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Understanding Psychological Incapacity in Marital Nullity Jurisprudence: Qualitative Analysis of Selected Supreme Court Case Verdicts

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Abstract

Marriage, as a cornerstone of society, is afforded protection by the 1987 Philippine Constitution (Article XV). Yet, marital conflicts often lead to severe consequences for spouses and children. The Family Code of 1987, amended by E.O. 227, introduced psychological incapacity as grounds for declaring marriages void ab initio. This study analyzes 42 marital nullity cases (17 affirmed, 25 denied) from 2000 to 2022, sourced from Lawphil, to uncover distinctions in verdicts by the Regional Trial Courts (RTC) and Supreme Court (SC). Using thematic narrative analysis, four key stages emerged: courtship, marital life, conflict, and case procedure. Affirmed and denied cases differed in evidence presentation, particularly regarding the severity, juridical antecedence, and incurability of psychological incapacity. RTC decisions primarily relied on the presented evidence, while the SC adopted a holistic approach, considering the illness's gravity, antecedence, and incurability. Direct psychological assessments were pivotal in affirmed cases, while indirect assessments were insufficient for denied cases. Some rulings equated psychological incapacity with personality disorders or mental illness, causing inconsistencies, especially in determining gravity, antecedence, and incurability. The study underscores the need for recognized psychologists or clinical experts to address marriage-related cases involving psychological incapacity, ensuring a more precise application of the Family Code.

Introduction

Marriage holds great value and protection in Philippine society, as defined in Article XV of the 1987 Philippine Constitution and Article 1 of the Family Code. It is considered a sacred and unbreakable institution, forming the foundation of the family, and governed by strict laws to maintain family harmony. The state, particularly the Supreme Court, is committed to preserving marriage and preventing its dissolution, allowing termination only in extreme cases to safeguard the integrity of the institution from whimsical and capricious motives. Laws on marital separation and annulment were designed to ensure that marriages are dissolved only under exceptional circumstances, reflecting the nation's dedication to upholding the sanctity of marriage and its significance in Philippine society. Marital conflicts, however, are inevitable and often lead to severe consequences for spouses and their children, with violence against wives being a common issue.

Before 1987, limited options existed for couples in tumultuous marriages. The introduction of the Family Code and the concept of psychological incapacity provided a more lenient legal process for declaring marriages null and void. Since then, the use of psychological incapacity as a basis for marital nullity has become popular, with around 85% of cases relying on it. Annulment cases have shown an increasing trend, with an average of 10,000 cases annually from 2012 to 2017 (Philippine Statistics Authority, 2019).

Initial observations show significant disparities in court verdicts from lower courts (RTC and CA) to the Supreme Court (SC) regarding marital nullity cases based on psychological incapacity. Around 95% of cases in lower courts are affirmed, but 90% of those reaching the SC are reversed or denied. The lack of a clear definition and examples of psychological incapacity in the law has led to diverse interpretations, prompting the SC to establish guidelines in the Santos vs. Court of Appeals (1995) and Republic vs. Court of Appeals and Molina (1997) cases, known as the Molina Guidelines. However, the Court still leaves the determination of psychological incapacity to the discretion of the judge, based on the evidence presented in each case (Malibiran, 2007).

After more than three decades, the concept of psychological incapacity remains elusive, leading to controversies and inconsistencies in its application and interpretation among clients, lawyers, and courts. Limited studies attempt to clarify it from a legal perspective, and no empirical study examines it from a behavioral-clinical-forensic psychology standpoint. The lack of consultation with experts in psychiatry and psychology during its conceptualization and enactment further contributes to the disparity in its implementation (Cruz-Abrenica, 2006; Pascual, 2017; Arias, 2016; Malibiran, 2007).

In light of the situation, a comprehensive analysis of the concept of psychological incapacity in marital nullity cases, considering its clinical equivalence and psychological foundations, is imperative. A forensic psychology perspective can enhance our understanding through empirical and scientific examination. This would benefit both the court system and potential clients seeking nullity based on psychological incapacity, facilitating informed decisions.

