

MARTIN LAHM III AND JAMES P. CONCEPCION, COMPLAINANTS, VS. LABOR ARBITER JOVENCIO LL. MAYOR, JR., RESPONDENT.

A.C. No. 7430. February 15, 2012

Ponente: REYES, J.

Read online (full-text search, related cases, audio case brief): <https://batas.org/library/a-c-no-7430/>

REYES, J.:

Before us is a verified complaint[1] filed by Martin Lahm III and James P. Concepcion (complainants) praying for the disbarment of Labor Arbiter Jovencio Ll. Mayor, Jr. (respondent) for alleged gross misconduct and violation of lawyer's oath.

On June 27, 2007, the respondent filed his Comment[2] to the complaint.

In a Resolution[3] dated July 18, 2007, the Court referred the case to the Integrated Bar of the Philippines (IBP) for investigation, report and recommendation.

The antecedent facts, as summarized in the Report and Recommendation[4] dated September 19, 2008 of Commissioner Romualdo A. Din, Jr. of the IBP Commission on Bar Discipline, are as follows:

On September 5, 2006 a certain David Edward Toze filed a complaint for illegal dismissal before the Labor Arbitration Branch of the National Labor Relations Commission against the members of the Board of Trustees of the International School, Manila. The same was docketed as NLRC-NCR Case No. 00-07381-06 and raffled to the sala of the respondent. Impleaded as among the party-respondents are the complainants in the instant case.

On September 7, 2006, David Edward Toze filed a Verified Motion for the Issuance of a Temporary Restraining Order and/or Preliminary Injunction Against the Respondents. The said Motion was set for hearing on September 12, 2006 at 10:00 in the morning. A day after, on September 8, 2006, the counsel for the complainants herein entered its appearance and asked for additional time to oppose and make a comment to the Verified Motion for the Issuance of a Temporary Restraining Order and/or Preliminary Injunction Against the Respondents of David Edward Toze.

Thereafter, the respondent issued an Order dated September 14, 2006 that directs the parties in the said case to maintain the status quo ante. The complainants herein sought the reconsideration of the Order dated September 14, 2006[6] x x x.

x x x x

On account of the Order dated September 14, 2006, David Edward Toze was immediately reinstated and assumed his former position as superintendent of the International School Manila.

The pending incidents with the above-mentioned illegal dismissal case were not resolved, however, the scheduled hearing for the issuance of a preliminary injunction on September 20, 2006 and September 27, 2006 was postponed.

On January 19, 2007, the co-respondents of the complainants herein in the said illegal dismissal case filed a

motion for an early resolution of their motion to dismiss the said case, but the respondent instead issued an Order dated February 6, 2007 requiring the parties to appear in his Office on February 27, 2007 at 10:00 in the morning in order to thresh out David Edward Toze' claim of moral and exemplary damages.

x x x x

The respondent on the other maintains that the Order dated September 14, 2006 was issued by him on account of [the] Verified Motion for the Issuance of a Temporary Restraining Order and/or Preliminary Injunction Against the Respondents that was filed by David Edward Toze, and of the Entry of Appearance with Motion for Additional Time to File Comment that was thereafter filed by the counsel for the herein complainants in the illegal dismissal case pending before the respondent.

The respondent maintains that in order to prevent irreparable damage on the person of David Edward Toze, and on account of the urgency of [the] Verified Motion for the Issuance of a Temporary Restraining Order and/or Preliminary Injunction Against the Respondents of David Edward Toze, and that the counsel for respondents in the illegal dismissal case have asked for a relatively long period of fifteen days for a resetting, he (respondent) found merit in issuing the Order dated September 14, 2006 that requires the parties to maintain the status quo ante.

x x x

The respondent argues that [the] instant case should be dismissed for being premature since the aforementioned illegal dismissal case is still pending before the Labor Arbitration Branch of the National Labor Relations Commission, that the instant case is a subterfuge in order to compel the respondent to inhibit himself in resolving the said illegal dismissal case because the complainants did not assail the Order dated September 14, 2006 before the Court of Appeals under Rule 65 of the Rules of Court.[5]

Based on the foregoing, the Investigating Commissioner concluded that: (1) the grounds cited by the respondent to justify his issuance of the status quo ante order lacks factual basis and is speculative; (2) the respondent does not have the authority to issue a temporary restraining order and/or a preliminary injunction; and (3) the inordinate delay in the resolution of the motion for reconsideration directed against the September 14, 2006 Order showed an orchestrated effort to keep the status quo ante until the expiration of David Edward Toze's employment contract.

