

Title:

****IRENE CONSTANTINO DATU vs. ALFREDO FABIAN DATU****

Facts:

- ****Marriage and Filing of Complaint:****

- ****December 15, 1980:**** Irene Constantino Datu (Irene) and Alfredo Fabian Datu (Alfredo) are married in Subic, Zambales.

- They had two children together.

- ****January 3, 2005:**** Alfredo files a complaint in the Regional Trial Court (RTC) of Olongapo City to declare the marriage void due to psychological incapacity under Article 36 of the Family Code.

- ****Psychiatric History:****

- Alfredo was discharged from the United States Navy after 14 months in service for medical and psychiatric reasons, being diagnosed with schizophrenia.

- Alfredo's aunt, Policornia Dela Cruz Fabian, corroborates his psychiatric history.

- ****Marital Relationship:****

- Alfredo and Irene's relationship began when they met at church and soon escalated to living together after an incident where Irene's sister insisted they marry upon finding Alfredo sleeping in Irene's bed.

- Their marital discord included disagreements about religious beliefs, financial support, and Alfredo's delusions and psychotic beliefs influenced by his schizophrenia.

- ****Psychiatric Evaluation:****

- Clinical psychologist Martha Johanna D. Dela Cruz assessed Alfredo and diagnosed him with schizophrenia, paranoid type.

- Irene declined to undergo a psychological evaluation organized by Dela Cruz.

- ****Trial Court Decision:****

- ****September 25, 2007:**** RTC declares the marriage void due to Alfredo's psychological incapacity.

- Based on the trial and expert testimonies, the court finds Alfredo's psychological incapacity to perform marital obligations due to schizophrenia.

- ****Appeals:****

- ****October 23, 2007:**** Irene files a Motion for New Trial which the RTC denies on

December 27, 2007.

- The Court of Appeals affirms the RTC's decision on September 28, 2012, and denies Irene's Motion for Reconsideration on September 18, 2013.

- **Supreme Court Petition:**

- **October 16, 2013:** Irene files a Petition for Review on Certiorari to the Supreme Court, challenging the Court of Appeals' findings and alleging fraud and collusion, which Alfredo counters by upholding the lower courts' rulings.

Issues:

1. **Factual Determination:**

- Whether Alfredo was suffering from schizophrenia, verified by examining evidence and testimonies.

2. **Psychological Incapacity:**

- Whether Alfredo's condition constituted psychological incapacity under Article 36 of the Family Code, including establishing the incapacity's juridical antecedence, gravity, and incurability.

3. **Procedural Defect Allegations:**

- Whether the trial court proceedings were tainted by fraud, collusion, or conflict of interest, thus calling for a new trial or reversal of decisions.

Court's Decision:

Resolution of Issues:

1. **Factual Determination:**

- The Supreme Court upheld factual determinations made by the RTC and Court of Appeals showing Alfredo's schizophrenia, grounded on sufficient evidence, including expert testimonies and corroborative documents from multiple sources.

2. **Psychological Incapacity:**

- **Juridical Antecedence and Continuity:**

- The Court emphasized psychological incapacity must be an enduring aspect of a party's personality, not strictly a medical diagnosis.

- **Legal Concept:**

- Psychological incapacity is a legal concept based on a party's inherent inability to perform

essential marital obligations as illustrated by Alfredo's refusal to live with or support Irene due to delusions.

- The Supreme Court found that Alfredo's condition and resultant actions fit the legal definition of psychological incapacity.

3. **Procedural Defects:**

- **Fraud, Collusion, Conflict of Interest:**

- These claims by Irene were dismissed as unsubstantiated; there was no compelling evidence of fraud or collusion, and allegations of conflict of interest against Alfredo's counsel were not proven to meet the criteria of representation inconsistency.

Doctrine - Psychiatric Incapacity as a Legal Concept:

- The ruling reinforces the notion that psychological incapacity under Article 36 of the Family Code is a legal, not a medical, concept.

- Psychological incapacity must be an enduring part of the spouse's personality, proven by dysfunctionality in performing marital duties which must have existed at or before the marriage's inception.

Class Notes:

Key Elements:

- **Article 36 of Family Code:** Psychological incapacity must be present at the time of marriage and make a spouse unable to perform essential marital obligations.

- **Articles 68 to 71 of Family Code:** Define essential marital obligations.

- **Clear and Convincing Evidence:** Required to show psychological incapacity, distinct from strict medical diagnoses.

Principle Application:

- **Psychological Incapacity:** A recurring incapacity due to genuine psychic causes that substantially hinder fulfilling marital duties.

- **Juridical Antecedence:** The incapacity must be rooted in the spouse's personality structure and not appear solely after marriage.

Historical Background:

- **Context:** The legal grounds for declaring a marriage void due to psychological incapacity, under Article 36 of the Family Code of the Philippines, were originally

interpreted via medical diagnostics. Judicial interpretations, such as in *Tan-Andal v. Andal*, shifted this understanding towards a broader legal context emphasizing functional incapacities over medical definitions.