

**Title:** Alcantara vs. Alcantara, G.R. No. 167684, September 27, 2006

**Facts:**

- **Initial Marriage:** On 8 December 1982, Restituto Alcantara (Petitioner) and Rosita A. Alcantara (Respondent) were married in Manila City Hall before Rev. Aquilino Navarro, using services of a “fixer” and allegedly without a valid marriage license.
- **Second Marriage:** On 26 March 1983, they had another marriage ceremony in San Jose de Manuguit Church in Tondo, Manila, still without securing a new marriage license.
- **Children:** The couple had two children, Rose Ann Alcantara (born 14 October 1985) and Rachel Ann Alcantara (born 27 October 1992).
- **Separation:** The couple separated in 1988.
- **Petition for Annulment:** Restituto filed a petition for annulment of marriage, arguing the absence of a valid marriage license rendered their marriage void.
- **Respondent’s Answer:** Rosita contested the annulment, claiming the existence of a marriage license and providing certification from the Civil Registry of Carmona, Cavite. She also filed a concubinage case against Restituto.

**Procedural Posture:**

- **RTC Ruling:** On 14 February 2000, the RTC of Makati City denied the petition for annulment and ordered Restituto to pay monthly support for their children.
- **Court of Appeals (CA):** Affirmed the RTC’s decision on 30 September 2004, and denied Restituto’s motion for reconsideration on 6 April 2005.
- **Petition for Review:** Restituto sought review from the Supreme Court, claiming errors in the CA’s ruling.

**Issues:**

1. Whether there was a valid marriage license at the time of the marriage.
2. Whether the marriage license number from Carmona, Cavite, which appeared in the civil registry but not in the marriage contract, affected the validity of the marriage.
3. Whether the CA erred in not applying the ruling in the case of Sy vs. Court of Appeals.
4. Whether procedural rules should be relaxed to protect the substantial rights of the litigants.

**Court’s Decision:**

1. **Existence of Marriage License:**

- **Presumption of Regularity:** The Court found no direct evidence to rebut the presumption of regularity attached to the Civil Registrar's certification from Carmona that a marriage license had been issued.
- **Typographical Error:** The disparity in the marriage license number (7054133 vs. 7054033) was deemed a possible typographical error, not affecting the legality of the marriage.

2. **Applicability of Sy vs. CA Case:**

- **Different Circumstances:** The Court distinguished this case from Sy vs. CA, noting that there was apparent evidence of the absence of a marriage license in the Sy case, while here a marriage license number existed in the registry.

3. **Substantial Rights and Procedural Rules:**

- **Clean Hands Doctrine:** The Court emphasized that Restituto's participation and repeated marriage ceremonies (civil and religious) nullified his claim. His actions did not exhibit the "clean hands" required to seek annulment.
- **Reiteration of Doctrine:** The principle favoring the validity of marriages (*semper praesumitur pro matrimonio*) was reiterated, maintaining strong presumption and favor towards marital bonds.

**Doctrine:**

- **Presumption of Regularity:** Certification from a local civil registrar that a marriage license was issued is presumed valid unless rebutted by strong evidence.
- **Marriage License Irregularities:** Procedural irregularities in the issuance or details of a marriage license do not affect the marriage's validity but may subject the responsible parties to civil, criminal, or administrative liability.
- **Semper Praesumitur Pro Matrimonio:** Presumption always leans towards the validity of the marriage.

**Class Notes:**

- **Elements of a Valid Marriage (Civil Code as applied):**
  1. Legal capacity of the contracting parties.
  2. Consent freely given.
  3. Authority of the person performing the marriage.
  4. A valid marriage license (exemption in specific cases).

- **Doctrine of Presumption of Regularity:** Public officials performing their duties are presumed to do so regularly unless proven otherwise with clear evidence.
- **“Clean Hands” Doctrine:** A party seeking equity must come with clean hands, meaning they must not have engaged in unethical behavior related to the matter at hand.

**Historical Background:**

The case falls within a significant period where the Civil Code governed marriage validity issues before the Family Code’s effectivity in 1988. The era stressed strict compliance with formal requisites such as marriage licenses underscoring the state’s interests in the stability and sanctity of marital relations.