Accordingly, the Investigating Commissioner recommended that:

WHEREFORE, it is respectfully recommended that the respondent be SUSPENDED for a period of six (6) months with a warning that a repetition of the same or similar incident will be dealt with more severe penalty.[6]

On December 11, 2008, the IBP Board of Governors issued Resolution No. XVIII-2008-644[7] which adopted and approved the recommendation of the Investigating Commissioner. The said resolution further pointed out that the Board of Governors had previously recommended the respondent's suspension from the practice of law for three years in Administrative Case (A.C.) No. 7314 entitled "Mary Ann T. Flores v. Atty. Jovencio Ll. Mayor, Jr.".

The respondent sought to reconsider the foregoing disposition,[8] but it was denied by the IBP Board of Governors in its Resolution No. XIX-2011-476 dated June 26, 2011.

The case is now before us for confirmation. We agree with the IBP Board of Governors that the respondent should be sanctioned.

Section 27, Rule 138 of the Rules of Court provides that a lawyer may be removed or suspended from the practice

of law, *inter alia*, for gross misconduct and violation of the lawyer's oath. Thus:

Section 27. Attorneys removed or suspended by Supreme Court on what grounds. – A member of the bar may be removed or suspended from his office as attorney by the Supreme Court for any deceit, malpractice, or other gross misconduct in such office, grossly immoral conduct, or by reason of his conviction of a crime involving moral turpitude, or for any violation of the oath which he is required to take before the admission to practice, or for a wilful disobedience of any lawful order of a superior court, or for corruptly or wilful appearing as an attorney for a party to a case without authority so to do. The practice of soliciting cases at law for the purpose of gain, either personally or through paid agents or brokers, constitutes malpractice. (emphasis supplied)

A lawyer may be suspended or disbarred for any misconduct showing any fault or deficiency in his moral character, honesty, probity or good demeanor.[9] Gross misconduct is any inexcusable, shameful or flagrant unlawful conduct on the part of a person concerned with the administration of justice; i.e., conduct prejudicial to the rights of the parties or to the right determination of the cause. The motive behind this conduct is generally a premeditated, obstinate or intentional purpose.[10]

Intrinsically, the instant petition wants this Court to impose disciplinary sanction against the respondent as a member of the bar. However, the grounds asserted by the complainants in support of the administrative charges against the respondent are intrinsically connected with the discharge of the respondent's quasi-judicial functions.

Nonetheless, it cannot be discounted that the respondent, as a labor arbiter, is a public officer entrusted to resolve labor controversies. It is well settled that the Court may suspend or disbar a lawyer for any conduct on his part showing his unfitness for the confidence and trust which characterize the attorney and client relations, and the practice of law before the courts, or showing such a lack of personal honesty or of good moral character as to render him unworthy of public confidence.[11]

Thus, the fact that the charges against the respondent were based on his acts committed in the discharge of his functions as a labor arbiter would not hinder this Court from imposing disciplinary sanctions against him.

The Code of Professional Responsibility does not cease to apply to a lawyer simply because he has joined the government service. In fact, by the express provision of Canon 6 thereof, the rules governing the conduct of lawyers "shall apply to lawyers in government service in the discharge of their official tasks." Thus, where a lawyer's misconduct as a government official is of such nature as to affect his qualification as a lawyer or to show moral delinquency, then he may be disciplined as a member of the bar on such grounds.[12]

In *Atty. Vitriolo v. Atty. Dasig*,[13] we stressed that:

Generally speaking, a lawyer who holds a government office may not be disciplined as a member of the Bar for misconduct in the discharge of his duties as a government official. However, if said misconduct as a government official also constitutes a violation of his oath as a lawyer, then he may be disciplined by this Court as a member of the Bar.

