

**SPOUSES NATHANIEL BUNYI AND FELICIDAD BUNYI,
PLAINTIFFS-APPELLEES, VS. SPOUSES MINIANO B. DELA CRUZ AND
LETA DELA CRUZ, SAMSON G. DE LEON, ROMEO C. CADANO AND
THE REGISTRY OF DE...**

Read online (full-text search, related cases, audio case brief): <https://batas.org/library/469799792e51/>

PAREDES, J.:[*]

THE CASE

THIS IS ON THE APPEAL filed by defendants-appellants Spouses Miniano B. Dela Cruz and Leta Dela Cruz assailing the Decision[1] dated August 19, 2008 of the Regional Trial Court (RTC), Branch 71, Antipolo City, in Civil Case No. 99-5354 for Review, Reconveyance, Cancellation of Title and Damages with prayer for Writ of Preliminary Injunction.

THE ANTECEDENTS

Spouses Nathaniel Bunyi and Felicidad Bunyi (individually referred to by their first names; collectively, as "Spouses Bunyi") filed an Amended Complaint[2] for Review, Reconveyance, Declaration of Nullity of Title and Damages against Spouses Miniano B. Dela Cruz and Leta Dela Cruz (individually referred to by their first names; collectively, as "defendants-appellants"), Samson De Leon (De Leon) of the Provincial Environment and Natural Resources Office (PENRO), DENR, Region IV, Romeo Cadano (Cadano) and Ruben Cabrera (Cabrera), the latter two of the Community Environment and Natural Resources Office (CENRO), DENR, Region IV, the Registry of Deeds for the Province of Rizal, and Ramon Ramos (Ramos) before the RTC alleging, inter alia, that:

Spouses Bunyi are the owners of a parcel of land (Lot 3064, Cad-688-D, Taytay-Cainta Cadastre) situated in Barangay San Juan, Taytay, Rizal, containing an area of Three Thousand Four Hundred Eighty Seven (3,487) square meters. The said property was a portion of the parcel of land they purchased from their parents Gavino Dominguez and Celia Dominguez on May 20, 1970 by virtue of a document known as "Bilihan ng Apat na Pirasong Palayan". They declared the property for taxation purposes, evidenced by Tax Declaration Nos. 135965, 8691, 04-4827 and 04-5619. In fact, the late Gavino Dominguez already declared the property for taxation purposes as early as December 15, 1948 until they sold the property to Spouses Bunyi[3].

Spouses Bunyi engaged the services of Geodetic Engineer Norberto Mendoza who resurveyed the property on July 20, 1997. It turned out that the parcel of land purchased from Spouses Dominguez was divided into two (2) parcels of land identified as Lot No. 3064 and Lot No. 3065. Thus, Spouses Bunyi caused the cancellation of Tax Declaration No. 04-5619 and the issuance of Tax Declaration No. 004-18238 for the smaller lot and Tax Declaration No. 004-18239 for the bigger lot[4].

As early as September 1987, they had applied for the issuance of a free patent with CENRO. However, Cabrera, the land investigator of CENRO, advised them to submit a letter request withdrawing the application to give way to the early approval of the advance plan. Accordingly, Spouses Bunyi prepared and submitted the letter dated

September 1, 1997. On December 16, 1997, the plan was approved. Thus, on November 27, 1998, Spouses Bunyi filed their application for registration of title before the Municipal Trial Court. However, when they were required to secure from CENRO a certification that the property (Lot No. 3064) is not covered by any application, they discovered that Lot No. 3064 has now been covered by FPA No. 045813-154 in the name of defendant-appellant Miniano[5].

They went to the PENRO and discovered the existence of the following documents: (1) application for free patent no. 045813-154 filed by defendant-appellant Miniano which was received by CENRO on March 31, 1998; (2) defendant-appellant Miniano's affidavit, dated March 31, 1999, was subscribed before Cadano; (3) joint affidavit dated March 31, 1998 of Cristy Francisco and Romeo Aguirre, also subscribed before Cadano; (4) notice of application for free patent with undertakings executed by defendant-appellant Miniano and subscribed before Cadano; (5) BL Form No. V-37 Lot 3064 showing the sketch of the property; (6) letter of Cadano dated June 19, 1998 to the Clerk of Court; (7) Order dated July 1, 1998 approving the application for issuance of patent issued by De Leon; (8) letter of transmittal dated July 2, 1998 from de Leon addressed to the Registry of Deeds, Pasig City; and (9) certification dated June 25, 1998 executed by Ramos to the effect that defendant-appellant Miniano is the actual occupant of Lot 3064 located at Brgy. San Juan, Taytay, Rizal with improvements thereon. They also discovered, at the Office of the Registry of Deeds, that Original Certificate of Title No. 1679 (OCT 1679) was registered in the names of defendants-appellants on July 2, 1998[6].

