

BRAZILIAN LAW AND THE RECOGNITION OF THE RIGHTS OF PETS IN CHILDFREE COUPLES

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ABSTRACT: The purpose of this scientific work is to analyze the legal status of pets in our legal system, and verify that it is consistent with the defense of their rights in childfree couples as well as the dispute of such when the breakdown of marriage or stable union occurs. The Civil Code categorizes pets as livestock. In order for these animals to have their due regard, they should be treated as subjects of rights, considering that they have the neurological capacity to generate awareness, albeit limited. In this day in age, many couples choose to achieve their parental project with pets rather than with children. Despite this change in the family context, pets are still classified as an asset, which denotes a gap between what society sees, and what the legislation determines. Childfree families with pets are a reality that cannot remain invisible before our legislation and judiciary. Thus, it is necessary to determine which animals are subject to rights according to their condition, through appropriate legislation and even including the issue of childfree couples by discussing custody, the exercise of rights to visitation and pet support. Finally, we used the theoretical method, which

consists of works researched, specialized periodicals and electronic documents, as well as the legal collection on the subject.

KEYWORDS: Domestic Animals; Subject of Law; Childfree Couples.

SUMMARY: 1. Introduction. 2. The historical evolution of animal rights. 3. The recognition of animals as either objects or subject of law. 4. The applicability of the rules and principles governing family rights for the best interest of the animal in childfree couples. 5. Final considerations. 6. References.

1. Introduction

From the industrial revolution to the technological revolution and especially with the consolidation of a global society, social structures have changed, including the family, who has also suffered numerous changes.

The traditional family model, once based on the patriarchal system where procreation and equity consisted on the essence of marriage, has ceased to be the mainstay of society, to be replaced by another concept of family, marked by plurality and affection.

It is important to point out that the postmodern family can be characterized as an instrument for achieving happiness and personal fulfillment by those who compose it.

It is noticed also that the claims for the promotion of gender equality which were brought up, especially in the second half of the twentieth century, caused women to join the labor market, and no longer belonging exclusively to the private and domestic sphere.

These factors, coupled with the degree of competitiveness in the labor market, caused families to begin to think more carefully on the planning of the family. Nowadays, it is common to see couples who choose not to have children, substituting them instead for a pet.

Once seen as a mere instrument for the satisfaction of people, animals began to gradually be considered in their fullness, and even integrated by the families as members in the relationship.

When a breakdown in the marital bond occurs, pets are often brought into the judicial dispute. However, it is clear that such conflicts resemble more a custody dispute than property dispute where food, right to visitation and family life are called into question.

Nowadays, with the increasing debate over animal rights, questions arise over their legal status: should they be seen as mere objects or as legal subjects?

Animals have legal protection regarding their care and welfare against cruelty. However, if they are recognized as sentient beings, we question if they should therefore be considered legal subjects.

Using the theoretical method, this article seeks to demonstrate that the classification given to animals by the Civil Code as livestock is not consistent with the condition of being alive and sensitive. This being said, we demonstrate that when the breakup of parental ties occurs, institutions of family law centered on protecting children and adolescents, by analogy, should apply to protect pets.

2. The historical evolution of animal rights

Throughout history mankind has exercised power over other living beings and things, just for believing to be the only species to have feelings, thoughts and sensations.

This belief was based on the interpretation of certain biblical passages describing the creation of Earth under the Creationist perspective, where, after making man in his image and likeness, the Creator gave him power over fish, birds, animals and Earth and all that dwelt therein.¹

Because of the image and likeness to God, man granted himself authority over other species.

Initial studies regarding the interests of animals appeared in ancient Greece, in the works of the philosopher Theophrastus (372 BC - 287 BC) *On Compassion*.²

At that time, there existed a position contrary to the sacrifice of animals. Theophrastus defended the principle of respect for life, regardless of who stopped it, maintaining the theory that animals were endowed with sensitivity and should be integrated in the moral community, as they had similar characteristics to those of humans.³

Although some were in favor of animal welfare, they were used exclusively to provide benefits to humans for transportation, food, clothing and safety, among others.

