

VENUS G. BACALLA, PETITIONER-APPELLANT, VS. HON. ARMIN A. LUISTRO, SECRETARY OF DEPARTMENT OF EDUCATION, RECAREDO G. BORGONIA, DEPED REGIONAL DIRECTOR, ARDEN D. MONISIT, DEPED S...

Ponente: DIY, J.

Read online (full-text search, related cases, audio case brief): <https://batas.org/library/8925b5dad3c5/>

DIY, J.:

Petitioner-appellant elevates the February 12, 2012 Order[1] of Branch 14, Regional Trial Court of Cebu City on appeal, dismissing petitioner-appellant's petition for mandamus, damages, attorney's fees, and costs[2] for failure to exhaust administrative remedies, as well as its May 16, 2012 Order[3] denying petitioner-appellant's motion for reconsideration.[4]

The factual antecedents of the case as culled from the records are as follows:

Petitioner-appellant started working as a public school teacher in Tuburan, Cebu on July 5, 1978. She alleged that she has served the country for a total of thirty (30) years, first, as a public school teacher for sixteen (16) years, and then as a head school teacher for another fourteen (14).

On January 17, 2008, the DepEd Screening Committee recommended petitioner-appellant's promotion to Principal I. She was thereafter appointed to said position on May 30, 2008. The appointment was confirmed and attested to by the Civil Service Commission, Regional Office VII (CSC Regional Office VII, for brevity).

It appears on record that the Department of Education Regional Office VII (DepEd Regional Office VII, for brevity) thereafter conducted an investigation into the alleged irregularity in the issuance of the appointment of petitioner-appellant for the position of Principal 1. The investigation yielded the result that petitioner-appellant was not qualified for the position of Principal I since she failed to pass the qualifying examinations for principals. This was embodied in an Order[5] issued by the DepEd Regional Office VII dated February 25, 2010. Pursuant to the dispositive portion of said February 25, 2010 Order, the CSC-Regional Office VII was furnished a copy of the same.

In a Decision dated April 5, 2011,[6] the CSC-Regional Office VII recalled petitioner-appellant's appointment. Petitioner-appellant's motion for reconsideration[7] proved unavailing as the CSC-Regional Office VII denied said motion per its June 1, 2011 Resolution.[8]

On July 27, 2011, petitioner-appellant filed a petition[9] for Mandamus, Damages, Attorney's Fees, and Costs before the court a quo impleading herein respondents-appellees. Petitioner-appellant alleged that on account of her promotion to the position of Principal I, she requested respondents-appellees to give her assignments concomitant to her new position. She likewise requested for adjustment in her salary and her benefits. These requests, according to petitioner-appellant, were, however, unreasonably refused. Petitioner-appellant also claimed that contrary to the provisions of Republic Act No. 4670, otherwise known as the Magna Carta of Public School Teachers, she was never informed of the nature of the accusation and investigation against her.

Petitioner-appellant further alleged that the investigation conducted by the DepEd Regional Office VII was leaked to the media where petitioner-appellant was vilified and maligned causing untold shame to her family and besmirching her reputation. Petitioner-appellant thus prayed that her petition for mandamus be granted and that respondents-appellees be ordered to give petitioner-appellant her proper assignment as Principal I, that her salaries and benefits be adjusted in order to be commensurate to her new position, and that her salary differential and benefits be computed and paid to her. Petitioner-appellant likewise prayed that she be awarded actual, moral, and exemplary damages, as well as attorney's fees, costs of suit, and litigation expenses.

In their Answer,[10] respondents-appellees denied that they unreasonably refused petitioner-appellant's requests that she be given the assignments pertaining to her position as Principal 1 and that her salary and benefits be accordingly adjusted. Respondents-appellees claimed that the requests were refused since petitioner-appellant was not qualified for the position and consequently, was not deserving of the promotion. Respondents-appellees explained that petitioner-appellant failed to pass the qualifying examination for principals. They likewise pointed out that the CSC-Regional Office VII had recalled petitioner-appellant's appointment per its April 5, 2011 Decision.[11] Respondents-appellees further stated that petitioner-appellant's motion for reconsideration was similarly denied by the CSC-Regional Office VII. It is asserted that petitioner-appellant had no cause of action for damages under Republic Act No. 4670 or the Magna Carta of Public School Teachers as said law provides for such protection only if a disciplinary case against a teacher is pending. In the instant case, they pointed out that a disciplinary case had not been lodged against petitioner-appellant. As affirmative defenses, respondents-appellees sought the dismissal of the petition on the ground of petitioner-appellant's failure to exhaust administrative remedies and on lack of cause of action contending that petitioner-appellant had no clear, legitimate and established legal right to support her petition for mandamus.

