. On October 7, 2003, Aguila filed a Petition for Declaration of Nullity of Marriage citing psychological incapacity under Article 36 of the Family Code, stating they had no conjugal property.
4. The summons was served via Salas' mother, as per the Return of Summons dated October 13, 2003.
5. On May 7, 2007, the Regional Trial Court (RTC) declared their marriage null and void, also suggesting the dissolution of any conjugal partnership of gains.
6. On September 10, 2007, Aguila filed a Manifestation highlighting newly discovered properties registered under Salas's name but claimed no conjugal properties in her initial petition.
7. A hearing was scheduled for September 21, 2007, during which Aguila testified about the properties registered to "Juan S. Salas, married to Rubina C. Salas."
8. Salas requested an Entry of Judgment on September 19, 2007, as there was allegedly no appeal or motion for reconsideration, and no conjugal property was claimed.
9. On February 8, 2008, Salas opposed the Manifestation, claiming Aguila's initial statement about no conjugal properties was a judicial admission.
10. The RTC, on September 26, 2008, ruled that the discovered properties were conjugal and required partition, noting Salas's failure to prove his claims of other properties.

Procedural Posture:

- Salas filed a complaint-in-intervention through Rubina, asserting that the discovered properties were Rubina's paraphernal property, which the RTC dismissed for lack of merit.
- The CA, on March 16, 2012, upheld the RTC's ruling, dismissing Salas's appeal for lack of merit and similarly denying his Motion for Reconsideration.
- The case was elevated to the Supreme Court via a Petition for Review.

Issues:

1. Whether the parcels of land covered by certain TCTs should be partitioned between Salas and Aguila.
2. Whether Rubina C. Cortez should have been allowed to intervene in the case.

Court's Decision:

1. **Partition of Properties**: The Supreme Court affirmed the CA's decision on the basis that the properties were acquired during the marriage, therefore subject to partition, despite Salas's claims.
2. **Intervention by Rubina Cortez**: The Court denied Rubina's intervention, as Rubina failed to establish a legal interest over the properties; the entries in the TCTs describing marital status were not sufficient to challenge ownership.

Doctrine:

- Under Article 147 of the Family Code, property acquired during a void marriage is presumed to be jointly owned unless proven otherwise. In such cases, the rules on co-ownership govern property relations.

Class Notes:

- Legal incapacity under Article 36 of the Family Code can lead to a declaration of nullity of the marriage.
- When partitioning properties in a nullified marriage, property acquired during the marriage is presumed co-owned.
- Evidence presented must be sufficient and meet the criteria of preponderance to affect properties' ownership rights.
- Interventions in a case require the intervener to demonstrate a legal interest in the litigation outcome.

Historical Background:

This case occurred during a period in the Philippines where the Family Code, which took effect in 1988, was being interpreted and applied to longstanding marital disputes. The doctrines established centered around equitable rights in void marriages and the evidentiary standards needed to rebut ownership presumptions on properties acquired during a marriage. This case also reflects the judiciary's role in clarifying property rights amidst marital dissolution under the family legal system in the Philippines.