

**THE PEOPLE OF THE PHILIPPINES/HEIRS OF SEGUNDO ESPINELI,
NAMELY: LAUREANO ESPINELI, ARNIE ESPINELI –UY, ELNIE
ESPINELI, JAYNIE ESPINELI, MARISSA ELSIE ESPINELI, REYCARTE
ESPINEL...**

Ponente: CAMELLO, J.

Read online (full-text search, related cases, audio case brief): <https://batas.org/library/242316c7caf2/>

CAMELLO, J.:

This is an Appeal[*] from the Decision[1] dated April 13, 2011 of the Regional Trial Court, Branch 32, Surigao City in Special Civil Case No. 475 for Indirect Contempt.

The present case stemmed from Civil Case No. 400 for Annulment and/or Declaration of Nullity of Ordinance no. 04,[2] series of 1993[3] filed in Regional Trial Court, Branch 32, Surigao City by one Segundo Espineli against then incumbent municipal officials[4] of Dapa, Surigao Del Norte. On November 3, 2005, RTC, Br. 32 rendered a decision[5] declaring Municipal Ordinance No. 04 null and void.[6] On November 22, 2005, RTC, Br. 32 issued an Order[7] granting immediate execution of the decision pending appeal. The dispositive portion of the Order says:

Wherefore, premises considered, plaintiff's motion for immediate execution pending appeal is hereby GRANTED.

- Plaintiff's D' Game Cockpit may now start its operation as usual without any further delay as if his rights thereto have never been interrupted;
- No one shall be allowed to prevent or meddle in its affairs unlawfully as long as necessary permits have been duly paid for and its operation is fully legal, except on the pretext that there is no permit being issued by refusal of any governmental authority to issue the same as long as the legal requirements are being duly complied with;
- Dapa Recreational Center Incorporated, a fictitious person for not being duly registered with the Securities and Exchange Commission is hereby ordered to stop its operation immediately for any purpose or business anywhere in the country whatsoever;
- All its offices and auspices within Dapa, Surigao del Norte or anywhere in the country whatsoever;
- Dapa Recreation Center Incorporated can only operate after it acquires juridical personality by registering itself with the Securities and Exchange Commission only in business areas which do not prejudice existing rights;
- The Sheriff of RTC-Branch 32 is hereby ordered to execute this judgment immediately without any further delay and to see to it that its actions shall be in accordance strictly with this Order; and
- The Provincial Philippine National Police is hereby directed to provide the necessary security to the Sheriff for the immediate enforcement of this Order.[8]

On November 30, 2005, a Sheriff's Return of Service[9] was submitted to RTC-Br. 32. It pertinently states:

6. That on November 26, 2005, at about 3:00 o'clock in the afternoon more or less, the team headed by Cirilita T. Solis, Acting Clerk of Court of RTC-Branch 31, together with the assisting Sheriff and the Policemen and others proceeded to Dapa Recreation Center Inc. located at Brgy. Osmena, Dapa, Surigao del Norte and upon arrival thereat, we noticed that there was an on going derby (cockfight);

7. That upon arrival thereat, we immediately went to the cockpit arena and were met by Federico T. Navarro, President of Dapa Recreation Center Inc., and Nemesio de Jesus, Secretary of the Board and explained to them our purpose in going there. They argued that, why should they be included and be affected by the order, when Dapa Recreation Center Inc., is not a party to the case and said officials of the corporation provided us with a copy of the business permit, ordinance granting said entity a franchise, SEC registration which was one of the requirements in the November 22, 2005 order and a resolution of the Sangguniang Panlalawigan of Surigao del Norte;

8. Thereafter, the officers of the corporation were told to stop their operation, pursuant to the Order of the Honorable Jose Manuel P. Tan and their establishment padlocked. A notice to that effect was posted at the cockpit arena and another was placed at the wall of the cockpit, while there was jerking and booing of the gamblers there. The aforementioned officers were warned that if they continue, they continue at their own risk and under pain of contempt because that would be clear defiance of the Order of the Honorable Court;

9. That the operation of Dapa Recreation Center Inc., was stopped for about two (2) hours, until the Acting Clerk of Court Cirilita T. Solis received a call from Hon. Jose Manuel P. Tan, informing her that we may now leave the premises, as

we have already complied with the order and if ever they continue the operation, we have to take pictures and observe;

10. That at about 6:30 o'clock in the evening, more or less of the same day, we went back to Dapa Recreation Center and observed that the scheduled derby continued;

