

INTESTATE ESTATE OF ANTONIO ZUZUARREGUI. PILAR I. DE ZUZUAEKEGUI ADMINISTRATRIX, BEATRIZ Z. DE RTSYES ET AL., APPELLEES, VS. ENRIQUE ZUZUARREGUI ET AL., APPELLANTS.*G. R. No. L-10010. October 31, 1957*

Ponente: BAUTISTA ANGELO, J.

Read online (full-text search, related cases, audio case brief): <https://batas.org/library/b4bbeb5180b6/>**BAUTISTA ANGELO, J.:**

On March B, 1953, a petition was filed in the Court of First Instance of Quezon City by Pilar Ibañez de Zuzuarregui for the administration and settlement of the estate of Antonio de Zuzuarregui who died intestate on February 22, 1953. In said petition it was prayed that letters of administration be issued in favor of Antonio de Zuzuarregui, Jr., but due to the opposition of Beatriz de Zuzuarregui, the court appointed Pilar Ibanez, the widow, as regular administratrix.

On August 25, 1954, Enrique de Zuzuarregui, a brother of the deceased, Maria Theresa San Mateo, Mercedes San Mateo and Jose San Mateo, half sisters and half brother, respectively, of the deceased, filed their opposition impugning the declaration of Beatriz, Antonio, Jr., Enrique and Jose, all surnamed De Zuzuarregui, as heirs contending that they are not related to the deceased either by affinity or by consanguinity. The latter filed their reply and a motion to dismiss the opposition. This motion was denied for lack of merit. Forthwith, an amended answer to the opposition was filed by the alleged heirs, to which the oppositors filed a reply. After the oppositors had made of record their opposition to the prosecution of any evidence tending to show that the alleged heirs were related by affinity or consanguinity to the deceased, the case was tried on the merits during which the parties presented their evidence. On August 22, 1955, the court rendered decision declaring Beatriz, Antonio, Jr., Enrique and Jose, all surnamed De Zuzuarregui, as the illegitimate (spurious) children of the deceased and heirs of his estate in conjunction with the widow Pilar Ibañez to the exclusion of the collateral relatives. In due time, the oppositors took the present appeal.

Antonio de Zuzuarregui died without a will in Quezon City, Philippines on February 22, 1953. On April 12, 1917, he contracted marriage with Pilar Ibanez who did not bear him any issue. He is survived by his widow and the herein claimants Beatriz, Antonio, Jr., Enrique and Jose, who claim to be his illegitimate (spurious) children.

The evidence shows, that Beatriz is the illegitimate (spurious) child of the deceased had with a woman who was then his tenant; that when she was born the widow took her from the custody of her mother and since then she lived continuously in the family residence until she reached the age of majority when she got married and lived with her husband; that since her childhood, Beatriz was considered as a member of the family, was given the family name, was supported and sent to school at the expense of the deceased. In the income tax returns submitted by the deceased for the years 1938, 1947 and 1948, he declared under oath that Beatriz was one of his children (Exhibits H, H-1, and I).

The evidence further shows that claimants Antonio, Jr., Enrique and Jose, all surnamed De Zuzuarregui, were the children of Pacita Javier had with the deceased. Pacita Javier is a cousin of the widow, Pilar Ibanes. When she

became orphan, the widow invited her and her mother to live with them in the conjugal residence sometime in 1930. While living with them she gave birth to a baby boy on August 17, 1931 in a maternity hospital who "was given by the deceased the name of Antonio, Jr. and the family name of De Zuzuarregui. This boy was reared and brought up as a member of the family by the spouses. He was supported and educated by the deceased. On May 5, 1948, Pacita also gave birth to a twin had with the deceased, who arranged for their baptism and gave them the names of Jose and Enrique and the family name of De Zuzuarregui. These twins also lived with the spouses in the conjugal dwelling and were always considered as members of the family. In the baptismal certificate of Antonio de Zuzuarregui, Jr., the deceased declared under his signature that he was his father (Exhibit A). The same admission was made by the deceased in two public documents executed by him before a notary public where he stated under his signature that Antonio, Jr. was his son (Exhibits D and E). And in the income tax returns, the deceased submitted for the years 1937, 1938, 1946, 1947 and 1948 he likewise stated under oath that Antonio, Jr. was his son. With regard to Jose and Enrique, the deceased also stated under his signature in their certificates of birth that he was their father (Exhibits B and C). Likewise, in the income tax returns the deceased submitted for 1949, 1950, 1951 and 1952, he stated under oath that he "was the father of said Jose and Enrique.

