

****Title:****

Arturio Trinidad vs. Court of Appeals, Felix Trinidad (deceased) and Lourdes Trinidad

****Facts:****

Arturio Trinidad filed a complaint for partition and damages on August 10, 1978, against Felix and Lourdes Trinidad in the Court of First Instance (CFI) of Aklan, alleging he was the legitimate son of the late Inocentes Trinidad, one of the three children of Patricio Trinidad, who had inherited four parcels of land. Felix died on October 28, 1982, without issue, and was not substituted. The trial court ruled in favor of Arturio on July 4, 1989, acknowledging him as the legitimate son and thus entitled to a portion of the property.

The case was appealed to the Court of Appeals (CA) by Lourdes Trinidad. The CA reversed the trial court's decision on December 1, 1994, citing insufficient evidence of Arturio's parents' marriage and noting that acquisitive prescription had set in. Arturio's motion for reconsideration was denied by the CA on February 8, 1995. Arturio then sought review by the Supreme Court (SC).

****Issues:****

1. Whether Arturio Trinidad presented sufficient evidence of his parents' marriage and his filiation to Inocentes Trinidad.
2. Whether Arturio's status as a legitimate child can be subject to collateral attack in an action for partition.
3. Whether Arturio's claim to the property was barred by acquisitive prescription.

****Court's Decision:****

1. ****Evidence of Marriage and Filiation:****

- The SC found that Arturio successfully proved the marriage between Inocentes Trinidad and Felicidad Molato through relevant testimonies and documentary evidence, including a baptismal certificate. Witnesses testified to the marriage and the couple's behavior as husband and wife.
- For filiation, there were testimonies, baptismal records, and photographs indicating Arturio's legitimacy, which outweighed the denial by the private respondents.

2. ****Collateral Attack on Legitimacy:****

- The SC acknowledged that filiation cannot be collaterally attacked. However, since Arturio provided adequate evidence of his filiation without needing to rely on this doctrine, the need to rule on this collateral attack was rendered unnecessary.

3. **Acquisitive Prescription:**

- The SC disagreed with the CA on acquisitive prescription. Since possession by a co-owner does not prescribe ownership in the absence of clear repudiation, Arturo's claim was not time-barred as there was no evidence of any express repudiation of co-ownership.

The SC reinstated the trial court's decision, affirming Arturo's legitimate status and his right to a share of the property.

Doctrine:

1. **Proof of Marriage and Filiation:** Marriage and filiation can be proven through relevant evidence such as witness testimony, baptismal certificates, photographs, and common reputation, among others.
2. **Non-prescription of Partition Actions:** An action to demand partition is imprescriptible unless there is a clear repudiation of the co-ownership which must be communicated to the co-owner.
3. **Collateral Attack on Legitimacy:** Filiation cannot be subject to a collateral attack.

Class Notes:

- **Elements of Proof of Filiation and Marriage:**
- **Marriage:** Witnesses, photographs, public cohabitation, relevant certificates, and acknowledgment in documents.
- **Filiation:** Birth record, continuous possession of status, baptismal certificate, photographs, and witness testimonies.
- **Statutory Provisions:**
- Article 265 of the Civil Code: Record of birth as proof of filiation.
- Articles 170 and 171 of the Family Code: Proof of filiation by other means.
- Article 1134 of the Civil Code: Acquisitive prescription requires open and adverse possession.
- **Concepts:**
- **Imprescriptibility of Partition:** Co-ownership does not prescribe without clear repudiation.
- **Collateral Attack on Legitimacy:** Not permitted; legitimacy must be directly challenged in proper proceedings.

Historical Background:

The case occurred amidst evolving legal interpretations of family and property law in the Philippines. During the relevant period, documentation was often lost due to wartime

destruction, complicating the proof of familial relationships. The case also highlights the importance of preserving historical records and the impact of such losses on legal claims. The Family Code, effective from August 3, 1988, introduced more explicit guidelines regarding marriage and filiation, reflecting societal shifts towards formalizing and evidentiary standards in family law disputes.