

**EDUARDO COJUANGCO, JR. AND GRETCHEN OPPEN-COJUANGCO,
PETITIONERS, VS. THE HONORABLE COURT OF APPEALS, GEORGE F.
SISON AND LUIS R. MAURICIO, RESPONDENTS.**

G.R. No. L-37404. November 18, 1991

Ponente: DAVIDE, JR., J.

Read online (full-text search, related cases, audio case brief): <https://batas.org/library/26a8043b2000/>

DAVIDE, JR., J.:

May a criminal case for libel and an independent civil action for damages arising therefrom, filed pursuant to Article 33 of the Civil Code, be consolidated for joint trial?

The case which provoked this issue eighteen (18) years ago was then one of first impression. However, its early resolution did not seem to merit priority from the parties and so it became one of the many "move in the premises" cases of this Court.

Subsequent events had significantly dimmed the glow of the issue's novelty. In the 1982 case of *Caños vs. Peralta, et al.*,^[1] this Court enunciated a new doctrine which significantly touched upon and indirectly, albeit partly, resolved this issue. Then followed amendments to the Rules on Criminal Procedure, some of which allowed, in certain instances, the consolidation of the civil suit with the criminal action for the recovery of the civil liability arising from the latter.^[2] In a later case, *Naguiat vs. Intermediate Appellate Court, et al.*,^[3] decided in 1988, this Court went further by allowing the consolidation with the criminal action for violation of a special law of a civil case for specific performance with damages arising from said law. Be that as it may, there is still the need to meet the issue squarely.

The parties do not dispute the following antecedents:

In the 14 June 1972 issue of the *GRAPHIC*, a weekly magazine of general circulation in the Philippines, under the column *Social Climbing* by one "Conde de Makati," later identified as George F. Sison, the following item appeared:

"ONCE UPON A time a beautiful Blue Lady (GOC) used to frequent the office of the Honorable Sir.

Because of her well-known beauty and charm, the frequency of her visits did not pass unnoticed by our Lady of the House by the Pasig. An investigation by her battery of personal 'spies' revealed that the beautiful Blue Lady was 'following up' her three-million-peso loan from one of our leading government-lending institutions.

'Ang mahal naman ng kanyang x x x! exclaimed our Lady of the House.

Aba, floating rate yata tayo ngayon. Even my friend Marquesa de Culi-Culi has upped her price by 50 percent, 'kasi ang mahal na ng biling ngayon, kahit bulak at alkohol."

Claiming that the publication alludes to petitioners-spouses, and that it is false, malicious and constitutes a vicious attack on petitioner-wife's virtue, honor and character as it imputes to her not only the corrupt and immoral act of "following up" an alleged loan, but also the commission of corrupt and immoral acts of adultery and/or

prostitution, petitioners filed on 11 July 1972 with the then Court of First Instance (now Regional Trial Court) of Quezon City a civil action for Damages based on Libel against the Graphic Publishing Co., Inc., as owner; J. Antonio Araneta, as publisher; Luis R. Mauricio, as general manager and editor; and Conde de Makati, as writer, of the GRAPHIC magazine. The case, docketed as Civil Case No. Q-16725, was raffled to Branch XVI of said court. The complaint was amended on 20 September 1972[4] to specifically identify Conde de Makati, herein private respondent George F. Sison.

On 29 December 1972, the City Fiscal of Quezon City filed with the above court a criminal case for libel against defendants Sison, Mauricio and Araneta.[5] The case was docketed as Criminal Case No. Q-2713 and was raffled to Branch V thereof.

On 7 March 1973, after issues in Civil Case No. Q-16725 were joined and the accused in Criminal Case No. Q-2713 were arraigned, petitioners filed therein separate motions to consolidate the criminal case with the civil case in Branch XVI alleging that the evidence to be presented in both would be the same; much valuable time and effort of the court as well as that of the parties would be saved by such consolidation; and, moreover, Article 360 of the Revised Penal Code, as amended, provides, inter alia, that in libel the civil action shall be filed in the same court where the criminal action is filed and vice-versa, provided, however, that the court where the criminal action or civil action for damages is first filed, shall acquire jurisdiction to the exclusion of other courts.

