

### Title:

Republic of the Philippines vs. Court of Appeals and Angelina M. Castro

### Facts:

Angelina M. Castro petitioned the Regional Trial Court (RTC) of Quezon City for a judicial declaration of nullity of her marriage to Edwin F. Cardenas on the ground of non-issuance of a marriage license prior to their wedding held on June 24, 1970. Castro's failure to secure Cardenas's response led to his default, and the trial proceeded without him. The controversy rooted from the discovery that, contrary to the marriage contract's claim, no marriage license was issued as verified by a certification from the Civil Register of Pasig, Metro Manila. The trial court rejected Castro's petition, concluding the certification inadequate for proving the license's non-issuance. On appeal, the Court of Appeals reversed the RTC's decision, nullifying the marriage and directing the cancellation of the marriage contract, a decision that the Republic of the Philippines contested through a petition for review on certiorari to the Supreme Court.

### Issues:

1. Whether the certification from the Civil Registrar and Castro's uncorroborated testimony sufficiently prove the non-issuance of the marriage license.
2. Whether the presumption of the marriage's validity was properly disregarded by the appellate court.

### Court's Decision:

The Supreme Court affirmed the decision of the Court of Appeals. It held that the certification of "due search and inability to find" issued by the Civil Registrar of Pasig, coupled with Castro's uncorroborated testimony, was sufficient to prove the non-issuance of a marriage license, rendering the marriage void ab initio. The Court reasoned that the custodian of documents, in this case, the Civil Registrar, is recognized by law to maintain and produce records relating to marriage licenses. Hence, the certification carried probative value per Section 29, Rule 132 of the Rules of Court. The Court also found no fault in relying solely on Castro's testimony due to the unique circumstances that limited the availability of corroborative witnesses.

### Doctrine:

The case reiterates the doctrine that a marriage with no marriage license, where such a license is required by law, is void from the beginning. It also underscores the legal acknowledgment given to certifications of "due search and inability to find" by custodians of

public documents as competent evidence of non-issuance of official records.

### Class Notes:

- Essential requirement of marriage: Issuance of a marriage license (Article 53 (4), New Civil Code).
- Proof of lack of record: Certification from the official custodian (Section 29, Rule 132, Rules of Court).
- Presumption of marriage validity can be refuted by substantive proof of a legal impediment (e.g., absence of a marriage license).

### Historical Background:

At the time of Castro and Cardenas's marriage in 1970, the governing law was the New Civil Code of the Philippines, which mandated the issuance of a marriage license as a prerequisite for solemnizing a marriage. The case underscores the procedural and evidential routes for challenging the validity of a marriage based on regulatory compliance with marital requisites set forth in the New Civil Code, highlighting the evolving standards and requirements for validating matrimonial bonds in Philippine law.