

HDA. HITA-AW/AGNES ESCALANTE, OWNER/ROLANDO DEOCADEZ, FARM OVERSEER, PETITIONERS, VS. NATIONAL LABOR RELATIONS COMMISSION (7TH DIVISION CEBU CITY) BIENVENIDO V. PORRAS, RESPONDE...

Ponente: LAGURA-YAP, J.

Read online (full-text search, related cases, audio case brief): <https://batas.org/library/ce9c9d21c55b/>

LAGURA-YAP, J.:

Before Us is this Petition for Certiorari[1] under Rule 65 of the Rules of Court, seeking to assail the Resolutions dated March 4, 2011[2] and June 30, 2011[3], of the National Labor Relations Commission, 7[th] Division of Cebu City in NLRC Case No. VAC-01-000072-2011. Petitioners pray that We set aside the assailed Resolutions for having been issued with grave abuse of discretion, and that in their stead, We render a new one, ordering the NLRC to give due course to their appeal.

THE ANTECEDENTS

On August 17, 2009, a Complaint[4] for Illegal dismissal, Underpayment/ Non-payment of Salaries/Wages, and Non-payment of separation pay and 13[th] month pay, was filed by private respondent, Bienvenido Porras against petitioners, Hda. Hita-aw, Agnes Escalante and Rolando Deocadez, before the Labor Arbiter of Bacolod City.

The Labor Arbiter summarized the assertions of the complaint, and that of the petitioners' answer thereto, as follows:

(Private Respondent) alleged that he was a regular employee of respondent Agnes Escalante, the owner of 108 hectare orchard plantation known as Hda. Germinal situated in Bgry. Guimbalaon, Silay City, Negros Occidental.

(Private Respondent) claims that He was hired to work was Watchman ("Ronda") in the orchard plantation of respondent.

Sometime in the first week of July 2009, five (5) children whose ages range from 9-10 years old approached (private respondent) and asked for "lanzones" to eat, so the latter allowed them to pick up from the tree just enough for the five(5) of them to partake. (Private Respondent) told the children that just in case other watchmen of the farm asked them, they will just inform them that he gave the "lanzones" to them.

Not long after, Renato Nato, the son-in-law of the overseer, arrived and inquired if indeed the (private respondent) gave those children some "lanzones" to eat to which the latter answered in the affirmative.

(Private Respondent) gave those children lanzones to eat in good faith and never thought that is was such a big deal until he was summoned in the barangay by (petitioner) Rolando Deocadez who asked the same question if he gave the five (5) children lanzones to eat to which he admitted having done so. (Petitioner) Rolando Deocadez then informed him "INDI KA LANG ANAY MAG-OBRA KAY PABAL-ON PA ANG AMO." (Don't report for work yet because I still have to inform our employer.)

On 21 July 2009, (private respondent) took the liberty of asking (petitioner) Agnes Escalante who arrived in the farm as to the status of his employment to which the latter confirmed the suspension from work effective 15 July 2009 with the further instruction to just wait for a letter coming from her end without indicating as to the nature of the letter she will be sending.

With not a single memorandum to support his indefinite suspension and with nothing to support his family after more than a month of being jobless, (private respondent) was constrained to file the present case.

On the other hand, (petitioner) Agnes Escalante (Escalante) argues in substance, that (private respondent) was not illegally dismissed from employment as he was merely suspended for lawful and legitimate reasons.

(Private respondent) was suspended on 10 August 2010 because he was caught stealing from the orchard of respondents.

To make matters worse, there were several instances where (private respondent) was caught stealing fruits from the lanzones trees inside the orchard farm being managed by (petitioner) Escalante as shown by copies of the barangay complaints dated 06 November 2008 and 23 July 2009.

(Petitioner) Escalante denies that (private respondent) was dismissed from employment on 15 July 2009, the truth being that he worked until 10 August 2009 as evidenced by copies of petty cash vouchers.

On November 19, 2010, the Labor Arbiter rendered a Decision[5] finding for private respondent Porras, viz:

Wherefore premises considered, judgment is hereby tendered DIRECTING (petitioner) AGNES ESCALANTE, Special Administratrix of HDA. HITA-AW, to pay (private respondent) BIENVENIDO V. PORRAS, the total amount of ONE HUNDRED TWENTY ONE THOUSAND TWO HUNDRED TEN and 59/100 PESOS (121,210.59) as his salary/wage differentials and 13[th] month pay.

