

****Title:**** Manuel v. People of the Philippines

****Facts:****

Eduardo P. Manuel met Tina B. Gandalera in Dagupan City in January 1996. They dated, and Eduardo assured Tina that he was single. They eventually married on April 22, 1996. However, Eduardo had a previous marriage with Rubylus Gaña in 1975, which Tina discovered in 2001 upon investigating at the National Statistics Office. Eduardo claimed he believed his first marriage to Rubylus was void as he hadn't heard from her for over 20 years.

****Procedural Posture:****

Eduardo was charged with bigamy on November 7, 2001. The RTC of Baguio City (Branch 3) convicted him, sentencing him to a prison term and awarding moral damages to Tina. Eduardo appealed to the Court of Appeals (CA), which affirmed the RTC's decision with modifications to the penalty. Eduardo then petitioned the Supreme Court for review.

****Issues:****

1. Whether Eduardo's first wife could be legally presumed dead under Article 390 of the Civil Code without a judicial declaration as mandated by Article 41 of the Family Code.
2. Whether the RTC and CA erred in awarding moral damages to Tina.

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

1. ****Presumption of Death and Bigamy Conviction:****

- The court affirmed Eduardo's bigamy conviction. Eduardo's defense that he acted in good faith believing his first wife was dead was insufficient without a judicial declaration of her presumptive death.
- Citing Article 41 of the Family Code, the court clarified that a judicial declaration is mandatory before contracting a subsequent marriage.
- The Court reasoned that the presence of a judicial declaration provides legal certainty and protects both the present spouse and the integrity of the marital institution.

2. ****Award of Moral Damages:****

- The Supreme Court upheld the RTC and CA's awarding of P200,000 as moral damages to Tina.
- Although bigamy wasn't specifically enumerated in Article 2219 of the Civil Code for moral damages, the court considered Eduardo's deceitful conduct towards Tina as falling under analogous cases per Articles 19, 20, and 21 of the Civil Code.

****Doctrine:****

- ****Judicial Declaration of Presumptive Death:**** As per Article 41 of the Family Code, a judicial declaration of presumptive death is required before entering into a subsequent marriage if the previous spouse is absent.

****Class Notes:****

1. ****Elements of Bigamy (Article 349 of the RPC):****

- A valid first marriage.
- A second marriage without the dissolution of the first.
- No judicial declaration of presumptive death of the absent spouse.
- Malice is presumed unless rebutted (Ignorance of the law is not a valid defense).

2. ****Key Legal Principles:****

- ****Ignorantia legis neminem excusat:**** Ignorance of the law excuses no one.
- ****Necessity of Judicial Declaration:**** Under the Family Code, before remarrying, a judicial declaration of presumptive death is mandatory.
- ****Moral Damages (Article 2219, Civil Code):**** Can be awarded even if the specific crime isn't listed if the case is analogous and based on bad faith or malice.

****Historical Background:****

This case revisits and solidifies the understanding of marriage laws in the Philippines, emphasizing the need for judicial intervention before presuming the absence of a spouse. It harmonizes earlier quite misguided practices with the updated Family Code provisions to clarify the boundaries and protections around marital relations.