

NAPOLEON A. ABIERA, COMPLAINANT, VS. JUDGE BONIFACIO SANZ MACEDA, REGIONAL TRIAL COURT, BR. 12, SAN JOSE, ANTIQUE, RESPONDENT.

A.M. No. RTJ-91-660. June 30, 1994

Ponente: BELLOSILLO, J.

Read online (full-text search, related cases, audio case brief): <https://batas.org/library/e31210fd011a/>

BELLOSILLO, J.:

JUDGE BONIFACIO SANZ MACEDA of the Regional Trial Court, Br. 12, San Jose, Antique, is administratively charged by District Public Attorney Napoleon A. Abiera with grave abuse of discretion and misconduct relative to a civil case[1] pending before respondent judge, and with gross dishonesty and inefficiency in deliberately falsifying his certificates of service, and failing to decide cases submitted for decision within the reglementary period prescribed by the Constitution.

The charge of grave abuse of discretion and misconduct stemmed from the Order of 20 December 1990 issued by respondent judge suspending complainant from the practice of law.

It appears that both counsel of the parties previously agreed to set Civil Case No. 2119 for hearing on 20 to 22 August 1990. On 20 August 1990, however, complainant requested the Court Interpreter for a second call of the case because he would first attend the trial of another case in Br. 11 of the same court.[2] At 11:15 that same morning, after waiting for complainant in vain, Civil Case No. 2119 was called for the second time. However, neither the complainant nor his clients appeared. As a result, respondent judge declared in open court that plaintiffs were deemed to have waived further presentation of their evidence.

On 21 August 1990, upon being informed of the Order of 20 August 1990, but before receiving a copy thereof, complainant verbally explained to respondent judge that his non-appearance at the hearing was due to the lengthy cross-examination of a witness in Crim. Case No. 3839 then being heard before Br. 11. On the basis thereof, he moved for reconsideration of the aforesaid order. Respondent judge denied the motion. Subsequently, complainant requested that the proceedings be suspended in order that he could secure a copy of the Order of 20 August 1990, but the same was also denied. Thus, the hearing of Civil Case No. 2119 proceeded with the presentation by defendants of their evidence. Complainant participated fully in the proceedings by raising objections and cross-examining defendants' witness.

On 23 August 1990, complainant received the Order of 20 August 1990. On 5 September 1990, he filed a motion for reconsideration of the Order of 20 August 1990 praying that the proceedings of 21 August 1990 be canceled and that plaintiffs be allowed to finish the presentation of their evidence.[3]

On 7 December 1990, respondent judge not only denied the motion for reconsideration of complainant but also ordered him -

x x x to show cause in writing within five (5) days from today or not later than the close of office on December 12, 1990 why he should not be punished for contempt and/or otherwise disciplinar(ily) dealt with for abusing

the court in participating and agreeing in the reception of evidence for the defendants on August 21, 1990 but only to ask maliciously later for its nullification and why no other liability should attach to him by reason of the heretofore described acts and/or omission of deceit, malpractice and gross misconduct.[4]

On 17 December 1990, complainant filed his Compliance within the extended period by registered mail posted in Manila. However, respondent's court received the same only on 26 December 1990. Earlier, on 20 December 1990, respondent judge already issued an order suspending complainant from the practice of law.

Complainant questioned the validity of the Order of 20 August 1990 before this Court through a petition for certiorari.[5] On 26 August 1991, we vacated this order upon a finding that complainant was not afforded procedural due process and ordered the records of the case returned to the sala of respondent judge, who may, if he was so minded, refile the proceedings for the suspension of complainant by following the procedure prescribed in Rule 138 of the Rules of Court.[6]

Upon receipt of our resolution, complainant filed the instant administrative complaint against respondent judge.

In his first cause of action, complainant claims that respondent judge acted in bad faith in issuing his Order of 20 December 1990. He asserts that respondent's perception that he (complainant) feigned ignorance of the Order of 20 August 1990 is disproved by the record of the proceedings. He further argues that his participation in the trial of 21 August 1990 was not a waiver of his objections to the Order of 20 August 1990; that he could not file his written motion for reconsideration as respondent judge declared him in contempt in another case and ordered his detention; and, that the motion for reconsideration was formalized during his detention and filed only on 5 September 1990.

