

### Title: Republic of the Philippines vs. The Hon. Court of Appeals (Ninth Division), and Eduardo C. De Quintos, Jr.

#### Facts:

Eduardo C. De Quintos, Jr., and Catalina Delos Santos-De Quintos were married on March 16, 1977. The marriage was childless due to Catalina's medical condition necessitating hysterectomy after her second miscarriage. Eduardo filed for the declaration of the nullity of their marriage on April 6, 1998, citing Catalina's psychological incapacity under Article 36 of the Family Code. Catalina did not object but demanded her share in the conjugal assets.

The case progressed with Eduardo presenting evidence, including testimony about Catalina's behavior detrimental to their marriage and a neuro-psychiatric evaluation by Dr. Annabelle L. Reyes diagnosing Catalina with Borderline Personality Disorder. The Regional Trial Court (RTC) granted the petition, a decision later affirmed by the Court of Appeals (CA). Both lower courts found that the evidence presented sufficed to declare the marriage null under Article 36 of the Family Code.

#### Issues:

1. Whether Catalina's alleged personality traits reflect psychological incapacity existing at the time of marriage celebration.
2. Whether marital unfaithfulness and abandonment are symptoms of psychological incapacity.
3. Whether the neuro-psychiatric evaluation and testimony sufficiently established the cause and incurability of Catalina's incapacity as required by law.

#### Court's Decision:

The Supreme Court granted the appeal, reversing the decisions of both the RTC and the CA. It held that the evidence provided was insufficient to establish Catalina's psychological incapacity under the standards set forth in existing jurisprudence, particularly the criteria outlined in the landmark case of Republic v. Molina. The Court reiterated that psychological incapacity under Article 36 of the Family Code must be characterized by gravity, juridical antecedence, and incurability, which were not adequately proven in this case.

#### Doctrine:

The case reiterated the doctrine regarding the stringent requirements for declaring a marriage null due to psychological incapacity under Article 36 of the Family Code, emphasizing the need for a thorough and in-depth assessment of the party's psychological

condition.

#### Class Notes:

1. **Article 36 of the Family Code**: Declares a marriage null due to psychological incapacity to comply with the essential marital obligations, requiring proof of gravity, juridical antecedence, and incurability.
2. **Republic v. Molina Guidelines**: The case details criteria and guidelines for determining psychological incapacity, including the need for a medically or clinically identified cause, proof of existence at the time of marriage, and the necessity of being grave and incurable.
3. **Evidence in Psychological Incapacity Cases**: The importance of expert testimony and a comprehensive evaluation of the parties by a psychologist or psychiatrist to establish the incapacity's root cause, gravity, and incurability.

#### Historical Background:

In the context of Philippine family law, cases like “Republic of the Philippines vs. The Hon. Court of Appeals (Ninth Division), and Eduardo C. De Quintos, Jr.” underscore the judiciary’s cautious approach towards the dissolution of marriages based on psychological incapacity. This cautious approach reflects the country’s societal values emphasizing the sanctity and inviolability of the marital institution, balanced against the need to address genuine cases of incapacity within the framework provided by the Family Code and relevant jurisprudence.