

Title

Aguilar vs. Siasat, G.R. No. 206021 (2015)

Facts

Spouses Alfredo Aguilar and Candelaria Siasat-Aguilar died intestate on August 26, 1983, and February 8, 1994, respectively, without any known debts but leaving two parcels of land identified by Transfer Certificates of Title Nos. T-25896 and T-(15462) 1070 in the Registries of Deeds of Bago and Bacolod. Petitioner Rodolfo S. Aguilar filed with the RTC of Bacolod City a civil case seeking mandatory injunction with damages against Edna G. Siasat, asserting that he was the sole surviving heir of the Aguilar spouses. Aguilar claimed that the titles were missing and suspected theft by someone from the Siasat clan. After executing affidavits of loss and filing for re-issuance of the titles, Siasat produced the original owner copies during a judiciary hearing.

In her defense, Siasat contended that Aguilar was not a legitimate heir but a stranger who had been raised by the Aguilar spouses. She asserted that Candelaria, her aunt, inherited everything from Alfredo and, upon Candelaria's death, her estate passed to her siblings, including Siasat. Siasat argued that the titles were entrusted to her for safekeeping. The RTC and subsequently the CA ruled against Aguilar, finding no solid evidence of his legitimate filiation to the Aguilar spouses. Aguilar's appeals contested this on the grounds of existing documentary evidence, particularly Alfredo Aguilar's SSS Form E-1.

Procedural Posture

1. **RTC Ruling (August 17, 1999)**: Dismissed Aguilar's complaint citing a lack of solid evidence attesting to his filiation either by birth or legal adoption.
2. **CA Ruling (August 30, 2006)**: Affirmed the RTC's decision emphasizing the inadequacy of Aguilar's exhibits and dismissing his counterclaims.
3. **Petition for Review on Certiorari**: Aguilar sought SC intervention citing the CA's misappreciation of his evidence, particularly the SSS Form E-1.

Issues

1. **Whether Alfredo Aguilar's SSS Form E-1 is sufficient to establish petitioner Aguilar's filiation under Article 172 of the Family Code**.
2. **Whether respondent Siasat has the standing to impugn petitioner's legitimacy**.
3. **Whether the petitioner is entitled to the owner's duplicate titles of the subject properties**.
4. **Whether damages should be awarded to the petitioner**.

Court's Decision

1. **SSS Form E-1 as Proof of Filiation**: The SC held that Alfredo Aguilar's SSS Form E-1 is a public document where Alfredo unequivocally recognized Aguilar as his son. This document complies with the requirements under Article 172 of the Family Code for establishing legitimate filiation as it is an express recognition in a public document.
2. **Validity of Impugning Legitimacy**: The SC clarified that Siasat's assertion was not merely impugning Aguilar's legitimacy but denying his filiation entirely. However, considering the evidence, Aguilar's filiation was sufficiently established.
3. **Rights to the Property Titles**: Given the established legitimate filiation, Aguilar was the rightful heir and entitled to the titles of the properties initially in his parents' name.
4. **Denial of Damages**: The SC concurred with lower courts' findings in denying damages, as Aguilar failed to prove any emotional or psychological suffering.

Doctrine

- **Article 172, Family Code**: Legitimate filiation may be proved by an admission of a public document or a private handwritten instrument signed by the parent. An SSS Form E-1 is such a public document.
- **Primary Consideration for Child's Welfare**: Consistent with the policy to liberally establish paternity and filiation, the welfare of the child is a paramount consideration.

Class Notes

- **Public Documents and Filiation**: An SSS Form E-1 counts as a public document under Article 172 of the Family Code and adequately proves filiation.
- **Impugning Legitimacy**: Only certain authorized persons can contest legitimacy under strict conditions per Articles 170 and 171 of the Family Code.
- **Children's Rights**: The welfare and rights of the child take precedence, following national and international standards.

Relevant Statutes:

- **Article 172, Family Code**: The rule for proving legitimate children through public documents or private handwritten instruments signed by the parent.
- **Articles 170 and 171, Family Code**: Time constraints and persons authorized for impugning legitimacy.

Historical Background

This case illustrates the principles governing inheritance, filiation, and legitimacy in Philippine jurisprudence. During the period in question, familial ties and claims to inheritance often relied on a mix of formal documentation and witness testimonies owing to incomplete civil records. Therefore, the Family Code provisions on evidential presumptions significantly addressed such gaps, demonstrating an evolution towards a more child-centric approach in legal determinations of familial relationships.