He further posits that respondent's words "machination x x x made via a clever use of the filthy instruments of a devil's advocate - wily submissions and a smiling fox's pleading x x x" used in the Order of 7 December 1990 are indecent and unbecoming a member of the judiciary. He concludes that the issuance of the Order of 20 December 1990 was due to the intense dislike, or even hatred, of respondent judge for complainant and his relative, Cong. Exequiel Javier of Antique.

With regard to his second cause of action, complainant claims that respondent willfully falsified his monthly certificates of service covering the periods from February to September 1989, February to April 1990, and June to October 1990. He contends that respondent judge certified that he had no pending unresolved civil and criminal cases when in fact he had eight (8) civil cases and ten (10) criminal cases unresolved within ninety (90) days from date of their submission for decision. He submits that such falsification enabled respondent to receive his salaries and allowances.[7]

Respondent judge, in his answer, asserts that he has been fair and impartial to complainant, as evidenced by a list of cases where the latter received favorable action. He however maintains that complainant's effort "to trifle with the judicial proceedings in Civil Case No. 2119 must not be tolerated and should be penalized to protect and uphold the integrity of the court."

Respondent also avers that the initial hearing of Civil Case No. 2119 was set on 20 February 1987; since that date until 7 March 1990, complainant had already obtained seventeen (17) postponements; in one case,[8] respondent had advised complainant to arrange his calendar to avoid any conflict in schedules which already seemed to be his pattern; the hearing on 20 August 1990 was fixed by both counsel of the parties and respondent merely adopted the same; while complainant had a scheduled hearing on the same date in another sala, the conflict in schedules was not the making of respondent but the fault of complainant who undertook to appear in two (2) branches of the court at the same time; complainant neither required Atty. Rolando Vedeja, the PAO lawyer assigned to respondent judge, to appear in his stead nor did he direct his clients to attend the hearing; their absence was

intentionally planned by complainant to demean respondent and to make him wait for them; on 30 August 1990, complainant committed a contemptible "showboating" towards the court in another case[9] for which respondent cited him for direct contempt and sentenced him to ten (10) days imprisonment; in his written motion for reconsideration of the Order of 20 August 1990, complainant made the impression that he learned of the order only when he received copy of the same on 23 August 1990 and the written motion was formalized while he was under detention; such impression showed complainant's bad faith; the motion for reconsideration could not have been formalized during complainant's detention because it is dated 24 August 1990, six (6) days before his imprisonment; his motion for reconsideration prayed for the nullification of the entire proceedings not of 20 August but of 21 August 1990 where he participated as fully as he could until the Galera spouses completed the presentation of their evidence; when the defendants were given time to submit a written offer of their evidence, complainant offered no objection; complainant purposely withheld the filing of his motion for reconsideration until his receipt of a copy of the written Offer of Exhibits by counsel for defendants; and, such actuations are wily, dilatory and obstructive.

On the second cause of action, respondent judge states that most, if not all, of the subject cases mentioned in the complaint were inherited from his predecessor. He adds that on 14 January 1989, during the 11th Judicial Conference in Libertad, Antique, then Chief Justice Fernan granted him an extension to deal with all the cases then pending decision in his sala. Respondent also points out that on 30 August 1990 and 25 September 1990, this Court granted him an extension to decide twenty-eight (28) cases.[10] Again, on 23 April 1991, he was granted an extension to decide a set of thirteen (13) newly-filed cases.[11] Respondent claims that all cases mentioned by complainant were part of the twenty-eight (28) cases decided by him within the extended period granted him.