11. That on November 27, 2005, D' Game Cockpit resumed its operation by holding at their establishment;

On December 4, 2005, the Office of the Mayor of the Municipality of Dapa, Surigao del Norte wrote a letter[10] to the Chief of Police which stated:

This refers to the continued holding of cockfight outside of licensed cockpit in Dapa, Surigao del Norte including STE D' Game Cockpit in Bragy. 12, Dapa, Surigao del Norte. I shall inform you that the said cockfighting activities grossly violate national laws and municipal ordinances declaring that cockfighting shall only be held in licensed cockpit. As we all know, STE D' Game Cockpit has no license and business permit to operate duly issued by the local government unit of Dapa, Surigao del Norte. Its operation is thus highly illegal.

The owner of the said cockpit establishment cannot simply rely on the Order of Writ of Execution Pending Appeal issued by the Honorable Regional Trial Court, Br. 32, Surigao City as the legality of the said writ is being seasonably challenged before appropriate forums thus it has not attained finality. Besides, the court cannot simply order the resumption of operation of STE D' Game Cockpit without a valid license and permit duly issued by the local government unit of Dapa, Surigao del Norte otherwise the basic principle that cockfighting is a sole domain of every local government unit would be violated.

In view hereof, you are hereby directed to conduct surveillance regarding the said illegal cockfighting and effect arrest/apprehension against any person who may be held responsible thereto. Also, please expedite the filing of criminal (inquest) cases against them so that the Courts can issue the necessary warrant of arrest to justify their continued detention.

On December 11, 2005, the Office of the Mayor of the Municipality of Dapa, Surigao del Norte again wrote another letter[11] directing the Chief of Police to apprehend and cause the stoppage of the operation of D' Game cockpit.

This series of events prompted Segundo to file a petition for indirect contempt on March 17, 2006 against Alma G. Navarro, then Mayor of Dapa, Surigao del Norte; Froilan M. Quijano, Jr., Hernando S. Navarro, Herlend T. Navarro, Nemesio S. De Jesus, Charito R. De Jesus, Federico T. Navarro, Saturnino Echavez, Jr., (Officers and Board of Directors of Dapa, SDN Recreation Center); Ferdinand Huerta, Estanislao Toner, Jr., Frederico Melindo, Antonio Adapon, Clemente De Jesus, Amid Flores, Allen De Jesus, Pastor Ampater, Felipe Madlos, Rey Micayas, Nicolas Tesiorna, Nicolas Gotinga, Visitacion Maslos and Samuel Resnera.

On April 25, 2006, a Joint Comment[12] was filed by the respondents except Samuel Resnera. Respondents averred that at the time the Decision dated November 3, 2005 in Civil case No. 400 was rendered by RTC-Br. 32, the permit of D' Game Cockpit had already expired. Thus, according to the respondents, Mayor Navarro's order of stoppage of operations of the D' Game Cockpit was well within her authority and based on justifiable grounds. D' Game Cockpit has to obtain the required permit to operate.

Respondents argued further that the order of execution pending appeal does not conform to the terms of the decision as it directs the DAPA SDN Recreation Center to stop its operations although it was not a party to Civil Case No. 400. Nor was an adjudication made by RTC-Br. 32 against DAPA SDN Recreation Center. Yet in the order of execution, the trial court suddenly ordered their operation to stop.

As regard respondents Froilan Quijano, Hernando S. Navarro and Saturnino Echavez, Jr., they claimed that they were mere incorporators DAPA SDN Recreation Center. They were neither members of the Board of Director nor officers of the Center. They further claimed that they do not have a hand in the day to day operations of the Center, and they were not at the Center during the Derby on November 26, 2006. Respondent Amid Flores is an SB member of Dapa who had not set foot on the cockpit after it commenced operations.

Respondents claimed that Don Enrique Navarro Memorial School – Parents Teacher's Association (DENMS –PTA) leased the cockpit from the Center. Respondents Ferdinand Huerta, Frederico Melindo and Estanislao Toner, Jr., were there as officers of DENMSPTA, while Antonio Adapon, Clemente de Jesus, Nicolas Gotinga, Allen Tesiorna were merely participants to the derby. Respondents Nemesio De Jesus, Federico T. Navarro, and Herlend T. Navarro admitted though that they were officers of DAPA SDN Recreation Center Inc. Respondents Nemesio De Jesus and Federico T. Navarro further admitted that they were present during the November 26, 2005 derby. Herlend T. Navarro, on the other hand, claimed to be out of town during the derby.

