

Title:

Republic of the Philippines v. Melvin T. Villacorta

Facts:

Melvin T. Villacorta and Janufi Sol P. Villacorta met in 1996 at Southwestern University in Cebu City and became sweethearts until their breakup in 2000. Melvin later heard rumors of Janufi dating someone else, but when they reconciled in March 2001, she denied any such involvement. In April 2001, Janufi revealed her one-month pregnancy to Melvin, who initially doubted paternity but was assured by Janufi of his fatherhood. The couple later married on August 14, 2004, following the birth of their first child, Mejan Dia, on December 1, 2001, and their second child, Javen Mel, on October 18, 2004.

During their marriage, disputes over Mejan Dia's paternity led Melvin to conduct a DNA test in 2010, the results of which showed a 0.0% chance of Melvin being the biological father. Janufi's text messages to Melvin in January and March 2011 conveyed no intention to deceive but acknowledged a one-time indiscretion that led to the pregnancy. On March 15, 2011, Melvin filed a petition for annulment on the grounds of fraud.

The Regional Trial Court of Cebu City annulled the marriage, citing Janufi's fraudulent concealment of pre-marital infidelity and pregnancy with another man. The Republic, via the Office of the Solicitor General (OSG), appealed, but the Court of Appeals dismissed the appeal for failure to file the appellate brief within the designated period.

Issues:

1. Whether the Court of Appeals was correct in dismissing the OSG's appeal due to the late filing of the appellate brief.
2. Whether the Regional Trial Court erred in annulling Melvin and Janufi's marriage on the ground of fraud under Article 45(3) in relation to Article 46(2) of the Family Code.

Court's Decision:

The Supreme Court ruled in favor of the petitioner, the Republic of the Philippines, reversing the decision of the Court of Appeals. The High Court found that the OSG had filed its motion for extension of time to file an appellate brief in a timely manner, and the actual appellate brief was filed within the extended period requested.

The Supreme Court held that the annulment granted by the Regional Trial Court was not consistent with the provisions of the Family Code since the concealment of a pregnancy by another man must exist at the time of the marriage to constitute fraud under Article 45(3)

and Article 46(2). In this case, Janufi was not pregnant at the time of the marriage, and her infidelity prior to marriage does not constitute a valid ground for annulment. The High Court emphasized that fraud as a ground for annulment is narrowly construed and exclusive to the situations enumerated in the Code.

Doctrine:

To annul a marriage on the grounds of fraud under Article 45(3) in relation to Article 46(2) of the Family Code, the fraudulent concealment must pertain to a pregnancy by a man other than the husband, existing at the time of the marriage. Non-disclosure of premarital relations that do not result in a pregnancy at the time of marriage does not constitute fraud warranting an annulment. Technical rules of procedure should not be rigidly applied so as to defeat the ends of justice.

Historical Background:

The Family Code of the Philippines, enacted in 1987, revised and expanded upon the 1950 Civil Code's provisions on marriage, family relations, and ground for annulment. Specifically, Article 45 establishes the grounds for annulment, with the Supreme Court's decision in this case providing insight into the application and interpretation of fraud as grounds, as set out under Article 45 and further specified under Article 46. The Supreme Court's ruling in this case underscores the legal and jurisprudential principle that marriage, considered an inviolable social institution and foundation of the family, can only be dissolved on limited, specified grounds, reflecting the State's interest in the permanence and sanctity of the marriage covenant.