On July 17, 1998, defendant-appellant Miniano requested the Registry of Deeds to separate the two (2) parcels of land appearing in OCT 1679. Thereafter, Transfer Certificate of Title (TCT) Nos. 646183 and 646184 for Lot Nos. 2769 and 3064, respectively, were issued[7].

Spouses Bunyi also averred that the allegation of Miniano in his application for free patent and affidavit is concocted and without factual and legal basis since the subject property is being tilled by their tenants, namely: (1) 77-year old Pablo Cruz who started working in the farm in 1970; and (2) Romulo Leonardo who inherited the job from his deceased father who started cultivating the property before the war in 1941. Further, the statement of De Leon and Cadano in the Order/Approval of Application and Issuance of Patent dated July 1, 1998, that defendants-appellants are the ones occupying and cultivating the subject property is not true[8]. Thus, the order and title issued to defendants-appellants were obtained through fraud, misrepresentation and malicious manipulation or maneuver at the CENRO[9].

In his Answer[10], Cadano claimed that he accepted the free patent application of defendants-appellants on March 31, 1999 and that all the information and statements set forth therein were submitted and executed by defendant-appellant Miniano under oath. Moreover, the free patent application was processed and went through the normal standard operating procedure under the Free Patent Law.

Defendants-appellants adopted their original Answer with Compulsory Counterclaim as their answer to the Amended Complaint[11] while Spouses Bunyi adopted their Answer to Defendants' Counterclaim as their Reply to Defendants' Answer with Compulsory Counterclaim[12]. Thereafter, the parties submitted their respective pre-trial briefs[13].

Spouses Bunyi presented the following witnesses on the stand: Felicidad[14], Andres Efren Cruz, Jr.[15], Pablo Cruz[16], Emilia Aquino[17], Henry Talag[18] and Lorisa Aldeano[19]. On November 26, 2001, they filed their Formal Offer of Evidence[20].

On January 22, 2002, defendants-appellants filed a Demurrer to Evidence[21] which was denied by the RTC in the Order[22] dated March 22, 2002. According to the RTC, it would rather have the complete facts and evidence of the parties upon which to reach a decision than to prematurely go into it based only on the facts and evidence of

Spouses Bunyi. Defendants-appellants moved[23] for reconsideration but the same was denied in the Order[24] dated July 30, 2002.

On June 9, 2003, defendants-appellants filed a Motion to Dismiss with Reservation to File Criminal Charges and (an) Administrative Complaint[25]. However, in the Order[26] dated July 7, 2003, the RTC denied the same because the grounds relied upon by defendants-appellants are not the grounds that the court should take into consideration as provided by the Rules of Court.

On July 18, 2003, defendants-appellants moved[27] for the resetting of the hearing scheduled on that day. The RTC, on the same day, granted said motion and reset the hearing to September 1, 2003[28]. On the said hearing date, upon motion of counsel for defendants-appellants, they were given fifteen (15) days to file a Motion to Dismiss on the issue of jurisdiction[29].

On September 12, 2003, defendants-appellants filed a Motion to Dismiss for Lack of Jurisdiction[30] on the following grounds: (1) they are the lawful patentees; (2) spouses Bunyi falsely claim that they own the subject property; (3) the complaint is void; (4) the decision dated July 12, 1999 of MTC, Taytay, Rizal is void; (5) the Republic of the Philippines appealed the MTC Decision to this Court; (6) the RTC has no jurisdiction over the case.