In addition, the respondents stressed that the writ of execution was prematurely issued in violation of the rules. They claimed that DAPA SDN Recreation Center Inc., seasonably questioned the validity of the order granting the execution pending appeal. They argued that the Order granting the execution pending appeal and the Writ itself are invalid. According to them, the invalid writ cannot demand obedience or compliance from any person or entity against whom it was directed.

Respondents also averred that the Verification and Certification on Non-Forum Shopping is not proper. Espineli appended several documents, thus, respondents posited that Espineli should have alleged that those documents are authentic.

With the pleadings in, the Pre-trial Conference followed. It was terminated on August 15, 2006. Both parties agreed that the issue that the court a quo should resolve is whether or not the respondents have violated the questioned order of execution pending appeal.

Subsequently, trial ensued. Petitioner presented witnesses to substantiate his allegations. Respondents, on the other hand, were declared to have waived their right to present evidence, and the Judicial Affidavits they submitted were expunged from the records.

On April 13, 2011, the trial court rendered the assailed decision.[13] Its fallo reads:

WHEREFORE, premises considered, respondent Mayor Alma G. Navarro and the officers and Board of Directors of Dapa Recreation Center, Inc., namely: Federico Navarro, Herlend T. Navarro, Charito R. De Jesus, Nemesio S. De Jesus, Froilan M. Quijano, Hernando S. Navarro, and Saturnino Echaves, Jr., are hereby ADJUDGED GUILTY of Indirect Contempt and FINED jointly and severally in the amount of THIRTY THOUSAND (P30,000.00) Pesos payable to this Court. The case with respect to the other respondents [is] ordered DISMISSED for insufficiency of evidence.

Respondents Alma G. Navarro, Federico Navarro, Herlend T. Navarro, Charito R. De Jesus, Nemesio S. De Jesus, Froilan M. Quijano, Hernando S. Navarro, and Saturnino Echaves, Jr. filed a Motion for Reconsideration.[14] The trial court, however, denied the motion in its Order dated July 25, 2011.

Dismayed with these findings of the trial court, these respondents assign following errors,[15] to wit:

I

THE REGIONAL COURT COMMITTED GRAVE ERRORS IN THE FINDINGS OF FACTS AND LAW, WHICH IF NOT CORRECTED WOULD CAUSE GRAVE OR IRREPARABLE DAMAGE OR INJURY TO THE APPELLANTS, WHEN IT FOUND RESPONDENTS- APPELLANTS, AS OFFICERS OF DAPA RECREATION CENTER, GUILTY OF INDIRECT CONTEMPT FOR VIOLATING THE WRIT OF EXECUTION PENDING APPEAL DATED NOVEMBER 22, 2005 IN CIVIL CASE NO. 400 WHEN THEY WERE NOT EVEN PARTIES TO THE SAID CASE;

II

THE REGIONAL TRIAL COURT COMMITTED GRAVE ERRORS OF FACT AND LAW WHEN IT DECLARED HEREIN RESPONDENT-APPELLANT FROILAN M. QUIJANO JR. TO BE AN OFFICER OF DAPA RECREATION CENTER, AND HENCE, GUILTY OF INDIRECT CONTEMPT FOR ALLEGEDLY VIOLATING THE ORDER OF THE COURT DATED NOVEMBER 22, 2006;

III

THE REGIONAL TRIAL COURT COMMITTED GRAVE ERRORS OF LAW WHEN IT SUMMARILY DISMISSED THE MOTION FOR RECONSIDERATION OF THE DECISION FINDING RESPONDENTS-APPELLANTS GUILTY OF INDIRECT CONTEMPT WITHOUT STATING CLEARLY AND DISTINCTLY THE FACTS AND LAW UPON WHICH THE SAID DISMISSAL MAY BE BASED;

IV

THE REGIONAL TRIAL COURT COMMITTED GRAVE ERRORS OF FACTS AND LAW WHEN IT FOUND RESPONDENT-APPELLANT ALMA G. NAVARRO, THEN THE MUNICIPAL MAYOR OF DAPA, GUILTY OF INDIRECT CONTEMPT FOR ALLEGEDLY VIOLATING THE ORDER OF THE COURT DATED NOVEMBER 22, 2006.

