

Title

Ofelia P. Ty vs. Court of Appeals and Edgardo M. Reyes, G.R. No. 127406, November 25, 2014

Facts

1. **First Marriage of Edgardo M. Reyes:**

- **March 29, 1977:** Reyes married Anna Maria Regina Villanueva in a civil ceremony.
- **August 27, 1977:** They had a subsequent church wedding.
- **August 4, 1980:** The Juvenile and Domestic Relations Court of Quezon City declared both ceremonies null and void ab initio due to the lack of a valid marriage license and lack of consent.

2. **Marriage with Ofelia P. Ty:**

- **April 4, 1979:** Reyes married Ty in a civil ceremony with a judge in Pasay.
- **April 4, 1982:** Reyes and Ty had a church wedding in Makati.
- **January 3, 1991:** Reyes filed a civil case in the RTC of Pasig (Branch 160), seeking the nullity of his marriage to Ty, alleging no marriage license and an existing marriage to Villanueva at the time of his marriage to Ty.

3. **Procedural Posture:**

- The **Regional Trial Court (RTC) of Pasig (Branch 160)** found in favor of Reyes, declaring the marriage with Ty null and void ab initio on November 4, 1991.
- Both parties appealed to the **Court of Appeals** (C.A. - G.R. CV 37897), which affirmed the RTC's decision on July 24, 1996.
- Ty filed a motion for reconsideration which was denied, leading to the current petition in the **Supreme Court**.

Issues

1. **Whether a judicial decree of nullity of the first marriage is required before contracting a subsequent marriage.**
2. **Whether the ruling in Domingo vs. Court of Appeals applied correctly.**
3. **Whether the civil effects of the religious ratification using the same marriage license should be considered.**
4. **Whether Ty is entitled to moral and exemplary damages.**

Court's Decision

1. **Judicial Decree Before Subsequent Marriage:**

- The Supreme Court held that under the Civil Code applicable at the time of the marriages, there was no express requirement for a judicial decree of nullity before a subsequent marriage. They referred to precedents such as *People v. Mendoza* and *People v. Aragon*, which indicated no need for a judicial declaration if the first marriage was void ab initio.
- The Court rejected the appellate court's application of post-Family Code decisions to events that occurred before the Family Code's enactment.

2. **Applicability of Domingo vs. Court of Appeals:**

- The Supreme Court found that the CA incorrectly applied *Domingo*, which involved the Family Code. Since Reyes' second marriage occurred in 1979, pre-Family Code jurisprudence (which did not require a judicial declaration of nullity) was applicable.

3. **Civil Effects of Religious Ratification:**

- The Supreme Court recognized the use of the original valid marriage license for both civil and church ceremonies. They held that the subsequent church ceremony ratified and solidified their original marriage.
- The SC was persuaded by petitioner's argument regarding the benefits and protections afforded to marriage under the law and held that the church wedding should be legally recognized to prevent injustice and absurdity.

4. **Awarding Damages:**

- The Court ruled against awarding damages to Ty, reasoning that awarding damages would lead to an illogical situation where the husband would pay damages using conjugal funds. This would contravene the objective of the complaint and remedy mechanisms available.

Doctrine

1. **Void Marriages:**

- No judicial decree of nullity is required to establish the invalidity of void marriages performed before the enactment of the Family Code (1988).

2. **Subsequent Marriages:**

- Second marriages contracted before the Family Code and based on void first marriages do not require prior judicial declaration of the nullity of the first marriage for the second marriage to be valid.

3. **Religious Ratification:**

- The Court may recognize the effects of a church marriage that uses the valid license initially used in a civil ceremony, fortifying the marriage's legality.

Class Notes

- **Nullity of Marriage** - Civil Code vs. Family Code: Judicial decree required post-Family Code.
- **Article 83 Civil Code** - Discusses conditions under which subsequent marriages are void without annulment of the first.
- **E.O. No. 209 (Family Code)** - Judicial declaration necessity established.
- **Case Precedents:**
 - *People v. Mendoza* (no need for judicial decree pre-Family Code)
 - *Wiegel v. Sempio-Diy* and *Domingo v. CA* (requirement of judicial declaration post-Family Code)
- **Legal Statutes:**
 - Article 83, **Civil Code**: Specifics on bigamy and subsequent marriages.
 - Article 40, **Family Code**: Requirement of judicial declaration for annulment.

Historical Background

This case sheds light on the legal evolution in the Philippines regarding the validity of marriages and the necessity of judicial declarations of nullity. Pre-Family Code laws permitted the parties to determine the nullity of a void marriage without court intervention. This changed with the enactment of the Family Code, mandating judicial declarations, thus giving courts the power to prevent chaotic determinations of marital status and protect societal interests. This significant legal transformation was aimed at providing clarity and legal certainty but left room for reevaluation regarding vested rights predating the Family Code, as highlighted in this case.