Only defendants Mauricio and Araneta, now private respondents, filed their opposition to the motions. They claim that petitioners, having filed a separate civil action, have no legal standing to intervene in the criminal case; there is no provision in the Rules of Court authorizing the consolidation of the criminal case with the separate civil action; the rule contemplates the consolidation of the hearing of two (2) or more cases pending before the same judge, and not when the cases are before different courts or different branches of the same court; different rules on the competency of witnesses and the weight of evidence necessary to make proper findings in the two (2) proceedings always exist; and consolidation would circumvent the rules giving the prosecution in the criminal action, thru the fiscal, direction and control over the case, and granting the offended parties the right to intervene in the criminal prosecution once they opt to pursue a civil action.

On 13 October 1973, then Judge Pacifico de Castro of Branch V of the above court handed down an Order in Criminal Case No. Q-2713 overruling the opposition, granting the motion to consolidate, and ordering the transfer of the records of said case to Branch XVI for consolidation with Civil Case No. Q-16725.[6] In overruling the opposition, the judge held that the Court may, in appropriate cases, order *motu proprio* the consolidation of cases as such power is inherent in the court.[7] The mere absence of any specific rule authorizing the consolidation of the trial of a criminal and civil case does not necessarily deprive the court of its inherent power to do so as long as it does not prejudice the parties or place difficulties during trial, thereby defeating the avowed purpose of consolidation, which is to avoid unnecessary costs, delay and inconvenience to the parties. The interpretation of the rule as urged in the opposition was clearly not meant to exclude consolidation of cases pending in different courts or branches of the same court as long as such branches or courts agree to the consolidation. Generally, the rules on evidence are the same in all courts and in all trials and hearings, whether civil or criminal, and the fact that there, nevertheless, would be different rules governing the competency of witnesses and weight of evidence necessary to make proper findings in the two (2) cases could not present special difficulties. Furthermore, it is not clear in what way the fiscal would be divested of his control and supervision over the criminal prosecution.

Mauricio filed a motion to reconsider the Order, which Sison adopted.

In the Order of 10 April 1973, the trial court denied the motion. Mauricio and Sison went to the Court of Appeals on a petition for certiorari, prohibition and mandamus with preliminary injunction to seek annulment of the

aforesaid Orders of 13 March and 10 April 1973. The herein petitioners were among the respondents therein. The petition was docketed as C.A.-G.R. SP-02026-R.

On 25 June 1975, the Court of Appeals promulgated a decision[8] granting the petition and setting aside the challenged Orders on the basis of the following grounds:

"1st. - There is really no law nor (sic) rule that expressly permits consolidation even quasi-consolidation of joint trial, of a criminal and a civil, case; x x x.

2nd. - Not only this, in cases of defamation, fraud or physical injuries, pursuant to Art. 33 and Rule 111, Sec. 2, the civil can be filed independently of the criminal which is the case here, but in that situation, the law and the rules expressly dictate that such civil action,

‘shall proceed independently of the criminal prosecution and shall require only a preponderance of evidence.’

going to show that the apparent intent of the Law and Rule Maker was to command that where offended party should choose to file an independent civil action, then said civil action should proceed entirely separate (sic), independent of and disconnected with, the criminal, and this can well be invoked to show that the law and the rules would and should be interpreted not to authorize consolidation;

3rd. - Since Fiscal controls criminal prosecution but complainant plaintiff in civil controls the civil complaint, it might well happen that Fiscal might insist on proving for prosecution of criminal, what complainant might refuse to prove for civil, or vice versa, Fiscal might refuse to present evidence for criminal what complainant would wish to present for civil; and when it comes to turn (sic) of petitioners to present their evidence, it might well happen that Fiscal might object and insist in objecting but complainants as plaintiffs, in civil might permit, and so on, -- this Court can hardly see who should be obeyed as captain in such emergencies; Therefore, a joint trial of the two cases where filed independently but tried consolidatedly would be not (sic) a clear and orderly trial; but a confusing and chaotic one;