On December 14, 2011, the Office of the Solicitor General likewise filed a "Motion to Dismiss" on the grounds of lack of cause of action, prematurity of the petition for failure to exhaust available administrative remedies, and non-suability of respondents-appellees being public officials in the performance of their public functions.[12]

In an Order dated February 12, 2012, the court a quo granted respondents-appellees' prayer for the dismissal of the petition on the ground of petitioner-appellant's failure to exhaust all the available administrative remedies. Petitioner-appellant moved for reconsideration but the same proved futile since the court a quo denied said motion per its May 16, 2012 Order. Hence, the instant appeal. Petitioner-appellant proffers the following as –

ISSUES TO BE RESOLVED

Whether or not the principle of exhaustion of administrative remedies is applicable in the instant case.

Whether or not the petitioner-appellant is entitled to a writ of mandamus.

Whether or not the petitioner-appellant is entitled to damages, attorney's fees & costs.[13]

Considering that the court a quo dismissed the petition for mandamus on the ground of non-exhaustion of administrative remedies and did not delve into the merits of the petition, We limit the resolution of this appeal to the propriety of the petition's dismissal on the aforementioned ground.

However, before We discuss the core issue, We find it necessary to first carefully scrutinize the allegations of the complaint as these have some bearing in the resolution of the issue confronting Us.

A review of the petition for mandamus filed before the court a quo shows that petitioner-appellant claimed to have five (5) causes of action against respondents-appellees. These are as follows:

First cause of action: for mandamus;[14]

Second cause of action: for moral damages;[15]

Third cause of action: for exemplary damages;[16]

Fourth cause of action: for actual damages;[17]

Fifth cause of action: for attorney's fees, litigation expenses, and costs of suit.[18]

A punctilious review of the allegations shows that petitioner-appellant is primarily seeking that respondents-appellees be compelled to recognize her appointment as Principal I and that she be given the assignments attendant to her new position. The actual damages prayed for by petitioner-appellant represent the salary and benefits that she was purportedly deprived of by reason of the refusal of respondents-appellees to recognize her appointment. The prayer for moral and exemplary damages as well as attorney's fees, litigation expenses, and costs of suit, on the other hand, all arose from respondents-appellees alleged act of supposedly having leaked the matter of petitioner-appellant's appointment to the media thus inciting the media into baseless speculation and conjectures causing petitioner-appellant and her family unwarranted opprobrium.

As a premise, We recall that a cause of action is an act or omission by which a party violates the right of another.[19]

To Our mind, in the case before Us, there are only two (2) causes of action pleaded in one petition. One cause of action is respondents-appellees' refusal to acknowledge petitioner-appellant's promotion as Principal I, on which cause of action the prayer for the issuance of a writ of mandamus is anchored. The second cause of action is for damages founded on respondents-appellees' alleged violation of her rights, as covered by Articles 19, 20, and 21 of the Civil Code.

While the Rules allow a party to allege as many causes of action as he may have against an opposing party in a single pleading, such is subject to the following conditions:

SEC. 5. Joinder of causes of action. – A party may in one pleading assert, in the alternative or otherwise, as many causes of action, as he may have against an opposing party, subject to the following conditions:

(a) The party joining the causes of action shall comply with the rules on joinder of parties;

(b) The joinder shall not include special civil actions or actions governed by special rules;

(c) Where the causes of action are between the same parties but pertain to different venues or jurisdictions, the joinder may be allowed in the Regional Trial Court provided that one of the causes of action falls within the jurisdiction of said court and the venue lies therein; and

(d) Where the claims in all the causes of action are principally for recovery of money, the aggregate amount claimed shall be the test of jurisdiction.