In this case, the record shows that the respondent, on various occasions, during her tenure as OIC, Legal Services, CHED, attempted to extort from Betty C. Mangohon, Rosalie B. Dela Torre, Rocella G. Eje, and Jacqueline N. Ng sums of money as consideration for her favorable action on their pending applications or requests before her office. The evidence remains unrefuted, given the respondent's failure, despite the opportunities afforded her by this Court and the IBP Commission on Bar Discipline to comment on the charges. We find that respondent's misconduct as a lawyer of the CHED is of such a character as to affect her qualification as a member of the Bar, for as a lawyer, she ought to have known that it was patently unethical and illegal for her to demand sums of money as consideration for the approval of applications and requests awaiting action by her office.

x x x

A member of the Bar who assumes public office does not shed his professional obligations. Hence, the Code of Professional Responsibility, promulgated on June 21, 1988, was not meant to govern the conduct of private practitioners alone, but of all lawyers including those in government service. This is clear from Canon 6 of said Code. Lawyers in government are public servants who owe the utmost fidelity to the public service. Thus, they should be more sensitive in the performance of their professional obligations, as their conduct is subject to the ever-constant scrutiny of the public.

For a lawyer in public office is expected not only to refrain from any act or omission which might tend to lessen the trust and confidence of the citizenry in government, she must also uphold the dignity of the legal profession at all times and observe a high standard of honesty and fair dealing. Otherwise said, a lawyer in government service is a keeper of the public faith and is burdened with high degree of social responsibility, perhaps higher than her brethren in private practice.[14] (emphasis supplied and citations omitted)

In *Tadlip v. Atty. Borres, Jr.*,[15] we ruled that an administrative case against a lawyer for acts committed in his capacity as provincial adjudicator of the Department of Agrarian Reform – Regional Arbitration Board may be likened to administrative cases against judges considering that he is part of the quasi-judicial system of our government.

This Court made a similar pronouncement in *Buehs v. Bacatan*[16] where the respondent-lawyer was suspended from the practice of law for acts he committed in his capacity as an accredited Voluntary Arbitrator of the National Conciliation and Mediation Board.

Here, the respondent, being part of the quasi-judicial system of our government, performs official functions that are akin to those of judges. Accordingly, the present controversy may be approximated to administrative cases of judges whose decisions, including the manner of rendering the same, were made subject of administrative cases.

As a matter of public policy, not every error or mistake of a judge in the performance of his official duties renders him liable. In the absence of fraud, dishonesty or corruption, the acts of a judge in his official capacity do not always constitute misconduct although the same acts may be erroneous. True, a judge may not be disciplined for error of judgment absent proof that such error was made with a conscious and deliberate intent to cause an injustice.[17]

While a judge may not always be held liable for ignorance of the law for every erroneous order that he renders, it is also axiomatic that when the legal principle involved is sufficiently basic, lack of conversance with it constitutes gross ignorance of the law. Indeed, even though a judge may not always be subjected to disciplinary action for every erroneous order or decision he renders, that relative immunity is not a license to be negligent or abusive and arbitrary in performing his adjudicatory prerogatives.[18]

When the law is sufficiently basic, a judge owes it to his office to know and to simply apply it. Anything less would be constitutive of gross ignorance of the law.[19]

In the case at bench, we find the respondent guilty of gross ignorance of the law.

Acting on the motion for the issuance of a temporary restraining order and/or writ of preliminary injunction, the respondent issued the September 14, 2006 Order requiring the parties to maintain the status quo ante until the said motion had been resolved. It should be stressed, however, that at the time the said motion was filed, the 2005 Rules of Procedure of the National Labor Relations Commission (NLRC) is already in effect.

Admittedly, under the 1990 Rules of Procedure of the NLRC, the labor arbiter has, in proper cases, the authority to issue writs of preliminary injunction and/or restraining orders. Section 1, Rule XI of the 1990 Rules of

Procedure of the NLRC provides that:

Section 1. Injunction in Ordinary Labor Disputes. – A preliminary injunction or restraining order may be granted by the Commission through its Divisions pursuant to the provisions of paragraph (e) of Article 218 of the Labor Code, as amended, when it is established on the basis of the sworn allegations in the petition that the acts complained of involving or arising from any labor dispute before the Commission, which, if not restrained or performed forthwith, may cause grave or irreparable damage to any party or render ineffectual any decision in favor of such party.

