

WASHINGTON DISTILLERS, INC., MANUEL CO KEHYENG, CHONGKING KEHYENG, QUIRINO KEHYENG, JASMIN KEHYENG AND PURITA KEHYENG, PETITIONERS, VS. COURT OF APPEALS AND LA TONDEÑA DISTILLER...

G.R. No. 118151. August 22, 1996

Ponente: MENDOZA, J.

Read online (full-text search, related cases, audio case brief): <https://batas.org/library/g-r-no-118151/>

MENDOZA, J.:

This is a petition for review of the decision,[1] promulgated on June 27, 1994, of the Court of Appeals in CA-G.R. SP No. 32752, reversing the order dated August 31, 1993 of the Regional Trial Court, Branch XXVIII, Manila,[2] which quashed the search warrant issued against petitioners, and the appellate court's resolution dated December 1, 1994 denying petitioners' motion for reconsideration.

The facts are as follows:

Petitioner Washington Distillers, Inc., which is owned and operated by petitioners Manuel Co, Chongking, Quirino, Jasmin and Purita, all surnamed Kehyeng, is a domestic corporation with principal office and business address at Sta. Lucia, San Fernando, Pampanga. It is engaged in the manufacture of liquor products, under the labels Gin Seven, Washington Gin 65, Luzon and Anisado, using as containers 350cc round white flint bottles with blown-in marks of La Tondeña, Inc. and Ginebra San Miguel.

On the basis of Search Warrant No. 93-64 issued by Hon. Rosalio G. de la Rosa, Presiding Judge, Branch XXVIII of the Regional Trial Court of Manila, agents of the National Bureau of Investigation seized on May 26-27, 1993 from the premises of petitioners in San Fernando, Pampanga, 314,289 pieces of 350cc round white flint bottles, for alleged violation of Republic Act No. 623, as amended by Republic Act No. 5700.[3] The bottles were seized upon complaint of private respondent La Tondeña Distillers, Inc., a domestic corporation engaged in the business of manufacture and sale of wines and liquors. Among private respondent's products is a gin popularly known as Ginebra San Miguel, which is bottled and sold in 350cc round white flint bottles especially ordered by private respondent for its exclusive use, with blown-in marks La Tondeña, Inc. and Ginebra San Miguel. The trademarks are registered with the Bureau of Patents, Trademark and Technology Transfer under the provisions of Republic Act No. 623.[4]

In a letter dated May 20, 1993 to the Director of the National Bureau of Investigation, private respondent requested assistance in prosecuting alleged illegal users, buyers, sellers or traffickers of its registered bottles.[5] In response to private respondent's request, NBI agents Florencio Corpuz and Dante Jacinto, accompanied by Atty. Jaime de la Cruz, private respondent's legal counsel, conducted surveillance operations at the premises of petitioner Washington Distillers in Sta. Lucia, San Fernando, Pampanga. In his affidavit given in support of the application for a search warrant, Atty. De la Cruz stated that by pretending to be dealers in second hand bottles, he and the NBI agents were able to enter the warehouse of Washington Distillers and discovered that petitioner Washington Distillers had been buying the empty bottles from junk dealers at a price higher than that offered by

private respondent for retrieving its bottles.[6] NBI Agent Florencio Corpuz, on the other hand, said in his affidavit that inside the warehouse they saw empty bottles, estimated to be in the thousands, placed in sacks and cartons, which they examined and found to be La Tondeña's registered 350cc round white flint bottles.[7] Based on these affidavits, Atty. Dante J. Jacinto, Senior Agent of the NBI, filed with Branch XXVIII of the Regional Trial Court of Manila an application for a warrant to search the premises of Washington Distillers and to seize empty and filled 350cc round white flint bottles with blown-in marks of Ginebra San Miguel and La Tondeña, Inc.

