

Title: Adoption of Stephanie Nathy Astorga Garcia: Middle Name Usage of an Illegitimate Child

Facts:

On August 31, 2000, Honorato B. Catindig (petitioner) filed a petition to adopt his minor illegitimate child, Stephanie Nathy Astorga Garcia. Stephanie was born to Gemma Astorga Garcia on June 26, 1994. She had been using her mother's middle name and surname. Petitioner, a widower, sought to change her surname to his and her middle name to "Garcia," her mother's surname.

On March 23, 2001, the trial court granted the adoption, making Stephanie the legitimate child of Honorato B. Catindig and changing her name to Stephanie Nathy Catindig. The decision included: "Stephanie is freed from all obligations of obedience and maintenance with respect to her natural mother and shall be the petitioner's legitimate child and legal heir."

On April 20, 2001, the petitioner filed a motion for clarification/reconsideration, seeking permission for Stephanie to retain "Garcia" as her middle name. On May 28, 2001, the trial court denied this motion, stating no law or jurisprudence supported the request.

Honorato B. Catindig then filed the present petition before the Supreme Court, questioning if an illegitimate child adopted by her natural father could use her natural mother's surname as her middle name.

Issues:

1. Whether an illegitimate child adopted by her natural father may use the surname of her natural mother as her middle name.
2. Determining the legal implications relating to the middle name usage in adoption cases.

Court's Decision:

The Supreme Court granted the petition, modifying the trial court's decision, and allowed Stephanie Nathy Astorga Garcia to use "Garcia" as her middle name.

Issue 1: Middle Name Usage

- The Court ruled there is no law explicitly prohibiting an adopted child from using the surname of their natural mother as a middle name.
- The Court reviewed Articles 364-380 of the Civil Code and Article 189 of the Family Code, noting the absence of specific regulations concerning middle names in these contexts.

Additionally, the Minutes of the Civil Code and Family Law Committees acknowledged the Filipino tradition of following the mother's middle name.

- The Court emphasized the underlying purpose of adoption statutes - to benefit the adopted child - and that liberally interpreting the law aligns with this purpose. Therefore, granting the middle name "Garcia" would uphold Stephanie's maternal lineage and avoid the stigma associated with her illegitimate status.

Doctrine:

1. **Substantive Rules for Surnames**: Regulated by Articles 364-380 of the Civil Code.
2. **Customary Filipino Naming Convention**: Middle name often derived from the mother's surname.
3. **Liberal Construction of Adoption Laws**: Adoption statutes should be construed liberally in favor of the adopted child's welfare.

Class Notes:

- **Adoption Process**: A juridical act creating a parent-child relationship, endowing the child with the status and rights of a legitimate child (Art. 189, Family Code).
- **Civil Code Naming Rules**: Articles 364-380 regulate surname usage, including special treatment for adopted children (Art. 365) and various family situations (Arts. 370-375).
- **Middle Name**: Not explicitly regulated by law, but customs and legal interpretations can support usage reflecting maternal lineage.
- **Legal Interests of Adopted Children**: Including maintaining familial relationships and avoiding stigma (RA 8552, Art. 189, Family Code).

Historical Background:

The decision reflects a traditional and evolving understanding of family names within Filipino society, recognizing the importance of heritage and identity in the context of familial ties and modern family structures. The case also highlights the Philippines' commitment to child welfare as endorsed by the United Nations Convention on the Rights of the Child, aiming at securing the rights and privileges of adopted children for legitimate status and harmonious familial integration.