Meanwhile, on June 26, 2009, We dismissed the special civil action of certiorari filed by Dapa SDN Recreation Center Inc. which assailed the validity of the Order dated November 22, 2005.[16] We also denied the appeal from the November 3, 2005 decision in Civil Case No. 400 in Our Decision promulgated on April 11, 2013.

On the issues at hand, appellants Dapa SDN Recreation Center Officers and Board of Directors contend that they

are not parties in the original case – Civil Case No. 400. Not being parties of Civil Case No. 400, they are not bound by the Decision rendered in it. They argued that as they are not bound by the Decision, it cannot demand obedience or compliance from them.[17]

Indeed, neither Dapa SDN Recreation Center Inc., nor its officers and board of directors were parties to Civil Case No. 400. Espenili filed an action for Annulment and/or Declaration of Nullity of Ordinance no. 4, series of 1993 on March 4, 1997 against the municipal officials of Dapa, Surigao del Norte.[18] The complaint was further amended on December 22, 1998 to include as defendants then newly assumed Mayor of Dapa, Alma G. Navarro. The amended complaint also named Fernando Durero, Municipal Treasure of Dapa, and Ernesto Bajas, Barangay Captain of Brgy. Osmena.[19] Thus, the first issue is whether non-parties Dapa SDN Recreation Center Inc., and its officers, incorporator, and Board of Directors may be held liable for contempt.

This first issue had been long resolved in the affirmative by the Supreme Court. Persons who are not parties in a proceeding may be declared guilty of contempt for willful violation of an order issued in the case. But an important qualification must be present. Non-parties may be held in contempt only if they are guilty of conspiracy with any of the parties in violating the court's order. So the Supreme Court held in the old case of *Ferrer v. Rodriquez*,[20] thus:

As a general rule, persons who are not parties to an action or proceeding are not subject to the jurisdiction of a court trying a case, are not supposed to be aware of the court's order and cannot, therefore, be declared guilty of contempt for violating its orders.

In order that a person may be declared guilty of contempt for violating a court's order within the meaning of the following provision of the Rules:

SEC. 3. . . .

(b) Disobedience of or resistance to a lawful writ, process, order, judgment, or command of a court, or injunction granted by a court or judge; (Rule 64, Rules of Court.)

the disobedience or resistance must be willful, and there cannot be willfulness without knowledge of the existence of the order and its provisions. (*Narcida vs. Bowen*, 022 Phil. 365; *People vs. Rivera*, L-3646, prom. May 26, 1952.)

Nevertheless, persons who are not parties in a proceeding may be declared guilty of contempt for willful violation of an order issued in the case if said persons are guilty of conspiracy with any of the parties in violating the court's order.

In a proceeding to punish for criminal contempt for willful disobedience of an injunction, the fact that those disobeying the injunction were not parties co nomine to the action in which it was granted, and were not personally served, is no defense, where the injunction restrains not only the parties, but those who act in connection with the party as attorney's agents, or employees, and the parties accused, with knowledge of the order and its terms, acting as the employees of a willfully violate it. (*People ex rel. Stearns, et al. v. Marr, et al.*, 74 N. E. 431.)

It goes without saying, then, that for Dapa SDN Recreation Center, Inc., and its officers, incorporators, and Board of Directors, to be declared guilty of contempt, they must be guilty of conspiring with any of the defendants in Civil Case No. 400 in violating the Order dated November 22, 2005.

An examination of the petition for indirect contempt reveals not even one allegation on “conspiracy”. Without such an express allegation that the non-parties had willfully violated the orders of the court, in conspiracy with the other defendants, the complaint for contempt cannot stand.[21]

We cannot, however, extend these findings to appellant Alma G. Navarro. The very subject of the writ of execution is the November 2, 2005 decision of RTC-Br. 32. This November 2, 2005 decision, in part, declared void Municipal Ordinance No. 04, Series of 1993, of the Sangguniang Bayan of Dapa, Surigao del Norte, and all acts emanating from it. It also declared that Espineli is restored to his status quo ante immediately, without delay, as though such status had never been interrupted. The Order dated November 22, 2005 even amplified on the restoration of Espenili's right to operate his cockpit by stating the following:

- a. Plaintiff's D' Game Cockpit may now start its operation as usual without any further delay as if his rights thereto have never been interrupted;
- b. No one shall be allowed to prevent or meddle in its affairs unlawfully as long as necessary permits have been duly paid for and its operation is fully legal, except on the pretext that there is no permit being issued by refusal of any governmental authority to issue the same as long as the legal requirements are being duly complied with;

Alma G. Navarro, undermining the authority of the trial court, wrote a letter addressed to Espineli, in which she said:

3. While it may be your belief, that you can operate D' Game cockpit on the basis of the Order granting your Motion for Execution Pending Appeal, such is erroneuos. The Order granting the motion for execution pending is not final; hence, you cannot assert any right from the said order. Furthermore, there is a pending motion to quash the writ of execution.

xxx

In view of the above reasons, you are hereby directed to cease from operating D' Game, until the final determination of your rights by the Court. Willful disregard of this directive for unjustifiable reasons shall subject you to criminal as well as civil liabilities.