The question to be determined is "whether the claimants can be considered as heirs of the estate upon the claim that they are the illegitimate (spurious) children of the deceased.

Previous to the approval of the new Civil Code, illegitimate children who did not have the status of natural, like spurious, were entitled to support only. They were not entitled to succeed as compulsory heirs as were the acknowledged natural children. Under the present law, however, they are not only given support but are entitled to a certain share of the inheritance, the law according to them the same liberal attitude accorded to natural children. In introducing this innovation, the Code Commission gives this justification. "The transgressions of social conventions committed by the parents should not be visited upon the illegitimate children. The law should not be too severe upon these illegitimate children, be they natural or otherwise, because they do need the special protection of the State. They are born with a social handicap and the law should help them to surmount the disadvantages facing them through the misdeeds of their parents." (Report of the Code Commission on the Proposed Civil Code of the Philippines, p. 89.)

Thus, article 287 of the new Civil Code provides: "Illegitimate children other than natural in accordance with article 289 and other than natural children by legal fiction are entitled to support and such successions! rights as are granted in this Code." And in article 887 these illegitimate children are considered as compulsory heirs, although they come fifth in the order therein mentioned.

It appearing from the overwhelming evidence submitted by the claimants which was not in any way contradicted by the oppositors that from their birth they had enjoyed the status of illegitimate (spurious) children of the deceased, it is evident that the lower court did not err in declaring them as heirs entitled to inherit from the deceased under the law.

Appellants, however, claim that before these illegitimate children may inherit under the present law it is yet necessary that they establish that they were recognized by their putative father, or that they had brought an action for recognition in the same manner as natural children. Since such recognition has not been established and their action to establish it has already prescribed, it is contended that they cannot now claim any successional right under the law. This claim is disputed by appellees who contend that, to establish their right to inherit, their recognition is not necessary, it being sufficient that their filiation be proved.

We find merit in this contention of appellees. There is nothing in the new law from which we may infer that in order that an illegitimate child may enjoy his successional right he must first bring an action for recognition

during the lifetime of the putative father as required by article 285 with regard to natural children. Neither is there any provision which requires that he be recognized as such before he can be accorded such successional right. All what the law provides concerning recognition refers to natural children (Chapter 4 Title VIII, new Civil Code.) On the other hand, article 887, when speaking of illegitimate children as compulsory heirs, contains only the following condition: "their filiation must be duly proved." It does not say that they must first be recognized by their putative parents. The reason perhaps behind this liberal treatment, is that, because they are spurious or offsprings of illicit relations, it would be obnoxious to oblige them to bring an action for recognition during the lifetime of their putative parents, let alone the embarrassment and scandal that such action would bring to all parties concerned.

That such interpretation is correct can be inferred from the following comment of the Code Commission on the matter: "in the proposed Code, illegitimate children other than natural may succeed as compulsory heirs provided that their filiation is duly proved" (Report of the Code Commission on the Proposed Civil Code of the Philippines, p. 118). (Italics supplied.) And Mr. Arturo M. Tolentino, a former member of the Code Commission, makes this comment on the same point: "This article merely allows investigation of paternity or maternity of the illegitimate child, but does not require that these should be a recognition before such child can claim his rights. Apparently, this places the illegitimate child in a better position than a natural child. In reality, however, such difference can hardly be said to exist, because the natural child can always bring a complex action in which he asks both for recognition and for his rights, either to support or to inheritance" (Tolentino, Civil Code of the Philippines, Vol. I, p. 567). (Italics supplied.)

But, even if we uphold the theory that recognition is still necessary to accord to appellees the right to inherit, we may say that the evidence on record more than sufficiently establishes that appellees had been recognized by the deceased as his illegitimate children. As we have already stated elsewhere, the deceased has in more than one occasion acknowledged under oath or declared under his signature in public or official documents that appellees are his children. This evidence is sufficient to entitle them to the successional rights granted by law.

Wherefore, the decision appealed from is affirmed, with costs against appellants.