Finally, respondent judge contends that the complainant filed this case "not only out of resentment and hate against (him) but it is (also) what your respondent has earlier branded as complainant Abiera's wily submission and smiling fox's pleading." Respondent judge further states that, in contrast, the greater sector of Antique has favorably recognized his judicial actuations as shown by his receipt of several plaques of appreciation.[12]

On 4 June 1992, the Court En Banc referred the case to Associate Justice Jaime N. Lantin of the Court of Appeals for investigation, report and recommendation.[13]

On 3 August 1993, the investigating justice submitted his report.[14] On the first cause of action, i.e., grave abuse of discretion and misconduct, he states that he concurs with our resolution in G.R. No. 96636 holding the suspension Order of 20 December 1990 null and void for non-observance of the prescribed procedure, adding that

-

x x x there was nothing contumacious in complainant Abiera's conduct as would warrant his suspension from the practice of law. The participation by Abiera in the hearing of August 21, 1990 should not be taken against him. Under the circumstances, where the verbal motion to suspend proceedings were denied, the most that could be expected of complainant Abiera was to participate and scrutinize the evidence presented by his opponent as a measure to protect the interest of his clients, and such participation did not bar him from subsequently questioning the Order of August 20, 1990, considering that at that time, he was not yet formally served a copy of the written order of August 20, 1990. It is the right and duty of complainant to exhaust all possible and available processes and/or remedies provided by law to protect the interest of his clients. Moreover, it would appear that the Order of August 20, 1990, constituted a violation of plaintiffs' right to due process considering that plaintiffs were deprived of their right to present further evidence.

Time and again, courts are reminded to use their contempt power with restraint and only in case of a clearly contumacious conduct. Contempt of court presupposes a contumacious attitude, a flaunting, or arrogant belligerence, a defiance of the court and it is not clearly established in this case.

x x x x

The suspension of complainant Abiera from the practice of law through an improper and invalid exercise of the contempt power of the court and in clear violation of the prescribed procedure for suspension, is unjust and manifests a deliberate intent to do injustice -- a grave misconduct for which he should be held administratively accountable.

On the second cause of action, respondent judge is charged with gross dishonesty and serious inefficiency predicated on various certificates of service, particularly referring to those dated 6 February 1989 to 10 October 1990 (Exhs. "M" to "M-16") allegedly falsified by him, and for failure of respondent Judge to decide the eighteen (18) cases, subject matter of the action, within the 90-day period provided by the Constitution. Complainant claims that respondent Judge did not decide the criminal and civil cases enumerated in the Resolution of the Investigator dated 17 May 1993 within a period of 90 days from their submission for decision and, despite such failure, respondent prepared and submitted falsified certificates of service so as he would be paid his salaries. But, as the Investigating Justice found -

x x x that respondent Judge upon his request was granted extensions by the Hon. Supreme Court in its Resolutions of August 30, 1990, September 25, 1990 and April 23, 1991, all giving an additional period of 90 days from notice within which respondent Judge shall decide the subject cases. And the facts would show that respondent Judge resolved all the subject cases within the 90-day extension period. It is the view of the Investigator that the said resolution of the Hon. Supreme Court had actually three effects. First, the resolutions gave respondent Judge an additional period of 90 days from receipt of notice thereof within which to decide subject cases. Second, the resolutions constituted an implied retroactive extension from the lapse of the original 90-day period. Third, the said resolutions also constituted an implied condonation by Hon. Supreme Court on the failure of respondent Judge to resolve subject cases within and after the lapse of the original 90-day period. Necessarily, the charge for gross dishonesty and serious inefficiency holds no water and, therefore, the respondent Judge should be exonerated therefrom.

On the basis of the foregoing findings, the Investigating Justice recommends that respondent Judge Bonifacio Sanz Maceda be ordered to pay a fine of P2,000.00 for grave misconduct in unlawfully suspending from the practice of law District Public Attorney Napoleon Abiera; and, that he be exonerated from the charge of gross dishonesty and serious inefficiency for allegedly failing to decide cases within the prescribed period.

We cannot agree fully with the aforecited recommendations of the Investigating Justice.

Let it be stressed that the Court does not condone the manner by which complainant was suspended from the practice of law. This was made clear in our Resolution of 26 August 1991 in G.R. No. 96636 when we set aside the Order of 20 December 1990 for being null and void as it failed to comply with Rule 138 of the Revised Rules of Court. Our disapproval however should not be construed as an indication that respondent judge's erroneous order merits administrative sanction, otherwise, we would have imposed the sanction then and there if in every proceeding for certiorari we punish a judge for grave abuse of discretion.

