

Title: Heirs of Cornelio Miguel vs. Heirs of Angel Miguel

Facts:

Cornelio Miguel owned a 93,844 sq.m. parcel of land in Puerto Princesa, Palawan, subdivided into ten lots (A to J). Cornelio sold Lots A to F and H to I to his children, and Lot G to his son Angel. The remaining Lot J was kept for himself and his wife Nieves. Cornelio and Nieves also owned another 172,485 sq.m. property, subdivided into smaller lots, one of which (Lot 2-J of Psd-146880) was donated to Angel through a deed of donation executed on December 28, 1973. Angel accepted the donation.

1. **Spl. Proc. No. 444**:

- On March 25, 1977, Angel filed a petition for the issuance of a new owner's duplicate of OCT No. S-14. The trial court granted this petition on June 27, 1977.

2. **Civil Case No. 1185**:

- On December 12, 1977, Cornelio filed for the annulment of the deed of donation, alleging a typographical error that purportedly caused the deed to reflect a donation of Lot J of Psd-146880 instead of Lot 2-J of Psd-146879. The trial court, on January 31, 1986, dismissed the case for lack of cause of action.

3. **Spl. Civil Action No. 1950**:

- Angel filed for the issuance of a certificate of title over Lot J of Psd-146880. After hearings, the RTC ordered the Registrar of Deeds of Puerto Princesa to issue the title in Angel's name on February 27, 1987. The decision became final and executory.

Angel later subdivided Lot J into four smaller lots and donated these to his sons: Peter Albert, Omar Angelo, Leo Antonio, and Oscar Joseph.

4. **Civil Case No. 2735**:

- The heirs of Cornelio filed a complaint to nullify Angel's TCT No. 11349 and the derivative titles issued in the names of his sons, alleging an error in the deed of donation that Angel held the property in trust for them. They argued that the true intention was to donate Lot 2-J, not Lot J. On March 21, 1995, the RTC dismissed the complaint, holding it was barred by prior judgments in Spl. Proc. No. 444, Civil Case No. 1185, and Spl. Civil Action No. 1950.

Issues:

1. **Whether the complaint in Civil Case No. 2735 is barred by res judicata due to the prior**

judgments in Civil Case No. 1185, Spl. Proc. No. 444, and Spl. Civil Action No. 1950.**

2. **Whether the deed of donation contained an incurable typographical error, invalidating the donation.**
3. **Whether an implied trust was created, necessitating the reconveyance of Lot J to the petitioners.**

Court's Decision:

1. **Res Judicata:** The Court ruled that res judicata, in the concept of conclusiveness of judgment, precludes the complaint in Civil Case No. 2735. The issues pertaining to the ownership and identity of Lot J of Psd-146880 had been decisively settled in the previous cases. Therefore, the petitioner's arguments are barred from re-litigation.
2. **Typographical Error:** The identities of the properties as described in the deed of donation were already ruled upon. The technical description provided in the donation correlated with Lot J of Psd-146880; hence, the Court upheld that there was no erroneous donation.
3. **Implied Trust:** Given the conclusiveness of the prior judgments, the Court refused to recognize any implied trust. Thus, there was no basis for petitioners' claim to recover and reconvey Lot J of Psd-146880.

Doctrine:

- **Res Judicata:** This case reiterates the doctrine of res judicata, emphasizing the concept of conclusiveness of judgment that prevents re-litigation of issues already settled in previous final judgments involving the same parties or their successors-in-interest.

Class Notes:

- **Elements of Res Judicata:**
 1. Final judgment.
 2. Jurisdiction over subject matter and parties.
 3. Judgment on the merits.
 4. Identity of parties, subject matter, and causes of action.
- **Articles in the Civil Code:**
 - **Article 1366:** Reformation of instruments excludes simple donations inter vivos where no condition is imposed.

- **Article 1442**: Trust created by operation of law does not apply where prior adjudication precludes a claim.

Historical Background:

The case reflects a common issue in civil law: land and familial disputes. It underscores the importance of accurately drafting and interpreting legal documents, the significant role of the judiciary in resolving ownership claims, and the import of judicial finality to prevent protracted litigation. The period highlights the ripples land ownership issues create within families, especially amid procedural technicalities and historical titling practices in the Philippines.