The other claims are DISMISSED for lack of merit.

From the foregoing decision, petitioners then interposed an Appeal[6] before the NLRC on December 21, 2010, and simultaneous thereto, they filed a Motion for Reduction of the Appeal Bond[7] from Php 121,210.34, the amount of the judgment award, to only Php 20,000.00. The motion to reduce bond was premised on the fact that respondent Agnes Escalante is not the owner of Hacienda Hita-aw, but only the court-appointed special administratrix of the Estate of the Late Espinella Jison, the alleged owner of Hda. Hita-aw; and that the appeal bond was coming from her own personal pocket.

On March 4, 2011, the NLRC, in view of petitioners' Motion for Reduction of Appeal Bond, issued a Resolution, thus:

“WHEREFORE, premises considered, (petitioner Escalante) is, hereby ORDERED to post an additional appeal bond to complete the amount of equivalent to the monetary award, within an inextendible period of ten (10) days upon receipt of this Order, failing which (petitioners') appeal would be dismissed for not having been duly perfected.”

The NLRC highlighted therein the jurisdictional nature of the posting of a bond for the perfection of an Appeal as set forth in Article 223 of the Labor Code; and noted that in the instant case, no evidence was presented by herein respondents to justify the reduction of the appeal bond required thereof.

On May 5, 2011, petitioners, instead of posting an additional bond, filed a Motion for Reconsideration[8] of the March 4, 2011 Resolution. Petitioner Escalante reiterated that she is not the employer of private respondent, but merely the court appointed Special Administratrix of the Estate of the Late Espinella Jison, who is the owner of Hda. Hita-aw and the real employer of private respondent. She added that their posting of Php20,000 cash bond is substantial compliance under the rules. She cited Rule 87 Section 1 of the Revised Rules of Court to relieve her

from being personally liable from the payment of the appeal bond. The said provision states:

“Actions which may and which may not be brought against executor or administrator.- No action upon a claim for the recovery of money or debt or interest thereon shall be commenced against the executor or administrator; but actions to recover real or personal property, or an interest therein, from the estate, or to enforce a lien thereon, and actions to recover damages for an injury to person or property, real or personal, may be commenced against him.”

On June 30, 2011 however, the NLRC rendered a Resolution dismissing with finality the appeal of petitioners, viz:

“WHEREFORE, premises considered, the instant Motion for Reconsideration filed b

y (petitioner) Agnes Escalante is, hereby, DENIED. The Appeal filed by the (petitioner), dated 21 December 2010 is, hereby DISMISSED WITH FINALITY.“

The NLRC stressed therein, that petitioner Escalante is impleaded not in her personal capacity, but as Special Administratrix of the Estate of Espinella Jison, part of which is Hacienda Hitaaw where private respondent worked as “Ronda” or watchman. It highlighted that the appeal bond is jurisdictional thus its non-compliance by petitioners is fatal, and has the effect of rendering the judgment appealed from, final and executory.

Aggrieved, petitioners filed the present Petition, on the following grounds, to wit:

I.

THE PUBLIC RESPONDENT NATIONAL LABOR RELATIONS COMMISSION COMMITTED GRAVE ABUSE OF DISCRETION AMOUNTING TO LACK AND/OR EXCESS OF JURISDICTION IN REQUIRING PETITIONER AGNES ESCALANTE AS SPECIAL ADMINISTRATIX TO PERSONALLY PAY THE ADDITIONAL BOND.

II.

THE PUBLIC RESPONDENT NATIONAL LABOR RELATIONS COMMISSION COMMITTED GRAVE ABUSE OF DISCRETION AMOUNTING TO LACK AND/OR EXCESS OF JURISDICTION IN DISMISSING THE APPEAL FOR FAILURE OF PETITIONERS TO PAY THE ADDITIONAL BOND.

