

EDGARDO AND ANA MARIE CO, REPRESENTED BY FLORANTE SAN DIEGO, PLAINTIFFS-APPELLEES, VS. ARTURO CEA, RENATO TOMAGAN AND MERLY MORALES, DEFENDANTS-APPELLANTS.

Ponente: DACUDAO, J.

Read online (full-text search, related cases, audio case brief): <https://batas.org/library/510de0a74eda/>

DACUDAO, J.:

Appeal from the Decision of the Regional Trial Court of Quezon City (or RTC), Branch 226, in Civil Case No. Q01-43361,[1] the decretal portion whereof states –

“WHEREFORE, in view of all the foregoing, judgment is hereby rendered in favor of the plaintiffs Edgardo and Ana Marie Co and against defendants Arturo Cea, Renato Tomagan and Merly Morales and all persons claiming rights under them. All the defendants are ordered:

“1. to relinquish and surrender peacefully the possession of the land in question, covered by TCT No. 100676 (165165) of the Register of Deeds of Quezon City to the Plaintiffs and to vacate the premises immediately hereafter;

“2. to pay a monthly rental of Three Hundred Pesos (P300.00), starting from March 1, 2000 up to the time that each defendant shall have actually vacated the premises;

“3. To pay costs of suit.

“SO ORDERED.

“May 11, 2005, Quezon City, Philippines.

“LEAH S. DOMINGO REGALA

“Presiding Judge”

On February 13, 2001, there was filed before the RTC of Quezon City a complaint for recovery of possession.[2] Captioned “EDGARDO/ANA MARIE CO, represented by Florante C. San Diego, Plaintiffs vs. ARTURO CEA, RENATO TOMAGAN and MERLY MORALES, Defendants” it was docketed thereat as Civil Case No. Q01-43361.

In said complaint, it is alleged that plaintiff (referring to Ana Marie Co) is of legal age, “married/widowed/separated” and a resident of 25 Mt. Clemente Street, Filinvest I, Batasan Hills, Quezon City, represented by her attorney-in-fact Florante San Diego, of legal age, married and a resident of 45 P. Bautista Street, Pansol, Quezon City; while the defendants are also of legal ages, married and with common residence at Sitio Lunduyan, Talanay Area, Batasan Hills, Quezon City; that plaintiff is the registered owner of a parcel of land situated in Sitio Lunduyan, Talanay Area, Batasan Hills, Quezon City with an area of 1,000 square meters, and covered by TCT No. 100676(165165),[3] a copy of which was thereto attached as Annex B; that, sometime in March 2000, it was discovered that the defendants were or had been occupying the property without plaintiff’s consent; that the defendants were thus requested to vacate the premises, but they refused to do so, compelling plaintiff to refer the matter to the barangay authorities; that, when conciliation efforts at the barangay lupong tagapayapa failed, plaintiff filed with the Metropolitan Trial Court of Quezon City (MeTC, for short) an ejectment

case against the defendants, along with the other illegal occupants; but the case was dismissed by the MeTC on the ground of lack of jurisdiction; and that plaintiff was advised to institute instead an accion publiciana before the RTC, hence, the instant suit.

In traverse, the defendants averred in their answer^[4] that the present action did not state a valid and subsisting cause or causes of action against them; that the instant case is dismissible, not having been referred to the barangay lupon for conciliation; that they had been occupying the premises for more than twenty (20) years; that the property is categorized as an “unclassified public forest” per LC Map No. 639, certified on March 11, 1927, as shown by a certification to that effect, a copy of which was appended to the answer as Annex 1 (referring to the one dated November 6, 2000 coming from the Department of Environment & Natural Resources, or DENR); that, nonetheless, the property was included in the proposed alienable and disposable block under Project No. 17 of Quezon City per LC Map No. 3967, as evidenced by a copy thereof, attached as Annex 2, of the memorandum of the DENR, the subject of the petition of the Katipunan ng Malayang Paninirahan ng mga Pilipino (KMPP, for brevity) for the lifting of the moratorium and the suspension of the issuance of residential use permits; that they were occupying the property by virtue of their 1985 application for residential use permit with the then Bureau of Forest Development (or BFD) pursuant to Section 57 of Presidential Decree No. 705, and Section 1838 of the Revised Administrative Code; that, in 1986, however, the BFD issued a moratorium on the issuance of residential use permits indefinitely, which subsisted up to this time, a copy of which was thereto appended as Annex 3; that they are bonafide members of Area 3 Neighborhood Association, Incorporated, and were duly affiliated with the KMPP; that, aside from the plaintiff, there are other claimants to the property, and one of these is Carlos Payawal; that the present action is barred by a prior judgment, for the reason that the ejectment case that the plaintiff had earlier filed against them had been dismissed; that moreover, plaintiff’s failure to state in the certification against forum shopping about the ejectment case warrants the dismissal of the instant suit; and that the present complaint amounts to a deprivation of property without due process.