4th. - Still worse, since petitioners as accused are entitled to keep silent, but as defendants in civil, may be called upon as hostile witnesses, it might well happen that complainants as plaintiffs may call them in that capacity, and perhaps petitioners would have no valid ground to refuse to testify, but it being a joint trial, this Court can hardly see how in such a possibility, even probability, the Judge can divide his brain, but let it not be forgotten that the test of sufficiency of proof in both cases unfortunately is different, mere preponderance in the civil, beyond reasonable doubt in the criminal, and yet, in the final analysis, the determination must rest in the conscience of trial Judge as Filangieri has written, XXVI Enciclopedia Juridica Española 399, and conscience is indivisible;

5th. - There further is the point of elementary fair play; since under law, Art. 33 and the Rules, Rule 111, complainants were free to vindicate their rights by either just intervening in the criminal case as offended parties, or by filing an independent civil action, and since they can not and are not permitted, to do both, having made their choice, it would not be very fair that they should be permitted retrace (sic) their steps and reap the benefit of a joint trial which they had opted to refuse at the beginning by filing an independent civil action; x x x"[9]

The motion for reconsideration of the decision by respondent Judge de Castro having been denied by the Court of Appeals, the petitioners filed on 15 September 1973 the instant petition for the review of the decision. In support thereof, petitioners interposed the following grounds:

“I

THE COURT OF APPEALS ERRED IN DECLARING THAT ARTICLE 33 OF THE NEW CIVIL CODE AND SECTION 2, RULE 111 OF THE NEW RULES OF COURT PROHIBIT THE CONSOLIDATION, FOR JOINT TRIAL, OR (SIC) THESE CRIMINAL AND CIVIL CASES.

II

THE COURT OF APPEALS ERRED IN DECLARING THE (SIC) A JOINT TRIAL OF TWO CASES WOULD ONLY CAUSE CONFUSION AND CHAOS.

III

THE COURT OF APPEALS ERRED IN DECLARING THAT A JOINT TRIAL OF THESE TWO CASES WOULD PUT THE TRIAL JUDGE IN A PREDICAMENT TO THE PREJUDICE OF THE ACCUSED IN THE CRIMINAL CASE.”[10]

In compliance with the Resolution of 20 September 1973,[11] private respondents Mauricio and Sison filed their Comment on 4 October 1973.[12] However, instead of opposing the petition, they manifested that considering the important question of law not yet resolved, it would be advisable for this Court to give due course to the petition to enable it to pass upon such a novel question and make an authoritative ruling for the guidance of the bench and the bar.

This Court gave due course to the petition in the Resolution of 10 October 1973.[13]

On 1 December 1973, petitioners filed their Brief[14] reiterating, as assignments of errors, the aforementioned grounds. Private respondents filed their Brief on 29 January 1974.[15]

As we stated in the opening paragraph, the core issue presented in this case is whether the criminal case and the separate and independent civil action to enforce the civil liability arising from the former, filed pursuant to Article 33 of the Civil Code, may be consolidated for joint trial. We also pointed out that the issue had been partly resolved by the Caños and Naguiat cases and the subsequent amendments to the Rules on Criminal Procedure.

In Caños, We affirmed the Order of respondent Judge Peralta of the then Court of First Instance of Davao del Sur ordering the consolidation of Criminal Case No. 326 and Civil Case No. 558. The former was for violation of Section 3 (a) of R.A. No. 602, as amended, otherwise known as the Minimum Wage Law, for alleged non-payment by Caños of the minimum wage to her employee, Rolando Apas, filed by the fiscal against the former on 23 December 1971. The latter was a civil action filed on 4 August 1972 by Apas against Caños for collection of differential, overtime and termination pay, plus damages. Caños maintained that after the institution of Criminal Case No. 326, the proceedings in Civil Case No. 558 should be suspended until final judgment in the criminal action pursuant to paragraphs (a) and (b), Section 3 of Rule 111 of the Rules of Court which read:

"[a] Criminal and civil actions arising from the same offense may be instituted separately, but after the criminal action has been commenced the civil action can not be instituted until final judgment has been rendered in the criminal action;

[b] After a criminal action has been commenced, no civil action arising from the same offense can be prosecuted, and the same shall be suspended, in whatever stage it may be found, until final judgment in the criminal proceedings has been rendered;"

In affirming the challenged consolidation Order, this Court per Justice Escolin held:

“The argument fails to consider the provisions of Article 31 of the Civil Code. Civil Case No. 558 is a separate

and distinct action from Criminal Case No. 326. The former is based upon a contract of services entered into by the parties, not upon the civil liability arising from the offense charged in Criminal Case No. 326, i.e., non-payment of the minimum wage, punishable under Section 3 (a) of Rep. Act 602, as amended, in relation to Section 15 (a) of the same Act. Being essentially an action for enforcement of an obligation ex-contractu, the civil case can proceed independently of the latter, in accordance with Article 31 of the Civil Code:

‘Art. 31. When the civil action is based on an obligation not arising from the act or omission complained of as a felony, such civil action may proceed independently of the criminal proceedings and regardless of the result of the latter.’