In interposing this Petition, petitioners reiterate their arguments before the NLRC, that as special administratrix, petitioner Escalante merely took possession and charge of the goods, chattels, rights and, credits, and estate of the deceased Espinella Jison. She did not act as owner or employer of private respondent, as erroneously ruled by the Honorable Labor Arbiter and the Honorable Commission, and as such she should not be held personally liable for the payment of the monetary award ordered against them, nor of the appeal bond. Petitioners furthered that in filing the appeal before the NLRC, petitioner Escalante is merely protecting the interest of the Late Espinella Jison. She therefore should not be made to pay the additional bond requirement, in consonance with Rule 80 Section 2 of the Revised Rules of Court, which states: xxx A special administrator shall not be liable to pay any debts of the deceased unless so ordered by the court. By virtue of such provision, petitioners add that the Estate of the Late Espinella Jison should have been impleaded in the original case, so the payment of the additional bond can be justified before the Estate Proceedings pending before the RTC 69.

Moreover, petitioners pray for a relaxation of the rules, particularly the rule providing for the bond requirement in the perfection of an appeal before the NLRC. For this purpose, they cite Article 221 of the Labor Code, which reads:

Art. 221. Technical rules not binding and prior resort to amicable settlement. In any proceeding before the

Commission or any of the Labor Arbiters, the rules of evidence prevailing in courts of law or equity shall not be controlling and it is the spirit and intention of this Code that the Commission and its members and the Labor Arbiters shall use every and all reasonable means to ascertain the facts in each case speedily and objectively and without regard to technicalities of law or procedure, all in the interest of due process. xxx

OUR RULING

This being a Petition for Certiorari, the main question for Our resolution is whether or not the agency a quo acted with grave abuse of discretion, in the rendition of the assailed Resolutions.[9] An act of a court or tribunal may constitute grave abuse of discretion, when the same is performed in a capricious or whimsical exercise of judgment amounting to lack of jurisdiction. The abuse of discretion must be so patent and gross as to amount to an evasion of positive duty, or to a virtual refusal to perform a duty enjoined by law, as where the power is exercised in an arbitrary and despotic manner because of passion or personal hostility.[10]

After a judicious study of the the instant petition, We find no such grave abuse of discretion on the part of the NLRC. The Resolution rendered are in accord with the facts, the law and applicable jurisprudence, thus there is no whimsical, arbitrary or capricious exercise of judgment by it, as that which is equivalent in the eyes of the law, to a lack or in excess of jurisdiction.[11]

To explain our position, We shall address the grounds submitted by petitioners one by one.

On the first ground, it is worth mentioning that the arguments posed by petitioners are hinged upon their obstinate yet mistaken assumption that herein petitioner Escalante, is being impleaded and held liable to pay the appeal bond, in her personal capacity. This however has been negated and clarified by the NLRC, in its June 30, 2011 Resolution, when it stated in its disquisition, viz:

xxx It bears to stress that Respondent Agnes Escalante is impleaded, herein not in her personal capacity but in her capacity as Special Administratrix of the Estate of the Espinella Jison, part of which is Hacienda Hitaaw where complainant worked as a “Ronda” or watchman. We agree with the Labor Arbiter that, respondent Escalante maybe held answerable in her capacity as the special Administratrix of the estate of Espinella Jison, based on Article 212 of the Labor Code, which provides:

“Employer” includes any person acting in the interest of an employer, directly or indirectly. xxx

Respondent Escalante did not deny the fact that as an Administratrix, she took part in the management of the Hacienda, thus acting for and on behalf of the estate in matters concerning its operation. She was the one who confirmed to, herein complainant that he was suspended from his work as a “Ronda” for having given away lanzones fruits to the children without permission from the owner. In her position paper she contended that the act of suspending complainant was an exercise of management prerogative, and suggested that it was a form of business judgment on the part of the hacienda, but nobody else was pointed to as the one particularly exercising such management rights and prerogatives. What appears obvious to us is that respondent Agnes Escalante was, in all matters, the only visible representation of the estate of Espinella Jison, particularly of the hacienda. Simply put, she acted in the interest of complainant's employer which is the hacienda or estate, hence, she could not, now conveniently excuse herself from complying with the liabilities or responsibilities appertaining to the estate.