In the Order[31] dated October 9, 2003, the RTC denied the motion for lack of merit. The RTC also set the reception of defendants-appellants' evidence on November 28, 2003. However, on the said date, defendant-appellant Atty. Miniano, who also acted as counsel, manifested[32] that he was indisposed. Since counsel for spouses Bunyi was also indisposed, the RTC reset the hearing to January 30, 2004[33]. However, the reception of evidence did not proceed, again, because the witnesses for defendants-appellants were not sent subpoenas[34]. The April 23, 2004 hearing was reset to June 11, 2004 considering the judge was indisposed[35], while the hearing on December 10, 2004 was likewise postponed on the request of counsel for defendants-appellants[36].

On September 25, 2005, trial was reset for the last time to November 21, 2005 since no witness was present. The RTC warned defendants-appellants that if they failed to present their evidence, their right to do so would be deemed waived[37].

On October 13, 2005, defendants-appellants filed a Second Demurrer to Evidence[38] anchored on two (2) grounds, to wit: (1) Spouses Bunyi had no cause of action; and (2) Spouses Bunyi had no legal personality to sue.

In view of the Second Demurrer, the scheduled presentation of defendants-appellants' evidence on November 21, 2005 was postponed over the vehement objection of the counsel for Spouses Bunyi[39].

In the Order[40] dated March 17, 2006, the RTC denied the Second Demurrer to Evidence and directed defendants-appellants to present their witness/evidence at the next scheduled hearing on May 15, 2006. However, on said date, only the counsel for Spouses Bunyi appeared; the record indicated that the notice sent to defendants-appellants was returned to sender for the reason, insufficient address. Thus, the latter was given one last chance to present evidence on June 27, 2006[41]. Unsurprisingly, on the scheduled hearing, no one appeared for defendants-appellants. Hence, the RTC granted the prayer of counsel for Spouses Bunyi that defendants-appellants be considered to have waived their right to present evidence[42].

On September 6, 2006, Spouses Bunyi filed their Memorandum[43]. Thereafter, the case was submitted for decision[44]. Defendants-appellants then filed a Motion to Inhibit[45], which was granted in the Order[46] dated September 26, 2006. The case was then re-raffled from Branch 73 to Branch 71 of the RTC[47].

On August 19, 2008, the RTC rendered the assailed Decision[48], the dispositive portion of which reads:

WHEREFORE, the Court hereby rules in favor of plaintiffs and against herein defendants as follows:

- Declaring as null and void Transfer Certificate of Title No. 646184, a derivative title of Original Certificate of Title No. 1679 (Lot No. 3064 with an area of 3,487 square meters, more or less situated in San Juan, Taytay, Rizal);
- Ordering the Registry of Deeds for the Province of Rizal, Pasig City, to cancel Transfer Certificate of Title No. 646184, a derivative title of Original Certificate of Title No. 1679, registered in the name of Miniano B. Dela Cruz married to Leta L. Dela Cruz;
- Ordering defendants Miniano B. Dela Cruz married to Leta Dela Cruz, jointly and severally to pay plaintiffs Nathaniel Bunyi and Felicidad D. Bunyi moral damages in the amount of P50,000.00; exemplary damages in the amount of P50,000.00 and attorney's fees in the amount of P50,000.00;
- Ordering defendants to pay the costs.

SO ORDERED.[49]

Hence, this Appeal.

ISSUE

Defendants-appellants come before Us, raising the lone issue of:

WHETHER OR NOT THE TRIAL COURT ERRED IN RENDERING JUDGMENT BASED ON THE EVIDENCE PRESENTED BY THE PLAINTIFFS-APPELLEES.[50]

THE COURT'S RULING

The appeal is bereft of merit.

Defendants-appellants claim[51] that the RTC erred in rendering judgment based on the evidence presented by Spouses Bunyi. Defendants-appellants posit[52] that while they failed to present evidence, Spouses Bunyi presented insufficient evidence to destroy their ownership of the subject property by virtue of a title which, under the Torrens system, is conclusive and indefeasible. We do not agree.

Placing a parcel of land under the mantle of the Torrens system does not mean that ownership thereof can no longer be disputed[53]. Ownership should not be confused with a certificate of title[54]. Registering land under the Torrens System does not create or vest title, because registration is not a mode of acquiring ownership. A certificate of title is merely an evidence of ownership or title over the particular property described therein[55]. That defendants-appellants were able to secure a title in their name did not operate to vest ownership upon them of the subject property[56].