Interpretation of Article 36 Over the Years

Article 36 of the Family Code offers an alternative to absolute divorce by declaring a marriage void from the start due to psychological incapacity. Adapted from Roman Catholic Canon Law 1095, it serves multiple purposes, including avoiding conflict with the church's stance on divorce and providing a remedy for couples with irreconcilable differences. The framers aimed to liberalize the grounds for nullifying marriages, but the Supreme Court emphasized cautious interpretation based on individual case facts and expert opinions (Arias, 2016; Cruz-Abrenica, 2006; Santos vs CA, 1995; Jumamil, 2012; Ngo Te vs. Yu-Te, 2009).

A precise and well-illustrated definition of psychological incapacity explicitly incorporated into the Family Code could have influenced the application and breadth of Article 36. The framers initially attempted to define it but opted for a broader provision due to differences in conceptualization from Canon Law. The lack of a definitive definition may lead to unstandardized and potentially misinterpreted application by courts and judges, encompassing various degrees of marital disagreements (Santos vs. Bedia-Santos, 1995; Pascual, 2017; Cruz-Abrenica, 2006).

The concept of psychological incapacity in Article 36 has evolved over the years. Initially, it was characterized as a serious mental illness or personality disorder, but the Molina guidelines (Supreme Court of the Philippines, 1997) intensified the criteria, requiring medical or clinical identification, permanence, and gravity. However, these strict guidelines limited its application. In the recent Tan-Andal v Andal case (Supreme Court of the Philippines, 2021), the Court re-examined and modified the guidelines, emphasizing a more liberal approach. Psychological incapacity need not be proven by experts, and its permanence and incurability are viewed from a legal, not medical perspective. This shift allows for a clearer and more convincing judgment based on the totality of the evidence.

Current Study

The primary objective of this study is to comprehensively examine the concept and application of psychological incapacity in marital nullity jurisprudence. Notably, the research seeks to address the significant variations in court verdicts regarding psychological incapacity. The main focus lies in analyzing the narratives of couples involved in marital nullity cases based on psychological incapacity. The researchers primarily utilize the stories of these cases as the key source of information to investigate specific questions of interest, which are as follows:

1. What are the stories of marital nullity cases based on psychological incapacity?
2. What constitutes psychological incapacity in marital nullity cases that are affirmed and denied in finality by the Supreme Court?
3. What problems and issues do these judicial decisions create from the standpoint of the interaction of psychology and law?

The Framework of the Study

The conceptual framework for understanding psychological incapacity in marital nullity jurisprudence encompasses the definition of psychological incapacity as stated in Article 36 of the Family Code and interpretations from landmark cases like Santos vs. Court of Appeals and Molina guidelines. It includes the legal criteria and guidelines for proving psychological incapacity, along with an exploration of relevant psychological theories and concepts such as personality disorders and mental illnesses. The framework involves analyzing case narratives to identify patterns and trends in applying the concept. Additionally, it considers empirical evidence, including psychological assessments and expert testimonies. The implications for legal practice and potential areas for further research are also addressed, providing a comprehensive guide for comprehending the complexities of psychological incapacity in marital nullity cases.

The foundational theory employed in this study is the legal framework of psychological incapacity, as specified in Article 36 of the Family Code, amended by Executive Order 227. According to this legal framework, if a couple entering into a permanent union is deemed psychologically incapacitated to fulfill essential marital obligations before or during the marriage celebration, the union shall be declared null and void, even if such incapacity becomes evident only after the solemnization.