On May 25, 1993, Executive Judge Rosalio G. de la Rosa issued a search warrant, pursuant to which agents of the NBI seized from the premises of petitioners 314,289 pieces of 350cc round white flint bottles,[8] of which 3,708 were filled and 310,581 were empty.[9] The seized bottles were deposited in the warehouse of private respondent La Tondeña Distillers, Inc. in Velasquez, Tondo, Manila on the ground that there was no space for storage in the court or in the NBI compound.[10]

On June 9, 1993, petitioners filed a motion to quash the search warrant on the ground that the Regional Trial Court of Manila had no jurisdiction to issue a search warrant to be executed in San Fernando, Pampanga. In addition, they claimed that there was no probable cause for issuing the search warrant because R.A. No. 623 does not cover registered bottles of liquor manufacturers and that even assuming that it does, under §5 of the law, no action could be instituted against petitioners because the bottles had lawfully been sold to them.[11] Petitioners charged that the private respondent was guilty of forum-shopping because twice it had applied for a search warrant over the same subject to the Regional Trial Court of San Fernando, Pampanga. Indeed, it appears that the first search warrant (Search Warrant No. 6) was issued on August 19, 1991, and the second (Search Warrant No. 11) was issued on December 2, 1992 but it was later quashed for lack of probable cause. On certiorari to the Court of Appeals, the order of the trial court was set aside.[12]

On August 31, 1993, Hon. Antonio L. Descallar, who had been designated assisting judge of Branch XXVIII, granted petitioners' motion to quash. He found private respondent guilty of forum-shopping and ruled that the Regional Trial Court of Manila had no authority to issue a search warrant effective outside its territorial jurisdiction.[13] He, therefore, directed the private respondent La Tondeña to return the bottles to petitioners within 48 hours from receipt of his order.

Private respondent filed a motion for reconsideration and a motion to suspend the execution of the order for the return of the bottles. Both motions were denied by the court in its order dated November 26, 1993, the dispositive portion of which states:

WHEREFORE, the motion for reconsideration and the motion to suspend the implementation of the order of execution are hereby DENIED. The Branch Deputy Sheriff of this Court is hereby directed to serve a copy of this order upon counsel for La Tondeña Distillers, Inc. (LTDI) and to immediately carry out the order of August 31, 1993 for the return of 314,298 filled and unfilled bottles seized from the respondents pursuant to the invalid Search Warrant No. 93-94.

Private respondent filed a petition for certiorari with the Court of Appeals, contending that Assisting Judge Antonio Descallar had no jurisdiction to quash a search warrant issued by another judge because a motion to quash should be filed with the same court which issued the search warrant, especially so in this case because Judge De la Rosa allegedly issued Search Warrant No. 93-94 in his capacity as executive judge.

On June 27, 1994, the Court of Appeals set aside the orders of the Regional Trial Court and held that, following the ruling of this Court in *Malaloan v. Court of Appeals*,^[14] a search warrant may be enforced outside the territorial jurisdiction of the Regional Trial Court of Manila. In addition, it was held that, as assisting judge, the

Hon. Descallar did not have authority to quash the search warrant issued by Judge De la Rosa in his capacity as executive judge. Petitioners filed a motion for reconsideration which was denied on June 1, 1994. Hence this appeal.

Petitioners contend that:

A. PRIVATE RESPONDENT HAS NO AUTHORITY OR CAPACITY TO FILE THE PETITION FOR CERTIORARI WITH THE COURT OF APPEALS BECAUSE IT IS NOT A PARTY TO THE SEARCH WARRANT PROCEEDINGS, SEARCH WARRANT 93-64 HAVING BEEN ISSUED IN THE NAME OF THE PEOPLE OF THE PHILIPPINES UPON THE APPLICATION OF THE NBI. THEREFORE, THE COURT OF APPEALS SHOULD HAVE DISMISSED THE PETITION OUTRIGHT.

B. THE COURT OF APPEALS ERRONEOUSLY DECIDED THE PETITION ON AN ISSUE NO LONGER DISPUTED BY THE PARTIES. THE FINDING OF THE LOWER COURT THAT JUDGE DE LA ROSA HAD NO AUTHORITY TO ISSUE A SEARCH WARRANT OUTSIDE OF HIS COURT'S TERRITORIAL JURISDICTION AND THAT PRIVATE RESPONDENT WAS GUILTY OF FORUM-SHOPPING SHOULD, THEREFORE, NO LONGER BE DISTURBED IN THE CERTIORARI PROCEEDING.