On April 16, 2001, the plaintiff filed an amended complaint accompanied by a motion to admit the same.^[5] The amendment consisted of the inclusion of a statement in the certification of non-forum shopping to the effect that there was an earlier ejectment case that was filed, which case was dismissed, however.

The defendants did not file an answer to the amended complaint, opting instead to stand upon their original answer.

On May 3, 2001, plaintiff tendered a reply^[6] to the answer, thereunder alleging that defendants’ contentions that the property was forest land, and that the latter had in their favor an application for residential use permit, are inconsequential, because, as indicated in the certification dated November 6, 2000 cited by the defendants themselves, the property had already been subdivided under (LRC) Psd-11684. Plaintiff further asserted that the claim by the defendants that they are members of the Area 3 Neighborhood Association, Inc. is likewise immaterial because, before the filing of the case, the negotiation between the registered owner and the Lunduyan Homeowners Association, Incorporated (LHOA, for short) relative to the sale of the property for purposes of socialized housing, had long been completed; that, besides, the defendants refused to join the LHOA, or even to recognize the genuineness of plaintiff’s title; that, indeed, defendants are considered professional squatters or deforciants in the disputed premises.

On July 24, 2001, defendants filed a motion to dismiss,^[7] this time arguing that plaintiff’s cause of action is barred by prior judgment, on the basis of the dismissal of the ejectment case (Civil Case No. 24794 of Branch 39 of the Metropolitan Trial Court of Quezon City) that she had previously filed against them; and that plaintiff had not complied with a condition precedent, as there was no allegation in the complaint that the case had earlier been referred for conciliation to the barangay authorities, nor was a certification to file action attached to the complaint.

On July 30, 2001, plaintiff submitted an opposition thereto,[8] thereunder contending that the plea of res judicata is unavailing, because one of the requisites thereof is absent, namely, that the previous judgment must have been rendered by the court having jurisdiction over the subject matter and over the parties; and that precisely the Metropolitan Trial Court of Quezon City dismissed the ejectment case because it believed that the appropriate action should be an accion publiciana.

As to defendants' claim that there was no prior resort to barangay conciliation, plaintiff attached a copy of the certification to file action issued by the barangay authorities.

In their reply,[9] the defendants asserted:

"1) That the Certification to File Action attached by the plaintiffs in their Opposition is dated June 15, 2000, which was attached to plaintiffs' complaint in the Metropolitan Trial Court, resulting in the Decision of said Court dated January 2, 2001;

"2) That a review of the present complaint, which was filed sometime on February 13, 2001, clearly shows that there is no allegation that this present complaint was referred to the barangay authorities and said Complaint does not even show any Certification to File Action, which is clearly in gross violation of the requirements of the Local Government Code and Administrative Circular No. 14-93 and this being so, we respectfully submit that this case should be DISMISSED."

But in its resolution of September 25, 2001,[10] the RTC denied the motion to dismiss.

