

Title:

Estella v. Perez, G.R. No. 236279 (2023)

Facts:

Jerik Estella and Niña Monria Ava Perez met and began a relationship while working together. Perez was already in an eight-year relationship with another person when she and Estella began their affair. Despite learning she maintained other intimate relations, Estella remained in the relationship and the two later cohabited.

In January 2008, Perez moved to Manila, where Estella followed her. Perez revealed she was two months pregnant but expressed a desire to abort the child, stating Estella might not be the father. They continued their relationship and lived together in Estella's parents' house, where Perez gave birth in September 2008. They married on October 10, 2010.

Shortly after marriage, Estella noticed that Perez manifested signs of psychological incapacity. She exhibited neglect towards their son, was jealous of his affection for their child, and was irritable and irresponsible. Perez preferred her social life over family responsibilities and had an illicit relationship with another man.

In January 2011, Perez abandoned Estella and their child permanently. Estella consulted Dr. Maryjun Delgado, a clinical psychologist, who diagnosed Perez with Borderline and Narcissistic Personality Disorders. Dr. Delgado's diagnosis was based on interviews with Estella and his cousins, and her opinion that Perez's dysfunctional childhood led to her incapable personality structure.

The Regional Trial Court (RTC) declared the marriage void ab initio on grounds of psychological incapacity. This decision was reversed by the Court of Appeals, which held that the evidence presented, including Dr. Delgado's opinion, was insufficient and one-sided, as Perez had not been personally examined.

Issues:

1. Did the Court of Appeals err in reversing the RTC decision nullifying the marriage on grounds of psychological incapacity?
2. Is a personal examination of the allegedly psychologically incapacitated spouse necessary in proving psychological incapacity?

Court's Decision:

The Supreme Court ruled in favor of Estella, reinstating the RTC's decision and declaring

the marriage void ab initio.

Issue 1:

The Court of Appeals reversed the RTC's decision on the basis that the totality of evidence failed to prove psychological incapacity. The Supreme Court disagreed and emphasized that the established psychological incapacity was grave and based on clear and convincing evidence manifesting itself as a durable aspect of Perez's personality, thus fulfilling the requirements under the landmark case of **Tan-Andal v. Andal**.

Issue 2:

Reflecting on **Marcos v. Marcos**, the Supreme Court reaffirmed that personal examination by a clinical expert is not necessary for a finding of psychological incapacity. The Court stressed that the totality of evidence rule and testimony from those who observed the incapacitated spouse's behavior sufficiently established the incapacity. Dr. Delgado's findings were based on well-supported interviews and observations recounted by those closely associated with Perez.

Doctrine:

****Reconfigured Concept of Psychological Incapacity****: As articulated in **Tan-Andal v. Andal**, psychological incapacity under Article 36 of the Family Code need not be proven by medical or clinical examination. The incapacity must be demonstrated through clear acts of dysfunctionality reflecting a durable personality structure that precludes compliance with marital obligations.

Class Notes:

- ****Psychological Incapacity (Article 36, Family Code)****:
- Not strictly a medical condition but involves clear acts showing incapacity to comply with marital obligations.
- Proof can be through ordinary witnesses (not necessarily experts).
- Requires clear and convincing evidence showing gravity, juridical antecedence, and incurability.
- Personal examination of the incapacitated spouse is not required.
- ****Landmark Case:**** **Tan-Andal v. Andal** - Reconfigures the understanding of psychological incapacity.

Historical Background:

****Context****: This case is significant within Philippine jurisprudence as it illustrates the

evolving interpretation of psychological incapacity in marital relations. Earlier cases required clinical diagnoses to establish psychological incapacity, but more recent interpretations, notably reinforced by **Tan-Andal v. Andal**, have placed greater reliance on clear, observable behavior and credible testimony, making the dissolution of certain patently dysfunctional marriages more accessible.

In conclusion, the Supreme Court's decision emphasizes a progressive understanding of psychological incapacity reflecting a holistic and practical approach, thus aligning legal doctrines with the legitimate need to address dysfunctional marriages justly.