Paras, C. J., Bengzon, Padilla, Endencia, and Felix, JJ., concur.

Labrador, J., concurs in the result.

CONCURRING

REYES, A., J., :

I concur in so far as the majority opinion holds that those of the appellees who claim to be spurious children of the deceased Antonio de Zuzuarregui should be adjudged entitled to the successional rights given to illegitimate children of that class by Article 287 of the New Civil Code, it appearing that their filiation is acknowledged in authentic writing by their presumed father. But I must reserve my vote on the broader question of whether spurious children not so acknowledged may, after the death of their alleged parents, bring an action for declaration of paternity under article 289. Resolution of that question is not necessary to the adjudication of the present case, and anyway the members of the Court are divided on that point.

CONCURRING IN PART AND DISSENTING IN PART

CONCEPCION, J., :

I share the opinion of the majority and that of Mr. Justice Reyes (J. B. L.) to the effect that appellees Antonio Jr.,

Jose, Enrique and Beatriz, all surnamed Zuzuarregui, are entitled to the successional rights granted by the Civil Code of the Philippines to illegitimate children who are not natural, it appearing that their father Antonio Zuzuarregui had, during his lifetime, voluntarily acknowledged them, in public instruments, as his children.

However, I do not deem it advisable to pass, in the case at bar, upon the question whether spurious children, not so acknowledged voluntarily, may bring an action for declaration or investigation of paternity, after the death of their parents-much less to decide such question in the affirmative.

To begin with, it is not necessary for Us to do so, in view of said voluntary acknowledgment made in public instruments. Secondly, the issue is transcendental in character and far reaching in its consequences—it affects the philosophy of our law on Persons and Family Relations and is fraught with possibilities of the gravest nature. Thirdly, the reasons given in the concurring and dissenting opinion of Mr. Justice Reyes (J. B. L.), in support of the negative view, are so strong that the Court should, to my mind, give itself more time to deliberate on said issue, consider it from a long range viewpoint and get the right perspective thereof, as well as wait for a more propitious occasion to decide it.

Personally, I am not prepared, as yet, to vote thereon in the affirmative.

CONCURRING

MONTEMAYOR, J., :

I concur in the concurring and dissenting opinion of Mr. Justice Concepcion.

CONCURRING IN PART AND DISSENTING IN PART

REYES, J. B. L., :

I agree that since the paternity of Antonio Zuzuarregui has been voluntarily admitted by him in public documents executed in his lifetime, such as his income tax returns, the appellees herein, Antonio, Jr., Jose, Enrique and Beatriz Zuzuarregui, albeit illegitimate children not natural of said deceased, have become entitled to the successions! rights granted them as such by the Civil Code (Article 287). While the Code is silent as to the forms of voluntary acknowledgment by a parent of the filiation of his spurious children (illegitimates not natural) there is no good reason to doubt that the forms of voluntary acknowledgment that suffice for illegitimate natural children under Article 278 of the new Civil Code (i.e., record of birth, will or testament, statement before a court of record or authentic writing) should also suffice for children that are illegitimates not natural, the rights conferred upon the latter being inferior to those of natural children. An action to establish paternity is totally superfluous where the parent spontaneously and publicly admits, the illegitimate relationship.

But I can not subscribe to the ruling that spurious children who are already of age, but have not been voluntarily acknowledged as such, may bring an action for declaration or investigation of their paternity even after the death of their progenitors. Such a holding seems to me subversive of the principles and plan of the Civil Code on the matter.

Like its predecessor, the Spanish Code of 1889, the new Civil Code of the Philippines establishes a gradation in the rights of children according to the circumstances that surround their conception. The greatest sum of rights corresponds to the legitimates, i.e., those conceived in valid matrimony; while of the illegitimates, those that are natural (actually or by fiction) enjoy greater rights than the illegitimates not natural (adulterous or incestuous).

Thus, the successional rights of the three classes of children vary in the proportions 10:5:4, since the legitime of the acknowledged natural children is merely one half of that of the legitimates; while the legitime of an illegitimate child not natural is four fifths (4/5ths) of that of an acknowledged natural child (Article 895), i.e., it is only 2/5ths as large as the legitime of a legitimate child. These proportions are preserved even in intestate succession (Article 983).

