

Title: Gil Miguel Wenceslao T. Puyat v. Ma. Teresa Jacqueline R. Puyat

Facts:

On February 24, 1978, Gil Miguel Wenceslao T. Puyat, the petitioner, and Ma. Teresa Jacqueline R. Puyat, the respondent, eloped. Due to societal pressures, they later married at the Archbishop's Chapel, Villa San Miguel, Mandaluyong on April 8, 1978. At the time of their marriage, Gil Miguel was 16 years old and had not finished high school, while Ma. Teresa was 17. They had two children, Gil Carlos and Juan Miguel.

The couple separated on February 1, 1982, due to alleged immaturity, petty quarrels, and misunderstandings. Gil Miguel obtained a divorce decree from the Superior Court of California on September 18, 1985, and subsequently married Mercedes M. Lacson. The divorce decree included a marital settlement agreement detailing custody, visitation rights, and support for the children.

On February 22, 1994, Gil Miguel filed a petition for the declaration of nullity of marriage in the Regional Trial Court (RTC) of Makati, alleging his psychological incapacity apparent after their marriage. Ma. Teresa contested the petition, claiming that Gil Miguel's womanizing and abusive behavior during their marriage debunks his psychological incapacity claim. The RTC declared the marriage null and void based on the psychological incapacity of both parties. Ma. Teresa appealed the decision.

Issues:

1. Whether there was collusion between Gil Miguel and Ma. Teresa in the declaration of nullity of marriage;
2. Whether Gil Miguel's psychological incapacity warrants the declaration of nullity of marriage under Article 36 of the Family Code.

Court's Decision:

The Supreme Court granted the petition, reversing the CA's decision and declaring the marriage between Gil Miguel and Ma. Teresa null and void, ab initio.

1. On the charge of collusion, the Supreme Court emphasized the necessity of evidence for such a claim. The CA inferred collusion in the absence of a challenge and non-participation of Ma. Teresa. However, the Court found no evidence of collusion and credited the report by Assistant Prosecutor Andres N. Marcos, which found no collusion.
2. Regarding psychological incapacity, the expert testimonies of Dr. Natividad A. Dayan and

Dr. Cecilia C. Villegas diagnosed Gil Miguel with Narcissistic Personality Disorder and Partner Relational Problem, rendering him psychologically incapacitated to perform his marital obligations. Although the incapacity of Ma. Teresa was not sufficiently established, the Court held that Gil Miguel's incapacity alone was sufficient to declare the nullity of their marriage.

Doctrine:

The Supreme Court reiterated the doctrine regarding psychological incapacity as a ground for the nullity of marriage under Article 36 of the Family Code. A marriage can be annulled if one party, at the time of celebration, is psychologically incapacitated to comply with the essential marital obligations, even if such incapacity becomes manifest only after the solemnization. For such a declaration, the incapacity must be characterized by gravity, antecedence, and incurability, in the legal sense. The Court also acknowledged that expert testimony is not the sole determinant and that clear acts of dysfunctionality, observable even by lay witnesses, may signal psychological incapacity.

Historical Background:

The case of *Gil Miguel Wenceslao T. Puyat v. Ma. Teresa Jacqueline R. Puyat* is set against the backdrop of evolving jurisprudence on psychological incapacity as a ground for the nullity of marriage in the Philippines. Legal interpretations surrounding the elements of antecedence, gravity, and incurability have been the focal point of numerous Supreme Court decisions since the enactment of the Family Code in 1987. As societal views on mental health and marital obligations have shifted, the Court's approach to psychological incapacity reflects a more nuanced understanding of the mental and emotional dynamics that affect marital relationships. The Puyat case demonstrates the Court's application of established principles to specific factual situations, particularly the assessment of psychological incapacity based on behavioral manifestations, and the role of expert opinion vis-à-vis observable evidence. The decision also aligns with the Filipino family's legal protection and the state's mandate to strengthen the institution of marriage.