If necessary, the Commission may require the petitioner to post a bond and writ of preliminary injunction or restraining order shall become effective only upon the approval of the bond which shall answer for any damage that may be suffered by the party enjoined, if it is finally determined that the petitioner is not entitled thereto.

The foregoing ancillary power may be exercised by the Labor Arbiters only as an incident to the cases pending before them in order to preserve the rights of the parties during the pendency of the case, but excluding labor disputes involving strike or lockout. (emphasis supplied)

Nevertheless, under the 2005 Rules of Procedure of the NLRC, the labor arbiters no longer has the authority to issue writs of preliminary injunction and/or temporary restraining orders. Under Section 1, Rule X of the 2005 Rules of Procedure of the NLRC, only the NLRC, through its Divisions, may issue writs of preliminary injunction and temporary restraining orders. Thus:

Section 1. Injunction in Ordinary Labor Disputes. - A preliminary injunction or restraining order may be granted by the Commission through its Divisions pursuant to the provisions of paragraph (e) of Article 218 of the Labor Code, as amended, when it is established on the basis of the sworn allegations in the petition that the acts complained of involving or arising from any labor dispute before the Commission, which, if not restrained or performed forthwith, may cause grave or irreparable damage to any party or render ineffectual any decision in favor of such party. (emphasis supplied)

The role of the labor arbiters, with regard to the issuance of writs of preliminary injunctions and/or writ of preliminary injunction, at present, is limited to reception of evidence as may be delegated by the NLRC. Thus, Section 4, Rule X of the 2005 Rules of Procedure of the NLRC provides that:

Section 4. Reception of Evidence; Delegation. - The reception of evidence for the application of a writ of injunction may be delegated by the Commission to any of its Labor Arbiters who shall conduct such hearings in such places as he may determine to be accessible to the parties and their witnesses, and shall thereafter submit his report and recommendation to the Commission within fifteen (15) days from such delegation. (emphasis supplied)

The foregoing rule is clear and leaves no room for interpretation. However, the respondent, in violation of the said rule, vehemently insist that he has the authority to issue writs of preliminary injunction and/or temporary restraining order. On this point, the Investigating Commissioner aptly ruled that:

The respondent should, in the first place, not entertained Edward Toze's Verified Motion for the Issuance of a Temporary Restraining Order and/or Preliminary Injunction Against the Respondents. He should have denied it outright on the basis of Section 1, Rule X of the 2005 Revised Rules of Procedure of the National Labor Relations Commission.

x x x x

The respondent, being a Labor Arbiter of the Arbitration Branch of the National Labor Relations Commission, should have been familiar with Sections 1 and 4 of the 2005 Revised Rules of procedure of the National Labor Relations Commission. The first, states that it is the Commission of the [NLRC] that may grant a preliminary

injunction or restraining order. While the second, states [that] Labor Arbiters [may] conduct hearings on the application of preliminary injunction or restraining order only in a delegated capacity.[20]

What made matters worse is the unnecessary delay on the part of the respondent in resolving the motion for reconsideration of the September 14, 2006 Order. The unfounded insistence of the respondent on his supposed authority to issue writs of preliminary injunction and/or temporary restraining order, taken together with the delay in the resolution of the said motion for reconsideration, would clearly show that the respondent deliberately intended to cause prejudice to the complainants.

On this score, the Investigating Commissioner keenly observed that:

The Commission is very much disturbed with the effect of the Order dated September 14, 2006 and the delay in the resolution of the pending incidents in the illegal dismissal case before the respondent.

Conspicuously, Section 3 (Term of Contract) of the Employment Contract between David Edward Toze and International School Manila provides that David Edward Toze will render work as a superintendent for the school years August 2005-July 2006 and August 2006-July 2007.