We find nothing arbitrary with the ratiocination of the NLRC above-quoted. It is supported by the facts as appreciated by the NLRC in the original case, and the deductions therein are further bolstered by petitioners' own factual assertions in the instant petition, viz:

16.0 Petitioner Agnes Escalante took over the management of the Hda. Hita-aw from her late uncle Francisco Jison on August 2007, after she was appointed xxx as Special Administratrix of the Estate of the Late Espinella Ayson Jison. xxx

17.0 xxx after her appointment petitioner Escalante merely continued to employ the services of private respondent as one of the watchmen “ronda” of the orchard plantation.

19.0 Subsequently private respondent was asked by petitioner Escalante on whether or not he stole fruits from the orchard. Private respondent admitted having stolen fruits in his letter Annex “E” of the position paper. Hence he was suspended from employment on 10 August 2010.

30.0 By filing this appeal, petitioner Escalante is merely protecting the interest of the estate of the late Espinella Jison who is the owner of Hda. Hita-aw until the same is properly settled. xxx

Inferredly, it was by petitioner Escalante's own judgment and own acts, for and on behalf of the estate, that private respondent was suspended/allegedly dismissed and, that a complaint for illegal dismissal was filed against petitioners. Thusly, it was by petitioner Escalante's own judgment and acts, that the appeal before the NLRC was interposed (still at petitioners' option), to assail the adverse decision of the Labor Arbiter against them. As the initiative for the appeal came from petitioner Escalante as special administrator, it is but logical that she complies with all the requisites for the commencement and maintenance thereof.

Needless to mention, the commencement and the maintenance of a suit on behalf of the estate, are recognized duties of a special administrator.[12] Since petitioner Escalante opted to perform this duty in the present case, she therefore has to pay the requisite bond.

On the second ground, We deem it important to remind petitioners that the right to appeal is not a natural right or a part of due process. It is merely a statutory privilege, and may be exercised only in the manner and in accordance with the provisions of law.[13] The party who seeks to avail of the same must comply with the requirements of the rules. Failing to do so, the right to appeal is lost.[14]

From the circumstances obtaining in the instant case, the conclusion is inescapable, that petitioners have lost their right to appeal from the November 19, 2010 decision of the Labor Arbiter, before the NLRC. Petitioners have not complied with all of the legal requisites for the perfection of their appeal, particularly the bond requirement set forth in Article 223 of the Labor Code. Though petitioners have posted a certain amount of cash as bond, it was “insufficient”, thus falling short of the prescription set in the aforementioned provision, and that of its related rules, in the NLRC's New Rules of Procedure, which respectively read:

ART. 223 of the Labor Code. xxx

In case of a judgment involving a monetary award, an appeal by the employer may be perfected only upon the posting of a cash or surety bond issued by a reputable bonding company duly accredited by the Commission in the amount equivalent to the monetary award in the judgment appealed from.

Rule VI of the New Rules of Procedure of the NLRC:

xxx

SECTION 4. REQUISITES FOR PERFECTION OF APPEAL. - (a) The Appeal shall be filed within the reglementary period as provided in Section 1 of this Rule; shall be verified by appellant himself in accordance with Section 4, Rule 7 of the Rules of Court, with proof of payment of the required appeal fee and the posting of a cash or surety bond as provided in Section 6 of this Rule; shall be accompanied by memorandum of appeal in three (3) legibly typewritten copies xxx A mere notice of appeal without complying with the other requisites aforesaid shall not stop the running of the period for perfecting an appeal.

xxx

SECTION 6. BOND. - In case the decision of the Labor Arbiter or the Regional Director involves a monetary

award, an appeal by the employer may be perfected only upon the posting of a cash or surety bond. The appeal bond shall either be in cash or surety in an amount equivalent to the monetary award, exclusive of damages and attorney's fees.

xxx

Even from a cursory reading of the foregoing it can be inferred that when Article 223 of the Labor Code was drafted, the lawmakers had no other intention but to require that the posting of a bond would be an indispensable requirement for perfection of an employer's appeal.[15] Having made the bond indispensable, it can likewise be inferred that the lawmakers had no other intention but to require that the bond to be posted, must be the whole amount of the Labor Arbiter's Award, excluding damages, and attorney's fees.[16]