This letter surfaced after the Acting Clerk of Court of RTC-Br. 31, Dapa, SDN, and Sheriff IV of RTC-Br. 32, Surigao City implemented the Writ of Execution and the November 22, 2005 Order.

To ensure that her directive is implemented, she directed the Chief of Police to cause the stoppage of the operation of D' Game cockpit and effect the arrest or apprehension of any person who may be held responsible in operating cockfight in D' Game Cockpit.

Alma G. Navarro, in her defense, argues that the order of stoppage of the operation of the D' Game Cockpit is well within her authority as she cannot be expected to tolerate the operation of the cockpit which has not obtained the required permit to operate. According to her, Espineli's license to operate had already expired. Unfortunately, Alma Navarro failed to substantiate this claim because she was declared to have waived her right to present her evidence.

It must be stressed that the November 2, 2005 Decision of RTCBr. 32, the subject of the Order which granted the motion of execution pending appeal, declared Municipal Ordinance No. 4 null and void. It follows that license issued by the Office of the Mayor of Dapa, SDN to any person or entity to operate cockfighting pursuant to this municipal ordinance has no legal effect. Surprisingly, Mayor Navarro singled out D' Game Cockpit. If this is not defiance, then what is?

Contempt of court has been defined as a disobedience to the court by acting in opposition to its authority, justice, and dignity. It signifies not only a willful disregard or disobedience of the court's order, but such conduct which tends to bring the authority of the court and the administration of law into disrepute or, in some manner, to impede the due administration of justice.[22]

Mayor Navarro's stubborn insistence that the November 22, 2005 Order has yet to attain finality, being then the subject of certiorari, is misplaced. While an action assailing the validity of the November 22, 2005 Order had been filed, yet no order was ever issued to stay the execution consistent with Rule 39, Section 3 of the Rules of Court which states:

Section 3. Stay of discretionary execution. — Discretionary execution issued under the preceding section[23] may be stayed upon approval by the proper court of a sufficient supersedeas bond filed by the party against whom it is directed, conditioned upon the performance of the judgment or order allowed to be executed in case it shall be finally sustained in whole or in part. The bond thus given may be proceeded against on motion with notice to the surety.

The actions taken by Mayor Navarro manifest her defiance of the trial court's Order and Writ of Execution, albeit on the flimsy pretext of D' Game Cockpit's alleged inability to obtain the required permit to operate which has remained merely an allegation.

FOR THESE REASONS, We GRANT the appeal. The Decision dated April 13, 2011 is MODIFIED in that the complaint for indirect contempt against Dapa SDN Recreation Center, Inc., and its Officers, Incorporators, and Board of Directors of Dapa SDN Recreation Center, Inc., namely: Federico Navarro, Herlend T. Navarro, Charito R. De Jesus, Nemesio S. De Jesus, Froilan M. Quijano, Hernando S. Navarro and Saturnino Echavez, Jr., in Civil Case No. 400 is DISMISSED. The Decision is AFFIRMED with respect to appellant Alma G. Navarro.

SO ORDERED.

WE CONCUR:

Inting and Perez, JJ., concur.

[*] Indirect Contempt proceedings partake of the nature of a criminal prosecution. The judgment or final order of a court in a case of indirect contempt may be appealed to the proper court as in criminal cases. [Rule 71, Section 11 of the Rules of Procedure]

[1] Records, pp. 332-343.

[2] An Ordinance amending Municipal Ordinance No. 06 authorizing the Municipal Mayor to issue permit or license the establishment, operation and maintenance of cockpits, and regulate cockfighting and commercial breeding of gamecocks in the municipality, provided that existing rights should not be prejudiced.

[3] Records, p. 1.

