

Title: Eloisa Goitia y de la Camara vs. Jose Campos Rueda

Facts:

Eloisa Goitia y de la Camara filed a suit against her husband, Jose Campos Rueda, seeking support outside of their conjugal home. The couple was legally married on January 7, 1915, in Manila, Philippines, and lived together until Eloisa left approximately a month later due to Jose's abusive demands and behavior. Jose demanded that Eloisa perform unchaste acts, which she refused. His demands escalated to physical abuse, prompting Eloisa to leave their home and seek refuge with her parents. Eloisa's complaint for support outside the conjugal domicile was met with a demurrer by Jose, arguing that the complaint did not state a cause of action since a spouse cannot be compelled to provide support outside their home without a decree of separation or divorce. The lower court sided with Jose, leading Eloisa to appeal to the Supreme Court of the Philippines.

Issues:

1. Whether a spouse can be compelled to provide support outside the conjugal domicile without a decree of separation or divorce.
2. Whether the behavior of one spouse can nullify their option under Article 149 of the Civil Code to provide support exclusively within the conjugal home.

Court's Decision:

The Supreme Court, reversing the lower court's decision, held that a spouse can indeed be compelled to provide support outside the conjugal domicile under exceptional circumstances where continued cohabitation becomes unbearable due to the wrongful conduct of the other spouse. The Court emphasized that marriage, beyond being a mere contract, establishes a set of mutual rights and duties, which are regulated by law for the benefit of both the parties involved and the public. The Court stated that while the general rule under Article 149 of the Civil Code gives the supporting spouse the option to either pay a fixed pension or maintain the claimant within the conjugal home, this option is not absolute. In cases where the behavior of the supporting spouse is so wrongful as to make cohabitation intolerable, the Court can compel them to provide support externally.

Doctrine:

The case reiterates the principle that marriage imposes legal obligations on spouses to support each other and that these obligations cannot be unilaterally nullified through abusive or wrongful acts. It highlights the discretionary power of the court to enforce external support obligations in instances where maintaining the claimant within the

conjugal home becomes unjustifiable due to one spouse's misconduct.

Class Notes:

- ****Marriage as a Contract and Institution****: Marriage is both a contract and an institution with mutual rights and duties prescribed by law.
- ****Obligation to Support****: Spouses are obliged to support each other; this obligation arises naturally from the marital bond and is of public interest.
- ****Exception to Conjugal Support Within the Marital Home (Article 149)****: The Supreme Court has discretion to compel a spouse to provide support outside the conjugal home if continuing cohabitation becomes unbearable due to the abusive behavior of the supporting spouse.
- ****Legal Protections Against Abuse****: The law protects the rights of a spouse to seek relief and support outside the marital domicile in cases of abuse, showcasing the balance between individual rights and marital obligations.

Historical Background:

This case emerges in a period where the legal system of the Philippines, though heavily influenced by the Spanish Civil Code, began asserting its distinct judicial autonomy, particularly in interpreting laws relating to family and marriage. It underscored the progressive stance of the Philippine judiciary in protecting the rights of individuals within the marital relationship against abuse and maltreatment, a significant move given the era's generally conservative viewpoint on marriage and familial roles.