Petitioners are praying, that We set aside these alleged "technicalities" in the light of Article 221 of the Labor Code, and accordingly direct the NLRC to give due course to their appeal, sans the required "sufficient bond". This We cannot rightfully do. Settled is the rule that Article 223 of the Labor Code, is a rule of jurisdiction and not a rule of procedure that could be treated liberally. Being a rule of jurisdiction, it is strictly construed and there is little leeway for condoning a liberal interpretation thereof.[17] As no liberality could be availed of, on the basis that the prescriptions of the said provision are allegedly "mere technicalities", it follows that no grave abuse of discretion could be ascribed to the NLRC in dismissing petitioners' appeal, on the sole basis of the "insufficiency" of their bond.

It is worth-mentioning that the appeal bond is intended by the lawmakers as a safeguard to ensure that the employee can target the properties of the employer on which he or she can execute upon in the event of a final, providential award against the employer. It is intended to discourage employers from using an appeal as a means to delay, or evade, their obligation to satisfy their employees' just and lawful claims.[18] Certainly, the non-payment, or in this case, the woefully insufficient payment of the appeal bond by petitioners frustrates these ends.

Moreover, We also do not find grave abuse of discretion on the part of the NLRC, in disallowing petitioner's motion to reduce the bond. The implied power of the NLRC to reduce bond is not a matter of right on the part of the movant, but lies within the sound discretion of the NLRC[19]. This discretionary authority is not unbridled and is subject to guidelines provided by the Rules and jurisprudence.

The last paragraphs of Section 6, Rule 6 of the NLRC's New Rules of Procedure, are explicit that:

No motion to reduce bond shall be entertained except on meritorious grounds and upon the posting of a bond in a reasonable amount in relation to the monetary award.

The filing of the motion to reduce bond without compliance with the requisites in the preceding paragraph shall not stop the running of the period to perfect an appeal.

In *Garcia, et. al. vs. KJ Commercial and Reynaldo Que*, [20] promulgated on February 29, 2012, the Highest Court in clarifying the NLRC Rules on posting and reduction of bond, has mentioned several cases where the rules have been relaxed to bring about the immediate and appropriate resolution of controversies on the merits. Some of these cases include:

"(a) counsel's reliance on the footnote of the notice of the decision of the labor arbiter that the aggrieved party may appeal within ten (10) working days; (b) fundamental consideration of substantial justice; (c) prevention of miscarriage of justice or of unjust enrichment, as where the tardy appeal is from a decision granting separation pay which was already granted in an earlier final decision; and (d) special circumstances of the case combined with its legal merits or the amount and the issue involved.

In *Nicol v. Footjoy Industrial Corporation*,^[21] the Court reviewed the jurisprudence respecting the bond requirement for perfecting appeal and summarized the guidelines under which the NLRC must exercise its discretion in considering an appellant's motion for reduction of bond, viz:

[T]he bond requirement on appeals involving monetary awards has been and may be relaxed in meritorious cases. These cases include instances in which (1) there was substantial compliance with the Rules, (2) surrounding facts and circumstances constitute meritorious grounds to reduce the bond, (3) a liberal interpretation of the requirement of an appeal bond would serve the desired objective of resolving controversies on the merits, or (4) the appellants, at the very least, exhibited their willingness and/or good faith by posting a partial bond during the reglementary period.

Taking into consideration the case law and the rule aforequoted, it cannot be gainsaid that herein petitioners have not alleged nor proven, any justifiable ground to reduce their appeal bond. Other than their stubborn assertion that as a mere special administratrix, petitioner Escalante, cannot be made personally liable to pay the bond and if made liable, the bond should be reduced as it would come from her own pocket, petitioners have not shown any other valid reason as to create for them an exception from the strict application of Article 223. To Us their assertion does not in any way fall under the purview of what is "meritorious" as contemplated by the pertinent rule, and thus, it cannot put into operation the NLRC's authority to reduce petitioners' bond, implied therein.

Further, there is gross disparity in the bond posted by petitioners from the Labor Arbiter's monetary award. The amount adjudged by the Labor Arbiter against petitioners was P121,210.34, but petitioners only paid the miniscule amount of Php20,000.00. Surely, this is not the amount considered by the pertinent rule as "reasonable".

