

****Title:** Sps. Melchor and Yolanda Dorao v. Sps. BBB and CCC, as Natural Guardians of AAA******

****Facts:****

Minors AAA and Paul, unknown to their respective parents, started a “mutual understanding” relationship in July 2004 while studying in La Union. Discovering this, the Dorao Spouses sought to prevent them from getting closer, frequently visiting the school and making derogatory remarks about AAA in front of her peers and via text messages to AAA’s mother CCC. They accused AAA of being flirtatious and having loose morals. Despite BBB’s attempt to intervene, the Dorao Spouses continued their behavior, leading AAA’s family to avoid school events.

The harassment escalated in the absence of AAA’s family at a Parents’ Meeting, where the Dorao Spouses spread malicious rumors about AAA, culminating in public accusations by Melchor, which led AAA to depression, disengagement in school activities, losing academic standing, and attempting suicide.

Spouses BBB and CCC filed a complaint against the Dorao Spouses at the Regional Trial Court (RTC) seeking moral and exemplary damages for infringing their daughter’s right to peaceful life and privacy. The RTC ruled in favor of Spouses BBB and CCC, ordering joint and several payments of damages against the Dorao Spouses. The Court of Appeals (CA) affirmed this decision, and their motion for reconsideration was denied.

The Dorao Spouses then filed a Petition for Review on Certiorari before the Supreme Court, which is the subject of this case.

****Issues:****

1. Whether the Dorao Spouses violated AAA’s right to dignity, privacy, and peace of mind.
2. Whether the Dorao Spouses’ actions justified under the guise of parental duty.
3. The credibility of the witness Arabella Cabading’s testimony.
4. Appropriateness of the damages awarded.

****Court’s Decision:****

The Supreme Court denied the Petition for procedural lapses and for raising substantial factual issues inappropriate for a Rule 45 petition, which is limited to legal issues.

1. ****Violation of Rights:**** The Supreme Court reaffirmed that the Dorao Spouses’ derogatory and defamatory statements and public humiliation of AAA violated her rights to

dignity and privacy under Articles 21 and 26 of the Civil Code. These articles mandate compensation for actions that cause loss or injury by transgressing moral norms and respecting personal dignity and privacy.

2. **Parental Duty Argument:** The Court rejected the argument that their actions were justified as parental duty under Article 220 of the Family Code. It held that the Dorao Spouses, not being AAA's parents or legal guardians, had no authority to impose discipline on her. Furthermore, even parents cannot resort to cruel or degrading forms of punishment as these are contrary to the child's human dignity.

3. **Credibility of Witness:** The Supreme Court upheld the credibility of Cabading's testimony, noting both the trial court and appellate court's determination of her unbiased and firsthand account, and reminding that credibility assessments are within the purview of the trial court and are respected if not tainted with palpable error or grave abuse of discretion.

4. **Award of Damages:** The Court affirmed the award of moral and exemplary damages to AAA. Moral damages were warranted due to the mental anguish and humiliation suffered. Exemplary damages served as a deterrent against similar future conduct. The decision was ordered to accrue legal interest until full payment.

Doctrine:

1. **Articles 21 and 26 of the Civil Code:** These articles impose liability for acts contrary to morals, good customs, or public policy, and mandate respect for the dignity and privacy of individuals, including actions that do not constitute criminal offenses.

2. **Protection of Children's Rights:** Based on Republic Act No. 7610 and principles from the United Nations Convention on the Rights of the Child, protections extend to preventing psychological abuse, cruelty, and other acts detrimental to a child's development and dignity.

3. **Parental Authority:** Article 220 of the Family Code establishes parental authority duties, but these must not infringe on a child's inherent rights or engage in demeaning disciplinary measures.

Class Notes:

- **Elements of a Quasi-Delict:** Article 2176 of the Civil Code - act or omission causing damage to another, fault or negligence, no preexisting contractual relation.

- **Moral Damages:** Article 2219, recovering mental anguish, shame, social humiliation.

- **Exemplary Damages:** Under Article 2232 of Civil Code, given to serve as a warning or example when the moral damages awarded are not sufficient deterrents.
- **Art. 26, Civil Code elements:** Respect for dignity, privacy, and peace of others; damages for non-criminal acts like vexing or humiliating based on personal condition.

Historical Background:

The case is within the broader context of protecting the rights of children in the Philippines. It reflects the statutory enactments like RA 7610 (Special Protection of Children Against Abuse, Exploitation, and Discrimination Act) showing the country's commitment to international treaties like the Convention on the Rights of the Child, ensuring any action concerning children prioritizes their best interests and respects their human dignity. It highlights the Judiciary's commitment to uphold these protections against any form of psychological abuse by redefining the limits of exercising authority over children.