

****Title:****

Mayuga v. Atienza, G.R. No. 214019, 823 Phil. 389; 114 OG No. 42, 7158 (2018)

****Facts:****

On May 4, 2000, Araceli Mayuga filed a petition to cancel and recall Free Patent Applications (FPA) No. 11636 and FPA No. 11637 against Antonio and Benjamin Atienza, representing the heirs of Armando and Benjamin Atienza, respectively. Araceli claimed the applications were obtained through fraud and sought to have the two lots equally divided among three heirs.

1. ****Procedural Posture:****

- ****Regional Trial Court (RTC):**** Mayuga's petition was filed and raffled to Branch 82, Odiongan, Romblon. Defendants requested a bill of particulars for vague claims of fraud. Mayuga provided additional details about the alleged fraud, including the manipulation of documents and her absence from the Philippines when patents were applied for.

- ****RTC Decision:**** On April 27, 2010, RTC ruled in favor of Mayuga, ordering the cancellation of the free patents and reconveyance of 1/3 share to Mayuga. Defendants' motion for reconsideration was denied.

- ****Court of Appeals (CA):**** Defendants appealed. The CA reversed RTC's decision, stating titles had become indefeasible and finding no fraud in the application process.

- ****Supreme Court (SC):**** Mayuga filed a petition for review on certiorari, arguing the free patents were fraudulently obtained and should be cancelled.

2. ****Pleadings:****

- ****Defendants:**** Filed affirmative defenses, argued indefeasibility of titles, lack of plaintiff's standing, and compliance with legal requirements.

- ****Mayuga:**** Amended the complaint to include all heirs, argued the title issued fraudulently was void ab initio.

- ****Additional Motions:**** Defendants sought to dismiss claims for procedural deficiencies which were denied. Filed comments and replies highlighting procedural and substantive issues in CA decision.

****Issues:****

1. Whether the CA erred in reversing the RTC decision and dismissing the amended complaint for cancellation of free patents and reconveyance.

2. Whether the free patents issued to the respondents were obtained fraudulently.

3. Whether the complaint's procedural deficiencies (lack of certification against forum

shopping) warranted its dismissal.

4. Whether Mayuga had proven ownership and entitlement to 1/3 of the disputed properties.

Court's Decision:

1. **Fraud and Misrepresentation:**

- The SC found no convincing evidence of fraud in the free patent application process. The Confirmation Affidavit of Distribution of Real Estate executed by Perfecto Atienza was presumed valid and not successfully impugned by contradictory claims.

2. **Indefeasibility of Titles:**

- Titles issued under the free patents became indefeasible after one year from their issuance as per Section 32 of Presidential Decree No. 1529.

3. **Procedural Aspect:**

- Although the procedural issues were noted, such as lack of certification against forum shopping, the SC focused on the merits of the substantive claims.

4. **Entitlement and Ownership:**

- The petitioner failed to prove entitlement to a 1/3 share. Verification of ownership through partition documents pre-dating Perfecto Atienza's death further negated the petitioner's claims.

Doctrine:

1. **Indefeasibility of Titles:** Titles issued under free patents become indefeasible one year after issuance as prescribed by Section 32 of Presidential Decree No. 1529.

2. **Fraud Requirement:** Fraud must be proven by clear and convincing evidence, merely assumed or alleged fraud is insufficient to annul a title.

Class Notes:

1. **Section 32 of Presidential Decree No. 1529:** Certificate of titles issued under a free patent become incontrovertible after one year from issuance.

2. **Fraud in Title Acquisition:** Must be based on clear and convincing evidence; cannot be presumed.

3. **Partition Inter Vivos:** Under Article 1080, a person may partition their estate during their lifetime without a will, respecting the legitime of compulsory heirs.

4. **Action for Reconveyance:** Plaintiff must prove ownership of the land and illegal dispossession by the defendant.

Historical Background:

Historically, property rights and land ownership in the Philippines have been contentious

issues, with many titles originating from colonial and post-colonial land laws. This case continues the theme where legal doctrines surrounding land patents and property rights intersect with familial claims and inheritance rights. The decision upholds the strength of legal titles issued through government processes against unfounded claims of fraud, reflecting ongoing efforts to secure land ownership clarity and stability in the Philippines.