In the Greco-Roman period, other philosophers and thinkers stood out in favor of animals such as Ovid, Plutarch, Porphyry and Seneca.⁴

Plutarch and Porphyry defended the idea that animals were beings with rational development, able to understand and think.⁵ Seneca and Ovid, in turn, defended the theory that animals were sentient beings, feeling pain and joy, among others.⁶ Nevertheless, the theories mentioned above dealt with animals in a general sense.

Only in the eighteenth century were there initial discussions about integrity and social status for animals.⁷

In 1776, inspired by the existing philosophical texts, Humphry Primatt published his thesis "A Dissertation on the Duty of Mercy and the Sin of Cruelty to Brute Animals" in which he defended equal treatment towards animals.⁸

In 1789, during the French Revolution Jeremy Bentham defended in his work "An Introduction to the Principles of Morals and Legislation", the inclusion of animals capable of feeling pain and suffering, with similar interests in the moral community and pointing to the irrelevance regarding species.⁹

It is noted, however, that all writings point for the integration of animals as having rights.

Given this problem and the need for specific regulations, in 1822 England introduced the first act for animals called *British Cruelty to Animals Act*, which dealt with cruelties committed against animals.¹⁰

Germany and Italy in the years 1838 to 1848 respectively, created rules to regulate specific cases of animals.¹¹

In Brazil, norms addressing the protection of animals emerged only in 1924, under the Decree 16.590.

Because of the need to draw up rules that regarded animals in their integrity in a wide and unrestricted way, UNESCO proclaimed on January 27, 1978 the Universal Declaration of Animal Rights,¹² consisting of articles that addressed animal rights with regard to respect, care, treatment, liberty, as well as its destination as food or experiment.¹³

It is noted that the Federal Constitution of 1988 in its article 225, determines environmental protection and provides awareness to the population in building an ecologically balanced environment in order to ensure, not only for the present generation but also for future generations, a better quality of life.

The environment can be understood as the set of elements that are part of what surrounds us, where we live, such as the fauna, the flora, the natural and artificial elements; such a concept is not restricted, thus, referring to nature objectively considered.

We denote that the constituent wrought significant change in the social conception about environmental issues. From that point, the legislation was directed to find solutions for environmental problems, foster awareness in a wide range of interests, especially for the construction of an ecologically balanced environment.¹⁴

The intent of the paradigmatic change is the improvement of the quality of life of the present population and future generations, in the pursuit of the survival of the human species threatened by man himself.¹⁵

Thus, with the publication of the Law No. 9,605 / 98, providing for criminal and administrative sanctions for conduct and activities harmful to the environment and regulating crimes against non-human animals, Brazil was considered to be one of the more developed countries in the context of environmental legislation.

Despite the parental rights law which provides for constitutional and infra-constitutional rule in order to protect the environment, it is stated that the claim of both the constituent, as well as the ordinary legislator was restricted to environmental inheritance, without providing ample protection to animals for being considered members of the fauna and not as subjects.

It should be noted that the constitutional system, in its paragraph 1 of article 225, gives animals an ecological function of the fauna, guaranteeing ethical treatment and prohibiting cruel treatment.

Therefore, the legal tutored good is the sound quality of human life, where the environment, fauna or animals are instruments used to achieve that end.

The Civil Code, though it does not refer specifically to non-human animals, has rules that refer to them, albeit indirectly.

Article 82 of the Brazilian Civil Code, states that “movable assets are goods susceptible through their own movement or their removal by external forces, without changing the substance or the economic and social destination”. By this definition, animals are regarded as objects, movable assets and/or livestock.

It is stated, therefore, that for the Brazilian Civil Code, animals are considered mere objects, and therefore devoid of any dignity.

However, with the evolution of movements striving for animal protection and, in particular, with the development of scientific research that demonstrates that animals have the ability to express intentional behavior with neurological substrates that generate awareness, fitting them into the category of goods is not coherent.

For Dominique Lestel:

[...] it is difficult to consider that animals could be reduced to primitive mechanical sets, because animals too are the mechanics of their own bodies. Accordingly, it is difficult to view these animals as objects, and it is better to consider them as subjects whose activity is organized by actions and perceptions. Animals are made of organs; they are not made of parts like machines. It is a subject who animates them, not an engine.¹⁶

One can say therefore, that although the questioning over the condition of animals and their rights has been present throughout history, inserting this theme in the legal framework is recent, requiring regulation because today's legal conception of the nature of animals is not able to consider their demands.

