

Title: Lovelle S. Cariaga vs. The Republic of the Philippines and Henry G. Cariaga (G.R. No. XXXXXX)

Facts:

Lovelle S. Cariaga (Lovelle) and Henry G. Cariaga (Henry) met as college students and were engaged in a relationship that led to a pregnancy. After Lovelle turned 18, they were civilly married on November 10, 2000. Their marriage produced three children. In 2013, due to differences and misunderstandings, the couple decided to live apart. Upon discovering Henry's new relationship with another woman, Lovelle sought legal advice to annul their marriage. She was informed that the marriage license number on their marriage certificate was issued to another couple. Consequently, Lovelle obtained a certification to that effect from the City Civil Registry of Quezon City (QCCR) dated July 16, 2015. Based on this, Lovelle filed a Nullity Petition before the Regional Trial Court (RTC) of Masbate City, Branch 48. Henry failed to respond to the petition and did not participate in the proceedings. Despite this, both the RTC and Court of Appeals (CA) dismissed the Nullity Petition on grounds of insufficiency of evidence, prompting Lovelle to file a Petition for Review on Certiorari under Rule 45 of the 1997 Rules of Court.

Issues:

The pivotal legal issue to be resolved by the Supreme Court was whether the CA erred in affirming the RTC's dismissal of the Nullity Petition for declaration of nullity of marriage due to the alleged absence of a valid marriage license, and thus, the insufficiency of the evidence presented.

Court's Decision:

The Supreme Court granted Lovelle's petition, reversing the RTC and CA decisions. The Court held that the 2015 QCCR Certification, combined with Lovelle's testimony and other evidence, established that no valid marriage license was issued for their marriage. The Court emphasized the procedural aspects of marriage license applications and certifications, and clarified the misapplication of the language required in such certifications - stating that a holistic approach should be taken in valuing certifications concerning the absence of marriage licenses. In this case, the certification and corroborating circumstances sufficiently disproved the presumption of a proper marriage license.

Doctrine:

The absence of a valid marriage license results in a marriage being void ab initio, subject to

exceptions enumerated in Chapter 2, Title I of the Family Code. The Court's holistic approach in valuing certifications from the local civil registrar regarding the absence of marriage licenses, considering applicable law and regulations, attendant facts, and other evidence on record, is integral in determining the existence of a marriage license.

Historical Background:

The case presents an example of a legal situation where a marriage could be rendered void due to the lack of a fundamental requirement: the marriage license. The historical context of the case reflects the complexities of family law in the Philippines, especially regarding the mechanisms available to individuals seeking remedies for marriages that might not have complied with the essential formalities required by law, particularly the existence of a marriage license at the time of marriage solemnization. The decision underscores the importance of maintaining accurate civil registry records and adheres to the Family Code's strict provisions on marriage formalities to ensure the validity of marital unions.