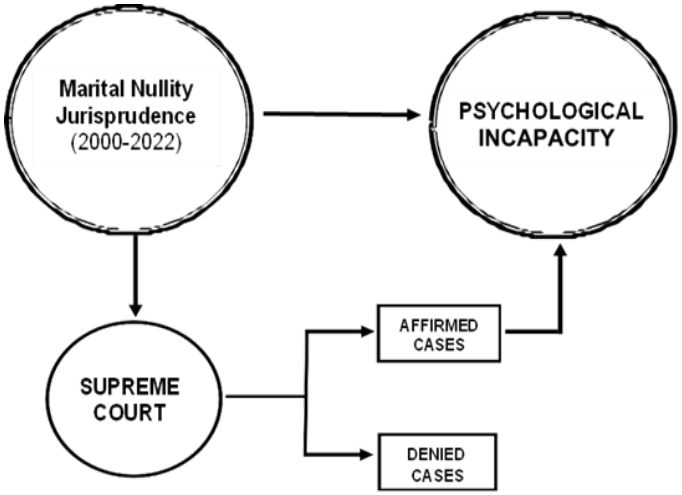

Figure 1. The conceptual framework of the study

In essence, it identifies spouses lacking appreciation for essential marital obligations, proven to be psychologically incapacitated and unfit for marriage. Arias (2016) previously utilized this legal theory in a thematic analysis of marital nullity cases, focusing on personality disorders as a core aspect of psychological incapacity. In this study, a similar legal framework is used to analyze narratives from petitioner trial court cases, contributing to a deeper understanding of psychological incapacity in marital nullity cases and addressing the research question.

Materials and Methods

This study employed a qualitative design to explore patterns of meaning in marital nullification cases based on psychological incapacity. A reflexive thematic analysis (Braun & Clarke, 2019) was chosen for its suitability in examining rich, context-specific narratives. This approach aligns with the study's exploratory nature, allowing themes to emerge inductively through deep engagement with the data. Although themes were identified post-hoc, this is consistent with qualitative inquiry that values emergent design and reflexivity. The unit of analysis was the narrative content of Supreme Court decisions, focusing on the couples' relational histories, grounds for nullification, and the court's rationale.

The primary source of case trials was the Lawphil Project by the Arellano Law Foundation, a credible legal website containing Philippine law and jurisprudence on voiding marriages due to psychological incapacity. Seventeen (17) affirmed cases and 25 denied cases were selected for this study. We utilized a narrative analysis with a thematic approach and coding to form themes from the 42 pieces of jurisprudence on marital nullification. The coding process followed Braun and Clarke's (2019) six-phase framework for reflexive thematic analysis. First, all 42 Supreme Court decisions were read repeatedly to gain familiarity with the data and note initial ideas. Next, open coding was done by highlighting and labeling relevant portions of text that reflected patterns related to psychological incapacity. These initial codes were then organized into broader potential themes by identifying patterns and connections across cases. Themes were reviewed, refined, and clearly defined to ensure they accurately represented the dataset. Finally, representative excerpts from selected cases were used to illustrate and support the finalized themes in the report. This process allowed for systematic analysis of the jurisprudence while preserving the depth and context of the legal decisions.

To ensure credibility, we employed peer review and engaged five (5) independent readers to code and discuss the data, following the guidelines of narrative analysis. Their insights and interpretations were then compared and discussed in group sessions to identify common patterns and resolve any interpretive differences. This collaborative process emphasized the plausibility of the findings and ensured shared meaning, establishing that the emerging themes are coherent, comprehensive, and contextually grounded

Results

The study's focus is on marital nullity jurisprudence revealing themes in four stages: courtship, marital, marital conflict, and case procedure. The courtship stage delves into initial meetings and relationship changes. The marital stage discusses marriage aspects, experiences, settlement, and children. The marital conflict stage explores conflicts leading to nullification. The case procedure stage outlines the legal process, including petitioner motivations, and court verdicts.

"Affirmed" Narratives

Courtship Stage

In the 17 affirmed cases, couples often had their first encounters in school, work, or church settings. For instance, Marcos v. Fajardo met at the University of the Philippines, Diliman, and their acquaintanceship evolved into a romantic relationship. In Hidalgo v. Gapac, they worked together at a fast-food chain, and their relationship turned intimate quickly. Some couples also met in church settings, like Santiago v. Bautista, where they reconnected through letters from mutual friends. Premarital sex was common in six cases, leading to pregnancies in five instances, such as in De Leon v. Gonzales. Instances of extreme jealousy, irresponsibility, and unstable relationships were observed, as in the case of Reyes v. Dolor. Some case files lacked information on first encounters and courtship stages.