The Order dated September 14, 2006 in effect reinstates David Edward Toze as superintendent of International School of Manila until the resolution of the former's Verified Motion for the Issuance of a Temporary Restraining Order and/or Preliminary Injunction Against the Respondents.

Since the Employment Contract between David Edward Toze and International School Manila is about to expire or end on August 2007, prudence dictates that the respondent expediently resolved [sic] the merits of David Edward Toze's Verified Motion for the Issuance of a Temporary Restraining Order and/or Preliminary Injunction Against the Respondents because any delay in the resolution thereof would result to undue benefit in favor of David Edward Toze and unwarranted prejudice to International School Manila.

x x x x

At the time the respondent inhibited himself from resolving the illegal dismissal case before him, there are barely four (4) months left with the Employment Contract between David Edward Toze and International School Manila.

From the foregoing, there is an inordinate delay in the resolution of the reconsideration of the Order dated September 14, 2006 that does not escape the attention of this Commission. There appears an orchestrated effort to delay the resolution of the reconsideration of the Order dated September 14, 2006 and keep status quo ante until expiration of David Edward Toze's Employment Contract with International School Manila come August 2007, thereby rendering the illegal dismissal case moot and academic.

x x x x

Furthermore, the procrastination exhibited by the respondent in the resolution of [the] assailed Order x x x should not be countenanced, specially, under the circumstance that is attendant with the term of the Employment Contract between David Edward Toze and International School Manila. The respondent's lackadaisical attitude in sitting over the pending incident before him for more than five (5) months only to thereafter inhibit himself therefrom, shows the respondent's disregard to settled rules and jurisprudence. Failure to decide a case or resolve a motion within the reglementary period constitutes gross inefficiency and warrants the imposition of administrative sanction against the erring magistrate x x x. The respondent, being a Labor Arbiter, is akin to judges, and enjoined to decide a case with dispatch. Any delay, no matter how short, in the disposition of cases undermine the people's faith and confidence in the judiciary x x x. [21]

Indubitably, the respondent failed to live up to his duties as a lawyer in consonance with the strictures of the lawyer's oath and the Code of Professional Responsibility, thereby occasioning sanction from this Court.

In stubbornly insisting that he has the authority to issue writs of preliminary injunction and/or temporary restraining order contrary to the clear import of the 2005 Rules of Procedure of the NLRC, the respondent violated Canon 1 of the Code of Professional Responsibility which mandates lawyers to “obey the laws of the land and promote respect for law and legal processes”.

All told, we find the respondent to have committed gross ignorance of the law, his acts as a labor arbiter in the case below being inexcusable thus unquestionably resulting into prejudice to the rights of the parties therein.

Having established the foregoing, we now proceed to determine the appropriate penalty to be imposed.

Under Rule 140[22] of the Rules of Court, as amended by A.M. No. 01-8-10-SC, gross ignorance of the law is a serious charge,[23] punishable by a fine of more than P20,000.00, but not exceeding P40,000.00, suspension from office without salary and other benefits for more than three but not exceeding six months, or dismissal from the service.[24]

In *Tadlip v. Atty. Borres, Jr.*, the respondent-lawyer and provincial adjudicator, found guilty of gross ignorance of the law, was suspended from the practice of law for six months. Additionally, in parallel cases,[25] a judge found guilty of gross ignorance of the law was meted the penalty of suspension for six months.

Here, the IBP Board of Governors recommended that the respondent be suspended from the practice of law for six months with a warning that a repetition of the same or similar incident would be dealt with more severe penalty. We adopt the foregoing recommendation.

This Court notes that the IBP Board of Governors had previously recommended the respondent’s suspension from the practice of law for three years in A.C. No. 7314, entitled “*Mary Ann T. Flores v. Atty. Jovencio Ll. Mayor, Jr.*”. This case, however, is still pending.