Defendants-appellants cannot rely solely on the fact that they were the ones who hold and possess a certificate of title over the subject property when, after trial, Spouses Bunyi sufficiently established that they are the ones who have title or ownership. To emphasize, the title refers to the ownership of the property covered by the transfer certificate of title while the transfer certificate of title merely evidences that ownership[57].

It must be noted that defendants-appellants' certificate of title was issued pursuant to a grant of free patent in their favor. For the issuance of a free patent, the following requirements should be complied with: the applicant is a natural-born citizen of the Philippines; is not the owner of more than twelve (12) hectares of land; has continuously occupied and cultivated, either by himself or through his predecessors-in-interest, a tract or tracts of

agricultural public land subject to disposition, for at least 30 years prior to the effectivity of Republic Act No. 6940; and has paid the real taxes thereon while the same has not been occupied by any person.[58]

In the case of defendants-appellants, it was proven that they were not in possession of the subject property. Thus, they failed to satisfy the third requirement, which is continuous occupation and cultivation for at least thirty (30) years. In addition, there was no showing that they declared the subject property for taxation purposes. In support thereof, Spouses Bunyi presented Henry Talag[59], Tax Mapper of the Assessor's Office, Taytay, Rizal, who testified that there was no property registered in the name of defendants-appellants.

We cannot ignore the fact that Spouses Bunyi withdrew their application for free patent in September 1997 after the pendency thereof for ten (10) years. The withdrawal was for the purpose of expediting their acquisition of a certificate of title over the property because the issuance of a free patent was taking too long. Even if Spouses Bunyi withdrew their application for free patent, it was clear from the letter[60] addressed to CENRO that they were not abandoning their claim over the property. They categorically stated that their withdrawal was for the purpose of facilitating the early approval of the advance plan[61], which was actually approved on December 16, 1997. In fact, they were in the process of registering the subject property through court action when they discovered the free patent issued to defendants-appellants.

On the other hand, as opposed to the experience of Spouses Bunyi, defendants-appellants were granted a free patent and were issued OCT 1679 on July 2, 1998, less than a year after Spouses Bunyi withdrew their own application. Note that the application for free patent of defendant-appellant Miniano was received by CENRO only on March 31, 1998 and their application was granted in just three (3) months. This expedited proceeding vis-a-vis the decade-long wait of Spouses Bunyi certainly creates an overpowering doubt on the regularity of the issuance of the certificate of title to defendants-appellants.

Based on the foregoing, it is clear that defendants-appellants cannot raise as defense the indefeasibility of title. It is settled that a title emanating from a free patent which was secured through fraud and misrepresentation does not become indefeasible, precisely because the patent from whence the title sprung is itself void and of no effect whatsoever[62].

While Spouses Bunyi do not hold any certificate of title over the subject property, they have sufficiently shown that they are the owners of the same. First, they presented Felicidad who testified[63] that: ever since she was a child, she knew that the subject property was owned by her parents; her family stayed on the said property during the Japanese occupation; she purchased the property by virtue of a document entitled *Bilihan ng Apat na Pirasong Palayan*[64] executed between Spouses Bunyi and Spouses Dominguez; presently, she receives the share of the harvest from their tenants; and, they declared the property for taxation purposes.

She identified tax declarations[65] dating back to as early as December 15, 1948, when her parents were still the owners of the property. It is settled that while tax declarations and realty tax receipts do not conclusively prove ownership, they may constitute strong evidence of ownership when accompanied by possession for a period sufficient for prescription[66].

Aside from proving payment of real property taxes, Spouses Bunyi also presented Pablo Cruz[67] (Cruz), the farmer who has tilled the property for more or less thirty (30) years, even during the time when the same was still owned by Spouses Dominguez, to support their claim of possession and ownership. It is Spouses Bunyi who he recognizes as the owners of the property he occupies and tills. In fact, he has no knowledge who defendants-appellants were. Cruz also testified[68] that defendant Cadano never inspected and investigated the property, contrary to the report stating that it was defendants-appellants who occupied the property. His clear and convincing testimony that defendants-appellants do not possess and have never possessed the subject property has

successfully overcome the presumption of regularity in the performance of duties. Moreover, Emilia Aquino[69], owner of the adjoining property, also supported and bolstered the claim that Spouses Bunyi are the owners of the subject property.

