

Title:

Alonzo Q. Ancheta vs. Candelaria Guersey-Dalaygon

Facts:

1. **Background:**

- Spouses Audrey O'Neill and W. Richard Guersey, both American citizens, resided in the Philippines for 30 years and had an adopted daughter, Kyle Guersey Hill.
- Audrey died on July 29, 1979, leaving a will that bequeathed her entire estate to Richard and named him executor. The will was probated in Baltimore, Maryland, and Atty. Alonzo Q. Ancheta was designated as ancillary administrator in the Philippines.

2. **Subsequent Marriages:**

- In 1981, Richard married Candelaria Guersey-Dalaygon and had two children, Kimberly and Kevin.

3. **Proceedings in the Philippines:**

- Audrey's will was probated in the Philippines (Court of First Instance of Rizal, Special Proceeding No. 9625), and an inventory listed her assets.
- Richard died on July 20, 1984, leaving a will that bequeathed his entire estate to Candelaria, except for his interests in A/G Interiors, which he left to Kyle. This will was also probated in Maryland.

4. **Local Probate Actions:**

- Richard's will was filed for probate in the Philippines (RTC Makati, Special Proceeding No. M-888, with Atty. William Quasha appointed as ancillary administrator).
- Motions were filed to declare Richard and Kyle as heirs of Audrey, leading to a project of partition, apportioning $\frac{3}{4}$ of the Makati property to Richard and $\frac{1}{4}$ to Kyle.
- Orders executing this distribution were issued and titles were appropriately transferred.

5. **Contestation by Candelaria:**

- Candelaria contested the partition on the grounds that under Maryland law, Richard should have inherited the entire interest in the Makati property, as per Audrey's will, and thus it should now belong to her entirely based on Richard's will.
- This led to the filing of multiple motions and proceedings, culminating in a case at the Court of Appeals, which annulled the earlier orders favoring Candelaria's claims.

Issues:

1. **Jurisdiction and Finality of Court Orders:**

- Whether the RTC orders dated February 12, 1988, and April 7, 1988, could be annulled despite being final and executory.

2. **Application of Foreign Law:**

- Whether the ancillary administrator was required to prove and apply the laws of Maryland concerning testamentary succession for Audrey's estate.

3. **Good Faith and Extrinsic Fraud:**

- Whether the alleged failure by the ancillary administrator to introduce Maryland law constituted extrinsic fraud, thus invalidating the partition orders.

Court's Decision:

1. **Jurisdiction and Finality:**

- The Supreme Court affirmed the CA's decision to annul the lower court orders under the doctrine that final decrees can be set aside in cases of extrinsic fraud.

2. **Application of Foreign Law:**

- The Court ruled that petitioner, as ancillary administrator, had a duty to introduce in evidence the pertinent laws of Maryland and that the failure to do so led to a misapplication of Philippine law over the succession, contrary to Article 16 and 1039 of the Civil Code.

3. **Good Faith and Extrinsic Fraud:**

- The Court held that petitioner's failure to apply or even introduce Maryland law, despite his resources and capability, amounted to extrinsic fraud. This failure misled the court into an erroneous partition which deprived Candelaria of her proper inheritance under the Maryland law.

Doctrine:

1. **Finality and Annulment of Probate Orders:**

- Final probate orders can be annulled on the ground of extrinsic fraud, which includes acts preventing a party from having a fair submission of their case.

2. **Primacy of National Law in Succession:**

- The intrinsic validity of a will and the rights of heirs are governed by the national law of the decedent, as per Articles 16 and 1039 of the Civil Code.

3. **Duty of Proving Foreign Law:**

- Foreign law must be proved in Philippine courts unless it can be judicially noticed, emphasizing the administrator's duty to act with high diligence and fidelity.

Class Notes:

- **Key Elements & Concepts:**
- **Final and Executory Judgment:** Once a probate order becomes final, it ordinarily cannot be annulled.
- **Extrinsic Fraud:** Acts occurring outside the trial that prevent a fair hearing (e.g., failure to present crucial foreign law).
- **National Law of Decedent (Art. 16 & 1039, Civil Code):** Testamentary succession should follow the decedent's national law, not the law of the forum.
- **Obligation to Prove Foreign Law (Sec. 4, Rule 77, Rules of Court):** Critical that foreign law is established when pertinent to a case.

Historical Background:

- The case reflects the complexities when foreign nationals domiciled in the Philippines leave behind estates subject to competing legal doctrines from different jurisdictions. It underscores how global mobility and cross-jurisdictional legal principles intersect within Philippine probate law, illustrating the duty to faithfully administer estates in line with an individual's final wishes and under applicable foreign laws.