3. Recognition of animals as legal subjects

Throughout history we can see that animals did not have a significant value for men and therefore were seen and used without any concern for their condition as a live being.

It is noteworthy to point out, however, that when analyzing historical and social evolution, we see that not only did man exercise his power over animals, but also over its own species, as with blacks and women for instance.¹⁷

With the evolution of human thought, it was possible to conquer rights considered fundamental and universal in order to defend and give everyone the full condition of equality.¹⁸

The domination promoted by speciesism with the idea that human beings, because of their superiority, would have the prerogative to explore animals freely, is very similar to the domination that man had over man himself in earlier times. Under a false assumption of superiority, man subjugated and dominated another as if he were the holder of such right.

According to Singer, Speciesism “is prejudice or biased attitude of someone in favor of the interests of members of their own species, against the other.”¹⁹

This term was coined in the 1970s by the scientist and philosopher Richard D. Ryder and was regarded as the “biased and partial attitude towards other species, like racism with regard to human beings”.²⁰

It so happens, however, that such a perspective is being fought against with greater intensity, as it is inadmissible that under such a conception one can legitimize animal exploitation.

In order to protect an animal’s wellbeing, the inc. VII, §1^a of art. 225 of the Federal Constitution, the constituent has forbidden any acts of cruelty committed against animals, recognizing them as sentient beings, that is, endowed with organizational structure enabling them to experience feelings and sensations,²¹ and therefore able to feel pain, pleasure, sorrow, joy and affection, among others.

In *The Cambridge Declaration on Consciousness* Philip Low says that humans are not the only ones who have consciousness, where animals show intentional conduct.²²

From this concept, it would not be credible that the legal perception of animals would continue as that of livestock. It is also important to note that the discussion about the possibility for animals to be considered subjects of rights is present not only in Brazil but also in other foreign legal systems, as in the Civil Codes of Austria, Germany and Switzerland.²³

In 1990, following the amendment of the German Civil Code (BGB - Bürgerliches Gesetzbuch), animals were no longer considered *things* and were protected by special laws,²⁴ and as of 1994, art. 20 of the German Basic Law ruled for the protection of animals.²⁵

Switzerland, in turn, one of the most advanced countries when it comes to animal protection laws, recognized in its constitution in 1992 the “dignity of animals”, and since 1987 has had a specific legislation regulating the protection of pets.²⁶

In 2001 the United States Supreme Court considered the possibility of animals as legal subjects. However, hunting and fishing continue to be practiced today.²⁷

In 2014, the French National Assembly approved the amendment in the French Civil Code, in order to consider animals as living beings endowed with personality and not as movable assets.²⁸

As we can see, many countries have advanced in their legislation in order to fully protect the rights of animals, and Brazil cannot remain inert before such needed demand.

There is a struggle among the various positions in favor of change in the legal status of animals to recognize non-human animals as legal subjects.

One cannot confuse “person” with “legal subject”. According to Art. 1 of the Civil Code, people are beings capable of rights and duties in the civil order, where the concept of legal subjects is broader than that of person.²⁹

According to Lorena Xavier Costa, a legal subject is the entity for which the legislator “grants rights, be it a person or not and being only the recipient of legal commands governing a particular legal relationship, becoming, thus, its subjective element”.³⁰

Paulo Lôbo, asserts that:

[...] the attribute of person is given by the law, not being a concept extracted from nature, and, thus being cultural and historical. The resistance within the Law to recognize animals as legal subjects overrides the legal issue, having then a social political characteristic [...].³¹

The law also assigns the concept and the nature of juristic person to entities that have no physical existence. We would add that there are entities that the law does not consider as a person and yet assigns the capacity to act, such as a bankrupt estate, assets, mixed-property, timeshares, etc.

Not every single person has the capacity to act in court, despite being endowed with personality, such as the disabled, who

rely on representation. Thus, animals as legal subjects require such representation in our legal system.

Even the Civil Procedure Code of 2015, in art. 75, lists the legal subjects which are represented in court such as: The Union represented by the Attorney General's Office; the States by the Federal District by prosecutors, the bankruptcy estate by the judicial trustee; assets by properties executor among others.³²

It should be noted that not every legal subject is considered subject to a duty, such as the unborn child who, despite being a subject of law has no assigned duties.

