

Republic of the Philippines

_____ Judicial Region

_____ TRIAL COURT

Branch _____, _____, _____

_____, Spec. Proc. No. _____

Petitioner

X - - - - - **X**

PETITION

COMES NOW, petitioner _____ through counsel, unto this Honorable Court, respectfully alleges:

- 1. That he is the special administrator of the estate of _____, deceased;
- 2. That the deceased, during his lifetime, executed a certain deed of sale of a piece of real estate in favor of the respondent, dated _____, and particularly described as follows, to wit: _____ ;
- 3. That the said sale is forged and fictitious, and is therefore in truth and in fact invalid;
- 4. That the existence of the said alleged deed of sale is prejudicial to the title of the lawful heirs of the deceased upon the above-described real property;
- 5. That equity demands that the said deed of sale be surrendered and cancelled, as it is a cloud upon the title of the deceased and his lawful heirs.

WHEREFORE, it is respectfully prayed that:

- 1. _____
- 2. _____

Other just and equitable reliefs are likewise prayed for.

Respectfully submitted.

_____ 20__

City of _____ .

Counsel for the Petitioner