

Title: Republic of the Philippines v. John Arnel H. Amata

Facts: The case arose from a petition for the declaration of nullity of marriage filed by John Arnel H. Amata (“respondent”) against Haydee N. Amata (“Haydee”). The couple met at Pamantasan ng Lungsod ng Maynila and became sweethearts, married, and had three children. Their initially blissful marriage eventually soured due to respondent’s complaints about Haydee’s domineering nature and unsatisfactory sexual relationship, leading to respondent’s infidelity, the couple’s periodic separations, and verbal conflicts. Seeking a therapeutic consultation, respondent visited Dr. Elena A. Del Rosario, a clinical psychologist, who diagnosed him with Passive-Aggressive Personality Disorder, asserting it was serious, permanent, incurable, existed before the marriage, and impaired his ability to fulfill marital obligations. Based on these findings, respondent filed the petition for nullity on October 13, 2008.

The Regional Trial Court (RTC) of Imus, Cavite, after reviewing the evidence and testimonies, declared the marriage void ab initio. The trial’s decision was appealed by Haydee and the Office of the Solicitor General (OSG) to the Court of Appeals (CA), which affirmed the RTC’s decision. The OSG then elevated the case to the Supreme Court, arguing the evidence was insufficient to prove psychological incapacity.

Issues: The main legal issue was whether there was sufficient basis to nullify the marriage on the grounds of psychological incapacity under Article 36 of the Family Code. Ancillary issues included the proper interpretation of “psychological incapacity” and whether the 15-day period to file an appeal via a petition for review on certiorari could be extended.

Court’s Decision: The Supreme Court granted the OSG’s petition, reversed the CA’s decision, and dismissed the petition for nullity of marriage for lack of merit. In the analysis, the Court found that the evidence presented did not meet the stringent requirements of psychological incapacity under Article 36 of the Family Code: gravity, juridical antecedence, and incurability. The Court upheld that the totality of evidence did not show that respondent had a mental incapacity that was so severe as to prevent him from assuming the ordinary duties of a marital life. Additionally, the Court held that an extension to file a petition for review on certiorari is permissible, dismissing the respondent’s claim that the OSG’s appeal was filed out of time.

Doctrine: The Supreme Court reiterated the established doctrine for psychological incapacity under Article 36 of the Family Code, requiring that it must be characterized by

gravity, judicial antecedence, and incurability. Psychological incapacity should be a mental incapacity rooted in the party's personality that effectively prevents them from assuming the essential duties and obligations of marriage.

Historical Background: In the historical context, the case reflects the Supreme Court's adherence to the high bar set for the declaration of nullity of marriages based on psychological incapacity. This standard aims to uphold the constitutional policy of protecting and strengthening marriage as an inviolable social institution. The decision emphasizes the reluctance of the judiciary to dissolve marriages except in clear and undeniable cases of incapacity. The Court's decision showcases a balance between individual grievances within a marriage and the State's interest in preserving the sanctity of the family unit.