

****Title:**** Republic of the Philippines v. Roselie Eloisa Bringas Bolante a.k.a. Maria Eloisa Bringas Bolante

****Facts:****

The respondent, Roselie Eloisa Bringas Bolante, also known as Maria Eloisa Bringas Bolante, filed a petition in the Regional Trial Court (RTC) of Bangued, Abra, seeking to legally change her registered name to the one she had been using and known as, Maria Eloisa Bringas Bolante. She claimed that her school records, employment documents, and other public and private records bore the name Maria Eloisa, and to avoid confusion, wished her registered name to conform. After fulfilling jurisdictional requirements, including notice and publication, and presenting evidence, the RTC granted her petition.

The Republic of the Philippines, through the Office of the Solicitor General (OSG), appealed the RTC's decision to the Court of Appeals (CA), asserting issues on procedural and jurisdictional grounds. The CA affirmed the RTC's decision, leading to the Republic's petition for review to the Supreme Court under Rule 45 of the Rules of Court.

****Issues:****

1. Whether or not respondent's substantial compliance with Section 3, Rule 103 of the Rules of Court suffices to vest the trial court with jurisdiction over the petition.
2. Whether or not the respondent's testimony alone is adequate to prove that the name change is not intended for illegal purposes.

****Court's Decision:****

The Supreme Court denied the Republic's petition, thereby affirming the CA's decision. It held:

1. On jurisdiction: Initial errors in scheduling the hearing within the prohibited period were rectified by rescheduling to a compliant date, with sufficient notice to all parties. The Court deemed the jurisdictional requirements, particularly publication, had been substantially complied with.
2. On the sufficiency of respondent's testimony: The Court found the respondent's testimony, corroborated by documentary evidence and uncontested by the Solicitor General's representative, satisfactorily established her identity and the bona fide reasons for her petition. Thus, the petition for a name change was granted for legitimate reasons without any shown intention for fraud or evasion of legal responsibilities.

****Doctrine:****

The case reinforces the principle that the State has an interest in the names borne by individuals for purposes of identification. A name change is a privilege contingent on showing a reasonable or compelling cause, and it should not prejudice public interest. A petition for a change of name is granted based on the discretion of the court, considering whether the change will avoid confusion or embarrassment and is not for fraudulent purposes.

****Class Notes:****

- Jurisdictional requirements for a change of name petition include proper notice and publication as mandated by Sections 2 and 3, Rule 103 of the Rules of Court.
- The standard for approving a name change is based on the presence of a reasonable cause or any compelling reason justifying such change, ensuring the change does not lead to legal evasion or fraud.
- Documentary evidence combined with testimonial assertions can be deemed sufficient to establish the facts and intentions of the petitioner.
- The government's role is represented by the Solicitor General, who has the authority to contest the petition on behalf of public interest.

****Historical Background:****

This case exemplifies the judiciary's approach to petitions for change of name within the Philippine legal system. It underscores the balance between individual interest in identity and consistency in official records against the backdrop of ensuring public interest and preventing fraud. The decision reflects a pragmatic acknowledgment of lived identity and official documentation alignment, demonstrating the courts' discretionary capacity to assess the merits of name change petitions based on substantive justice and factual circumstances.