Clearly, there is a misjoinder of causes of action in the case at bench. One cause of action – for the issuance of a writ of mandamus - is a special civil action covered by Rule 65 of the 1997 Rules of Civil Procedure, while the other is an ordinary civil action for damages for which the ordinary rules of procedure apply. It should, however, be noted that Section 6, Rule 2 of the 1997 Rules of Civil Procedure provides:

SEC. 6. Misjoinder of causes of action. - Misjoinder of causes of action is not a ground for dismissal of an action. A misjoined cause of action may, on motion of a party or on the initiative of the court, be severed and proceeded with separately.

In *Ada v. Baylon*,[20] the Supreme Court further elucidated:

By a joinder of actions, or more properly, a joinder of causes of action is meant the uniting of two or more demands or rights of action in one action, the statement of more than one cause of action in a declaration. It is the union of two or more civil causes of action, each of which could be made the basis of a separate suit, in the

same complaint, declaration or petition. A plaintiff may under certain circumstances join several distinct demands, controversies or rights of action in one declaration, complaint or petition.

The objectives of the rule or provision are to avoid a multiplicity of suits where the same parties and subject matter are to be dealt with by effecting in one action a complete determination of all matters in controversy and litigation between the parties involving one subject matter, and to expedite the disposition of litigation at minimum cost. The provision should be construed so as to avoid such multiplicity, where possible, without prejudice to the rights of the litigants.

Nevertheless, while parties to an action may assert in one pleading, in the alternative or otherwise, as many causes of action as they may have against an opposing party, such joinder of causes of action is subject to the condition, *inter alia*, that the joinder shall not include special civil actions governed by special rules.

Here, there was a misjoinder of causes of action. The action for partition filed by the petitioners could not be joined with the action for the rescission of the said donation *inter vivos* in favor of Florante. Lest it be overlooked, an action for partition is a special civil action governed by Rule 69 of the Rules of Court while an action for rescission is an ordinary civil action governed by the ordinary rules of civil procedure. The variance in the procedure in the special civil action of partition and in the ordinary civil action of rescission precludes their joinder in one complaint or their being tried in a single proceeding to avoid confusion in determining what rules shall govern the conduct of the proceedings as well as in the determination of the presence of requisite elements of each particular cause of action.

A misjoined cause of action, if not severed upon motion of a party or by the court *sua sponte*, may be adjudicated by the court together with the other causes of action.

Nevertheless, misjoinder of causes of action is not a ground for dismissal. Indeed, the courts have the power, acting upon the motion of a party to the case or *sua sponte*, to order the severance of the misjoined cause of action to be proceeded with separately. However, if there is no objection to the improper joinder or the court did not *motu proprio* direct a severance, then there exists no bar in the simultaneous adjudication of all the erroneously joined causes of action. On this score, our disquisition in *Republic of the Philippines v. Herbierto* is instructive, *viz.*:

This Court, however, disagrees with petitioner Republic in this regard. This procedural lapse committed by the respondents should not affect the jurisdiction of the MTC to proceed with and hear their application for registration of the Subject Lots.

xxx xxx xxx

Considering every application for land registration filed in strict accordance with the Property Registration Decree as a single cause of action, then the defect in the joint application for registration filed by the respondents with the MTC constitutes a misjoinder of causes of action and parties. Instead of a single or joint application for registration, respondents Jeremias and David, more appropriately, should have filed separate applications for registration of Lots No. 8422 and 8423, respectively.

Misjoinder of causes of action and parties do not involve a question of jurisdiction of the court to hear and proceed with the case. They are not even accepted grounds for dismissal thereof. Instead, under the Rules of Court, the misjoinder of causes of action and parties involve an implied admission of the court's jurisdiction. It acknowledges the power of the court, acting upon the motion of a party to the case or on its own initiative, to order the severance of the misjoined cause of action, to be proceeded with separately (in case of misjoinder of causes of action); and/or the dropping of a party and the severance of any claim against said misjoined party, also to be proceeded with separately (in case of misjoinder of parties).