And this gradation is followed in other rights as well. The right of action to claim legitimacy lasts during the whole lifetime of the child and can be brought against the presumed parents, if alive, and against their heirs if the parents are no longer living (Article 268); while the action to compel acknowledgment of an illegitimate natural child may be brought only during the lifetime of the presumed parents and therefore not against the parent's heirs) except in two cases: (1) where the parent has died during the minority of the child, or (2) when a hitherto unknown document of recognition is discovered after the parent's death (Article 28a). Furthermore, while an action to claim legitimacy may exceptionally pass to the heirs of the child claimant (as when he dies insane or still a minor) (Article 268), the right to compel recognition never passes to the heirs of the natural child (Conde vs. Abaya, 13 Phil. 249).

On the other hand, as between the two classes of illegitimates, only those that are natural can be elevated to the category of legitimates by the process of legitimation; while those that are not natural are denied this improvement of their condition (Article 269).

Let us now examine the question of the time for the exercise by illegitimates not natural of their right to assert their filiation bearing in mind this progressive diminution of the rights of illegitimate children. The new Code only provides in this regard:

"Art. 289. Investigation of the paternity or maternity of children mentioned in the two preceding articles is permitted under the circumstances specified in articles 283 and 284."

The articles thus referred to bring as follows:

"Art. 238. In any of the following cases, the father is obliged to recognize the child as his natural child:

- (1) In cases of rape, abduction or seduction, when the period of the offense coincides more or less with that of the conception;
- (2) When the child is in continuous possession of status of a child of the alleged father by the direct acts of the latter or of his family;
- (3) When the child was conceived during the time when the mother cohabited with the supposed father;
- (4) When the child has in his favor any evidence or proof that the defendant is his father."

"Art. 284. The mother is obliged to recognize her natural child:

- (1) In any of the cases referred to in the preceding article, as between the child and the mother;
- (2) When the birth and the identity of the child are clearly proved."

It will be seen that the Code nowhere specifies the period within which the action to investigate spurious, paternity under Article 289 should be brought. That in the absence of a competent voluntary admission of the parent, such action must be instituted, and the paternity of the defendant shown, before the spurious child (illegitimate not natural) may claim a right to the parental support and succession is readily apparent; for both support and inheritance in our law are rooted in, and flow from, blood relationship, with the sole exception of the spouse (Article 291). Does the silence of the Code warrant the conclusion that this action may be brought at any time, even after the demise of the parent?

I submit that, at the very least, the spurious child must be required to file the action to establish his paternity or

maternity during the lifetime of the presumed parent, as in the case of the natural child. It is to me inconceivable that the illegitimate child not natural should enjoy a longer right of action than the natural child, when the law clearly tends to favor the natural issue as against the non-natural one. If the latter may sue to establish his filiation even after the death of the presumed parents, then he is practically placed on a par with the legitimate child, who is given right to do so during his (the child's) lifetime. That appears contrary to the plan and intent of the Code.

Just as there is no express provision of the Code conferring upon illegitimates any rights denied to those that are legitimate^[1] (Conde vs. Abaya, 13 Phil. 249, 254), we find no article expressly giving to illegitimate children not natural any right or privilege that is not granted to illegitimate natural children. Likewise, what the Code denies to illegitimate natural children, it denies to those illegitimates not natural. Wherefore, the silence of the Code on the period during which the illegitimate children not natural may bring an action to investigate (and prove) their paternity can not be said to authorize a longer period of action than in the case of illegitimate natural children, since the Civil Code favors the latter over the former class.

We should not overlook that a natural child's conception may take place under circumstances that render it practically indistinguishable from that of a legitimate child, except for the absence of a marriage ceremony between the parents. In fact a natural child may be "natus et conceptus ex unica concubina, in domo retenta et utroque soluta, ex quibus indubitanter videatur procreatus", as formulated in the Authenticum cited by Pacheco in his commentary to the Law :XI of Tore To . hold that such a child's action to claim his due is limited by the life span of the parent, while the claims of a child conceived in adultery or incest are not so limited is to step from the bounds of law into the realm of sentimental romance.

A second factor to be borne in mind is that illegitimate children (natural or not natural) are the result of extra-matrimonial activities usually kept hidden from the legitimate family. Hence it is but just that the investigation of the parental relation should take place while the alleged parent is alive; for only the parent is in a position to reveal the true facts surrounding the claimant's conception. To allow the action to be brought against the heirs of the parent is to open the door to false claims and blackmail suits.