Marital Stage

Based on the 17 affirmed cases, most couples experienced harmonious cohabitation during the initial years of their marriage, indicating positive early marital experiences. A significant number of couples chose to live with their parents after the wedding. However, it is noteworthy to mention that some of the cases revealed distressing situations, wherein certain spouses engaged in contentious arguments with their in-laws, leading to strained relationships. There were instances where couples encountered challenges such as financial discomfort, feelings of shame towards their partner, and suspicious behaviors.

One particular instance involved a woman who entered marriage with the belief that her husband would change, but it resulted in immense disappointment. These cases showcased the diverse range of experiences that couples faced during their early years of marriage.

When analyzing the context of marital bonds, it became evident that civil weddings were more common compared to church weddings. Some couples had previously cohabited before getting married, leading to unique circumstances, such as having a child before marriage, surrounding their union.

In general, the data from the affirmed cases provided insights into the early marital experiences, contextual aspects of marriage, dwelling choices, and childbearing patterns of couples involved in marital nullity cases based on psychological incapacity grounds.

Marital Conflict Stage

The most prevalent sources of marital conflict in the affirmed cases included physical violence, extramarital affairs, and irresponsible behavior. These conflicts often arose a few years into the marriage, but some cases showed conflicts arising even before the marriage. Financial issues were also frequently cited as the root cause of misunderstandings leading to marital conflict. For example, in Valdez v. Villaruel, the wife's demands for a luxurious lifestyle and lack of concern for their children's support led to conflict. Extreme jealousy, deceitful attitudes, and lackadaisical behaviors were also contributing factors. Other cases indicated conflicts arising from threats by in-laws, anger issues, and gambling habits.

Physical violence emerged as the most severe problem faced by couples, with eight out of 17 cases involving fits of anger leading to physical harm. Cases like Reyes v. Dolor depicted both spouses engaging in physical violence against each other.

Extramarital affairs were another significant factor contributing to conflicts. Several cases revealed partners having affairs outside of marriage, leading to trust issues and emotional distress. In some cases, extramarital affairs even resulted in the birth of illegitimate children, further complicating the marital dynamics.

Irresponsible behavior and apathy on the part of the respondents were the third major reason for the gradual deterioration of relationships. For instance, in the case of Reyes v. Dolor, the respondent showed a lack of responsibility and failed to find stable employment to support the family.

Case Procedure Stage

The case procedure stage encompasses four subthemes: the reasons given by the petitioner for filing, the psychological findings, the evidence presented, and the duration of the procedure from marriage to the three levels of court rulings in affirming cases. The majority of the

affirmed cases were filed by male petitioners, claiming psychological incapacity of their wives, themselves, or both.

Among the reasons cited by petitioners for filing marital nullity, relationship abandonment was the most common, exemplified in cases like Bugan v. Domingo. Other reasons included adultery, an uncommitted spouse, pathological lying, jealousy, drug addiction, neglect of children, and death threats. The psychological findings revealed that narcissistic personality disorder (NPD) was the most prevalent personality disorder, appearing in nine affirmed cases. Individuals with NPD exhibited grandiose self-importance, fantasies of unlimited success, and a need for excessive admiration, often leading to extramarital affairs and hindering the spouse from fulfilling marital obligations.

Evidence presented in the cases primarily relied on direct psychological assessments of the petitioners conducted by experts, followed by indirect evaluations by respondents using testimonies from family and friends. Expert testimonies played a crucial role in proving psychological incapacity. The courts made decisions based on the weight of evidence, looking for gravity, incurability, and juridical antecedence to determine psychological incapacity.

"Denied" Narratives

Courtship Stage

The typical scenarios characterizing the initial encounters in the 25 instances of denied cases involve varied dynamics, primarily encompassing familial connections, chance meetings among strangers, and introductions facilitated by shared acquaintances. Predominantly observed within the 25 denied cases are situations where couples initially establish connections through familial relationships. In the context of Puno v. Mago, for instance, the bonding of the couple was catalyzed by their parents' longstanding friendship and business collaboration. A similar pattern emerged in Carpio v. Koral, wherein one of the partners was introduced to the other through the intervention of Koral's mother.