Trial thereafter ensued, in the course of which Florante San Diego, as well as the defendant Merly Morales testified. The RTC synthesized the testimonies of these two as follows:

"FLORANTE C. SAN DIEGO testified on 21 February 2002 & 21 April 2003 as follows:

"He is the Attorney-In-Fact of Edgardo and Ana Marie Co. the plaintiffs in this case. He has a Special Power of Attorney dated 14 January 2000 to attest to this (Exh. 'A'). Edgardo and Ana Marie Co are the owners of a property covered by Transfer Certificate of Title (TCT) No. RT-100676 (Exh. 'B'). The property was declared for taxation purposes. He has a copy of a Declaration of Real Property No. B-023-02158 issued by the Assessor's Office of Quezon City (Exh. 'F'). Taxes concerning the subject property were duly paid as proven by a Certification dated 20 January 2000 (Exh. 'G'). The defendants in this case are illegally occupying the subject property and he sent these defendants a Notice to Vacate dated 08 May 2000, (Exhs. 'C' & 'D'). The defendants failed to vacate the premises despite receipt of the Notice to Vacate. After this, he referred the matter to the Barangay of Batasan Hills but still, no settlement was reached. He then asked the Barangay for the issuance of a Certification to File Action which was issued on 15 June 2000 by Godofredo L. Ramos (Exh. 'E'). After which, he asked their lawyer to file the necessary ejectment case against defendants Cea, Tomagan and Morales. He has a contract with their lawyer in the amount of SIXTY THOUSAND PESOS (P60,000.00) for the three (3) defendants. He prays for FIFTY THOUSAND PESOS (P50,000.00) as and for moral damages against the three (3) defendants; and THIRTY THOUSAND PESOS (P30,000.00) as and for exemplary damages. He likewise prays that the defendants pay plaintiffs THREE HUNDRED PESOS (P300.00) per month from 01 March 2000 up to the time that the defendants finally vacate the premises. Up to the present the property is being occupied by, Merly Morales, Arturo Cea and Renato Tomagan, among others. (TSN 21 February 2002, pp. 4-13).

"He is Florante San Diego, the Attorney-in-Fact of Ana Marie Co as evidenced by a Special Power of Attorney (Exh. 'A'). He met Mercy Morales when he visited the property, which is registered in the name of Edgardo and Ana Marie Co (Exh.'B'). He did not consent to the occupation of Mercy Morales of the subject property. He sent a Notice to Vacate to Morales dated 08 May 2000, which was duly served upon the said defendant by Fred Palabrica even as Morales refused to sign the same (Exhs. 'H' & 'H-1'). He also sent Notices to Vacate to defendants Cea and Tomagan and like Morales, both refused to sign the receiving copy and so, Fred Palabrica

made a notation of the same of the receiving copies (Exhs. 'C' & 'D'). He was the one who signed the certification of non-forum shopping contained in the Complaint he filed as attorney-in-fact of the registered owners. Edgardo and Ana Marie Co did not appear at the proceedings in the Barangay. He appeared in their behalf. The Certification to File Action issued by the Barangay Batasan Hills was used to file a case before the Metropolitan Trial Court of Quezon City, Branch 39, (TSN 21 April 2003, pp. 3-11).

“Thereafter, the defendants presented a witness whose testimony is summarized, thus:

“MERLY MORALES testified on 07 October 2003 as follows:

“She has been occupying the premises subject matter of this case for about fifteen (15) years now. The land subject matter of this case is classified as a forestland and she has a Certification to this claim (Exh. 'I'). They have settled in the land subject matter of this case because it was their knowledge that nobody is occupying the said land that is why they have settled there. There are a lot of people claiming the land aside from the plaintiffs. (TSN 07 October 2003, pp. 3-5).[11]”

Juxtaposing the foregoing with the documentary evidence adduced during the trial, the RTC postulated this wise:

“After going over the allegations in the complaint as well as the evidence, both documentary and testimonial presented by the plaintiffs, this Court finds that the plaintiffs have proven their case through a preponderance of evidence, and they are entitled to the relief prayed for.

“At the outset, let it be stressed that plaintiffs have a TCT No. 100676 (165165) of the Registry of Deeds of Quezon City issued in their names, even as defendants simply claim to have been occupying the land in question for a period of more than twenty years. The possession of defendants is not even characterized as open, continuous, adverse, uninterrupted and in concept of owners which could ripen into ownership should plaintiffs not have a title in other (sic) favor. Instead defendants themselves advance that the land is “unclassified Public Forest as per LC Map No. 639 certified on March 11, 1927 x x x” meaning, defendants admit they have not title over the property much less do they pretend to be owners of the property.

