

Title: Gotardo vs. Buling, G.R. No. 163504

Facts:

1. **Events Leading to the Case:**

- **December 1, 1992:** Divina Buling and Charles Gotardo met at the Philippine Commercial and Industrial Bank branch in Maasin, Southern Leyte. Buling was a casual employee, and Gotardo was an accounting supervisor.
- **December 1992 to January 1993:** Gotardo started courting Buling, and they became sweethearts by the end of January 1993.
- **September 1993:** The couple began intimate sexual relations at Gotardo's boarding house room rented from Buling's uncle, Rodolfo Lopez.

2. **Pregnancy and Birth:**

- **August 8, 1994:** Buling discovered her pregnancy and informed Gotardo. They initially planned to marry, even applying for a marriage license.
- **March 9, 1995:** Buling gave birth to their son, Gliffze O. Buling.

3. **Legal Actions:**

- **July 24, 1995:** Buling sent a letter demanding recognition and support for Gliffze.
- **September 6, 1995:** Filed a complaint for compulsory recognition and support pendente lite at the RTC, Maasin, Southern Leyte.

4. **Procedural History:**

- **RTC Proceedings:**
 - Gotardo denied paternity. The RTC terminated the pre-trial proceedings due to the failure of an amicable settlement.
 - During the trial, Buling's discrepancies in her testimony were noted, specifically concerning when their intimate relations started ("September 1993" vs. "last week of January 1993").
 - The RTC dismissed Buling's complaint on **June 25, 2002**, citing insufficient evidence and ordered her to return the support amount and pay **₱10,000** in attorney's fees.
- **Court of Appeals (CA) Proceedings:**
 - The CA overturned the RTC decision on **March 5, 2004**, citing that Buling had an honest mistake in understanding the question and concluded the established intimate relationship enough for paternity. It reinstated the **₱2,000** monthly child support order.
 - Gotardo's motion for reconsideration was denied on **July 27, 2004**.

- ***Supreme Court Proceedings***: Gotardo filed a petition for review on certiorari, challenging the CA's decisions.

Issues:

1. ****Primary Issue:****

- Did the CA commit a reversible error in rejecting the RTC's evaluation of the respondent's testimony and ordering Gotardo to recognize and support Gliffze?

2. ****Legal Issues:****

- Determination of filial evidence sufficiency to establish paternity.
- The legal obligations of a recognized putative father towards support, specifically for an illegitimate child.

Court's Decision:

The Supreme Court ruled in favor of Buling, affirming the CA's decision:

1. ****Evaluation of Evidence:****

- The Court found significant evidence proving Gotardo's paternity. The minor discrepancies in Buling's testimony were attributed to simple misunderstanding rather than dishonesty.
- The Court emphasized totality in evaluation, ruling that Buling consistently established an intimate relationship and the prima facie case for Gotardo being Gliffze's father.

2. ****Rejection of Petitioner's Arguments:****

- Gotardo's allegations of Buling's infidelity and promiscuity lacked substantial proof.
- The petitioner's defense (denial of paternity based on the disputed timeline) was not credible compared to Buling's testimony corroborated by her uncle Lopez.

3. ****Support Obligation:****

- Established paternity obligates support. The Court upheld the ₱2,000 monthly child support considering the petitioner's financial capacity and the necessities of Gliffze.

Doctrine:

- ****Filiation and Support Obligations:**** Once filiation is proven, the parent is obligated to provide support. This applies to both legitimate and illegitimate children (Articles 195, 194, and 201 of the Family Code of the Philippines).
- ****Burden of Proof:**** The burden shifts to the putative father to prove incapability of sexual relations or mother's infidelity after a prima facie case is established.

Class Notes:

- **Prima Facie Case in Paternity:** When a woman declares a man as the child's father supported by substantial evidence, the burden shifts to the alleged father.
- **Support:** The amount of child support may be subject to adjustment based on the financial capacity of the parent and the child's needs (Family Code, Article 201).
- **Evidence Evaluation:** Witness credibility and testimony should be evaluated in totality, not in isolated sections.

Historical Background:

This case underlines the complexities in establishing paternity and the legal obligations resulting from recognition of filiation in the Philippines. It highlights the judicial approach towards intimate relationships and the necessity for thorough evidence review and balancing parental responsibilities towards children's welfare. The precedent stresses fair child support by obliging presumed fathers based on credible relationship proof, enriching jurisprudence in family law.