But did respondent judge abuse his discretion in ordering the consolidation and joint trial of the criminal and civil cases? A court may order several actions pending before it to be tried together where they arise from the same act, event or transaction, involve the same or like issues, and depend largely or substantially on the same evidence, provided that the court has jurisdiction over the case to be consolidated and that a joint trial will not give one party an undue advantage or prejudice the substantial rights of any of the parties (citing 1 CJS, 1347). Consolidation of actions is expressly authorized under Section 1, Rule 31 of the Rules of Court:

‘Section 1. Consolidation. - When actions involving a common question of law or fact are pending before the court, it may order a joint hearing or trial of any or all the matters in issue in the actions; it may order all the actions consolidated; and it may make such orders concerning proceedings therein as may tend to avoid unnecessary costs or delay.’

The obvious purpose of the above rule is to avoid multiplicity of suits, to guard against oppression and abuse, to prevent delays, to clear congested dockets, to simplify the work of the trial court; in short the attainment of justice with the least expense and vexation to the parties litigants (citing 1 CJS 1342-1343).

Consolidation of actions is addressed to the sound discretion of the court, and its action in consolidating will not be disturbed in the absence of manifest abuse of discretion. In the instant case, respondent judge did not abuse his discretion in ordering the joint trial of the two cases. There is no showing that such joint trial would prejudice any substantial right of petitioner. Neither does the latter question the court's jurisdiction to try and decide the two cases."

In *Naguiat*, We set aside the 20 March 1985 decision of the Intermediate Appellate Court annulling the Order of Branch LX of the Regional Trial Court of Angeles City which decreed the consolidation of Criminal Case No. 6727 for violation of Section 25, P.D. No. 957[16] (on delivery of title of lot or unit upon full payment thereof) which was filed, at *Naguiat*'s instance, by the fiscal on 13 September 1984 against Manuel Lazatin, president of the Timog-Silangan Development Corp. (TSDC), and Civil Case No. 4224 in the same court, a complaint for specific performance with damages filed by *Naguiat* against TSDC and Lazatin; We then reinstated said Order. In the civil case, *Naguiat* prayed for judgment ordering, inter alia, said defendants to deliver to him the transfer certificates of title to three (3) lots which he had allegedly paid in full. Both cases were raffled to Branch LX of the above court. The Intermediate Appellate Court disagreed with the trial court and ordered instead the suspension of the civil case until final determination of the criminal case, in line with the spirit of Section 3, Rule 111 of the Rules of Court. It further disallowed the intervention of *Naguiat* in the criminal case. In overruling the Intermediate Appellate Court, We held:

"In the cases at bar, the nature of the issues involved, at least, the factual issues in the civil and criminal actions are almost identical, i.e., whether or not petitioner had fully paid for the lots he purchased from the private respondents, so as to entitle him to the delivery of the certificates of title to said lots. The evidence in both cases, likewise, would virtually be the same, which are, the Contract to Sell, the letter which contains the conditions for the purchase of the lots and, to which petitioner allegedly affixed his conformity, the official receipts for the alleged payments made by the petitioner, and other related documents.

Based on the foregoing, and considering that the criminal action filed is one for violation of a special law where, irrespective of the motives, mere commission of the act prohibited by said special law, constitutes the offense, then the intervention of the petitioner's counsel, as private prosecutor in the criminal action, will not prejudice the substantial rights of the accused.

The consolidation of the two (2) cases in question, where petitioner's counsel may act as counsel for the plaintiff in the civil case and private prosecutor in the criminal case, will instead be conducive to the early termination of the two (2) cases, and will redound to the benefit and convenience of the parties; as well as to the speedy administration of justice."