There is nothing in the Report of the Code Commission to indicate that the new Civil Code intended to make actions for investigation of the paternity (or maternity) of illegitimate children not natural survive the presumed parent. As we have shown, precisely the same reason exists to grant the parents an opportunity to defend the action in person when the claimant is a natural child as when he is not natural.

The new Civil Code allows an unlimited investigation of paternity, predicated on "any evidence or proof that the defendant is his (the claimant's) father" (Article 283). This very facility demands that the action should not be directed against the parent's heirs, who are ordinarily kept in the dark as to the extra-matrimonial activities of their predecessor. It should be recalled that, historically, the refusal of the Code Napoleon and the Spanish Civil Code of 1889 to allow a free investigation of illegitimate paternity was not motivated by a desire to cover up the debaucheries of the ruling aristocracy, as is commonly believed, but to avoid its being used as a weapon for extortion. Under the French monarchy, that regime of privilege, illegitimate paternity could be investigated practically without restriction. It was the French Revolution, the revolution of the guillotine and the Rights of Man, the destroyer of feudal and aristocratic privileges, that prohibited inquiries on illegitimate paternity by the Law of the 12 Brumaire, An II, at the same time that it enlarged the successional rights of bastards; and the then restrictive spirit of that law was carried into the subsequent Codes of France and Spain. The underlying reasons were expressed in the deliberations on the Code Napoleon as preserved in the collections (Recueils of Fenet and Loche (2 Planiol-Ripert, *Berecho Civil Frances*, p. 567; I De Page, *Droit, Civil Beige*, p. 1124-1125). Scaevola (Codigo Civil, Vol. III, (2d ed.) pp. 400-401) quotes from Bigot Preameneu, Lahary and Duveyrier, their denunciations against the system of unlimited investigations, of paternity during the ancien regime:

"Desde largo tiempo, en el antiguo regimen, un grito general se elevo contra dichas investigaciones. Estas exponian a los Tribunales a los pleitos mas escandalosos, a los juicios mas arbitrarios y a la jurisprudencia mas variable. El hombre de conducta mas intachable, aquel cuyos cabellos habian encanecido en el ejercicio de todas las virtudes, no estaba al abrigo del ataque de una mujer impudica o de hijos que le eran extraños. Este genero de calamidad dejaba siempre consecuencias dolorosas. Las investigaciones de la paternidad se consideraban como una plaga de la sociedad."

"Nada mas frecuente en otros tiempos que estas audaces reclamaciones de estado que asediaban por todas partes a los Tribunales. Cuantas mujeres impudicas osaban publicar su debilidad bajo el pretexto de recobrar su honor! Cuantos intrigantes, nacidos en la condicion mas abyecta, tenian el inconcebible atrevimiento de intentar introducirse en las familias mas distinguidas y, sobre todo mas opulentas!"

"* * * Al lado de una desgraciada que reclamaba auxilios en nombre y a expensas del honor, mil prostitutas especulaban con la publicidad de su vida licenciosa y subastaban la paternidad de que disponian. Se buscaba un padre al hijo que podia ser reclamado por veinte, y se elegia siempre que era posible al mas virtuoso, al mas bonrado y rico, para fijar el precio de su silencio* por la importancia del escandalo."

These ideas are echoed in the decision of this Supreme Court in *Serrano vs. Aragon*, 22 Phil. p. 18:

"Illegitimate children should not be admitted into the home of a legitimate family unless the proof is strong and convincing, showing that every requirement of the law has been strictly complied with. The writers of the code no doubt had in mind that there would arise instances where certain illegitimate children, on account of the strong temptation due to the large estates left by deceased persons, would attempt to establish that they were natural children of such persons in order to get part of the property; and furthermore, they considered that it is nothing but just and right that alleged parents should have a personal opportunity to be heard. It was for these reasons and others equally as well founded that article 137 was enacted."

Certainly the dangers pointed out apply to all illegitimate paternity actions, whether the plaintiff claims to be a natural child or one not natural. In truth, a charge of adulterous or incestuous relations involves more danger of chantage, because the greater threatened scandal heightens the natural desire of the family of the alleged parent to protect his memory.