As a general rule, the acts done by a judge in his judicial capacity are not subject to disciplinary action, even though erroneous.[15] These acts become subject to our disciplinary power only when they are attended by fraud, dishonesty, corruption or bad faith. A re-evaluation of the case at bar presents no occasion for us to depart from the general rule.

The records show that Civil Case No. 2119 has long been pending presentation of plaintiffs' evidence. Yet, respondent judge has been very lenient in granting motions for postponements to both counsel of the parties, more particularly to counsel for plaintiffs. Of the twenty-seven (27) motions for postponement granted, seventeen (17) of these were filed by complainant as counsel for plaintiffs, four (4) by agreement of the parties, one (1) by reason

of the stenographic reporters' strike, and five (5) by motion of defendants.[16] Finally, upon prior agreement of both counsel for plaintiffs and defendants, respondent judge set the case for hearing on 20 to 22 August 1990.

Given this factual backdrop, complainant's non--appearance at the hearing despite his previous commitment and his personal request for a second call of the case inevitably pushed the patience of respondent judge to the limit. In his Order of 20 August 1990, respondent tersely declared that "(t)he complaint in the case was filed on 18 June 1986 and plaintiffs have not even rested their case due to repeated postponements asked by plaintiffs. This Court cannot tolerate further delay in the proceedings of this case." [17]

A reading of the Order of 20 December 1990 [18] discloses that respondent judge was not without reason in imposing a disciplinary sanction against complainant. The latter's proffered excuse of a protracted cross-examination in Br. 11 was a mere subterfuge. As we view it, the fault indeed lies in his failure to keep a systematic record of his cases set for hearing. As it happened, complainant appears to have learned only on 19 August 1990 that on the following day, 20 August 1990, he had to attend simultaneously to two (2) cases in different branches of the court. [19] Faced with a conflict in schedules, complainant made no move to transfer the hearing of either case. Perhaps he thought he could cope with the situation. [20] Unfortunately, he was wrong. Obviously, complainant's predicament then was of his own doing. Therefore, the hearing of another case in Br. 11 could not be made a shield for his blunder.

A hard look at complainant's oversight also reveals that he was unprepared for the trial on 20 August 1990. The plaintiffs who were then his clients were not even present in court. As the Investigating Justice correctly pointed out, readiness for trial is to be prepared with his witness for that day. [21] In his testimony, complainant stated that plaintiffs were with him and that he advised them to await the second call of the case. [22] For their part, plaintiffs claimed otherwise. They countered that "(they) would have been in court on August 20, 1990 to present further evidence had Atty. Abiera informed (them) of the hearing but he did not." [23]

We are more inclined to believe the submission of plaintiffs. For, other than his testimony, complainant presented no corroborating evidence. On the other hand, logic dictates that if plaintiffs were indeed present, respondent judge would not have issued the Order of 20 August 1990, otherwise, had he done so, plaintiffs would have promptly protested against it, or respondent judge could have asked them to call for their counsel who was in Br. 11. The whole incident plainly underscores the truth, which eludes some lawyers, that an orderly schedule, a punctual appearance at court hearings, and preparedness for trial highly contribute to the speedy disposal of cases.

We also note that since complainant personally requested a second call, courtesy demands that he should have at least informed respondent judge of his predicament. But he did not. Complainant's reason that the matter slipped his mind [24] is flimsy and clearly indicates a lack of respect not for the sake of the incumbent judge but for the court owing to its importance. [25]

In his Order of 20 December 1990, respondent judge deplored the strategy of complainant in withholding the filing of his motion for reconsideration until defendants filed their Offer of Exhibits on 5 September 1990. He claims that he could not file his motion earlier because on 30 August 1990 he was detained by respondent judge for contempt in another case so that he had to formalize his motion while in detention.

