

Title

****Illuminada Ponce Berciles, Ilona Berciles Alvarez, Ellery P. Berciles, England P. Berciles and Ione P. Berciles vs. Government Service Insurance System, Pascual Voltaire Berciles, Maria Luisa Berciles Villareal, Mercy Berciles Patacsil and Rhoda Berciles (213 Phil. 48)****

Facts

Judge Pascual G. Berciles of the Court of First Instance of Cebu died in office on August 21, 1979. He had been married to Illuminada Ponce Berciles, with whom he had four children: Ilona, Ellery, England, and Ione. Another woman, Flor Fuentebella, also claimed to be his wife and had four children with him: Pascual Voltaire, Maria Luisa, Mercy, and Rhoda.

Illuminada Ponce and her four children filed a claim for survivor's benefits under Republic Act 910, which was supported by the necessary documentation. Meanwhile, Flor Fuentebella and her children also filed a claim, submitting various documents and affidavits alleging the marital relationship with the deceased Judge Berciles.

The GSIS initially approved Illuminada Ponce's application, as reflected in a resolution dated April 10, 1980. An investigation was recommended to determine the rightful beneficiaries. Despite initial approval, the GSIS later reconsidered and decided that both families had entitlements, splitting the retirement benefits between them.

This procedural tussle eventually culminated in both parties lodging motions and petitions, leading to the present appeal to the Supreme Court. Specifically, Illuminada Ponce challenged the GSIS's determination that Pascual Voltaire, Maria Luisa, Mercy, and Rhoda were legitimate heirs of Judge Berciles.

Issues

1. Whether Pascual Voltaire Berciles is an acknowledged natural child of Judge Pascual G. Berciles.
2. Whether Maria Luisa Berciles, Mercy Berciles, and Rhoda Berciles are illegitimate children of Judge Pascual G. Berciles.
3. Whether the GSIS erred in its determination on the distribution of benefits.
4. Procedural validity of the appeal under Section 25 of Presidential Decree No. 1146.

Court's Decision

****1. Acknowledgment of Pascual Voltaire Berciles:****

The Supreme Court found that the birth certificate of Pascual Voltaire Berciles did not meet the requirements for voluntary acknowledgment under Philippine law, as it lacked the father's signature or any mention of acknowledgment in public documents.

****2. Illegitimacy of Other Children:****

Similarly, the Court examined the documents for Maria Luisa, Mercy, and Rhoda and found them insufficient to support claims of acknowledgment or legitimate filiation. The documents included certificates without the deceased judge's signature, which do not fulfill the statutory requirements for establishing paternity.

****3. Distribution of Benefits:****

The Court ruled that the GSIS erred in its distribution, affirming that only Iluminada Ponce and her children were the legitimate heirs entitled to the benefits. Therefore, it set aside the GSIS Resolution and ordered the benefits to be distributed equally among Iluminada Ponce and her four children.

****4. Validity of Appeal:****

The Court upheld the applicability of Section 25 of Presidential Decree No. 1146 for appealing the decision, emphasizing remedial statutes' liberal construction to ensure the protection and facilitation of benefits claims.

Doctrine

1. **Filiation and Paternity Requirements:**

- Birth certificates must be signed by the parent acknowledging the child to be considered valid proof of parentage (Vidaurreazaga vs. Court of Appeals).
- Baptismal records and similar documents are insufficient for proving parentage unless the parent directly signed or participated in such documents (Canales vs. Arrogante).

2. **Applicability of P.D. 1146:**

- The procedures under section 25 for appeals to the GSIS decisions can be invoked by claimants of judicial annuities under R.A. 910 following a dispute.

Class Notes

- ****Filiation and Paternity Evidence:**** Birth certificates, baptismal records, and authentic writings must be signed by the alleged parent and meet statutory requirements to establish

paternity.

- ****Intestate Succession:**** Under Philippine law, the surviving spouse and legitimate children inherit equally. Filiation with the deceased must be legally proven (Articles 893, 982, and 979 of the New Civil Code).
- ****Remedial Statutes:**** Provisions of P.D. 1146 facilitating appeals on benefits can be applied in disputes under other retirement acts administered by GSIS, promoting claimant protection and expedited resolution.

Historical Background

This case occurred in a socio-legal context where the proper identification of legal heirs and the distribution of benefits in the form of judicial retirement pay were being meticulously contested and reformed, reflecting broader issues concerning family rights and administrative justice within Philippine jurisprudence during the late 20th century. The court navigated these issues, blending procedural precision with a focus on equitable relief for legitimate heirs.