[4] Rodolfo G. Navarro, in his capacity as Mayor of Dapa; Pedro B. Gonzales, Jr., Ramon M. Gotinga, Willifortes U. Penecitos, Ambrosio D. Bulac, Corazon T. Espaldon, Cayetano Sunico, Rosie M. Libay, Trinidad E. Consigo, Manuel A. Aplo, Ian Joseph N. Penecitos, in their official capacity as presiding officers and members of the Sangguniang Bayan of the Municipality of Dapa.

[5] Records, pp. 57-J – 57- FF.

[6] "WHEREFORE, premises considered, it is hereby decreed

- a. That Municipal Ordinance No. 04, Series of 1993, of the Sangguniang Bayan of Dapa, Surigao del Norte, is null and void, and all acts emanating therefrom, based thereon or subsequent thereto are of no legal effect;

- b. That plaintiff is hereby ordered to be restored to his status quo ante immediately without delay as if his rights

thereto had never been interrupted;

xxx.

[7] Records, pp. 57-GG -57-WW.

[8] Records, pp. 57-VV -57-WW.

[9] Records, pp. 57-XX – 57-AAA.

[10] Records, p. 57-BBB.

[11] Records, p. 57-CCC.

[12] Records, pp. 124-131.

[13] Supra at no. 1.

[14] Records, pp. 345-353.

[15] Rollo, p. 19.

[16] Records [CA G.R. SP No. 00722], pp. 159-166.

[17] Rollo, pp. 29-30.

[18] Rodolfo G. Navarro, in his capacity as Mayor of the Dapa; Pedro B. Gonzales, Jr., Ramon M. Gotinga, Willifortes U. Penecitos, Ambrosio D. Bulac, Corazon T. Espaldon, Cayetano Sunico, Rosie M. Libay, Trinidad E. Consigo, Manuel A. Aplo, Ian Joseph N. Penecitos, in their official capacity as presiding officers and members of the Sangguniang Bayan of the Municipality of Dapa..

[19] The name of the Barangay where D' Game Cockpit is situated.

[20] G.R. No. L-17507, August 6, 1962.

[21] Ferrer v. Rodriguez, G.R. No. L-17507, August 6, 1962.

[22] Digital Telecommunications Philippines, Inc., v. Cantos, G.R. No. 180200, November 25, 2013.

[23] Section 2. Discretionary execution. —

(a) Execution of a judgment or final order pending appeal. — On motion of the prevailing party with notice to the adverse party filed in the trial court while it has jurisdiction over the case and is in possession of either the original record or the record on appeal, as the case may be, at the time of the filing of such motion, said court may, in its discretion, order execution of a judgment or final order even before the expiration of the period to appeal.

After the trial court has lost jurisdiction the motion for execution pending appeal may be filed in the appellate court.

Discretionary execution may only issue upon good reasons to be stated in a special order after due hearing.

(b) Execution of several, separate or partial judgments. — A several, separate or partial judgment may be executed under the same terms and conditions as execution of a judgment or final order pending appeal. (2a)

ABOUT BATAS.ORG

Study smarter at BATAS.org

The Philippine bar review and law-school companion built around how your brain actually remembers.

The complete Philippine law library - free for everyone.

More than 100,000 Supreme Court decisions, Republic Acts, and executive issuances - full-text searchable, browsable by category and year, and always free. No paywall, no login. This PDF came from it.

Audio case-brief lectures.

Any decision becomes a podcast-style lecture - facts, issues, ruling, and doctrine - with read-along highlighting and a hands-free presentation mode. Study while commuting, working out, or resting your eyes.

Bar review built on the science of memory.

Complete, sequenced courses for all eight bar subjects, narrated like podcasts and reinforced with retrieval practice and spaced review - the study techniques with the strongest evidence behind them.

The full law-school curriculum.

One subscription unlocks the entire J.D. curriculum - every subject, every lesson, with your progress tracked down to the paragraph so you can pick up exactly where you left off, on any device.

Mock exams that tell you where you stand.

Timed multiple-choice exams graded instantly, with per-subject score breakdowns and focus suggestions that point you at your weakest topics first.

A study planner that keeps you on pace.

Set your schedule and BATAS tells you every day whether you are on track for bar day - and exactly which lesson to take next.

Start free at <https://batas.org>

The law library is free forever - and your first lesson is one click away.

The text of this document is an official public record and remains in the public domain. Formatting, presentation, and compilation © 2026 batas.org.

Downloaded free from the batas.org Law Library. Share it freely - the library is free for every law student, bar reviewee, and practitioner.