

Title: Sue Ann Bounsit-Torralba v. Joseph B. Torralba

Facts:

Sue Ann Bounsit-Torralba and Joseph B. Torralba met in college and over time, Joseph pursued Sue Ann, leading to a relationship and marriage on January 26, 1996, without a marriage license. During their relationship, Joseph engaged in harmful behaviors such as substance abuse, gambling, and infidelity; this pattern continued after their marriage. Despite Sue Ann's efforts to support the family, Joseph's actions persisted, culminating in his involvement in drug trafficking. After their child was born, Sue Ann moved to Dubai for work, and Joseph eventually left home and made no further contact.

In 2007, Sue Ann filed a petition for the declaration of nullity of marriage on the grounds of Joseph's psychological incapacity and the absence of a marriage license. The RTC granted the petition, but the decision was reversed by the CA, which questioned the psychological incapacity claim but overlooked the issue of the absent marriage license. Sue Ann filed a motion for reconsideration, focusing on the latter issue, but the CA denied the motion without providing reasons.

Issues:

1. Whether there was clear and convincing evidence of Joseph's psychological incapacity to fulfill marital obligations as grounds for nullifying the marriage.
2. Whether the CA erred in refusing to decide on the validity of the marriage due to the absence of a valid marriage license, despite clear evidence that the marriage was solemnized without one.

Court's Decision:

The Supreme Court granted the petition, reinstating the RTC's decision declaring the marriage null and void. The court found that while Sue Ann's evidence showed negative behaviors from Joseph, it did not sufficiently relate to or prove psychological incapacity as required for nullification. The CA's decision was reversed not because of psychological incapacity but due to the absence of a valid marriage license, which rendered the marriage void from the beginning.

Doctrine:

The Supreme Court reiterated and modified the doctrine regarding psychological incapacity, emphasizing that it must manifest a true inability to commit to and perform the essential obligations of marriage and cannot be simplified into personality disorders or misbehavior.

Additionally, the doctrine concerning the requirement of a marriage license was clarified: if a marriage was solemnized without a license and does not fall under exceptions, such as cohabitation for five years, it is void ab initio.

**Historical Background:**

This case illustrates the application and development of legal standards for the grounds of nullity of marriage in the Philippines. The evolving interpretation of psychological incapacity since the milestone cases of *Santos v. CA* and *Republic v. Court of Appeals and Molina* reflects the judiciary's approach to safeguarding the marital institution while addressing individual circumstances. The historical context underscores the challenges in balancing technical legal requirements with the societal and familial implications of nullifying a marriage based on psychological incapacity and the absence of legal formalities.