

Title:

****Mallion vs. Alcantara, G.R. No. 143230****

Facts:

1. ****Initial Petition Filing:**** On October 24, 1995, petitioner Oscar P. Mallion filed a petition with the Regional Trial Court (RTC), Branch 29, of San Pablo City, seeking a declaration of nullity of his marriage to respondent Editha Alcantara under Article 36 of the Family Code, citing respondent's alleged psychological incapacity. The case was docketed as Civil Case No. SP 4341-95.
2. ****RTC's Decision:**** After trial, the RTC denied the petition on November 11, 1997, finding that Mallion "failed to adduce preponderant evidence" to justify the sought relief.
3. ****Appeal to Court of Appeals:**** Mallion appealed the RTC decision, but the Court of Appeals dismissed the appeal on June 11, 1998, due to his failure to pay the required docket and lawful fees within the reglementary period.
4. ****Second Petition Filing:**** After the first decision reached finality, Mallion filed another petition on July 12, 1999, with the RTC of San Pablo City, this time alleging the absence of a valid marriage license at the time of his marriage to Alcantara.
5. ****Respondent's Motion to Dismiss:**** Alcantara filed an answer along with a motion to dismiss on August 13, 1999, citing *res judicata* and forum shopping.
6. ****RTC Dismissal of Second Petition:**** On October 8, 1999, the RTC granted respondent's motion to dismiss, citing "forum shopping and multiplicity of suits." Mallion's motion for reconsideration was denied on January 21, 2000.
7. ****Petition for Review to Supreme Court:**** Mallion then filed a petition for review on certiorari under Rule 45 of the Rules of Court, contesting the dismissal of his second petition on grounds of *res judicata*, splitting of a cause of action, and forum shopping.

Issues:

1. ****Primary Legal Issue:**** Does the principle of *res judicata* bar a subsequent petition for declaration of nullity on the ground of lack of a marriage license when a prior petition, based on psychological incapacity, was denied?
2. ****Subsidiary Issues:****
 - Does filing a second petition for nullity, based on a different ground, constitute forum

shopping?

- Is there a violation of the rule on splitting a cause of action?

Court's Decision:

1. **Res Judicata:** The Supreme Court identified that res judicata (bar by prior judgment) applies to this case. The Court ruled that since the first three requisites for res judicata (final judgment, jurisdiction, and judgment on the merits) were met, the crux was the identity of causes of action in the two cases filed by Mallion.

- The Court held that even though the grounds (psychological incapacity and lack of marriage license) differ, the cause of action in both cases remains the same—the declaration of nullity of the marriage. Therefore, the principle of res judicata bars the subsequent petition as both actions stem from the same controversy.

2. **Forum Shopping:** The Court affirmed that Mallion committed forum shopping by filing the second petition. Although the grounds were different, seeking the same relief (nullity of marriage) in separate suits is prohibited. Forum shopping is determined by the act of pursuing multiple remedies in different courts, which could result in different judgments on the same matter.

3. **Splitting a Cause of Action:** The Court supported the RTC's finding that Mallion's second petition violated the rule against splitting a cause of action. The petitioner should have raised all potential grounds in the initial action rather than presenting them piecemeal in successive actions. The practice promotes litigation finality and judicial efficiency.

Doctrine:

- **Res Judicata:** A final judgment on the merits by a competent court bars further suits involving the same parties based on the same cause of action.

- **Forum Shopping:** Pursuing multiple judicial remedies simultaneously or successively is barred when it could lead to conflicting decisions.

- **Splitting a Cause of Action:** All relevant grounds must be presented in the initial pleading to avoid multiple litigations on the same issue.

Class Notes:

- **Key Concepts:**

- **Res Judicata:** Defined under Section 47 of Rule 39, Rules of Court. Prevents re-litigation of claims.

- **Forum Shopping:** Seeking multiple judicial reliefs for the same cause.

- **Splitting of a Cause of Action:** Presenting all grounds in the first instance is mandatory.
- **Article 36, Family Code:** Addresses psychological incapacity grounds for nullity of marriage.
- **Article 4, Family Code:** Essential requisites for marriage, including a marriage license.

Application: Requires a comprehensive presentation of all grounds and issues related to the petition in the initial action to avoid legal consequences tied to res judicata and forum shopping.

Historical Background:

The case highlights the Philippine judiciary's commitment to preventing legal redundancy and judicial inefficiency. By asserting res judicata's principle and establishing strict compliance with forum shopping regulations and cause of action rules, the case reinforces litigation's foundational doctrines dating back to ancient common-law principles and modern statutory regulations. This decision underscores the legal evolution and continued emphasis on finality and judicial orderliness in Philippine jurisprudence.