It is argued in the appealed decision that the time limitation established by Article 268, for actions by natural children to compel their acknowledgment or recognition, can not apply to spurious children for the reason that the latter can not be, or do not need to be, acknowledged or recognized. This argument stops at the terminology of the Code and does not look at the facts that lie behind the words. It is thinking at a purely verbalistic level.

What, in fact, is the voluntary acknowledgment or recognition of a natural child? Nothing but an admission of the fact of paternity or maternity by the presumed parent, expressed in the form prescribed by the Code. Its essence lies in the avowal of the parent that the child is his; the formality is added to make the admission incontestable, in view of its consequences. If in certain cases (Article 281) the law demands that the admission of the paternity or maternity be approved by the Court, it does so merely to assure that the effects of the acknowledgment will not be detrimental to the child. But there is nothing in the nature of a voluntary acknowledgment or recognition that would make its application to illegitimate children not natural contrary to law, morals or public policy. If the Code fails to mention such recognition in connection with these children it is not because their voluntary acknowledgment is forbidden, but because it is seldom encountered, since an admission of paternity of a spurious child involves an admission of either adultery, concubinage or incest.

Similarly, between the action for compulsory recognition of natural children under Article 285, and the action for investigation of paternity or maternity of illegitimate children not natural, authorized by Article 289, there is no substantial difference. Both are actions whereby the child may prove that the defendant is in fact the father or

mother of the plaintiff, notwithstanding the refusal of the parent to admit the generative link. The grounds upon which either action must be premised are the same, as is apparent from the text of Article 289.

"ART. 289, Investigation of the paternity or maternity of children mentioned in the two preceding articles is permitted under the circumstances specified in articles 283 and 284."

And when the court is satisfied that, denials notwithstanding, the plaintiff is the defendant's child, the court *eo motu* so declares, and thereupon the child assumes his proper status, and acquires automatically the support and successional rights granted by the Code. The parent is not compelled to execute a formal recognition of the relationship that he has denied: the court's, decision is self-sufficient, without any other compulsion on the parent. Thus the term "compulsory recognition" applied to these actions to establish filiation is plainly a misnomer that should not deceive anyone as to their true nature, which does not vary whether the child is natural or not natural. Logically, the same time limitation should apply to both actions, in the absence of express legal provision to the contrary.

The doctrine that a natural child not recognised has no rights to support or succession is not peculiar to natural children but applies to all illegitimate children, natural or not natural. The failure to obtain recognition, whether voluntary or by a court's, decision, necessarily means that the illegitimate child is not able to establish the identity of his father or mother. This is especially true under the new Civil Code, in which the court may declare the existence of the relationship on any adequate evidence. And if despite such latitude the child is unable to convince the court that the defendant is his parent, it is but natural that he should be denied any support or inheritance from the defendant, since these rights are predicated on the existence of the relationship of father and child.

Finally, I see no substantial difference in principle between this case and that of *Conde vs. Abaya*, 18 Phil. 249, decided by this Court through the late Chief Justice Arellano. In that case we held that in view of the silence of the Civil Code on whether the natural child's action for recognition was transmissible or not to the heirs of the child, such silence is proof that the Code intended to make the action strictly non-transmissible, as otherwise, the natural child would obtain better rights than a legitimate child, whose action to claim legitimacy was transmissible only in exceptional cases. By the same token, the silence of the Code as to whether the paternity action of an illegitimate child not natural survived the death of the parent must be construed against such survival, because otherwise, illegitimates not natural would have better rights than natural children, whose right to demand recognition is extinguished upon the parent's demise, save in the two exceptional instances given in Article 268.

Wherefore, my conclusion is that said Article 268 limits not only the so-called actions for recognition by natural children but also actions for investigation of paternity by illegitimate children not natural.

[1] Although the Civil Code considerably improved the condition of recognized natural children, granting them rights and actions that they did not possess under the former laws, they were not, however, placed upon the same plane as legitimate one. The difference that separates these two classes of children is still great, as proven by so many articles dealing with the rights of the family and with succession in relation with the members thereof. It may be laid down as a legal maxim, that whatever the code does not grant to the legitimate children, or in connections with their rights, must still less be understood as granted to recognized natural children or in connection with their rights. There is not a single exception in its provisions."

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.