Again, we are not persuaded. He is less than candid to the court. His argument is belied by his own motion for reconsideration which is dated 24 August 1990. Evidently, it was prepared six (6) days before he was detained. In this regard, respondent judge aptly observed -

The filing of the subject motion for reconsideration on the same day, September 5, 1990, adverse counsel filed his formal written offer of exhibits for defendants may truly be coincidental. But, holding on to the motion until September 5, 1990, or twelve (12) days after its date of execution on August 24, 1990, is clearly a

coincidence purposely made to coincide. It should even become anomalous if it is considered that Atty. Abiera received the two separate orders dated August 20 and 21, 1990 at the same time at 3:00 P.M. on August 23, 1990 while adverse counsel received personally his copy of the order dated August 20 the following day on August 21 and later his copy of the August 21 order was received on August 22.[26]

Moreover, respondent judge can hardly be blamed for taking complainant to task for not being factual in his motion for reconsideration when he states[27] -

1. That the undersigned counsel received the order dated August 20, 1990 on August 23, 1990 at 3:00 o'clock in the afternoon, declaring the plaintiffs to have waived presenting evidence in their favor for failure of plaintiffs and counsel to appear in Court on August 20, 1990;
2. That on August 20, 1990 counsel for the plaintiffs appeared together with the counsel for the defendants in Criminal Case No. 3879 entitled, PP vs. Anselmo Pagunsan, et al., for Violation of RA 6455 before RTC, Branch 11 as counsels (sic) for the accused and Capt. Zenaida Sinfuego of the PCCL, Camp Delgado, Iloilo City, testified for the prosecution. The setting was earlier requested by Capt. Sinfuego herself, appearing in the Order of the Honorable Presiding Judge given in chamber last June 18, 1990;
3. That before the start of the session of Branch 11, the undersigned counsel informed the Court Interpreter of Branch 12, that he would request for a second call since he will (sic) appear in Criminal Case No. 3839 before Branch 11;
4. That unfortunately due to the lengthy direct and cross-examination of the witness on the stand in Criminal Case No. 3839, the second call requested for Civil Case No. 2119 was ahead a few minutes than that of the termination of the proceedings in Criminal Case No. 3839 and the reason why counsel was not around as well as the counsel for the defendants when the second call for Civil Case No. 2119 was made x x x x

Apparently, the aforesaid motion creates the impression that complainant had no knowledge of the Order of 20 August 1990 nor of the proceedings of 21 August 1990 where he fully participated. The misleading statement in complainant's motion led respondent to rule that -

What stands out is an effort to trifle with judicial proceedings of this court. Worse, the machination is made via a clever use of the filthy instruments of a devil's advocate - wily submissions and a smiling fox's pleading - executed with the use of legal knowledge by an officer of the court, Atty. Napoleon Abiera, who is sworn to protect and uphold the dignity and authority of the court.

Thus, Atty. Abiera submits - at least sub silencio - that he was unaware of the August 20, 1990 order (received by him on August 23, 1990) declaring his clients, the plaintiffs herein to have waived further presentation of their evidence when he entered into trial on August 21, 1990. And, because of his lack of knowledge of such order he did not object to the presentation of defendants' evidence on August 21. Hence, the court should cancel and nullify all the proceedings had on August 21, including his own cross examination of Mrs. Floreta Pillo Galera and the court should also set aside Exhibits "1" to "3" for the defendants and Exhibits "C" to "E-3" for the Third Party Plaintiffs, inclusive, even if such exhibits have all been previously identified in his presence and without his objection.

x x x x

Granting that Atty. Abiera never learned of the order of August 20 but his appearance on August 21 for the reception of evidence for the defendants must have adequately apprised him that further presentation of evidence for his client was summarily terminated and shut because defendants were allowed to present their evidence even before he could close and offer the evidence for his clients.

Not only that, Atty. Abiera did not even raise a quibble when adverse counsel asked in open court for time to file formal written offer of exhibits for the defendants.

x x x x

The intention to manipulate in a hidden fashion a coated image of innocence in counsel's submission is all too clear as crystal to escape notice. The conduct is not simply odd but exhibits an effort to trifle with the court. Such conduct plainly makes a mockery of judicial proceedings and makes a fool of this court.”[28]

Indeed, candor towards the courts is a cardinal requirement of a practicing lawyer.[29] Complainant's aforequoted motion for reconsideration could barely measure up to this criterion. The concealment of the facts naturally did not earn sympathy for him.

