

Title: Clavecilla v. Clavecilla, G.R. No. 250853

Facts:

1. Fernando Clavecilla (petitioner) and Marivic Clavecilla (respondent) met through a mutual friend in December 1986 in Jeddah, Saudi Arabia.
2. Fernando, then a finance officer at the Philippine Embassy in Saudi Arabia, courted Marivic, a nurse, leading to their marriage on December 10, 1987, at the Philippine Consulate General in Jeddah. They held another ceremony in Manila on March 12, 1988.
3. The couple had a son, Patrick Joshua, born in 1993.
4. On November 14, 2006, Fernando filed for the declaration of nullity of the marriage, claiming Marivic's psychological incapacity. He cited her carefree nature, nagging, demand for attention, and lack of employment efforts.
5. Fernando detailed an incident where Marivic incurred unapproved loans, resulting in a creditor filing action against him, which jeopardized his employment.
6. To support his claim, Dr. Nedy Tayag, a psychologist, diagnosed Fernando with Narcissistic Personality Disorder (NPD), stating it impacted his ability to fulfill marital obligations.
7. Marivic countered these claims, accusing Fernando of infidelity and psychological incapacity manifesting through his actions. She claimed she had to work abroad due to Fernando's insufficient support.
8. RTC Decision (April 10, 2013): RTC sided with Fernando, granting the annulment and declaring their marriage null and void under Article 36 of the Family Code. Marivic's Motion for Reconsideration was denied, leading to her appeal to the Court of Appeals (CA).
9. CA Decision (June 30, 2016): The CA reversed the RTC's decision, stating Fernando failed to establish the juridical antecedence, gravity, and incurability of his psychological incapacity. Fernando's Motion for Reconsideration was also denied, which led to the filing of this petition before the Supreme Court.

Issues:

1. Whether a psychologically incapacitated spouse can file a petition for annulment under Art. 36 of the Family Code.
2. If the CA erred in finding that Fernando failed to establish psychological incapacity.
3. Whether Fernando's narcissistic tendencies constituted psychological incapacity under Art. 36 of the Family Code.

Court's Decision:

1. ****Filing by Psychologically Incapacitated Spouse****: The Court affirmed that either

spouse, whether psychologically incapacitated or not, can initiate a petition for the nullity of their marriage under Art. 36 of the Family Code. The doctrine of unclean hands does not bar a psychologically incapacitated spouse from filing such a petition.

2. **CA Findings on Psychological Incapacity**: The Court adhered to the CA's conclusion, emphasizing that Fernando failed to present clear and convincing evidence of psychological incapacity. The evaluation of Dr. Tayag was insufficient as it lacked specificity in explaining how Fernando's NPD hindered his ability to fulfill marital obligations.

3. **Standards for Psychological Incapacity**: The Court reiterated that psychological incapacity must be grave, permanent, and juridically antecedent. The evidence provided failed to meet these criteria, as required by the recent recalibration of standards in *Tan-Andal v. Andal*, focusing on clear dysfunctionality in assuming marital responsibilities.

Doctrine:

- A psychologically incapacitated spouse is not barred from filing a petition to declare their marriage null under Art. 36 of the Family Code.
- Psychological incapacity involves a persistent inability to assume marital obligations, manifesting as a dysfunction in one's personality, which must be proven by clear and convincing evidence.
- Proof of incapacity need not invoke medical expertise exclusively and can be based on the consistent testimonies from those who observed the spouse's behavior.

Class Notes:

- Essential elements of Art. 36 petitions: incapacity must be grave, antecedent to the marriage, incurable, and evident through behavior that undermines the marital union.
- Key citations: Art. 36 of the Family Code, *Republic v. Molina*, *Tan-Andal v. Andal*.
- Emphasis on the legal (vs. medical) view of psychological incapacity - showing concrete, enduring patterns of behavior.

Historical Background:

- The case situates within the evolution of interpreting Art. 36, from rigid adherence to clinical proofs to a more realistic, functional view of psychological incapacity.
- Reflects the judiciary's effort in balancing legal doctrine with the practical realities of marriage dynamics and psychological health.