“Further, defendants continue to aver on their answer thus: 'x x x however, said parcel of land is included in the proposed Alienable LC Map No. 3967, x x x”

“As admitted by defendants this is a mere proposal as far as they are concerned. On the other hand, plaintiffs have in their favor a Transfer Certificate of Title which is incontrovertible and indefeasible. It is well settled that a certificate of title, once registered, should not thereafter be impugned, altered, changed, modified, enlarged, or diminished, except in a direct proceeding permitted by law (Seville v. NDC, 351 SCRA 112). A title once registered under the Torrens System cannot be defeated even by adverse, open and notorious possession, neither can it be defeated by prescription (Cervantes v. CA, 352 SCRA 47).

“The parcel of land in question with the correspondent TCT having been issued, had ceased to be alienable and disposable and therefore, could not be acquired by continuous, open, and public possession under a concept of an owner within the contemplation of Sec. 14 (1) of PD No. 1529.

“Last, a certificate of title cannot be subject to collateral attack, it cannot be altered, modified or cancelled except in a direct proceeding (Vda. De Retuerto v. Bauz, 372 SCRA 712).

“Hence, the transfer certificate of title registered in the names of Edgardo and Ana Marie Co serves as evidence of their indefeasible and incontrovertible title to the property in favor of plaintiffs whose names appear thereon as registered owners thereof. As owners, plaintiffs are entitled to the peaceful possession and occupation of this parcel of land. The defendants shall not be allowed to enter the same, occupy the premises and claim they are entitled to the land of plaintiffs.

“However, no damages was proven by the plaintiffs hence, none may be awarded in their favor in this case.”

It thereafter dispositively decreed as follows—

“WHEREFORE, in view of all the foregoing, judgment is hereby rendered in favor of the plaintiffs Edgardo and Ana Marie Co and against defendants Arturo Cea, Renato Tomagan and Merly Morales and all persons claiming rights under them. All the defendants are ordered: “1. to relinquish and surrender peacefully the possession of the land in question, covered by TCT No. 100676 (165165) of the Register of Deeds of Quezon City to the plaintiffs and to vacate the premises immediately hereafter;

“2. to pay a monthly rental of Three Hundred Pesos (P300.00), starting from March 1, 2000 up to the time that each defendant shall have actually vacated the premises;

“3 to pay costs of suit.

“SO ORDERED.

“May 11, 2005, Quezon City, Philippines.

“(Sgd.) LEAH S. DOMINGO REGALA

“Presiding Judge.[12]”

Taking exception thereto the defendants, as appellants, interposed the instant recourse, which is planted on this sole assignment of error:

I

THE LOWER COURT COMMITTED GRAVE ABUSE OF DISCRETION WHEN IT DISREGARDED THE FACT THAT THE PROVISIONS OF THE LOCAL GOVERNMENT CODE REGARDING THE KATARUNGANG PAMBARANGAY WERE VIOLATED.

In other words, the defendants-appellants do not contest the substantive basis of the RTC's decision. What they are questioning is the RTC's alleged disregard of their claim that the plaintiff-appellee failed to comply with the required barangay conciliation proceedings. They insist that since the plaintiff-appellee herself did not personally appear before the barangay authorities, the RTC ought to have dismissed the case on that account. Our review is thus confined to addressing this procedural matter.

The appeal will not lie.

The defendants-appellants' contention that there was no prior referral of this case to the barangay lupon for conciliation is roundly contradicted by the statement in the resolution of the court a quo (dated September 25, 2001) that: “Considering that the plaintiff filed a Certificate to File Action, showing that this case has been referred to the Barangay for conciliation, the second ground raised by the defendants has likewise no leg to stand on.” Indeed, in the Decision rendered by the Metropolitan Trial Court of Quezon City, Branch 39 (per Judge Cesar O. Untalan in the ejectment suit in Civil Case No. 24594, (amongst several other ejectment cases), which is the genesis of the present case, it is there stated that “During the preliminary conference held on October 16, 2000, the parties admitted the following:

“1. Identities of the parties;

“2. Jurisdiction of this Court to try these cases;

“3. The matter was referred to the Barangay for conciliation.”

