

****Title:**** Diana M. Barcelona vs. Court of Appeals and Tadeo R. Bengzon

****Facts:****

1. On March 29, 1995, Tadeo R. Bengzon (“Respondent Tadeo”) initially filed a Petition for Annulment of Marriage against Diana M. Barcelona (“Petitioner Diana”) in the Regional Trial Court of Quezon City, Branch 87 (first petition: Civil Case No. Q-95-23445).
2. On May 9, 1995, Respondent Tadeo filed a Motion to Withdraw the Petition, which was granted on June 7, 1995, resulting in a dismissal without prejudice.
3. Subsequently, on July 21, 1995, Respondent Tadeo filed another Petition for Annulment of Marriage in the same court but under a different branch (Civil Case No. Q-95-24471).
4. Petitioner Diana moved to dismiss the second petition citing (a) failure to state a cause of action, and (b) violation of Supreme Court Administrative Circular No. 04-94 concerning forum shopping.
5. Despite opposition from Respondent Tadeo and additional arguments from Petitioner Diana, the trial court deferred the ruling initially and, upon reconsideration, ultimately denied both dismissal and reconsideration motions.
6. On February 14, 1997, Petitioner Diana filed a Petition for Certiorari, Prohibition, and Mandamus with the Court of Appeals, contesting the trial court’s decisions.
7. The Court of Appeals dismissed this petition and subsequent motion for reconsideration, affirming that a cause of action was stated in the second petition and there was no forum shopping violation.
8. Petitioner Diana elevated the matter to the Philippine Supreme Court through a Petition for Review.

****Issues:****

1. Whether the allegations in the second petition for annulment sufficiently state a cause of action.
2. Whether Respondent Tadeo violated Supreme Court Administrative Circular No. 04-94 by not indicating the filing and status of the first petition in the certificate of non-forum shopping.

****Court’s Decision:****

1. ****Sufficiency of Cause of Action:****

- The Court held that an adequate cause of action was stated, comprising elements of a legal right in the plaintiff, an obligation of the defendant to respect such right, and an act or omission in violation. Respondent Tadeo’s petition met these requirements by claiming psychological incapacity under Article 36 of the Family Code. The Court noted that the new

procedural rules superseded earlier requirements, eliminating the necessity to state the root cause or expert opinion in the petition.

2. **Violation of Forum Shopping Rule:**

- The Court found no violation of procedural rules regarding forum shopping. The previous case's withdrawal and dismissal without prejudice negated any risk of res judicata or litis pendencia, rendering the omission of the past case's details in the non-forum shopping certificate as non-fatal to the petition.

Doctrine:

- A pleading sufficiently states a cause of action if it outlines the plaintiff's right, a correlative obligation, and a breach thereof. Psychological incapacity petitions do not require initial root cause assertions or expert testimony.
- The rules on forum shopping require substantial compliance, and literal interpretations should not thwart the objective of ensuring justice.

Class Notes:

- **Elements of Cause of Action:** Right of the plaintiff, obligation of the defendant, violation of that right.
- **Article 36, Family Code:** Psychological incapacity at marriage time renders marriage void ab initio.
- **Forum Shopping:** Courts assess the status and closure of prior actions to avoid litis pendencia.

Historical Background:

- The doctrine of psychological incapacity, introduced in the Family Code in 1988, aimed to address the validity of marriages concerning severe personality disorders.
- Supreme Court Administrative Circular No. 04-94 was instituted to prevent simultaneous and duplicitous litigations, safeguarding judicial resources and ensuring efficient adjudication processes.