

TRIBUNAL DE APELACIONES DE PUERTO RICO

Ann Marie Terón Aguilú, Arnoy Terón Aguilú, Digna De Jesús v. Ardín Terón Santiago, Amir J. Terón Lladó, Mirely Terón Lladó y otros

TA2025AP00584 · No. TA2025AP00584 · Decided January 20, 2026

SUMMARY

The Puerto Rico Court of Appeals reviewed the dismissal with prejudice of Ardín Terón Santiago's counterclaim challenging the validity of two wills. The court held that the validity of the wills had already been conclusively adjudicated and affirmed the trial court's partial judgment dismissing the counterclaim.

CASE DETAILS

COURT	Tribunal de Apelaciones de Puerto Rico
WRITING FOR THE COURT	Bonilla Ortiz; Pagán Ocasio; Sánchez Báez
JURISDICTION	Puerto Rico Court of Appeals
DECIDED	January 20, 2026
DOCKET	TA2025AP00584
DISPOSITION	affirmed
PROCEDURAL POSTURE	Appeal from a partial judgment of the Puerto Rico Court of First Instance dismissing with prejudice Ardín Terón Santiago's counterclaim seeking invalidation of two wills.
STANDARD OF REVIEW	The dismissal of a cause of action under Rule 39.2 is reviewed for abuse of discretion and must be exercised judiciously and appropriately. The court also considered whether, under the facts already adjudicated and applicable law, the counterclaimant had any entitlement to relief.
PRECEDENTIAL VALUE	Published opinion
PARTIES	Ardín Terón Santiago v. Ann Marie Terón Aguilú, Arnoy Terón Aguilú, Digna De Jesús

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PRACTICE AREAS

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QUESTIONS PRESENTED

1. Whether the trial court erred by dismissing with prejudice a counterclaim alleging that the decedents' wills were invalid when the validity of those wills had already been finally adjudicated.
2. Whether the counterclaim remained independently viable merely because it was pleaded separately from the complaint.

HOLDINGS

1. A counterclaim seeking invalidation of wills may be dismissed when the wills' validity has already been finally adjudicated against the counterclaimant, because the counterclaimant no longer has a legal entitlement to the requested relief.
2. A counterclaim's separate pleading does not preserve an independent claim for relief when the substantive issue on which it is based has already been finally resolved.

KEY QUOTATIONS

“En caso de duda, debe requerirse al demandado que presente su caso.” (12)

“La desestimación de un caso como sanción, debe prevalecer únicamente en situaciones extremas” (13)

FACTUAL BACKGROUND

The plaintiffs sought a declaratory judgment validating the open wills of Lorenzo Terón Del Río and Ana Amelia Santiago Avilés. Ardín Terón Santiago challenged the wills as invalid and sought intestate succession through a counterclaim. After the trial court entered partial summary judgment validating the wills, and that ruling became final and was affirmed on review, the trial court dismissed the counterclaim with prejudice because its requested relief depended on invalidating the wills.

PROCEDURAL HISTORY

The appellees filed a declaratory-judgment action seeking validation of the wills of Lorenzo Terón Del Río and Ana Amelia Santiago Avilés. Terón Santiago filed an answer, counterclaim, and crossclaim alleging that the wills were invalid. The trial court granted partial summary judgment validating the wills; that ruling was affirmed by the Puerto Rico Court of Appeals and the Puerto Rico Supreme Court. The trial court later dismissed the counterclaim with prejudice because it was based on the already-adjudicated invalidity theory. The Court of Appeals affirmed that dismissal.

DISPOSITION

affirmed

CASES CITED

- SLG Sierra v. Rodríguez, 163 DPR 738, 745 (2005)
- Díaz v. Tribunal Superior, 93 DPR 79, 83 (1966)
- Acevedo v. Compañía Telefónica de PR, 102 DPR 787, 791 (1974)
- Maldonado v. Srio. de Rec. Naturales, 113 DPR 494, 498 (1982)
- Ramírez de Arellano v. Srio. de Hacienda, 85 DPR 823, 829-830 (1962)
- Rivera Figueroa v. The Fuller Brush Co., 180 DPR 894, 916 (2011)
- Lebrón v. Díaz, 166 DPR 89, 94-95 (2005)
- Pueblo v. Rivera Toro, 173 DPR 137, 146 (2008)
- SLG Font Bardón v. Mini-Warehouse Corp., 179 DPR 322, 332 (2010)
- Neca Mortgage Corp. v. A & W Dev. S.E., 137 DPR 860, 867 (1995)
- Consejo de Titulares v. Gómez Estremera, 184 DPR 407, 424-425 (2012)

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