

Title: Spouses Butiong and Villafria vs. Riñoza Plazo and Alaras

Facts:

1. **Pedro L. Riñoza's Death and Heirs**: Pedro L. Riñoza died intestate on November 16, 1989, leaving several heirs, including his children Ma. Gracia R. Plazo and Ma. Fe Alaras, and several properties in Nasugbu, Batangas.
2. **Discovery of Property Sale**: In March 1991, respondents discovered that their co-heirs, including Pedro's second wife Benita Tenorio, had sold the resort and family home to spouses Francisco Villafria and Maria Butiong (petitioners).
3. **Document Examination**: Benita showed a document believed to evidence receipt of her share from the sale, which was actually related to a previous loan. The Register of Deeds had no record of the transactions, and the titles were still under Pedro and Benita's names.
4. **Property Condition**: Respondents noted that cottages on the property were demolished without their prior knowledge.
5. **Extra-Judicial Settlement Notice**: On July 18, 1991, a notice of the extra-judicial settlement of Pedro's estate was published. Respondents then annotated adverse claims over the properties.
6. **Complaint Filed**: Respondents filed a complaint for Judicial Partition, Annulment of Title, and Recovery of Possession, alleging clandestine sale by co-heirs.
7. **Petitioners' Defense**: Petitioners claimed good faith, stating they only bought the resort and presented an undated Extra-Judicial Settlement and Deed of Sale.
8. **RTC's Ruling**: The RTC voided the documents due to irregularities, such as unauthorized notarization and incomplete signing, ordering the return of possession to respondents and the issuance of titles to rightful heirs.
9. **Appeal and CA's Decision**: The CA affirmed the RTC decision. Petitioners argued that the trial court overstepped its jurisdiction by not separately handling the intestate settlement and partition. The CA dismissed the appeal, emphasizing the petitioners' ample opportunity to present their case.

Issues:

1. **Jurisdiction**: Whether the RTC had jurisdiction to entertain an action for judicial partition and annulment of title in a single proceeding.
2. **Authenticity of Documents**: Whether the Extra-Judicial Settlement and Deed of Sale were valid and binding.
3. **Good Faith of Petitioners**: Whether the petitioners were innocent purchasers for value and builders in good faith.

4. **Finality of Judgment**: Whether the CA and SC correctly dismissed petitioners' subsequent motions and letters after the trial court's decision attained finality.

Court's Decision:

1. **Jurisdiction**:

* **Resolution**: The Supreme Court ruled that the action was primarily one for judicial partition, which is properly within the RTC's jurisdiction. The court emphasized Section 1, Rule 74 of the Rules of Court, allowing extrajudicial or judicial partition when the deceased left no debts.

* **Reasoning**: The allegations in the complaint were customary and mandatory for a partition of real estate, not requiring separate judicial administration as no debts were present.

2. **Authenticity of Documents**:

* **Resolution**: Both the RTC and CA found the documents (Extra-Judicial Settlement and Deed of Sale) invalid due to several irregularities, such as unauthorized notarization and missing signatures.

* **Reasoning**: The executed documents did not meet the required proof of authenticity under Section 20, Rule 132 of the Rules on Evidence.

3. **Good Faith of Petitioners**:

* **Resolution**: Petitioners were not considered innocent purchasers for value or builders in good faith.

* **Reasoning**: The glaring defects in the instruments should have alerted the petitioners. Further, acts like demolishing cottages indicate bad faith.

4. **Finality of Judgment**:

* **Resolution**: The additional motions and letters filed by the petitioners post-final judgment were correctly dismissed by the CA and SC based on procedural grounds.

* **Reasoning**: Final judgments are immutable except for correcting clerical errors. Petitioners had ample opportunity to present their case; thus, no exceptional circumstance warranted altering the final judgment.

Doctrine:

The doctrines reiterated:

- **Jurisdiction on Partition**: RTCs have jurisdiction over judicial partitions even if issues like the annulment of titles are intertwined.

- **Finality of Judgments**: Once a judgment attains finality, it becomes immutable and unalterable unless only to correct clerical errors.
- **Proof of Authenticity**: Private documents must meet evidence requirements under Section 20, Rule 132 of the Rules on Evidence.

Class Notes:

- **Partition of Real Estate**: Section 1, Rule 69 of the Rules of Court details partition proceedings.
- **Proof Requirements for Private Documents**: Section 20, Rule 132 stipulates proof of execution and authenticity.
- **Intestate Estate Procedures**: Section 1, Rule 74 allows extrajudicial settlements if no debts and proper representation are present.
- **Jurisdictional Principles**: Understanding limitations and extents of trial courts concerning special and ordinary proceedings.

Historical Background:

- **Context**: The case revolves around the proper legal procedures in partition and administration of properties left intestate, underlining the importance of legitimate documentation and jurisdictional limits.