It should be emphasized that the foregoing rule only applies if the court trying the case has jurisdiction over all of the causes of action therein notwithstanding the misjoinder of the same. If the court trying the case has no jurisdiction over a misjoined cause of action, then such misjoined cause of action has to be severed from the other causes of action, and if not so severed, any adjudication rendered by the court with respect to the same would be a nullity.

In the case before Us, the court a quo ruled to dismiss the petition in its entirety on the ground that there was no prior exhaustion of available administrative remedies. We point out that in this case, the available remedy which petitioner-appellant inadvertently dispensed with in order to directly avail of a petition for mandamus is an appeal before the Civil Service Commission. Notably, the jurisdiction of the Civil Service Commission is limited to hearing and deciding administrative cases instituted by, or brought before it, directly or on appeal, including contested appointments. It is further tasked to review decisions and actions of its offices and of the agencies attached to it.[21]

The court a quo overlooked the fact that the action for damages was well within its jurisdiction to adjudicate and it is the proper forum to adjudicate the matter. It should further be noted that the dismissal of the case was ordered before trial could be conducted. There is thus a need to sever petitioner-appellant's cause of action for moral and exemplary damages as well as attorney's fees, litigation expenses, and costs of suit from the prayer for the issuance of a writ of mandamus and the same should be proceeded with separately.

With that, We now resolve the issue of the propriety of the dismissal of the petition for mandamus on the ground of petitioner-appellant's failure to exhaust available administrative remedies.

In *Republic of the Philippines v. Lacap*, [22] the Supreme Court instructed:

The general rule is that before a party may seek the intervention of the court, he should first avail of all the means afforded him by administrative processes. The issues which administrative agencies are authorized to decide should not be summarily taken from them and submitted to a court without first giving such administrative agency the opportunity to dispose of the same after due deliberation.

The Supreme Court then explained the rationale for such doctrine in *Addition Hills Mandaluyong Civic & Social Organization, Inc. v. Megaworld Properties & Holdings, Inc., et al.*, [23] thus:

We have consistently declared that the doctrine of exhaustion of administrative remedies is a cornerstone of our judicial system. The thrust of the rule is that courts must allow administrative agencies to carry out their functions and discharge their responsibilities within the specialized areas of their respective competence. The rationale for this doctrine is obvious. It entails lesser expenses and provides for the speedier resolution of controversies. Comity and convenience also impel courts of justice to shy away from a dispute until the system of administrative redress has been completed.

In the case at bench, the CSC Regional Office VII issued its April 5, 2011 Decision revoking petitioner-appellant's appointment. Since the decision was rendered by a regional office, petitioner-appellant's recourse should have been to elevate the matter before the Civil Service Commission pursuant to Section 4 of the CSC Memorandum Circular No. 19-99.[24] Said provision reads:

Section 4. Jurisdiction of the Civil Service Commission. — The Civil Service Commission shall hear and decide administrative cases instituted by, or brought before it, directly or on appeal, including contested appointments, and shall review decisions and actions of its offices and of the agencies attached to it.

Except as otherwise provided by the Constitution or by law, the Civil Service Commission shall have the final authority to pass upon the removal, separation and suspension of all officers and employees in the civil service and upon all matters relating to the conduct, discipline and efficiency of such officers and employees.

(Emphasis supplied)

Having failed to exhaust available administrative remedies, We find no reversible error on the part of the court a quo in dismissing the petition for mandamus.[25]

Petitioner-appellant would, however, want to impress upon this Court that her case is an exception to the rule on prior exhaustion of administrative remedies. She thus prays that petition for mandamus should be given due course. She contends:

3.2. [T]he instant case falls among the many exceptions enumerated by jurisprudence where exhaustion of administrative remedies will not apply.

3.3. First, there is a violation of the plaintiff's right to due process in the instant case.

3.4. While the petitioner-appellant was alleged to have been investigated on a questionable promotion for principal in DepEd Region 7.[sic] She was never informed of any accusation or investigation against her. She was not even served a notice and a chance to explain.

3.5. Moreover, before the alleged investigation was conducted, respondents-appellees, through the Cebu Provincial Superintendent Monisit spoke to the media and condemned the petitioner-appellant guilty.

