

****Title:****

Perez v. Court of Appeals, Tristan A. Catindig and Lily Gomez-Catindig, G.R. No. 74456

****Facts:****

Private respondent Tristan A. Catindig married Lily Gomez Catindig twice on May 16, 1968, duplicating their ceremony at the Central Methodist Church and subsequently at Lourdes Catholic Church. The marriage produced four children. Later, encountering marital issues, they opted for a divorce mutually facilitated through the Dominican Republic. On April 27, 1984, they executed a Special Power of Attorney for a lawyer in San Cristobal to dissolve their marriage, ratified by a Dominican civil court on June 12, 1984. Following this, on June 23, 1984, a Regional Trial Court (RTC) in Makati ordered the separation of their properties. Tristan subsequently married petitioner Elmar O. Perez on July 14, 1984, in Virginia, USA, and they had one child together, living as husband and wife until October 2001. However, Perez learned that the Dominican divorce decree was not recognized in the Philippines, rendering her marriage void under Philippine law.

Upon confrontation, Tristan promised to annul his marriage to Lily and legitimize his union with Perez. On August 13, 2001, Tristan filed a petition for the declaration of nullity of his marriage to Lily in the Regional Trial Court of Quezon City under Civil Case No. Q-01-44847. Perez, deeming she had interest, filed for intervention, which the court granted on September 30, 2002. Tristan subsequently sought certiorari and prohibition in the Court of Appeals (CA), which declared the RTC's decision null and void, prompting Perez to file for certiorari and prohibition in the Supreme Court, claiming legal interest in the annulment process.

****Issues:****

1. Whether the Court of Appeals acted with grave abuse of discretion in annulling the RTC's grant permitting Perez's intervention.
2. Whether Perez had the "legal interest" required under the Rules of Court to intervene in the annulment case between Tristan and Lily.

****Court's Decision:****

1. ****Grave Abuse of Discretion by the Court of Appeals:****
 - The Supreme Court held that the Court of Appeals did not act with grave abuse of discretion. The petitioner failed to demonstrate that the appellate court's decision was devoid of reasonable basis or was arbitrary. The CA's decision was aligned with established

jurisprudence and legal principles.

2. **Petitioner's Legal Interest:**

- The Court underscored that legal interest required for intervention must be direct and substantial. Perez's interest, as purported, stemmed from her position as Tristan's wife based on a void marriage since Tristan was still lawfully married to Lily under Philippine law. Consequently, she lacked the direct legal interest necessary under Rule 19, Section 1 of the Rules of Court.

Doctrine:

- **Legal Interest in Intervention:**

- Legal interest must be actual, direct, and material, not contingent or expectant. A subsequent marriage, when a prior binding marriage exists under Philippine law, does not confer legal interest on the new spouse.

- **Recognition of Foreign Divorce:**

- Filipino citizens are bound by Philippine law concerning family rights and duties. Foreign divorces do not dissolve marriages recognized under Philippine law.

Class Notes:

- **Key Elements:**

- Legal Interest (Rule 19, Section 1): Must be direct, substantial, actual, and material.

- Grave Abuse of Discretion: Must be capricious, arbitrary, or a manifest departure from settled jurisprudence.

- Foreign Divorce Recognition: Philippine law disregards foreign divorces obtained by Filipino citizens.

- **Relevant Statutes:**

- Civil Code, Article 15: Governing family rights and duties binding Filipino citizens irrespective of residence.

- Rule 19, Section 1 of the Rules of Court: Conditions for an individual's intervention in ongoing litigation.

- **Principles:**

- Directly Applicable Legal Interest: Intervenors in legal matters must have stakes that are immediately and substantially impacted by the litigation's outcome.

- Jurisdiction Assertion: Philippine family laws apply to Filipino citizens, globally enforcing marriage sanctity despite foreign divorces.

****Historical Background:****

- This case highlights the strict application of Philippine family laws even when Filipinos pursue foreign divorces. It underscores the nation's legal framework resisting foreign decrees that contravene the Civil Code's stipulations, preserving marital institution sanctity and ensuring uniform application of laws to citizens globally.