Some couples encountered each other as unfamiliar individuals, only to later evolve into romantic partners. An illustrative example is Ferrer v. Kimi, where an unconventional setting—an automotive service establishment along a highway—served as the backdrop for their initial meeting. Some couples also met with the involvement of mutual acquaintances. In Tingco v. Edralin, the introduction of the couple transpired due to their shared circle of friends.

Marital Stage

The analysis of the 25 denied cases reveals a consistent trend indicating early marital difficulties. A common pattern among these couples was the establishment of civil weddings as their primary marital contract. Their marital trajectories often commenced with cohabitation alongside their parents, and transitioning to independent living post-marriage.

The initial marital experiences for the majority of couples were marked by challenges, hinting at the inception of difficulties even prior to formal marriage. An example is found in Tingco v. Edralin and several analogous cases, where early marital discord was manifest through confrontations, disputes, and blame allocation due to miscommunication and the inability to uphold marital obligations.

The trend also reveals that while pre-wedding relationships of most couples encompassed sexual intimacy, some faced unplanned pregnancies, prompting a preference for civil weddings. Some couples opted for church weddings, as illustrated in Martin v. Saulo and Dalang v. Chua.

Marital Conflict Stage

One prominent catalyst for marital strife stemmed from one spouse's negligent attitude toward their marital commitments. Such instances encompassed the neglect of marital responsibilities, including emotional support, financial contributions, and trustworthiness. An example is the Tanes v. Medina case, where the husband mismanaged his wife's business assets, engaged in improper financial transactions, and failed to provide financial assistance to his family.

Another theme in marital conflicts was the occurrence of extramarital affairs resulting in the birth of children outside of the marriage. This led couples to seek the nullity of their marriages. For instance, in the Paragas v. Luna case, the wife discovered her husband's extramarital relationship through a phone call from the woman involved, indicating that they had a child together.

Marital conflicts often included various forms of violence, encompassing physical altercations and verbal abuse. The Villar v. Jaen case serves as an illustration, where the husband detailed instances of his wife throwing a knife at him and experiencing verbal aggression in mundane circumstances. This highlights the prevalence of violence as a destructive element in marital dynamics. In summary, a recurring theme among denied cases involved marital conflicts stemming from irresponsibility, extramarital affairs, and violence.

Case Procedure Stage

The analysis of the denied cases reveals commonalities among the themes of reasons stated by the petitioner, psychological findings, and presented evidence, with distinct patterns emerging in Supreme Court rulings that set them apart from the affirmed cases.

Petitioners often seek marital nullity, attributing the respondent's inability to fulfill essential marital duties to factors such as irresponsible conduct, extramarital affairs, and aggressive behavior. For instance, Monde v. Duran illustrates a respondent who failed to contribute to parenting tasks and financial support. In Cañete v. Manuel, infidelity, non-commitment, and aggressive actions were cited.

Moreover, the majority of denied cases feature various personality disorders, with narcissistic personality disorder being prevalent, appearing in nine cases. For example, Layag v. Soriano highlighted narcissistic traits in the respondent. Other disorders like antisocial personality disorder appeared in four cases, as seen in Serrano v. Vargas.

Indirect psychological assessments were predominant due to respondents' avoidance of direct expert evaluation. Typically, evaluations relied on interviews with the petitioner, relatives, or acquaintances, which sometimes lacked a factual basis. Direct expert evaluations were less frequent.

In sum, denied cases showcase recurring themes of the petitioner's grounds, psychological findings, and evidence presentation. They parallel affirmed cases but often lack the evidentiary strength to substantiate psychological incapacity claims.

Discussion

This study analyzed the narratives of marital nullity cases filed on the grounds of psychological incapacity, aiming to distinguish between affirmed and denied cases and to examine the interplay between psychological factors and legal principles.

