

Title: Heirs of Paula C. Fabillar v. Miguel M. Paller, Florentina P. Abayan, and Demetria P. Sagales (G.R. No. 231509)

Facts:

This dispute involves a 3.1003-hectare parcel of agricultural coconut land in Sitio Cabotjo-an, Brgy. Parina, Giporlos, Eastern Samar, valued at P950.00. The respondents, Miguel M. Paller, Florentina P. Abayan, and Demetria P. Sagales, filed an Amended Complaint for Recovery of Ownership, Possession, and Damages against Spouses Antonio and Matilda Custodio and Paula C. Fabillar before the 9th Municipal Circuit Trial Court of Giporlos-Quinapondan, Eastern Samar.

1. **Inheritance and Possession:**

- The land originally belonged to Marcelino Paller, who died in 1929 or 1932.
- Marcelino's estate was orally partitioned among his children, with Ambrosio, Isidra, and Ignacia Paller receiving different portions.
- Ambrosio Paller, respondents' predecessor, received one hectare, while Isidra's two hectares were sold to respondents' mother, Sabina Macawile.
- Ignacia Paller, the Custodios' predecessor, received parcels in Sitio Dungon and Sitio Bangalog.

2. **Dispute Initiation:**

- In 1995, Demetria Paller mortgaged the land but redeemed it in 2000, finding the Custodios in possession who refused to vacate.

3. **Custodios' Claim:**

- The Custodios argued that Ambrosio was not Marcelino's son, thus having no claim to the land.
- Presented discrepancies in names on documents, and land boundaries.

4. **Lower Court Proceedings:**

- MCTC dismissed the Custodios' demurrer and declared respondents the lawful owners, orders Custodios to surrender possession, and pay damages.
- RTC and CA upheld MCTC's rulings despite Custodios raising a new defense that respondents never declared heirship before instituting action.

Issues:

1. **Necessity of Special Proceeding for Declaration of Heirship:**

- Whether a separate special proceeding is necessary to declare heirship before claiming

property rights.

2. **Proof of Filiation:**

- Whether Ambrosio's baptismal certificate sufficiently proves his filiation with Marcelino Paller.

3. **Identity of the Land:**

- Whether respondents established the identity of the land they seek to recover.

Court's Decision:

I. Special Proceeding for Declaration of Heirship:

- **Not Required:** The necessity for such a proceeding was dispensed because the parties voluntarily submitted the issue of heirship during the trial. The court can resolve the issue of ownership based on the evidence presented in the civil case.

II. Proof of Filiation:

- **Insufficient Evidence:** Ambrosio's baptismal certificate alone was deemed insufficient to prove his filiation with Marcelino since it must be corroborated by additional evidence, which was lacking. The burden of proving this relationship rested with the respondents.

III. Identity of the Land:

- **Identity Not Proven:** Discrepancies in the boundaries and insufficient linkage between tax receipts and the claimed property rendered the respondents' evidence inadequate to establish the land's identity.

As a result, the Supreme Court reversed the CA decision, dismissed the complaint, and declared the respondents failed to prove ownership of the disputed land.

Doctrine:

- **Declaration of Heirship:** A court in a civil case can resolve the issue of heirship without a separate special proceeding if the parties voluntarily submit the issue and present evidence.

- **Proof of Filiation:** Baptismal certificates alone are insufficient to prove filiation unless supported by corroborative evidence under the Family Code and Rules of Court.

- **Burden of Proof:** In property recovery cases, the burden to prove ownership and identity lies with the plaintiffs.

Class Notes:

- **Filiation Proof (Family Code, Article 172)**: Filiation must be established through the record of birth, legitimate filiation admission, or other acceptable means.
- **Voluntary Submission (Jurisprudence)**: Issues like heirship can be decided in civil proceedings if both parties submit and contest them.
- **Property Identity**: Plaintiffs must clearly establish property boundaries and identity through consistent documentary evidence and credible witness testimony.

Historical Background:

The case reflects common land disputes in the Philippines stemming from ancestral inheritance and oral partitions. It highlights the legal complexities in proving land ownership and familial relationships, stressing the importance of documentary evidence and the evolving nature of jurisprudence regarding heirship declarations. The case also illustrates the judiciary's adaptability in procedural issues to ensure justice and practicality in resolving disputes.