

**Title:** Manuel de Asis v. Court of Appeals, et al., G.R. No. [Insert G.R. Number]

**Facts:**

- Initial Complaint:** On October 14, 1988, Vircel D. Andres, representing her minor child Glen Camil Andres de Asis, filed Civil Case No. Q-88-935 in the Regional Trial Court (RTC) of Quezon City, Branch 94. The complaint sought maintenance and support from Manuel de Asis, asserting he was the father.
- Defendant's Response:** Manuel de Asis denied paternity in his Answer and claimed he had no obligation to support Glen Camil Andres de Asis.
- Procedural Development:**
  - On July 4, 1989, Vircel D. Andres, via her counsel, filed a manifestation highlighting Manuel de Asis' judicial admission of denying paternity.
  - The plaintiff concluded it was futile to pursue the support claim and sought case withdrawal, conditioned on the defendant not pursuing his counterclaim.
- Court Order:** On August 8, 1989, the RTC dismissed Civil Case No. Q-88-935 with prejudice, based on mutual agreement by the parties.
- Subsequent Complaint:** On September 7, 1995, Vircel D. Andres, again representing Glen Camil Andres de Asis, filed a new complaint for support (Civil Case No. C-16107) in the RTC of Kalookan City, Branch 130, seeking arrears and ongoing monthly support from Manuel de Asis.
- Motion to Dismiss:** Manuel de Asis filed a motion to dismiss on October 8, 1993, arguing that the action was barred by res judicata due to the previous dismissal with prejudice of Civil Case No. Q-88-935.
- Trial Court Decision:** On November 25, 1993, the RTC denied the motion to dismiss, ruling that res judicata does not apply to support actions prohibited from renunciation or waiver by law. A subsequent motion for reconsideration was also denied.
- Appeal to CA:** Manuel de Asis petitioned for certiorari with the Court of Appeals, which dismissed the petition on June 7, 1996, affirming the trial court's orders.
- Appeal to Supreme Court:** Manuel de Asis filed the instant petition for certiorari under Rule 65 before the Supreme Court.

**\*\*Issues:\*\***

1. **\*\*Whether the second complaint for support is barred by res judicata due to the previous dismissal with prejudice of Civil Case No. Q-88-935:\*\***
  - Sub-issue: Whether the manifestation by the complainant's mother, acknowledging the futility in pursuing support based on the defendant's denial of paternity, constitutes an effective renunciation of the minor's right to support.

**\*\*Court's Decision:\*\***

1. **\*\*Res Judicata and Support Actions:\*\*** The Supreme Court ruled that res judicata does not bar the subsequent action for support. The bar against renunciation or waiver of future support, as per Article 301 and Article 2035 of the Civil Code, signifies that the minor's right to support cannot be negated by a prior judicial admission or compromise agreement.
  - The court emphasized that support claims, predicated on paternity and filiation, cannot be conclusively settled by the private agreement of parties and must be judicially determined.
2. **\*\*Futility Admission:\*\*** The court held that the manifestation by the complainant's mother amounted to an improper renunciation of the minor's right to claim support, violating statutory protections against such waivers. The earlier case's dismissal, predicated on this faulty renunciation, does not judicially establish the absence of paternity.
3. **\*\*Compromise and Future Support:\*\*** Compromise agreements affecting future support are explicitly prohibited by law due to the nature of support being founded on the essential needs of the recipient, as reinforced by precedents and statutory stipulations.
4. **\*\*Binding Nature of Admission:\*\*** While admissions may bind a party evidentially, they are not conclusive in determining essential legal relationships like paternity and do not bar future genuine claims for support by the minor.

**\*\*Doctrine:\*\***

1. **\*\*Renunciation and Waiver of Support:\*\*** Article 301 of the Civil Code states the right to receive support cannot be renounced or transmitted. Article 2035 asserts that future support cannot be compromised. Thus, any agreement or judicial admission negating this right is legally ineffective.
2. **\*\*Right to Life & Public Policy:\*\*** The right to support is aligned with the right to life, which cannot be renounced. Allowing renunciation undermines public policy by potentially

converting private familial obligations into public burdens.

**\*\*Class Notes:\*\***

1. **\*\*Res Judicata:\*\*** The principle that a final judgment on the merits by a competent court is conclusive between the same parties in any future lawsuit on the same cause of action. Not applicable to future claims for support.
2. **\*\*Article 301, Civil Code:\*\*** Prohibits renunciation, transmission, reduction through compensation, or compromise of the right to support.
3. **\*\*Article 2035, Civil Code:\*\*** Lists non-compromisable issues, including the civil status of persons and future support.
4. **\*\*Judicial Determination:\*\*** Paternity and filiation must be judicially established, not left to private admission or agreement.

**\*\*Historical Background:\*\***

The case highlights evolving jurisprudence on the irrevocable nature of support obligations within Philippine family law. Historically, the courts have emphasized protection mechanisms to ensure that support, essential for life's sustenance, is preserved notwithstanding parents' private agreements or judicial admissions aimed at evading these responsibilities. This legal rigor is reflective of the broader societal commitment to uphold family integrity and prevent public fiscal burdens resulting from private familial neglect.