3.6. In fact, the petitioner-appellant was denounced in several media outlets, even at [sic] the internet, guilty for the alleged "Promotion for Sale" incident.

3.7. Such damming [sic] actuations is not only a violation of the petitioner-appellant's Constitutional right to be presumed innocent but also a blatant and patent violation of the Magna Carta for Public School Teachers, to wit:

Safeguards in Disciplinary Procedure. Every teacher shall enjoy equitable safeguards at each stage of any disciplinary procedure and shall have:

a. The right to be informed, in writing of the charges;

b. xxx xxx xxx.

c. xxx xxx xxx.

d. xxx xxx xxx.

No publicity shall be given to any disciplinary action being taken against a teacher during the pendency of his case.

3.8. Second, the issue involved is purely legal, well within the jurisdiction of the trial court but beyond the competence of the administrative bodies.

3.9. The petitioner-appellant is asking for damages pursuant to the Civil Code for the violation of her constitutional rights committed by a public official.

Art. 19. Every person must, in the exercise of his rights and in the performance of his duties, act with justice, give everyone his due, and observe honesty and good faith.

Art. 20. Every person, who contrary to law, willfully or negligently causes damage to another, shall indemnify the latter for the same.

Art. 21. Any person who willfully causes the loss or injury to another in a manner that is contrary to morals, good customs or public policy shall compensate the latter for damage.

Art. 2217. Moral damages include physical suffering, mental anguish, fright, serious anxiety, besmirched reputation, wounded feelings, moral shock, social humiliation, and similar injury. Though incapable of pecuniary computation, moral damages may be recovered if they are the proximate result of the defendant's wrongful act or omission.

Art. 2219. Moral damages may be recovered in the following analogous cases: x x x

(10) Acts and actions referred to in articles, 21, 26, 27, 28, 29, 30 32, 34, and 35.

3.10. The malevolent publicity caused the petitioner-appellant and her family untold shame and suffering, destroying her reputation beyond repair.

3.11. Clearly, the petitioner-appellant's action calls for the application and interpretation of the provisions of the Civil Code, a function, which exclusively falls within the jurisdiction of the regular courts and not with administrative agencies like the Civil Service or Department of Education.

3.12. Moreover, administrative agencies are not courts or judicial tribunals, which do not have the power, or jurisdiction to award damages, the High Tribunal has consistently declared that exhaustion of administrative remedies will not apply if the question involved is beyond the competence of the administrative agencies to act but the matter is within the jurisdiction of the trial court, to wit:

"Second, exhaustion of administrative remedies is applicable when there is competence on the part of the administrative body to act upon the matter complained of. Administrative agencies are not courts; they are neither part of the judicial system, nor are they deemed judicial tribunals. Specifically, the CHED does not have the power to award damages. Hence, petitioner could not have commenced her case before the Commission.

Third, the exhaustion doctrine admits of exceptions, one of which arises when the issue is purely legal and well within the jurisdiction of the trial court. Petitioner's action for damages inevitably calls for the application and interpretation of the Civil Code, a function that falls within the jurisdiction of the courts.

3.13. Finally, the summary dismissal of complaints is frowned upon and parties to a case should be given full opportunity to ventilate their causes of action and defenses. The herein petitioner-appellant is entitled to the full adjudication of her complaint on the merits. The ends of justice will be better served if the instant complaint be adjudicated on its merits after the parties are given full opportunity to ventilate its causes and defenses rather than on technical imperfections of its pleadings.

It has been our consistent holding that the ends of justice are better served when cases are determined on the merits – after all parties are given full opportunity to ventilate their causes and defenses – rather than on technicality or some procedural imperfections.[26]

The grounds proffered by petitioner-appellant to support her contention that her case falls under the exception to the doctrine of prior exhaustion of administrative remedies actually substantiate her cause of action for damages anchored on Article 19, 20, and 21, which as We ruled, should be severed from the petition for mandamus and tried separately. Petitioner-appellant has not proffered any other ground showing that We should exempt her case from the application of the doctrine of prior exhaustion of administrative remedies. To reiterate, We find no reversible error on the part of the court a quo in dismissing the petition for mandamus.

