

Perez-Ferraris vs. Ferraris

Facts

1. **Initial Marriage and Petition**:

- **Marriage**: Ma. Armida Perez-Ferraris and Brix Ferraris were married.
- **Petition for Nullity**: Ma. Armida Perez-Ferraris filed a petition for declaration of nullity of marriage based on Brix Ferraris' alleged psychological incapacity under Article 36 of the Family Code.

2. **Trial Court Proceedings**:

- **Trial Court Decision (February 20, 2001)**: The Regional Trial Court (RTC) of Pasig City, Branch 151 denied the petition. The court stated that the respondent's condition of epilepsy did not amount to psychological incapacity and the evidence was insufficient to prove infidelity.
- **Motion for Reconsideration**: Petitioner filed a motion for reconsideration, which was denied on April 20, 2001. The RTC reiterated the lack of evidence demonstrating a psychological or physical incapacity to assume marital obligations knowingly and willingly.

3. **Appeal to Court of Appeals**:

- **Appeals Court Decision (April 30, 2003)**: The Court of Appeals affirmed the trial court's judgment, stating that petitioner's evidence failed to convincingly establish respondent's severe psychological incapacity.
- **Motion for Reconsideration**: Denied on February 24, 2004, petitioner again failed to substantiate claims regarding respondent's psychological incapacity.

4. **Supreme Court Review**:

- **Petition for Review**: Denied by the Supreme Court on June 9, 2004, due to lack of sufficient shown reversible error on the part of the Court of Appeals.
- **Motion for Reconsideration**: Filed by petitioner; the Supreme Court directed the respondent to comment, but he waived this opportunity. The Office of Solicitor General (OSG) complied with submitting a comment on March 2, 2006.

Issues

1. **Existence of Psychological Incapacity**:

- Whether Brix Ferraris was psychologically incapacitated to fulfill essential marital obligations from the inception of the marriage under Article 36 of the Family Code.

2. **Review of Factual Findings**:

- Whether the Supreme Court can re-evaluate and reverse the factual findings of the lower courts with regard to psychological incapacity.

Court's Decision

Existence of Psychological Incapacity

1. **Factual Review Limitation**:

- **Supreme Court Jurisdiction**: The Supreme Court emphasized that it is not its role to reassess evidence or re-evaluate factual determinations especially when the trial court's factual findings, affirmed by the Court of Appeals, show no compelling reason for further review.

2. **Article 36 Criteria**:

- **Definition**: Psychological incapacity under Article 36 involves a grave, permanent, and severe psychological illness existing at the inception of the marriage rendering a party unable to assume marital responsibilities knowingly.

- **Expert Testimony**: Court requires concrete, definite proof of such incapacity provided by medical or psychological experts. The failure to identify, explain or prove a root psychological illness led to denial of the petition.

3. **Invalid Claims**:

- **Dr. Dayan's Testimony**: The psychological expert's vague and speculative conclusions failed to demonstrate respondent's incapacity. The evidence, derived largely from petitioner, lacked credibility and conclusiveness.

- **Behavioral Deficiencies**: Evidence of infidelity and respondent's alleged misbehavior were attributed to personal willfulness or relational conflicts but not to psychological incapacity.

Final Ruling

- **Motion for Reconsideration**: Denied with finality due to insufficiently demonstrated claims of reversible error and substantial failure to prove psychological incapacity as legally defined.

Doctrine

- **Psychological Incapacity under Article 36**: Refers to a severe and permanent

psychological disorder existing at the marriage's inception, rendering one unable to perform essential marital duties. Requires medically recognized evidence that clearly correlates behavior with psychological illness.

Class Notes

- **Key Legal Elements**:
- **Psychological Incapacity**: Grave, chronic, incurable, present at marriage's inception.
- **Article 36 of the Family Code**: Legal basis for nullity based on incapacity.
- **Factual Findings**: Supreme Court's limited review role in factual findings.

- **Statutory Provisions**:
- Article 36, Family Code: Establishes grounds for marriage nullity based on psychological incapacity.

- **Application**:
- Verified by expert psychological analysis.
- Definitive proof required to substantiate claims effectively.

**Historical Background

- **Legal Context**:
- **Article 36**: Enacted to allow nullity on proven psychological grounds while maintaining marriage indissolubility respecting constitutional protection.

- **Case Interaction**:
- **Framework application**: Case highlights rigorous standards for psychological incapacity claims and strengthens the judicial restraint principle in reviewing lower courts' factual findings.