It cannot be gainsaid that since public office is a public trust, the ethical conduct demanded upon lawyers in the government service is more exacting than the standards for those in private practice. Lawyers in the government service are subject to constant public scrutiny under norms of public accountability. They also bear the heavy burden of having to put aside their private interest in favor of the interest of the public; their private activities should not interfere with the discharge of their official functions.[26]

At this point, the respondent should be reminded of our exhortation in *Republic of the Philippines v. Judge Caguioa*,[27] thus:

Ignorance of the law is the mainspring of injustice. Judges are called upon to exhibit more than just a cursory acquaintance with statutes and procedural rules. Basic rules should be at the palm of their hands. Their inexcusable failure to observe basic laws and rules will render them administratively liable. Where the law involved is simple and elementary, lack of conversance with it constitutes gross ignorance of the law. “Verily, for transgressing the elementary jurisdictional limits of his court, respondent should be administratively liable for gross ignorance of the law.”

“When the inefficiency springs from a failure to consider so basic and elemental a rule, a law or a principle in the discharge of his functions, a judge is either too incompetent and undeserving of the position and title he holds or he is too vicious that the oversight or omission was deliberately done in bad faith and in grave abuse of judicial authority.”[28] (citations omitted)

WHEREFORE, finding respondent Atty. Jovencio Ll. Mayor, Jr. guilty of gross ignorance of the law in violation of his lawyer’s oath and of the Code of Professional Responsibility, the Court resolved to SUSPEND respondent from the practice of law for a period of six (6) months, with a WARNING that commission of the same or similar offense in the future will result in the imposition of a more severe penalty.

Let copies of this Resolution be furnished the IBP, as well as the Office of the Bar Confidant and the Court Administrator who shall circulate it to all courts for their information and guidance and likewise be entered in the record of the respondent as attorney.

SO ORDERED.

Carpio, (Chairperson), Villarama, Jr.,[*] Perez, and Sereno, JJ., concur.

[*] Additional Member in lieu of Associate Justice Arturo D. Brion per Special Order No. 1195 dated February 15, 2012.

[1] Rollo, pp. 1-7.

[2] Id. at 16-28.

[3] Id. at 95.

[4] Id. at 260-275.

[5] Id. at 261-265.

[6] Id. at 275.

[7] Id. at 258-259.

[8] Id. at 276-305.

[9] Spouses Donato v. Atty. Asuncion, 468 Phil. 329, 335 (2004), citing Re Administrative Case Against Atty. Occeña, 433 Phil. 138 (2002).

[10] Office of the Court Administrator v. Liangco, A.C. No. 5355, December 13, 2011.

[11] Halili v. Court of Industrial Relations, G.R. No. L-24864, April 30, 1985.

[12] Ali v. Bubong, 493 Phil. 172, 182 (2005), citing Reyes v. Gaa, 316 Phil. 97, 102 (1995).

[13] 448 Phil. 199 (2003).

[14] Id. at 207-209.

[15] 511 Phil. 56 (2005).

[16] A.C. No. 6674, June 30, 2009, 591 SCRA 217.

[17] Dipatuan v. Mangotara, A.M. No. RTJ-09-2190, April 23, 2010, 619 SCRA 48, 55.

[18] Id. at 56.

[19] Cabili v. Judge Balindong, A.M. No. RTJ-10-2225, September 6, 2011.

-[20] Rollo, pp. 267-268; 271.

[21] Id. at 267-272.

[22] Discipline of Judges of regular and Special Courts and Justices of the Court of Appeals and the Sandiganbayan.

[23] Section 8 (9), Rule 140 of the Rules of Court.

[24] Section 11 (A), Rule 140 of the Rules of Court.

[25] *Amante-Descallar v. Ramas*, A.M. No. RTJ-08-2142, March 20, 2009, 582 SCRA 23; *Baculi v. Belen*, A.M. No. RTJ-09-2176, April 20, 2009, 586 SCRA 69; *Ocampo v. Arcaya-Chua*, A.M. OCA IPI No. 07-2630-RTJ, A.M. Nos. RTJ-07-2049, RTJ-08-2141 and RTJ-07-2093, April 23, 2010, 619 SCRA 59.

[26] *Olazo v. Tinga*, A.M. No. 10-5-7-SC, December 7, 2010, 637 SCRA 1, 9.

[27] A.M. Nos. RTJ-07-2063, RTJ-07-2064 and RTJ-07-2066, June 26, 2009, 591 SCRA, 51.

[28] *Id.* at 77.

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.