We moreover find another reason why the prayer for the issuance of a writ of mandamus cannot prosper.

Section 3, Rule 65 of the 1997 Rules of Civil Procedure states:

SEC. 3. Petition for mandamus. – When any tribunal, corporation, board, officer or person unlawfully neglects

the performance of an which the law specifically enjoins as a duty resulting from an office, trust, or station, or unlawfully excludes another from the use and enjoyment of a right or office to which such other is entitled, and there is no other plain, speedy and adequate remedy in the ordinary course of law, the person aggrieved thereby may file a verified petition in the proper court, alleging the facts with certainty and praying that judgment be rendered commanding the respondent, immediately or at some other time to be specified by the court, to do the act required to be done to protect the rights of the petitioner, and to pay the damages sustained by the petitioner by reason of the wrongful acts of the respondent.

The petition shall also contain a sworn certification of non-forum shopping as provided in the third paragraph of section 3, Rule 46.

In *Cabungcal, et al. v. Lorenzo, et al.*,^[27] the Supreme Court emphasized that the remedy of mandamus may only be availed of only when there is no appeal or any plain, speedy or adequate remedy in the ordinary course of law. The Supreme Court further went on to say that mandamus being an extraordinary remedy, resort to the same may only be made “in cases of extreme necessity where the ordinary forms of procedure are powerless to afford relief.”

As already adverted to, an appeal before the Civil Service Commission was then available. Petitioner-appellant’s choice of judicial remedy was thus premature, rendering the petition susceptible of dismissal as correctly done by the court a quo.

To reiterate, the thrust of the rule on exhaustion of administrative remedies is that courts must allow administrative agencies to carry out their functions and discharge their responsibilities within the specialized areas of their respective competence. To this end, administrative agencies are afforded a chance to correct any previous error committed in its forum. Furthermore, reasons of law, comity, and convenience prevent the courts from entertaining cases proper for determination by administrative agencies.^[28]

WHEREFORE, premises considered, the February 12, 2012 Order dismissing the petition for mandamus is **AFFIRMED** in toto. Insofar, however, as petitioner-appellant’s cause of action for moral and exemplary damages, as well as attorney’s fees, litigation expenses, and costs of suit is concerned, the same is ordered severed from the instant petition for mandamus and the court a quo is **ORDERED** to conduct separate proceedings for the same.

SO ORDERED.

Maxino, and Diy, JJ., concur.

[1] Original Records, pp. 113-115.

[2] *Ibid.*, pp. 2-14.

[3] *Ibid.*, p. 129.

[4] *Ibid.*, pp. 117-123.

[5] Cited in the April 5, 2011 Decision of the Civil Service Commission Regional Office No. 7. Original Records, p. 47.

[6] Original Records, pp. 47-54.

[7] Stated in the June 1, 2011 Resolution of the Civil Service Commission Regional Office No. 7. Original Records, p. 51.

- [8] Original Records, pp. 51-54.
- [9] Supra., see note no. 2.
- [10] Original Records, pp. 29-37.
- [11] Ibid., pp. 46-49.
- [12] Ibid., pp. 87-91.
- [13] Rollo, p. 14
- [14] Original Records, p. 7.
- [15] Ibid.
- [16] Ibid., p. 9.
- [17] Ibid., p. 10.
- [18] Ibid., p. 12.
- [19] Section 2, Rule 2, 1997 Rules of Civil Procedure.
- [20] G.R. No. 182435, August 13, 2012.
- [21] CSC Memorandum Circular No. 19-99, as cited in Cabungcal v. Lorenzo, et al., G.R. No. 160367, December 18, 2009.
- [22] G.R. No. 158253, March 2, 2007
- [23] G.R. No. 175039, April 18, 2012.
- [24] As cited in Cabungcal v. Lorenzo, et al., G.R. No.160367, December 18, 2009.
- [25] Dy v. Court of Appeals, et al., G.R. No. 121587, March 9, 1999.
- [26] Rollo, pp. 15-18.
- [27] G.R. No. 160367, December 18, 2009.
- [28] Delos Reyes v. Flores, et al., G.R. No. 168726, March 5, 2010

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.