Item No. 3, above, in fact finds support in the Certificate to File Action issued by Lupon/pangkat Godofredo L. Ramos, duly attested by Lupon/pangkat Chairman, Manuel D. Laxina, Sr. of Barangay Hills, Quezon City in Barangay Case No. 190-A-2000.

And even supposing *arguendo* that plaintiff-appellee herself did not personally appear before the barangay lupon

or pangkat, the fact is that she was duly represented therein by her agent or attorney-in-fact, Florante San Diego.

No less importantly, the defendants-appellants actively participated in the trial before the RTC. In fact one of the defendants-appellants – Merly Morales – herself took the witness stand to resist the complaint: this constitutes judicial estoppel, foreclosing any disavowal or rejection of the validity and regularity of the proceedings wherein defendants-appellants participated. Nearly on all fours to the present case is *Diu v. Court of Appeals*,^[13] where the High Court, speaking thru Justice F. D. Regalado, ruled:

“The basic issue to be resolved in the instant petition is whether or not the confrontation before the Barangay Chairman of Naval satisfied the requirement therefor in Presidential Decree No. 1508. This Court finds for petitioners.

“It must be noted that Presidential Decree No. 1508 has been repealed by codification in the Local Government Code of 1991 which took effect on January 1, 1992. The basic complaint was filed by petitioners before the trial court on July 10, 1991 before the effectivity of the former law have been substantially reproduced in Sections 410(b) and 412, respectively, of the latter law. The pertinent provisions read as follows:“SEC. 410. PROCEDURE FOR AMICABLE SETTLEMENT.À—

'(b) x x x. If he (lupon chairman) fails in his mediation effort within fifteen (15) days from the first meeting of the parties before him, he shall forthwith set a date for the constitution of the pangkat in accordance with the provisions of this chapter.

'SEC. 412. CONCILIATION.—(a) Precondition to filing of Complaint in Court.—No complaint x x x shall be filed or instituted in court x x x unless there has been a confrontation of the parties before the lupon chairman or the pangkat, and that no conciliation or settlement has been reached as certified by the lupon secretary or pangkat secretary as attested to by the lupon or pangkat chairman x x x.'

“In the case at bar, it is admitted that the parties did have confrontations before the Barangay Chairman of Naval although they were not sent to the pangkat as the same was not constituted. Their meetings with said barangay chairman were not fruitful as no amicable settlement was reached. This prompted the issuance of the following Certification to File Action.

“This is to certify that:

“Respondent, Patricia Pagba admitted her indebtedness with complainant but she refused to pay because according to her, complainant has also an unsettled accounts (sic) with her husband. Hence no settlement/conciliation was reached and therefore the corresponding complaint for the dispute may now be filed in court.

“Date(d) this 10th day of July 1991.

“(Sgd.) JHONY C. JEREZ

“Lupon Pangkat Chairman

“Attested:

“(Sgd.) IRENEO DOCALLOS

“Lupon/Pangkat Secretary

“According to private respondent, however, the above certification is 'falsified' since no pangkat was constituted. She, therefore, insists that petitioners have not complied with the mandatory provision of Presidential Decree No. 1508 on compulsory arbitration. We disagree.

“While no pangkat was constituted, it is not denied that the parties met at the office of the barangay chairman for

possible settlement. The efforts of the barangay chairman, however, proved futile as no agreement was reached. Although no pangkat was formed, we believe that there was substantial compliance with the law. It is noteworthy that under Section 412 of the Local Government Code aforequoted, the confrontation before the Lupon chairman or the pangkat is sufficient compliance with the precondition for filing the case in court.

“This is true notwithstanding the mandate of Section 410(b) of the same law that the barangay chairman shall constitute a pangkat if he fails in his mediation efforts. Section 410(b) should be construed together with Section 412, as well as the circumstances obtaining in and peculiar to the case. On this score, it is significant that the barangay chairman or punong barangay is himself the chairman of the lupon under the Local Government Code.

“From the foregoing facts, it is undeniable that there was substantial compliance with Presidential Decree No. 1508 which does not require strict technical compliance with its procedural requirements. Under the factual antecedents, it cannot be said that the failure of the parties to appear before the pangkat caused any prejudice to the case for private respondents considering that they already refused conciliation before the barangay chairman and, as will hereafter be discussed, their sham insistence for a meeting before the pangkat is merely a ploy for further delay. We are thus forced to remind them that technicalities should not be made to desert their true role in our justice system, and should not be used as obstructions therein.