More to the foregoing, petitioners failed to pay the deficiency in the bond, to complete the amount, when they filed their Motion for Reconsideration of the NLRC Resolution dismissing their appeal. This failure consequently made the decision of the Labor Arbiter final and executory, as has been held in the same case of *Garcia, et. al. vs. KJ Commercial and Reynaldo Que*, viz

"In order to give full effect to the provisions on motion to reduce bond, the appellant must be allowed to wait for the ruling of the NLRC on the motion even beyond the 10-day period to perfect an appeal. If the NLRC grants the motion and rules that there is indeed meritorious ground and that the amount of the bond posted is reasonable, then the appeal is perfected. If the NLRC denies the motion, the appellant may still file a motion for reconsideration as provided under Section 15, Rule VII of the Rules.

If the NLRC grants the motion for reconsideration and rules that there is indeed meritorious ground and that the amount of the bond posted is reasonable, then the appeal is perfected. If the NLRC denies the motion, then the decision of the labor arbiter becomes final and executory.

Owing to the disparity in amount and petitioners' subsequent failure to complete the bond during their Motion for Reconsideration, there is overwhelming reason to conclude: 1) that there was no substantial compliance with the law and the rules in the posting of the requisite bond for the perfection of the appeal; 2) that because of this non-compliance, the running of the period to perfect appeal did not stop; that because the running of the period to appeal did not stop, the decision of the Labor Arbiter appealed from, has become final and executory; and that because the Labor Arbiter's decision has become final and executory, there is no grave abuse of discretion on the part of the NLRC in dismissing petitioners' Appeal with finality.

WHEREFORE, premises considered, the instant petition is DENIED. The assailed Resolutions dated March 4, 2011 and June 30, 2011, of the National Labor Relations Commission, 7th Division of Cebu City in NLRC Case No. VAC-01-000072-2011 are AFFIRMED.

SO ORDERED.

Delos Santos, and Lopez, JJ., concur.

[1] Rollo, pp. 3-23.

[2] Rollo, pp. 28-31.

[3] Rollo, pp. 33-36.

[4] Rollo, pp. 48-49.

[5] Rollo, pp. 81-87.

[6] Rollo, pp. 88-90

[7] Rollo, pp. 110-116.

[8] Rollo, pp.37-44.

[9] Francisco P. Soriano, Jr. vs. NLRC, G.R. No. 165594, April 23, 2007.

[10] Angeles vs. Secretary of Justice, G.R. No. 142612, July 29, 2005.

[11] Metropolitan Bank and Trust Company vs. Hon. Salvador Abad Santos, G.R. No. 157867, December 15, 2009.

[12] Rule 80 of the Revised Rules of Court:

Sec. 2. Powers and duties of special administrator. - Such special administrator shall take possession and charge of goods, chattels, rights, credits, and estate of the deceased and preserve the same for the executor or administrator afterwards appointed, and for that purpose may commence and maintain suits as administrator. He may sell only such perishable and other property as the court orders sold. A special administrator shall not be liable to pay any debts of the deceased unless so ordered by the court.

[13] Building Care Corporation et. al., vs. Myrna Macaraeg, G.R. No. 198357, December 10, 2012.

[14] Lipanto Consolidated Mining Corporation vs. Belio Icao, January 15, 2014.

[15] University Plans Inc. vs. Belinda P. Solano, et. al., G.R. No. 170416, June 22, 2011.

[16] Andrew James Mcburnie vs. Eulalio Ganzon, et.al., G.R. Nos. 78034 and 178117, G.R. Nos. 186984-85, October 17, 2013, Computer Innovations Center/Nelson Yu Quilos vs. NLRC, et. al., G.R. No. 152410, June 29, 2005.

[17] Computer Innovations Center/Nelson Yu Quilos vs. NLRC, et. al., G.R. No. 152410, June 29, 2005.

[18] Accessories Specialist, Inc. v. Alabanza, G.R. No. 168985, 23 July 2008

[19] Ramirez vs. Court of Appeals, G.R. No. 182626, December 4, 2009.

[20] G.R. No. 196830

[21] G.R. No. 159372, July 27, 2007.

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.