In his Compliance with the Order of 7 December 1990, complainant clarified his misleading statement. He mailed his Compliance in Manila by registered mail on 17 December 1990. However, the same was received by respondent court only on 26 December 1990. In the meantime, respondent judge had already issued the order of 20 December 1990 suspending him from the practice of law.

Considering the foregoing circumstances, we find no malice in the actuations of respondent judge. We perceive from his Order of 20 December 1990 the zeal to uphold the dignity of the court and the seriousness with which he takes his task as dispenser of justice. His record at the Office of the Court Administrator attests to his earnest efforts in reducing his heavy caseload and instilling discipline in his court. As the aforesaid order reveals, he would not tolerate any attempt at disrespect towards the court nor permit the use of double talk from any member of the Bar. Such attitude may be severe and inflexible at times but in the case at bench, his actuations do not constitute grave abuse of discretion and misconduct to justify the imposition of an administrative sanction.

On the other hand, complainant should be reminded of his primary duty to assist the court in the administration of justice. It bears stressing that the relations between counsel and judge should be based on mutual respect and on a deep appreciation by one of the duties of the other.[30] It is upon their cordial relationship and mutual cooperation that the hope of our people for speedy and efficient justice rests.

As regards the charge of gross dishonesty and serious inefficiency, we affirm the recommendation of the investigating justice that the same should be dismissed for being baseless.

WHEREFORE, the complaint against JUDGE BONIFACIO SANZ MACEDA, Regional Trial Court, Br. 12, Antique, now detailed in Naval, Biliran, Br. 16, for grave abuse of discretion and misconduct, gross dishonesty and serious inefficiency, and failing to decide cases within the reglementary period, is DISMISSED.

SO ORDERED.

Narvasa, C.J., Cruz, Feliciano, Padilla, Bidin, Regalado, Davide, Jr., Romero, Melo, Quiason, Puno, Vitug, Kapunan, and Mendoza, JJ., concur.

[1] Cepeda v. Galera, Civil Case No. 2119.

[2] People v. Pagunsan, Crim. Case No. 3839.

[3] Exh. "D," Complainant's exhibits.

[4] Exh. "E," id.

[5] Abiera v. Sanz Maceda, G.R. No. 96636.

[6] Id., First Division Resolution dated 26 August 1991.

- [7] Rollo, pp. 1-5, 126-162.
- [8] *People v. Bertolano*, Crim. Case No. 3455.
- [9] *People v. Boston*, Crim. Case No. 4220.
- [10] A.M. No. 90-2008-RTC-Re: Request for extension of time to decide cases, Exh. "83," Respondent's exhibits.
- [11] Exh. "84," *id.*
- [12] Rollo, pp. 61-111, 163-188.
- [13] *Id.*, p. 57.
- [14] *Id.*, pp. 189-217.
- [15] See *Libarios v. Dabalos*, A.M. No. RTJ-89-286, 11 July 1991, 199 SCRA 48, 55.
- [16] Rollo, p. 65.
- [17] Exh. "C," Complainant's exhibits.
- [18] Exh. "A," *id.*
- [19] TSN, 22 September 1992, p. 15.
- [20] TSN, 23 September 1992, pp. 70-71.
- [21] *Id.*, p. 83.
- [22] TSN, 12 November 1992, p. 52.
- [23] Exh. "28," Respondent's exhibits.
- [24] TSN, 23 September 1992, p. 77.
- [25] See *Garcia v. Alconcel*, Adm. Matter No. 2499-CCC (OCA--101), 30 January 1982, 111 SCRA 178, 184.
- [26] Exh. "A-4," Complainant's exhibits.
- [27] Exh. "D," *id.*
- [28] Exh. "A-3," *id.*
- [29] *Paluwagan ng Bayan Savings Bank v. King*, G.R. No. 78252, 12 April 1989, 172 SCRA 60, 69; Canon 10, Code of Professional Responsibility.
- [30] *Romero v. Valle, Jr.*, Adm. Matter No. R-192-RTJ, 9 January 1987, 147 SCRA 197, 201-202.

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.