Affirmed cases frequently originated in settings such as school, work, or church, whereas denied cases often involved individuals with family connections. Both case types revealed commonalities in motivations for nullity petitions, reflecting broader trends in divorce associated with educational and familial factors, as discussed by Abalos (2017). Early relationships appeared linked to higher separation rates, partially influenced by age at marriage (Jennings, 2016). However, initial encounters were not always indicative of marital outcomes. Early sexual activity and unintended parenthood often escalated disputes, corroborating findings by Libo-on, Manzo, and Manzo (2021). These insights highlight the significance of early relational dynamics in marital stability.

Role of Marital Conflict and Violence

The study found that both affirmed and denied cases exhibited diverse early marital experiences, underscoring the centrality of conflict in the dissolution of unions (Bayudan-Dacuycuy, 2013). Physical violence, predominantly observed in affirmed cases, emerged as a significant theme. Violence was not solely spousal but extended to other family members, with reports of aggression involving in-laws. For instance, Abalos (2017) identified harmful spouses, incompatibility, and in-law disputes as common causes of marital dissolution. Specific instances, such as threats of violence from extended family members (e.g., Valdez v. Villaruel), further demonstrated the complex web of family conflicts contributing to marital instability. This aligns with findings by Karimi *et al.* (2019) that family conflicts undermine marital stability.

The narratives revealed gendered patterns of violence. Male-perpetrated violence was more persistent, with women often enduring intimate partner violence (IPV), as documented by Yoshioka *et al*., (2022). Although some cases involved mutual violence, wives' aggressive behaviors reportedly diminished over time, unlike those of husbands (Abalos, 2017). In contrast, male petitioners constituted a minority, only 10 of 17 affirmed cases involved male victims. Financial disputes also surfaced as a common source of marital conflict, often manifesting as economic violence and spousal dominance (Mendiratta & Sharma, 2023).

This study underscores the multifaceted nature of psychological incapacity in marital nullity cases, bridging legal analysis and psychological insights. By categorizing narratives into thematic sections, it sheds light on the complex psychological and social factors underpinning marital dissolution. The findings offer a nuanced understanding of how psychological incapacity manifests in Filipino marital contexts and highlight the need for a culturally sensitive framework in adjudicating such cases.

Marital Conflicts and Extramarital Conflicts

Infidelity was frequently cited as a contributing factor to marital separation or divorce, consistent with the findings of Labrecque and Whisman (2019). Le *et al.* (2024) further linked infidelity to moral and behavioral

irresponsibility, which often intensified conflicts within marriages. While extramarital affairs were a common theme in both affirmed and denied cases, their role in denied cases often lacked sufficient evidence to establish psychological incapacity under Article 36 of the Family Code. Schonian (2013) emphasized that infidelity remains a significant challenge to marital stability, and some cases involved children born from extramarital relationships, yet the inability to substantiate these claims weakened their legal standing.

Themes common to both affirmed and denied cases included partner irresponsibility, marital discord, and psychological incapacity. However, the severity and nature of these issues varied significantly. Affirmed cases tended to demonstrate more evident and severe conflicts, while denied cases often failed to meet the criteria of psychological incapacity, as outlined in the Family Code. For instance, denied cases frequently highlighted partner irresponsibility, including lack of cooperation, affection, financial support, and time spent together, aligning with the findings of Menber (2014). However, these issues, while problematic, did not always meet the legal threshold for nullity based on psychological incapacity. Physical violence also emerged as a recurring theme in both affirmed and denied cases. However, violence in denied cases was less severe and lacked the characteristics of incurability and juridical precedence required to establish psychological incapacity. This distinction reflects the critical role of severity and permanence in court judgments.

Grounds for Marital Nullity

Abandonment was a prominent ground for marital nullity petitions, consistent with Pflieger *et al.* (2022) observation that partner negligence, especially in fulfilling child-rearing responsibilities, often leads to marital dissolution. Other common grounds included pathological lying, jealousy, substance abuse, and negligence (Suminar & Kaddi, 2018). Narcissistic Personality Disorder (NPD) was frequently identified as a psychological factor contributing to relational dysfunction, further complicating efforts to maintain marital stability.

