

Title: Laurente Baldovino vs. Pedro Amenos et al.

Facts:

In 1881, Agustin Lukban de San Miguel passed away, leaving several heirs, including his son, Vicente Lukban. A tract of land known as the estate of Pangpang, located in Ambos Camarines, is part of the estate. In 1894, Vicente Lukban initiated proceedings for a possessory information before a justice of the peace, declaring ownership of the estate of Pangpang and 34 other parcels by inheritance from his father. The possessory information was approved on August 21, 1894, and recorded on September 7, 1894.

By 1885, Vicente Lukban possessed the estate of Pangpang, which was attached in proceedings against him and others. A final judgment led to its sale on April 22, 1896, to Ildefonso Moreno for the appraised amount. The Court of First Instance executed a deed on December 24, 1896, in Moreno's favor, recorded on January 2, 1897. Moreno sold the property to Pedro Amenos on January 4, 1897, with the deed recorded on January 21, 1897.

Laurente Baldovino, as the administrator of Agustin Lukban's estate, filed an action in the Court of First Instance to recover possession, claiming it belonged to Agustin's heirs. The trial court ruled in favor of Pedro Amenos, prompting Baldovino to appeal to the Supreme Court.

Issues:

1. Was Vicente Lukban the legitimate owner of the estate of Pangpang at the time of the sale to Ildefonso Moreno?
2. Does the principle established in *Trinidad vs. Ricafort* regarding possessory information apply?
3. Did Pedro Amenos violate Article 1459 of the Civil Code by purchasing property that was under his administration?
4. Can Laurente Baldovino, as estate administrator, challenge the sale under these circumstances?

Court's Decision:

1. The Court found that Vicente Lukban was possessed prima facie ownership of Pangpang at the time of the sale, as demonstrated by his recorded possessory information and continual possession since 1881. The court held that the prima facie evidence of ownership was not sufficiently rebutted by the plaintiff's testimony.
2. The Court acknowledged the rule in *Trinidad vs. Ricafort* but noted that even if the

possessory information did not provide benefits under Article 34 of the Mortgage Law, it wouldn't alter the outcome. Vicente Lukban's possession was sufficient at the time of the judicial sale to support Amenos's title through Moreno.

3. The Court ruled that Pedro Amenos did not directly purchase from Vicente Lukban but from Ildefonso Moreno. With no evidence of a prior agreement between Moreno and Amenos to circumvent Article 1459, the sale remained valid.

4. The Court did not see sufficient grounds for Baldovino to contest the validity of the sale since his claim against Amenos didn't arise from holding rights to the estate through Lukban.

Doctrine:

The case reinforced that a person in possession of property through recorded possessory information holds sufficient prima facie ownership unless effectively contested by credible evidence. Additionally, for Article 1459's restrictions on agent purchase to apply, a clear intermediary scheme must be demonstrated.

Class Notes:

- Possessory information: Recording pursuant to inheritance may establish prima facie ownership (compare to the Trinidad Doctrine).
- Article 1459, Civil Code: Prohibits certain parties from purchasing property they manage, requiring proof of circumvention via intermediaries.
- Prima facie evidence: Party asserting ownership must rebut it with compelling evidence. Absentee witnesses weaken claims.
- Judicial sale: Execution via court order solidifies the buyer's claim absent fraud or illegality.

Historical Background:

The case unfolded during a period of transition from Spanish colonial to American civil legacies in Philippine legal proceedings. It illustrates the interplay between civil code provisions inherited from Spanish rule and their application in matters of property title—essentially a reflection of evolving legal systems in post-colonial jurisdictions.