

Title: Republic of the Philippines and Felisa Tecson-Dayot vs. Jose A. Dayot (573 Phil. 553)

Facts:

- On November 24, 1986, Jose Dayot and Felisa Tecson-Dayot were married at the Pasay City Hall by Rev. Tomas V. Atienza using a sworn affidavit in place of a marriage license. The affidavit, also dated November 24, 1986, falsely stated that they had lived together as husband and wife for at least five years.
- On July 7, 1993, Jose filed a Complaint for Annulment and/or Declaration of Nullity of Marriage with the Regional Trial Court (RTC) in Biñan, Laguna, asserting that he was tricked into signing the marriage documents and did not consent to the marriage.
- Felisa opposed the complaint, detailing they had begun their relationship in early 1980 but delayed marriage because of their age difference. She also revealed Jose married another woman, Rufina Pascual, on August 31, 1990, leading to her filing bigamy and administrative complaints against him.
- The RTC dismissed Jose's complaint on July 26, 2000, ruling the marriage valid and determining Jose's claims were implausible. The court also noted Jose's action for annulment based on fraud had prescribed, citing the four-year prescriptive period under Article 87 of the Civil Code.
- Jose appealed, but the Court of Appeals upheld the RTC's decision on August 11, 2005, agreeing the complaint was filed beyond the prescriptive period and that there was no fraud justifying annulment.
- Jose's Motion for Reconsideration led to the Court of Appeals issuing an Amended Decision on November 7, 2006, declaring the marriage void ab initio for lack of a valid marriage license, relying on the *Niñal v. Bayadog* doctrine.
- Felisa and the Republic of the Philippines filed separate Petitions for Review with the Supreme Court, challenging the Amended Decision.

Issues:

1. ****Was the marriage between Jose and Felisa void ab initio for lack of a marriage license?***
2. ****Did the false affidavit executed by Jose and Felisa affect the validity of the marriage?***
3. ****Was the action to annul the marriage based on fraud prescribed?***
4. ****Can Jose be estopped from assailing the marriage's validity due to his own fraudulent conduct?***

Court's Decision:

Issue 1:

- The Supreme Court ruled that the marriage was void ab initio because Jose and Felisa falsely claimed cohabitation for five years to avail an exemption from obtaining a marriage license under Article 76 of the Civil Code. The five-year continuous cohabitation was a strict statutory requirement.

Issue 2:

- The falsity of the affidavit indeed invalidated the marriage. The affidavit was meant to take the place of a marriage license, and a false affidavit could not serve as a substitute for this essential requirement.

Issue 3:

- While the action for annulment on the ground of fraud under Article 87 of the Civil Code may have prescribed, this did not prevent the declaration of nullity of the marriage, which is imprescriptible.

Issue 4:

- The Court rejected the argument that Jose could be estopped from challenging the marriage's validity. Actions for the declaration of nullity of void marriages do not prescribe, and thus, Jose's motivations were irrelevant to the marriage's inherent validity.

Doctrine:

- ****Doctrine of Nullity****: An affidavit falsely stating cohabitation to bypass a marriage license requirement results in a void marriage ab initio. The requisites for a valid exception to the marriage license requirement must be strictly complied with.
- ****Imprescriptibility of Nullity Actions****: Actions to declare a marriage void ab initio do not prescribe, much like in the case under the Family Code.

Class Notes:

1. ****Essential Requisites of Marriage under Article 53, Civil Code****:
 - Legal capacity of contracting parties
 - Consent freely given
 - Authority of the person performing the marriage
 - A marriage license, except in special circumstances (Art. 76).
2. ****Exceptional Marriages under Article 76, Civil Code****:
 - Five-year continuous cohabitation period before marriage exempting the need for a marriage license.

3. **Prescriptive Period for Annulment under Article 87, Civil Code**:

- Action must be commenced within four years from the discovery of fraud.

4. **Imprescriptibility of Nullity of Void Marriages**:

- Actions for declaration of nullity are not subject to prescriptive periods.

5. **Relevant Provisions**:

- Article 76, Civil Code - No marriage license needed for cohabiting couple for at least five years.
- *Niñal v. Bayadog* - Requires unbroken, exclusive five-year cohabitation to claim exemption from marriage license requirement.

Historical Background:

The case emerged from an era when the strict requirements for validating marital status and the shift from the Civil Code to the Family Code influenced numerous legal proceedings regarding marriage validity. The decision reinforced the importance of adhering to marital requisites as a means of protecting societal norms surrounding the institution of marriage.