The idea of objectification of animals is obsolete, and foreign legislations have already advanced in the protection of such rights, giving them a differentiated treatment. We can cite in this regard the Constitution of Ecuador in its art. 71, which establishes that animals are rights holders with the objective of creating a balance within the environment for human benefit.³³

Edna Cardozo Dias states the following on the subject: "[...] animals have rights and their rights are the duty of all men".³⁴ Thus, animals cannot be treated as a means to meet the satisfaction and needs of man.

Therefore, animals are subject to civil and constitutional rights, according to their condition, and deserving legal protection.

4. Applicability of norms governing family law for a pet's best interest in childfree couples

With the evolution of the concept of family unit as well as the development of new technologies that have greatly influenced the creation of new market niches, many families have decided not to have children, either because they are not able or as a result of extreme concern for their professional career.

Therefore, it is not uncommon for children to be replaced by pets, which are actually considered for many couples as members of the family.³⁵ Couples who opt for not having children

often adopt pets and develop a relationship of extreme love and affection and provide similar treatment to that given to children, such as having birthday parties, providing Christmas gifts, and so on.

Thus, once the emotional bond between the pet and caregivers is established, when rupture occurs in the marital bond, there may be disputes over pets, which must be observed and solved by applying the laws pertaining to family law and what it institutes. And this, par excellence, involves family courts.

Just as children and adolescents, pets are vulnerable beings that should have particular treatments in the face of family disputes, while maintaining their best interest. Of course, this comparison should be viewed with caution because animals can never be independent as children when they grow up.

In this same perspective it is appropriate to create legislation adequate for the circumstances of animals, even regulating their status as a member of childfree couples. The recognition of this type of family is irrefutable and we can no longer objectify animals by assigning them the condition of *goods*.

Recently there have been trials in this regard, as for example in early 2016 where in the State of São Paulo, Judge Fernando Henrique Pinto from the 2nd Family Court and Probate of Jacarei, by not objectifying the animal and using, by analogy, the rules governing custody of a disabled. He determined alternating custody of a dog to its owners who were undergoing a legal separation process.³⁶

Interestingly, the judiciary system is being requested increasingly to resolve these issues. In May 2016, judge Katscharowski Leandro Aguiar in charge of the 7th Civil Court of the district of Joinville, when receiving the case discussing custody of a pet, he referred the case to the Family Court and emphasized in his decision:

I think the real issue lies on the statement, though incidental, of the possession and ownership of the animal, whose discussion, in turn,

involves Family Law [...] Perhaps taking advantage of the academic field, the conception, though yet restricted is timidly appearing in jurisprudence and considering animals, especially mammals and birds, as being endowed with a certain conscience.³⁷

One can affirm, therefore, that pets are increasingly occupying a significant role within the family, receiving affection, attention and even a treatment similar to those given to children, and such a fact cannot be ignored by the judiciary.

Thus, it is essential to create an appropriate legal status, which not only meets specifically the demands but is suited to the peculiarities of this type of relationship; a relationship where interests are taken into consideration. A relationship with affection and care, remembering that both feel pain, love, pleasure, happiness, joy, sadness and allowing the spouses or partners to request custody, food, and the right to visitation, exercising the principle of the best interest which it is the most vulnerable in the relationship: prioritizing physical and psychological well-being.

5. Final considerations

Throughout history, animals have been seen as a means to satisfy the desires and needs of human beings, without there being any limitation in their exploitation.

With the discovery that animals were actually beings with the capacity to experience feelings, coupled with growing animal rights movements, regulations were created to avoid such degrading treatments.

In addition, due to structural changes in post-modern society, many couples decided not to fulfill their role of parenthood, opting for the inclusion of pets in the family instead of having children.

Although the parental rights law considers animals as livestock, when the breakdown of marital bond occurs, disputes

over pets are not similar to those of property, but instead are equivalent to disputes involving children and adolescents, as it discusses custody, the right to coexistence and support for their benefit.

This time, in order to contemplate the protection of the rights of animals as sentient living beings, until a specific legislation prevails with the perspective that these, in fact, are subjects of rights with applicable litigations in which they appear as the center of the dispute, the institutions of family rights must first recognize them and consequently the existence of childfree couples.