The aforesaid Section 3 of Rule 111 was subsequently amended, and is now Section 2 thereof, and reads in full as follows:

"SECTION 2. Institution of separate civil action. - Except in the cases provided for in Section 3 hereof, after the criminal action has been commenced, the civil action which has been reserved cannot be instituted until final judgment has been rendered in the criminal action.

(a) Whenever the offended party shall have instituted the civil action as provided for in the first paragraph of Section 1 hereof before the filing of the criminal action and the criminal action is subsequently commenced, the pending civil action shall be suspended, in whatever stage before final judgment it may be found, until final judgment in the criminal action has been rendered. However, if no final judgment has been rendered by the trial court in the civil action, the same may be consolidated with the criminal action upon application with the court trying the criminal action. If the application is granted, the evidence presented and admitted in the civil action shall be deemed automatically reproduced in the criminal action, without prejudice to the admission of additional evidence that any party may wish to present. In case of consolidation, both the criminal and the civil actions shall be tried and decided jointly.

(b) Extinction of the penal action does not carry with it extinction of the civil, unless the extinction proceeds from a declaration in a final judgment that the fact from which the civil might arise did not exist. (3a)"

Section 3 of said Rule referred to in the opening paragraph of Section 2 reads as follows:

"SECTION 3. When civil action may proceed independently. - In the cases provided for in Articles 32, 33, 34 and 2176 of the Civil Code of the Philippines, the independent civil action which has been reserved may be brought by the offended party, shall proceed independently of the criminal action, and shall require only a preponderance of evidence. (2a)"

while the first paragraph of Section 1, referred to in subsection (a) of Section 2, reads:

"SECTION 1. Institution of criminal and civil action. - When a criminal action is instituted, the civil action for the recovery of civil liability is impliedly instituted with the criminal action, unless the offended party waives the civil action, reserves his right to institute it separately, or institutes the civil action prior to the criminal action. x x x"

From the foregoing, it is clear that the civil action for the recovery of damages arising from a crime, or *ex delicto*, may be filed separately from the criminal case either before the institution of the latter, which may be done without reservation, or after such institution, provided, however, that a reservation to that effect has been made. If in the meantime the criminal action is instituted, the civil action which has been reserved cannot be commenced until final judgment has been rendered in the former. This restriction does not, however, apply to the cases provided for in the aforesaid Section 3. Thus, in the cases provided for in Articles 32, 33 (as in the instant case), 34 and 2176 of the Civil Code, the civil action may be filed even after the institution of the criminal case, provided that prior proper reservation had been made.

Subsection (a) of Section 2 refers to civil cases filed before the institution of the criminal cases. Since it makes reference to the first paragraph of Section 1, and the latter necessarily includes the cases under Articles 32, 33, 34 and 2176 of the Civil Code as expressly recognized in the second paragraph thereof which reads:

"Such civil action includes recovery of indemnity under the Revised Penal Code, and damages under Articles 32, 33, 34 and 2176 of the Civil Code of the Philippines arising from the same act or omission of the accused."

it follows without saying that an independent civil action for the recovery of civil liability, authorized under Articles 32, 33, 34 or 2176 of the Civil Code, filed before the institution of the criminal case, may be consolidated with the latter, subject to the condition that no final judgment has been rendered in the criminal case. If this is permitted, there is neither rhyme nor reason why, given the existence of the condition, an independent civil action under any of the said Articles, but filed after the institution of the criminal case, may not be consolidated with the latter. This second scenario is equally and logically addressed by the reasoning behind the provision for the first situation.

That these provisions were incorporated into the Rules after this petition was filed may not be interposed to deny their retroactive application since procedural laws may be given retroactive application.[17]

Furthermore, Section 1, Rule 31 of the Rules of Court authorizes consolidation of actions involving common questions of law or fact pending before the court. The purpose or object of consolidation is to avoid multiplicity of suits, guard against oppression or abuse, prevent delay, clear congested dockets, simplify the work of the trial court, and save unnecessary costs or expense; in short, the attainment of justice with the least expense and vexation to the parties litigants.[18] This provision applies to both civil and criminal actions. Caños and Naguiat had removed any doubt on this point.