“The court a quo was likewise correct in invoking the doctrine in *Tijam* and, as indicated by the factual scenario in this case, private respondents are clearly in estoppel to assail the jurisdiction of the two lower courts. It is also worth stressing that while the case was filed when Presidential Decree No. 1508 was still in force, the procedural provisions of the Local Government Code, which we have earlier noted as being supportive of the validity of the conciliation proceedings, are also applicable to this case. Statutes regulating procedure in courts are applicable to actions pending and undetermined at the time of their passage. Procedural laws are retrospective in that sense.

“To indulge private respondents in their stratagem will not only result in a circuitous procedure but will necessarily entail undue and further delay and injustice. This is inevitable if this Court should dismiss the complaint and require the parties to meet before the pangkat, only to bring the case all over again through the hierarchy of courts and ultimately back to us for decision on the merits. Obviously, this is the game plan of private respondents. For, when private respondents appealed to respondent court, they did not at all assail the propriety or correctness of the judgment of the Regional Trial Court holding them liable to petitioners for the sum of money involved. Such primary substantive issue, therefore, has been laid to rest, but private respondents would wish to keep the case alive merely on a conjured procedural issue invoking their supposed right to confrontation before the pangkat.

“However, from the very start of this action, private respondents failed to show or evince any honest indication that they were willing to settle their obligations with petitioners, notwithstanding the efforts of the latter to submit the matter to conciliation. It is, therefore, quite obvious that their insistence on technical compliance with the requirements of the barangay conciliation process is a dilatory maneuver. This is an evident and inevitable conclusion since the main argument of respondents in this petition is only the supposed failure of petitioners to comply with the barangay conciliatory procedure and not the denial or repudiation of their indebtedness.

“We do not agree with the findings of respondent appellate court that inasmuch as private respondents pleaded in their answer the alleged lack of cause of action of petitioners, an objection to the complaint had been timely made. It will be readily observed that said defense was only one of the six affirmative defenses cryptically alleged in single short sentences in private respondents' Answer in the court a quo, running the implausible gamut from supposed defects in parties to res judicata and up to capacity to sue, without any statement of the facts on which they would rely to support such drivel. This calculated travesty of the rules on pleadings betrays the ulterior

motives of private respondents and cannot be countenanced.

“The failure of private respondents to specifically allege that there was no compliance with the barangay conciliation procedure constitutes a waiver of that defense. All that they alleged in their Answer in the trial court was that ‘the complaint states no cause of action’ without giving even the semblance of any reason to support or explain that allegation. On the other hand, they admitted the confrontations before the barangay chairman in paragraph 13 of their Answer.

“Since private respondents failed to duly raise that issue, their defense founded thereon is deemed waived, especially since they actually did not pursue the issue before the case was set for hearing. Also, the conciliation procedure under Presidential Decree No. 1508 is not a jurisdictional requirement and non-compliance therewith cannot affect the jurisdiction which the lower courts had already acquired over the subject matter and private respondents as defendants therein.”[14] (At 478-482).

UPON THE VIEW WE TAKE OF THIS CASE, THUS, the instant appeal must be, as it hereby is, DENIED DUE COURSE, and consequently DISMISSED. Costs against defendants-appellants.

SO ORDERED.

Carandang and Perlas-Bernabe, JJ., concur.

[1] Record, pp. 176-185.

[2] Id, pp. 1-3.

[3] Note: The title states, “in the name of “EDGARDO CORTEZ CO, xxx married to Ana Marie Lozano.”

[4] Record, pp. 40-41.

[5] Id., pp. 46-49.

[6] Id., pp. 55-56.

[7] Id., pp. 65-67.

[8] Id., pp. 74-75.

[9] Id., p. 78.

[10] Id., pp. 81-82.

[11] Decision, pp. 8-9, Records, pp. 183-184.

[12] Decision pp. 9-10, Records, pp. 184-185.

[13] G.R. No. 115213, December 19, 1995, 251 SCRA 472.

[14] G.R. No. 115213, December 19, 1995, 251 SCRA 472.

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.