6. References

- ¹ BÍBLIA, ANTIGO TESTAMENTO, Gênesis, cap. 1, v 26 e 27, traduzido por José Luiz Gonzaga do Prado. *A Bíblia Sagrada*: Edição Pastoral. São Paulo: Editora Paulus, 2003, p. 15.
- ² PESSOA JUNIOR, Osvaldo. *Teoria do Conhecimento & Filosofia da Ciência I: A Ciência Aristotélica e seus Sucessores*. São Paulo, 2014. 4 p. Notas de aula, p. 20.
- ³ TRINDADE, Gabriel Garmendia da. *Animais como pessoas: A abordagem abolicionista de Gary L. Francione*. Jundiaí: Paco Editorial, 2014, p. 37-38.
- ⁴ FELIPE, Sônia Teresinha. *Fundamentação ética dos direitos animais*. 2008. Disponível em: <<http://www.pensataanimal.net/component/content/article?id=200:fundamentacao-etica>>. Acesso em: 15 mai. 2016.
- ⁵ SOUZA, Joseth Filomena de Jesus Souza. *O olhar da bioética sobre a representação social de animais no contexto da educação humanitária*. 2012, 87 f. Dissertação (Mestrado em Bioética), Universidade de Brasília, Brasília, 2012, p.19.
- ⁶ FELIPE, Sônia Teresinha. *Fundamentação ética dos direitos animais*. 2008. Disponível em: <<http://www.pensataanimal.net/component/content/article?id=200:fundamentacao-etica>>. Acesso em: 15 mai. 2016.
- ⁷ Ibidem.

- ⁸ CAMPOS, Daniel Rodrigo de. *O legado de Humphry Primatt*. 2007. 39 f. Trabalho de Conclusão de Curso (Graduação em Filosofia). Universidade Federal de Santa Catarina, Florianópolis, 2007, p. 6-8.
- ⁹ GALVÃO, Pedro. *Os animais têm direitos?* Universidade de Lisboa, 2011. Disponível em: <<http://criticanarede.com/animais2.html>>. Acesso em 18 jun. 2016.
- ¹⁰ RODRIGUES, Danielle Tetu. *O direito & os animais: Uma abordagem ética, filosófica e normativa*. Curitiba: Juruá, 2008, p. 63.
- ¹¹ Ibidem.
- ¹² Ibidem.
- ¹³ *Declaração Universal dos Direitos dos Animais*. UNESCO, 1978.
- ¹⁴ COELHO, L. F. *Fumaça do bom direito: ensaios de filosofia e teoria do direito*. 1. ed. Curitiba: Bonijuris, 2011.
- ¹⁵ Ibidem.
- ¹⁶ LESTEL, Dominique. *As origens animais da cultura*. Lisboa: Instituto Piaget, 2001.
- ¹⁷ SILVA, Leonardo Dantas. *Alguns documentos para a história da escravidão*. Recife: Fundação Joaquim Nabuco, 1988.
- ¹⁸ *Declaração Universal dos Direitos Humanos*. ONU, 1948.
- ¹⁹ SINGER, P. *Libertação Animal*. Tradução Marly Winckler; Marcelo Brandão Cipolla. São Paulo: WMF M. Fontes, 2010, p. 11.
- ²⁰ LOURENÇO, D. B. *Direito dos animais: fundamentação e novas perspectivas*. Porto Alegre: S. Fabris, 2008, p. 405.
- ²¹ MOLNTO, Carla Forte Maiolino. *Senciência Animal*. Revista do Conselho Regional de Medicina Veterinária, Curitiba, v. 16, 2005.
- ²² BEKOFF, Mark. *Os animais são conscientes e devem ser tratados como tal*. Disponível em: <<http://ethoanimal.com.br/animais-sao-conscientes-tratados>>. Acesso em: 03 jul. 2016.
- ²³ RODRIGUES, Dantas. *Direitos dos animais*. 2015. Disponível em: <<https://www.publico.pt/sociedade/noticia/direitos-dos-animais-1710167>>. Acesso em 03 jul. 2016.

