

****Title:****

Reinel Anthony B. De Castro vs. Annabelle Assidao-De Castro

****Facts:****

In 1991, Reinel Anthony B. De Castro and Annabelle Assidao-De Castro met and became sweethearts. By September 1994, they planned to get married and applied for a marriage license in Pasig City. In March 1995, after the marriage license expired, they executed an affidavit claiming they had lived together as husband and wife for at least five years to bypass obtaining a new license. Judge Jose C. Bernabe officiated their marriage, but they did not cohabit following the ceremony. On 13 November 1995, Annabelle gave birth to Reinna Tricia A. De Castro and assumed full financial responsibility.

On 4 June 1998, Annabelle filed a complaint for support in the Regional Trial Court of Pasig City, alleging marriage to Reinel and seeking support for herself and the child. Reinel contended their marriage was void ab initio due to a false affidavit and denied paternity. The trial court declared the marriage void but recognized Reinna as Reinel's natural child requiring support. Reinel appealed to the Court of Appeals.

The Court of Appeals upheld the trial court's ruling, affirming the child's legitimacy and declaring the marriage valid until properly annulled. Reinel then petitioned the Supreme Court, arguing the trial court's jurisdiction to annul the marriage in support proceedings and contesting the legitimacy of the child.

****Issues:****

1. Whether the trial court had jurisdiction to annul the marriage during an action for support.
2. Whether Reinna Tricia A. De Castro is Reinel's daughter and entitled to support.

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

1. ****Jurisdiction Over Annulment:****

The Supreme Court ruled that the trial court had jurisdiction to determine the marriage's validity within an action for support. This stance was supported by jurisprudence, citing *Niñal v. Bayadog* and *Nicdao Cariño v. Yee Cariño*, which both establish that the validity of void marriages can be determined in collateral suits if essential to the case.

2. ****Legitimacy and Support of the Child:****

The Supreme Court found Reinna to be an illegitimate child of Reinel. Evidence included the birth certificate listing Reinel as the father, testimonies about their relationship, and

Reinel's admission in an affidavit. Consequently, Reina was entitled to support from Reinel.

****Doctrine:****

1. ****Nullity of Marriage:****

- A marriage's nullity may be determined in collateral cases, not necessarily requiring an independent nullity declaration, if such judgment is crucial to resolve the matter at hand (Niñal v. Bayadog).

2. ****Proof of Illegitimate Filiation:****

- Illegitimate filiation can be evidenced similarly to legitimate filiation, including documentation like birth certificates and admissions in public documents (Family Code Art. 172, 175).

****Class Notes:****

- ****Essential Elements for Nullity of Marriage:****

- ****Absence of Essential/Formal Requisites:**** Renders marriage void ab initio (Family Code Art. 4).

- ****Collaterally Attacked Marriage:**** Permissible for purposes like support or legitimacy of children without prejudice to potential future judgments for remarriage purposes.

- ****Illegitimate Filiation:****

- ****Proof Mechanism:**** Birth certificates, public or private admissions, testimonies, and other evidences (Family Code Art. 172, 175).

****Historical Background:****

The case highlights issues arising in marital disputes around the validity of marriages conducted without proper licenses and the subsequent responsibility for child support. It underscores the evolution of jurisprudence whereby courts are empowered to determine the validity of marriages in collateral matters, reflecting the dynamic interpretation of marriage laws to balance justice and practicalities in family law.

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This structure ensures a comprehensive understanding of the case, from factual background to legal doctrines, useful for both legal scholars and students.