

Title

Marietta C. Azcueta vs. Republic of the Philippines and the Court of Appeals, G.R. No. 182487

Facts

Step-by-Step Series of Events

1. **Marriage and Separation:**

- Marietta C. Azcueta (petitioner) and Rodolfo Azcueta (respondent) got married on July 24, 1993, after less than two months of courtship.
- Their marriage lasted four years before they separated in 1997. They had no children.

2. **Initial Petition:**

- On March 2, 2002, petitioner filed a petition for declaration of absolute nullity of marriage under Article 36 of the Family Code in the RTC of Antipolo City, Branch 72. The case was docketed as Civil Case No. 02-6428.

3. **Proceedings at RTC:**

- Respondent failed to appear or file an answer despite being served summons. The court then directed the City Prosecutor to investigate any possible collusion between parties, finding none.
- The Office of the Solicitor General (OSG) entered its appearance on behalf of the Republic of the Philippines.

4. **Petitioner's Claims:**

- Petitioner claimed Rodolfo was psychologically incapacitated to comply with marital obligations, describing him as emotionally immature and irresponsible.
- He relied financially on his mother, showing no initiative to seek employment, and even lied about having a job to appease petitioner.
- Rodolfo exhibited physical violence when drunk and was sexually reticent.

5. **Witnesses and Expert Testimony:**

- Florida de Ramos, Rodolfo's cousin, corroborated petitioner's claims.
- Dr. Cecilia Villegas, a psychiatrist, diagnosed Rodolfo with Dependent Personality Disorder, asserting it was severe, incurable, and predated the marriage.

6. **RTC Decision:**

- On October 25, 2004, the RTC declared the marriage null and void, based on Rodolfo's psychological incapacity.
- An Amended Decision was issued on July 19, 2005, to correct a clerical error in Rodolfo's name.

7. **Appeal and CA Decision:**

- The OSG appealed, arguing the psychiatric report was inadequate without directly examining Rodolfo and that psychological incapacity was not proven to exist at marriage's inception.
- The Court of Appeals (CA) reversed the RTC's decision on August 31, 2007, maintaining the validity of the marriage, citing a lack of substantiation for psychological incapacity under Article 36.

8. **Petition for Review:**

- Petitioner Marietta C. Azcueta appealed to the Supreme Court, challenging the CA's decision.

Issues

1. Whether the totality of evidence was sufficient to prove Rodolfo's psychological incapacity under Article 36 of the Family Code.
2. Whether psychological incapacity needs to be personally examined by a psychiatrist or psychologist.
3. Whether Rodolfo's psychological incapacity existed at the time of or prior to the marriage ceremony.
4. Whether Rodolfo's psychological incapacity was severe, permanent, and incurable.
5. Whether Rodolfo's actions resulted from psychological incapacity or merely from youth and emotional immaturity.

Court's Decision

1. **Totality of Evidence:**

- The Supreme Court agreed with the trial court that the petitioner had sufficiently established Rodolfo's psychological incapacity through both direct testimony and the psychiatric evaluation.

2. **Psychiatric Examination Necessity:**

- The Court reiterated in *Marcos v. Marcos* that personal examination of the psychologically incapacitated spouse is not a sine qua non for declaring a marriage null. The totality of evidence standard applies.

3. **Existence of Incapacity at Marriage:**

- The Court found that Rodolfo's dysfunctions, stemming from a deep-seated dependency on his mother, existed prior to the marriage and became apparent post-marriage.

4. **Severity, Permanence, and Incurability:**

- Supported by expert testimony, the Court held that Rodolfo's condition was severe and irreversible, rendering him incapable of fulfilling marital obligations.

5. **Distinguishing Psychological Incapacity from Youthful Immaturity:**

- Addressing the CA's view of Rodolfo's actions as immaturity, the Supreme Court emphasized the clinical diagnosis of Dependent Personality Disorder explained by Dr. Villegas, marking a juridically significant condition under Article 36.

Doctrine

- **Article 36, Family Code:** Psychological incapacity must be:

- Medically or clinically identified.

- Existing at the time of marriage.

- Permanent and incurable.

- Grave to an extent that it renders a spouse incapable of performing marital obligations.

- **Marcos vs. Marcos:** Personal examination of the allegedly incapacitated spouse is not mandatory for evidence.

- **Republic v. Court of Appeals and Molina:** Burden of proof lies with the plaintiff; any doubt should favor marriage's validity.

Class Notes

- **Dependent Personality Disorder:** A severe, ingrained psychological condition characterized by dependence on a dominant figure, causing incapacity in marital roles.

- **Article 36 Family Code:**

- **Art. 68:** Mutual obligations of love, respect, support.

- **Art. 69-71:** Responsibilities for domicile, family support, and management.

- **Psychological Incapacity Jurisprudence:** Emphasizes gravity, juridical antecedence,

and incurability, as rooted in serious medical/psychological disorders.

Historical Background

The legal framework under Article 36 of the Family Code allows the declaration of nullity of marriages on the grounds of psychological incapacity. The doctrine evolved significantly through landmark cases like *Molina*, refining the judicial interpretation by establishing stringent criteria balancing state interest in preserving marriages and the protection of individuals from being bound in dysfunctional marital bonds. This case underscores the judiciary's ongoing effort to delineate the boundaries of psychological incapacity within evolving societal and psychological paradigms.