

### Title: Daoang v. Municipal Judge of San Nicolas, Ilocos Norte

### Facts:

The case originated from a petition for adoption filed by spouses Antero and Amanda Agonoy on 23 March 1971, in the Municipal Court of San Nicolas, Ilocos Norte, aiming to adopt minors Quirino Bonilla and Wilson Marcos. The legal proceeding was marked as Spec. Proc. No. 37. The court scheduled a hearing for 24 April 1971, with due notices sent out, including publication requirements met via the ILOCOS TIMES.

Roderick and Rommel Daoang, grandsons of the petitioners through their deceased mother Estrella Agonoy, opposed the adoption. They argued that the Agonoy spouses were disqualified from adopting due to having legitimate descendants, as outlined in Article 335 of the Civil Code. Despite the opposition, the Municipal Court granted the adoption, leading to the Daoang siblings appealing the decision to the Supreme Court.

### Issues:

The primary legal issue concerned the interpretation of Article 335 (1) of the Civil Code, specifically whether grandparents with legitimate descendants (in this case, grandchildren) are disqualified from adopting other children.

### Court's Decision:

The Supreme Court upheld the lower court's decision, ruling that Article 335 (1) of the Civil Code explicitly disqualifies individuals with legitimate, legitimated, acknowledged natural children, or children by legal fiction from adopting but does not include grandchildren in this disqualification. The Court reasoned that the language of the law was clear and unambiguous, requiring no further interpretation. It further noted that the legal rationale behind adoption statutes had shifted towards prioritizing the welfare and best interests of the child over the benefits to the adopter.

### Doctrine:

1. **\*\*Clear and Unambiguous Statutes:\*\*** A clear and unambiguous statute does not require judicial interpretation. Only those laws which present doubt or ambiguity in their language may be subject to statutory construction.
2. **\*\*Adoption's Purpose:\*\*** The modern interpretation of adoption laws leans more towards the well-being and opportunities afforded to the child rather than the benefits to the adoptive parents.

### Class Notes:

- **Article 335 of the Civil Code**: This statute lists the specific qualifications and disqualifications for individuals wishing to adopt. For purposes of disqualification, the term “children” is to be understood as explicitly stated, not including grandchildren.
- **Statutory Construction Principle**: If a statute’s language is clear, it should be applied as written without further interpretation. This is based on the principle that lawmakers craft laws with precise intentions, and words are chosen carefully to reflect those intentions.
- **Welfare of the Child in Adoption**: Current legal trends and laws prioritize the child’s welfare in adoption cases, indicating a shift from previous legal views that considered adoption’s primary benefit as accruing to the adoptive parents.

### ### Historical Background:

This case reflects the evolving legal landscape regarding adoption in the Philippines. While previously the interests of adoptive parents might have taken precedence, by the time of this decision, there was a clear shift towards prioritizing the rights and welfare of the adoptive child. Additionally, it underscores the principle that statutory language will be strictly adhered to by the courts, emphasizing the importance of legislative precision in drafting laws.