- ²⁴ ARAÚJO, F. *A hora dos direitos dos animais*. Coimbra: Almedina, 2003, p. 287.
- ²⁵ CASPAR, J. O art. 20^a da Lei Fundamental da Alemanha e o novo objetivo estatal de proteção aos animais. In: MOLINARO, C. A.; MEDEIROS, F. L. F.; SARLET, I. W.; FENSTERSEIFER, T. (Org.). *A dignidade e os direitos fundamentais para além dos humanos: uma discussão necessária*. Belo Horizonte: Fórum, 2008. p. 473-492.
- ²⁶ ALVES, D. Lei determina que agressor de animais pague pelos cuidados das vítimas. *Agência de Notícias de Direitos Animais*, São Paulo, 23 julho 2013. Disponível em: <<http://www.anda.jor.br/>>. Acesso em: 23 jul. 2016.
- ²⁷ OLEDO, Maria Izabel Vasco de. *A tutela jurídica dos animais no Brasil e no direito comparado*. Revista Brasileira de Direito Animal. v. 11. Salvador: Instituto de Abolicionismo Animal, 2012.
- ²⁸ *Mudança no Código Civil Francês Considera Animais Seres Sensíveis*. Disponível em: <http://pt.rfi.fr/franca/20140416-mudanca-no-codigo-civil-frances-considera-animais-seres-sensiveis>. Acesso em 08 maio 2016.
- ²⁹ BRASIL. Código Civil. 2002. *Vade Mecum Acadêmico de Direito Rideel*. Anne Joyce Angher (org). 19 ed. São Paulo: Rideel, 2016.
- ³⁰ COSTA, Lorena Xavier da. *Sujeito de direito e pessoa: conceitos de igualdade?* Disponível em: <<https://www.google.com.br/url?sa=t&rct=j&q=&esrc=s&source=web&cd=3&cad=rja&uact=8&ved=0ahUKEwi7s4WSusHNAhUHEpAKHbDlCkQFggpMAI&url=http%3A%2F%2Fapl.unisuam.edu.br%2Fprevistas%2Findex.php%2Flegisaugustus%2Farticle%2Fview%2F534%2F445&usg=AFQjCNG7QPNOqQfFX7AaElgHNTFAsc8tFA&sig2=2ciJhz-GJtflhCSAymkTwA&bvm=bv.125596728,d.Y2I>>. Acesso em: 20 mai. 2016.
- ³¹ LÔBO, Paulo. *Direito Civil: parte geral*. 3. ed. São Paulo: Saraiva, 2012.
- ³² BRASIL. Código de Processo Civil. 2002. *Vade Mecum Acadêmico de Direito Rideel*. Anne Joyce Angher (org). 19 ed. São Paulo: Rideel, 2016.
- ³³ PACHECO, Cristiano de Souza Lima. *A Constituição do Equador e o direito dos animais em um mundo em transformação*. 2012. Disponível em: <<http://www.portalseer.ufba.br/index.php/RBDA/article/view/8406/6025>>. Acesso em: 03 jul. 2016.

- ³⁴ DIAS, Edna Cardozo. *Tutela Jurídica dos Animais*. 2000. Tese. Curso de Direito. Universidade Federal de Minas Gerais. Belo Horizonte, 2000, p.37.
- ³⁵ BRASIL. Instituto brasileiro de geografia e estatística (org). Presença de animais no domicílio. In: *Pesquisa nacional de saúde 2013: acesso e utilização dos serviços de saúde, acidentes e violências*. 2015. Disponível em: <<http://biblioteca.ibge.gov.br/visualizacao/livros/liv94074.pdf>>. Acesso em: 07 abr. 2016.
- ³⁶ TJSP, Comunicação Social. *Liminar determina guarda alternada de animal de estimação*. 2016. Disponível em: <<http://www.tjsp.jus.br/Institucional/CanaisComunicacao/Noticias/Noticia.aspx?Id=30364>>. Acesso em: 18 mai. 2016.
- ³⁷ MEDEIROS, Ângelo (resp). *Juiz entende que cão não é objeto e remete disputa por animal para Vara de Família*. 2016. Disponível em: <<http://portal.tjsc.jus.br/web/sala-de-imprensa/-/juiz-entende-que-cao-nao-e-objeto-e-remete-disputa-por-animal-para-vara-de-familia>>. Acesso em: 21 mai. 2016.