It is self-evident that Civil Case No. Q-16725 and Criminal Case No. Q-2713 involve common or identical questions of fact and law, and that they would even have the same witnesses. These considerations alone justify the exercise by the court of its discretion to consolidate the cases for joint hearing to attain the salutary purpose of consolidation.

There is yet a further consideration why in the instant case consolidation of Civil Case No. Q-16725 and Criminal Case No. Q-2713 should be allowed. What is involved is the crime of libel. As correctly stated by petitioners, per the third paragraph of Article 360 of the Revised Penal Code, as amended, the criminal case for libel and the civil action for damages arising therefrom must be filed in the same court. The pertinent portion thereof reads as follows:

x x x

"The criminal and civil action for damages in cases of written defamations as provided for in this chapter, shall be filed simultaneously or separately with the court of first instance of the province or city where the libelous article is printed and first published or where any of the offended parties actually resides at the time of the commission of the offense. x x x Provided, further, That the civil action shall be filed in the same court where the criminal action is filed and vice-versa: Provided, furthermore, That the court where the criminal action or civil action for damages is first filed, shall acquire jurisdiction to the exclusion of other courts: x x x"

If the court referred to is a multi-sala court, it may happen, as in this case, that the criminal and civil actions are raffled or assigned to different salas. In this situation, consolidation of one with another earlier filed would not only be practical and economical -- it would subserve the very purpose of the law. Consolidation of cases assigned to different branches of a court had earlier been recognized. In *Raymundo, et al. vs. Felipe, et al.*,[19] We held:

"[A]lthough consolidation of several cases involving the same parties and subject-matter is a matter addressed to the discretion of the trial court, joint hearing becomes a matter of duty if two or more cases are tried before the same judge, or even if filed with the different branches of the same court of first instance, provided one of such cases has not been partially tried."

This modified what this Court stated in *PAL, et al. vs. Teodoro, et al.*,^[20] that the provision on consolidation^[21] refers to the consolidation of hearings of two (2) or more cases which are before the same judge, and not when the cases are pending before different courts or different branches of the same court.

In view of the foregoing, it would no longer be necessary to consider the other reasons adduced by respondent Court of Appeals in setting aside the Orders of the trial court. Suffice it to say that the feared chaos or confusion in procedure is at best speculative and the possible difficulty the judge may face in the light of the different tests of sufficiency of proof in each case is unfounded for it fails to consider the instances when the civil aspect is impliedly instituted with the criminal action.

WHEREFORE, the Petition is GRANTED. The challenged Decision of 25 June 1973 and Resolution of 7 August 1973 of the Court of Appeals in C.A.-G.R. No. SP-02026-R are hereby SET ASIDE and the Order of the trial court of Quezon City of 13 March 1973 consolidating for joint trial Civil Case No. Q-16725 and Criminal Case No. Q-2713, and its Order of 10 April 1973 denying the motion to reconsider the former, are hereby REINSTATED.

No pronouncement as to costs.

IT IS SO ORDERED.

Fernan, C.J., Gutierrez, Jr., Bidin, and Romero, JJ., concur.

[1] G.R. No. L-38352, August 19, 1982, 115 SCRA, 843.

[2] Section 2 (a), Rule 111, Rules of Court.

[3] G.R. No. 73836, August 18, 1988, 164 SCRA 505.

[4] Rollo, 43-48.

[5] *Id.*, 49-51.

[6] Rollo, 37-40.

[7] Citing 1 C.J. 1122.

[8] Per Associate Justice Magno S. Gatmaitan, concurred in by Associate Justices Cecilia Muñoz Palma and Jose N. Leuterio.

[9] Rollo, 30-33.

[10] *Id.*, 16.

[11] *Id.*, 92.

[12] *Id.*, 113.

[13] Rollo, 116.

[14] Id., 125, et seq.

[15] Id., 134, et seq.

[16] Regulating the Sale of Subdivision Lots and Condominiums, Providing Penalties for Violations Thereof.

[17] Yakult Philippines vs. Court of Appeals, 190 SCRA 357.

[18] 1 C.J.S. 1343.

[19] 42 SCRA 615 (1971).

[20] G.R. No. L-6698, August 30, 1955, 97 Phil. 461.

[21] Then Section 1, Rule 32, of the Rules of Court.

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.