

Title: Republic v. Ariel S. Calingo and Cynthia Marcellana-Calingo

Facts:

Ariel S. Calingo and Cynthia Marcellana-Calingo met in 1978, started a relationship, and married civilly on February 5, 1980. Multiple instances of marital discord followed, with Cynthia exhibiting aggressive behavior, infidelity, and neglect of marital duties. Despite this, they had a church wedding on February 22, 1998. Ariel filed a petition for declaration of nullity of marriage, supported by Dr. Arnulfo Lopez's psychological evaluation, which diagnosed Cynthia with Borderline Personality Disorder with Histrionic Personality Disorder Features.

The Regional Trial Court (RTC) of Quezon City denied the petition, finding that the evidence did not prove psychological incapacity. The Court of Appeals (CA) reversed the RTC's decision, granting the petition based on testimony of sexual infidelity and testimony about Cynthia's quarrelsome attitude. The Republic, through the Solicitor General, opposed the CA's decision.

In a March 11, 2020 decision, the Supreme Court sided with the Republic, reversing the CA's decision because Ariel's evidence did not establish the requisite legal parameters (antecedence, gravity, and incurability) of Cynthia's incapacity. Ariel, in a motion for reconsideration, reasserted his position, aided by Dr. Lopez's evaluations and the dissenting opinion of the original decision.

Issues:

The main legal issue was whether Cynthia's purported behavior and personality disorders constituted psychological incapacity under Article 36 of the Family Code of the Philippines, which would render the marriage void from the beginning. This encompassed further issues related to the antecedence, gravity, incurability of the incapacity, and sufficiency of evidence.

Court's Decision:

The Supreme Court, upon reconsideration, granted Ariel's motion. Applying the recalibrated guidelines from the recent case of *Tan-Andal v. Andal*, it concluded that Ariel had provided clear and convincing evidence to establish Cynthia's psychological incapacity to comply with her essential marital obligations, particularly with the testimony from Elmer Sales about Cynthia's background and personality prior to the marriage. Therefore, the Supreme Court reinstated the CA's decision granting the petition for declaration of nullity of marriage.

Doctrine:

The doctrine reiterated in this case is the concept of psychological incapacity as a ground for declaring a marriage void under Article 36 of the Family Code of the Philippines. Psychological incapacity includes clear acts of dysfunctionality in the personality structure of a spouse, rendering them unable to comprehend or perform their marital obligations. This incapacity must be existing at the time of the celebration of marriage, be legally incurable, grave, and clearly substantiated by evidence.

Class Notes:

Key elements central to this case are rooted in Article 36 of the Family Code, which defines psychological incapacity as a ground for nullity of marriage. The case also illustrates the requirements for proving psychological incapacity: (1) burden of proof by the plaintiff, (2) psychological incapacity must be shown to be existing at the time of the marriage, (3) it must be grave and legally incurable, and (4) the incapacity must be properly documented and testified to by expert or personal witnesses.

Historical Background:

This case unfolds in the context of evolving legal interpretations of psychological incapacity in marriage annulment cases in the Philippines. The shift began with the reinterpretation of guidelines in the case of *Tan-Andal v. Andal*, which liberalized the application of the doctrine and provided a more updated understanding of psychological incapacity relative to earlier stringent standards set by *Republic v. Molina*.