Spouses Bunyi and their predecessors-in-interest, having declared the property for taxation purposes, coupled with proof of open, continuous, exclusive and notorious possession in the concept of an owner, established a powerful, preponderant case in their favor. Their witnesses were subjected to cross-examination and their documentary evidence was subjected to scrutiny and was proved to be genuine. The totality of the evidence they presented convincingly supports their allegation that they indeed own the subject property which they purchased from their parents.

For their part, defendants-appellants filed numerous motions, not the least of which were motions for inhibition of the judges who handled the case; and squandered the opportunity to present evidence in their favor. Aside from their failure to present evidence, an examination of their Answer with Counterclaim reveals that, while they insist that they are the true owners of the subject property, their defense hinged solely on their possession of a certificate of title and nothing more. Nowhere did they allege how they became the owners of the property. Neither did they claim that they possessed, at present or at any point in time, the subject property.

Thus, Spouses Bunyi properly filed an action for reconveyance, which is a legal and equitable remedy granted to the rightful landowner, whose land was wrongfully or erroneously registered in the name of another, to compel the registered owner to transfer or reconvey the land to him[70]. In an action for reconveyance, the decree of registration is respected as incontrovertible. What is sought instead is the transfer of the property or its title which has been wrongfully or erroneously registered in another person's name, to its rightful or legal owner, or to the one with a better right[71]. A private individual may bring an action for reconveyance of a parcel of land even if the title thereof was issued through a free patent since such action does not aim or purport to re-open the registration proceeding and set aside the decree of registration, but only to show that the person who secured the registration of the questioned property is not the real owner thereof[72]. That the subject property was not registered under the name of Spouses Bunyi prior to the issuance of title in the name of the defendants-appellants would not effectively deny the remedy of reconveyance to the former[73].

Anent the award of damages, We do not find any cogent reason to disturb the findings of the RTC. Moral damages are awarded to enable the injured party to obtain means, diversions or amusements that will serve to alleviate the moral suffering he/she has undergone, by reason of the defendant's culpable action. Its award is aimed at restoration, as much as possible, of the spiritual status quo ante; thus it must be proportionate to the suffering inflicted[74]. The award of moral damages must be anchored on a clear showing that respondent actually experienced mental anguish, besmirched reputation, sleepless nights, wounded feelings or similar injury[75]. In the instant case, Felicidad testified that after discovering that the property was claimed by defendant-appellant Miniano, she and her spouse, Nathaniel, are now suffering from heart ailment[76]. Considering that Spouses Bunyi are entitled to moral damages, We also find it proper to affirm the award of exemplary damages[77].

We likewise affirm the award of attorney's fees which may be recovered when exemplary damages are awarded[78]. Moreover, had it not been for the fraudulent issuance of title in the names of defendants-appellants, Spouses Bunyi would not have sought the services of counsel to defend their interest and represent them in this case.

WHEREFORE, premises considered, the appeal is DENIED. The Decision dated August 19, 2008 of the Regional Trial Court, Branch 71, Antipolo City, in Civil Case No. 99-5354, is hereby AFFIRMED.

SO ORDERED.

Didican, (Chairperson), and [**]Corales, JJ., concur.

[*] Acting Senior Member per Office Order No. 461-14-ABR dated November 3, 2014.

[**] Acting Junior Member per Office Order No. 461-14-ABR dated November 3, 2014.

[1] Records, pp. 666-680.

[2] Id., pp. 91-103.

[3] Id., p. 92-93.

[4] Id., p. 93.

[5] Id., pp. 93-94.

[6] Id., p. 94.

[7] Id., pp. 95-96.

[8] Id., pp. 96-97.

[9] Id., p. 98.

[10] Id., pp. 58-59.

[11] Manifestation dated June 13, 2000, Id., p. 141.

[12] Manifestation dated June 30, 2000, Id., p. 143.

[13] Defendants' Pre-trial Brief, Id., , pp. 146-148; Pre-trial Brief for the Plaintiffs, Id., pp. 150-153.

[14] TSN, October 23, 2000, Id., pp. 500-522; TSN, December 4, 2000, Id., pp. 523-558; TSN, December 11, 2000, Records, pp. 5Id.,

[15] TSN, January 29, 2001, Id., pp. 577-585.

