Title: Tanyag v. Tanyag: Forum Shopping and Property Settlement in Nullity of Marriage Cases

Facts:

Arturo C. Tanyag and Dolores G. Tanyag were married on July 31, 1979, under the regime of conjugal partnership of gains. Their marriage faced judicial scrutiny when Dolores filed a petition to declare it null and void due to Arturo's psychological incapacity (Nullity Case) at the Regional Trial Court of Quezon City in 2004. During the pendency of this Nullity Case, Dolores initiated a separate action at the Regional Trial Court of La Trinidad, Benguet, seeking to declare two parcels of land as her exclusive paraphernal property (Property Case).

Arturo challenged the jurisdiction of the Benguet court over his person, citing litis pendentia and claiming that Dolores was guilty of forum shopping. The Quezon City court eventually declared the marriage null and void; however, Dolores's subsequent motion for property liquidation was denied. Both moved for reconsideration failed, leading both parties to the Court of Appeals.

Parallelly, Arturo sought to dismiss the Property Case on grounds including litis pendentia. The La Trinidad court denied his motion, a decision upheld by the Court of Appeals. Arturo then elevated the matter to the Supreme Court, claiming litis pendentia and forum shopping by Dolores for filing a separate action on property, which is intrinsically linked to the decree of nullity of the marriage already being contested in another court.

Issues:
1. Whether the filing of the Property Case constitutes litis pendentia.
2. Whether Dolores engaged in forum shopping by initiating the Property Case alongside the Nullity Case.
3. The determination of jurisdiction over property disputes following the declaration of nullity of marriage based on psychological incapacity.

Court's Decision:
The Supreme Court granted the petition, reversing the Court of Appeals' decision. It held that:

1. Litis Pendentia: The Property Case was barred due to the principles of litis pendentia, given the identical parties, rights asserted, and relief sought in both cases.
2. Forum Shopping: Dolores was found guilty of forum shopping by filing the Property Case

while the Nullity Case, which could address property matters as an incident to declaring the marriage null, was pending.

3. Jurisdiction Over Property Settlement: The Court clarified that upon filing a petition for nullity of marriage, trial courts also acquire jurisdiction over incidental matters, including property settlements. Thus, any move to declare properties as paraphernal post-filing amounts to splitting causes of action, meriting dismissal.

Doctrine:

The Supreme Court reiterated the doctrine that the trial court, with jurisdiction over a petition for the declaration of nullity of marriage, also holds jurisdiction over incidental and consequential matters such as property settlements. Thus, a separate action for property declaration amounts to forum shopping and is barred under the principles of litis pendentia and res judicata.

Class Notes:

1. **Litis Pendentia**: Requires identity of parties, rights or causes of action, and reliefs sought such that the judgment in one case would resolve the other.
2. **Forum Shopping**: The act of filing multiple cases based on the same cause of action to increase one's chances of a favorable decision, constituting abuse of court processes.
3. **Property Relations Following Nullity of Marriage**: Upon a petition for the declaration of nullity of marriage, the trial court gains authority over property matters, which must be settled in the same proceeding to avoid splitting causes of action and forum shopping.

Historical Background:

The case highlights the interplay between personal status litigation (nullity of marriage due to psychological incapacity under the Family Code) and property relations disputes in Philippine law. It underscores the Supreme Court's stance against forum shopping and the necessity of consolidating interrelated issues within a single judicial proceeding for efficiency and to uphold judicial integrity.