Psychological assessments played a pivotal role in court decisions, particularly when they involved direct clinical examinations of respondents. Direct assessments carried more evidentiary weight than indirect evaluations based solely on petitioners' narratives. Personal testimonies from family members, including parents and in-laws, further strengthened the credibility of petitioners' claims. Witness accounts provided valuable firsthand information, often substantiating claims of severe and incurable psychological incapacity.

The court focused on identifying conditions that were both severe and irreparable, emphasizing the necessity for strong evidence to demonstrate the respondent's inability to fulfill the essential obligations of marriage (Askarshahi *et al*., 2019).

Gender Dynamics in Marital Nullity Cases

A slight gender variation was observed among petitioners, with male petitioners being more common in affirmed cases. This finding challenges the conventional belief that women are more likely to seek marital nullity. Manning and Payne (2021) noted that both men and women form perspectives on marriage separation without significant gender differences. However, the reasons for disputes varied, with some studies suggesting that male petitioners might be more likely to cite psychological incapacity in court. Contrary to Apostolou *et al.* (2019), harmful spousal behavior was not found to disproportionately motivate women to file for nullity in these cases.

Conclusion

The study examines court cases involving marital disputes, focusing on affirmed and denied cases to identify patterns in court decisions. The lower court tended to rely on credible informants and psychological assessments to prove marital disputes, while the Supreme Court considered various factors like evidence, illness severity, juridical history, and incurability. Direct psychological assessments were crucial in proving partners' incapacity, impacting the final judgment. Extreme cases of abuse were also considered evidence of partners' incompatibility. Denied cases often lacked justification for mental illness's impact on marriages and failed to establish a clear link between disorders and psychological incapacity. The study suggests appointing qualified psychologists to handle marriage-related issues to address gaps in court rulings. However, certain ambiguities in Supreme Court decisions regarding illness severity and other factors were noted. The study underscores the importance of valid evidence in supporting claims of psychological incapacity rather than mere allegations.

The study makes an initial contribution to the emerging field of forensic psychology in the Philippines, given its relatively recent establishment. The focus of this study, namely psychological incapacity, is in its early developmental stages. Limited resources and materials exist regarding this concept, especially when approached from the perspective of forensic psychology, resulting in only a partial understanding. Despite these constraints, the present study remains a significant step toward comprehending psychological incapacity.

Future researchers can delve deeper into the realm of forensic psychology by engaging in interviews and surveys with petitioners, respondents, legal professionals, as well as individuals practicing psychology and law. This approach would shed light on the reliability and relevance of expert testimonies within the legal context, specifically concerning marital nullity cases.

Further exploration of the value attributed to psychological evaluations, assessments, and findings in such cases is warranted, deciphering which holds substantial weight in jurisprudential decisions. Subsequent studies could employ these insights to delve into psychological incapacity and rectify issues at the intersection of psychology and the legal process in marital nullity cases. This might involve comprehensive investigations into ongoing marital nullity cases, offering a unique perspective distinct from the ponente.

Ethical Statement

This study did not require formal ethical clearance, as it solely utilized publicly accessible legal documents and published court decisions.

Conflict of Interest Statement

The authors declare no conflict of interest related to the conduct and publication of this research. All procedures followed were in accordance with institutional and ethical standards, and there were no financial or personal relationships that could have influenced the outcomes of this study.

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Declaration of Generative AI and AI-Assisted Technologies

The authors acknowledge the use of Grammarly, an artificial intelligence–based writing assistant, to improve grammar, spelling, and clarity in the preparation of this manuscript. The authors affirm that all intellectual content, interpretations, and conclusions are their own responsibility.

Data Availability

The data that support the findings of this study are available from the corresponding author upon reasonable request.

Author Contributions

NVA: Conceptualization, Methodology, Writing - Original Draft; **JARB**: Data Curation, Formal Analysis, Visualization; **DLUE:** Investigation, Project Administration, Writing - Review and Editing; **GNLJ:** Resources, Supervision, Validation; **DUM**: Methodology, Writing - Review & Editing; **VVP**: Software, Data Curation, Writing - Review & Editing

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