

In re Marriage of Seaton

“Prince, thou art sad, get thee a wife, get thee a wife.”
Much Ado About Nothing, II, 1.73

Yes. But not after a buffet dinner and a drinking binge in Reno. Our heroine, Patricia Seaton, was married to H-1 when she married H-2 during a memorable overnight visit to Reno. She later divorced H-1, then subsequently married H-3. When Patricia and H-3 separated, the issue concerned the validity of that marriage, given that she was still married to H-2. Whether the H-2 marriage was void *ab initio* or had to be judicially annulled under Nevada law was also at issue in the case.

The Court of Appeal held the H-3 marriage valid, because Patricia’s marriage to H-2 was bigamous, void and illegal and need not have been judicially annulled. As if the family law issues here weren’t enough, let’s not overlook the estate planning mess if one of these characters had died somewhere along the line. Ascertaining validity of relationships has become a necessity in a myriad of legal disciplines, including family law, estate planning, real estate, retirement plan benefits, beneficiary designations, tax status, same-sex relationships...the list goes on.

A couple of lessons: Alcohol fueled buffet dinners in Reno can be dangerous to your marital health; law student interns should not visit the law library and provide technical legal advice, as was done here by the then prospective H-3, and finally:

“Their knot of love
Tied, weav’d, entangled, with so true, so long,
And with a finger of so deep a cunning,
May be outworn, never undone.”

The Two Noble Kinsmen, I,III.41

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