[16] TSN, March 26, 2001, Id., pp. 586-601.

[17] TSN, May 28, 2001, Id., pp. 602-614.

[18] TSN, October 5, 2001, Id., pp. 615-624.

[19] TSN, November 9, 2001, Id., pp. 625-638.

[20] Id., pp. 195-200.

[21] Id., pp. 273-277.

[22] Id., pp. 291-292.

[23] Id., pp. 300-301.

[24] Id., p. 314.

[25] Id., pp. 332-337.

- [26] Id., p. 348.
- [27] Urgent Motion to Reset Hearing, Id., pp. 349-350.
- [28] Order dated July 18, 2003, Id., p. 352.
- [29] Order dated September 1, 2003, Id., p. 354.
- [30] Id., pp. 355-367.
- [31] Id., pp. 409-410.
- [32] Manifestation/Motion, Id., pp. 411-412.
- [33] Order dated November 28, 2003, Id., p. 415.
- [34] Order dated January 30, 2004, Id., p. 421.
- [35] Minutes, Id., p. 422.
- [36] Order dated December 10, 2004, Id., p. 428.
- [37] Minutes, Id., p. 452.
- [38] Id., pp. 454-463.
- [39] Order dated November 21, 2005, Id., p. 472.
- [40] Id., pp. 482-483.
- [41] Order dated May 15, 2006, Id., p. 487.
- [42] Order dated June 27, 2006, Id., p. 489.
- [43] Id., pp. 490-495.
- [44] Order dated September 7, 2006, Id., p. 496.
- [45] Id., pp. 497-498.
- [46] Id., p. 499.
- [47] Order dated October 18, 2006, Id., p. 656.
- [48] Id., pp. 666-680.
- [49] Id., pp. 680.
- [50] Rollo, p. 227.
- [51] Id., p. 287.
- [52] Id., p. 288.
- [53] Pineda vs. Court of Appeals, GR No. 114172, August 25, 2003 citing Lee Tek Sheng vs. Court of Appeals, GR No. 115402, July 15, 1998.
- [54] Heirs of De Guzman Tuazon vs. Court of Appeals, GR No 125758, January 20, 2004.
- [55] Heirs of Ermac vs. Heirs of Ermac, GR No. 149679, May 30, 2003.

- [56] See *Naval vs. Court of Appeals*, GR No. 167412, February 22, 2006.
- [57] *Pineda vs. Court of Appeals*, *supra*.
- [58] *Lorzano vs. Tabayag, Jr.*, GR No. 189647, February 6, 2012.
- [59] TSN, October 5, 2001, Records, p. 622.
- [60] *Id.*, p. 231.
- [61] *Id.*, p. 232.
- [62] *Heirs of Alcaraz vs. Republic*, GR No. 131667, July 28, 2005.
- [63] TSN, October 23, 2000, Records, p. 508.
- [64] *Id.*, pp. 201-202.
- [65] *Id.*, pp. 203-211-2.
- [66] *Heirs of Ermac vs. Heirs of Ermac*, *supra*.
- [67] TSN, March 26, 2001, Records, pp. 586-601.
- [68] TSN, March 26, 2001, *Id.*, pp. 593-594.
- [69] TSN, May 28, 2001, *Id.*, pp. 602-614.
- [70] *Lorzano vs. Tabayag, Jr.*, *supra*.
- [71] *Naval vs. Court of Appeals*, *supra*.
- [72] *Lorzano vs. Tabayag, Jr.*, *supra*.
- [73] See *Lorzano vs. Tabayag, Jr.*, *supra*.
- [74] *Pleyto vs. Lomboy*, GR No. 148737, June 16, 2004.
- [75] *Mahinay vs. Velasquez, Jr.*, GR No. 152753, January 13, 2004.
- [76] TSN, December 4, 2000, Records, pp. 557-558.
- [77] Art. 2229, New Civil Code: Exemplary or corrective damages are imposed, by way of example or correction for the public good, in addition to the moral, temperate, liquidated or compensatory damages.(Emphasis ours)
- [78] See *Tsai vs. Court of Appeals*, GR No. 120098, October 02, 2001.

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.