C. THE ONLY REMAINING POINT OF CONTENTION IN THIS CASE IS JUDGE DESCALLAR'S AUTHORITY AS ASSISTING JUDGE TO QUASH THE WARRANT ISSUED BY JUDGE DE LA ROSA.

First. Petitioners argue that private respondent had no personality to bring the action for certiorari in the Court of Appeals because the proceedings for a search warrant were brought by the NBI in behalf of the People and private respondent La Tondeña Distillers, Inc. cannot represent the People. As thus put, the contention disregards rulings of this Court in several cases,[15] recognizing the right of parties at whose instance search warrants are applied for to question orders quashing the search warrants. However, there is a sense in which petitioners' contention is correct. In those cases in which private parties were allowed to bring suits, the parties were the complainants or offended parties in pending criminal prosecutions[16] or in cases where at least preparatory steps had been taken to commence criminal prosecution[17] and the search warrant was issued in those cases either as an incident of the pending action or in anticipation thereof.

But, in the case at bar, there has been not even an attempt to prosecute for violation of R.A. No. 623, pursuant to which the application for search warrant was ostensibly made. The NBI, which applied for the search warrant in 1993, did not file any case against petitioners. When petitioners filed a motion to quash the search warrant, the NBI did not oppose the motion. Only private respondent La Tondeña did.

Indeed, what is noticeable about this case is that possession of the bottles was transferred to private respondent through the expediency of a search warrant, so that instead of merely being an ancillary writ issued either as an incident of criminal proceedings or in anticipation of such proceedings, the proceedings for a search warrant have become, for all intents and purposes, the main proceedings by which private respondent have been able to obtain possession of what it claims to be its property. Unlike in an ordinary action, however, there was neither complaint by which petitioners could have been informed of the charge against them nor answer by which they could have been heard in their defense, before property claimed by them was taken from them and given to private respondent.

Contrary to the requirement of Rule 126, §11 that property seized by virtue of a search warrant must be deposited in custodia legis, the NBI delivered the bottles to the private respondent La Tondeña. It is claimed that this was done because there was no place for storage either at the NBI compound or in the premises of the RTC. This is not a good excuse. Some place could have been found or rented for the purpose, but the delivery of the bottles to private respondent cannot be made without giving the impression that private respondent has been given

possession of bottles claimed by petitioners to have been lawfully acquired by them.

Indeed, it would seem that private respondent La Tondeña later brought the certiorari proceedings in the Court of Appeals mainly in order to keep the bottles in its possession and not really as legal custodian, in anticipation of a criminal proceeding. Private respondent had been frustrated not only in applying for a search warrant to the RTC at San Fernando, Pampanga. As private respondent La Tondeña admitted in its opposition to petitioners' motion to quash:

True, that LTDI (La Tondeña Distillers, Inc.) had been, previously granted by the Regional Trial Court of San Fernando, Pampanga search warrants. However, to apply for a search warrant in respondents' home base for the third time would be an act in futility.[18]

Private respondent filed a replevin case against petitioners in 1987, but again it lost, and it had to bring an appeal which, up to the time it applied for a search warrant to the Manila RTC, was still pending in the Court of Appeals (CA-G.R. No. 36971).[19]

Private respondent's desire to maintain the search warrant would be understandable if there was a criminal action. But there was none. To make matters worse, when the deputy sheriff, Benjamin Garrido, tried to recover the seized bottles from La Tondeña's warehouse where they had been deposited, in view of the quashal of the search warrant, the bottles could not be found.[20]

Private respondent alleges:

12. While it is true that search warrants is (sic) in the name of the "People of the Philippines," Respondent LTDI owns the subject property in Search Warrant No. 93-94, pursuant to RA 623, as amended by RA 5700. A reading of the law will reveal that unauthorized use by Petitioners of LTDI bottles with marks "Ginebra San Miguel" and "La Tondeña, Inc." is illegal. Hence, having been deprived of its property, Respondent LTDI, with the assistance of the agents of the National Bureau of Investigation applied for a search warrant, in order to recover its own bottles, only to find out later that the said search warrant was quashed without giving LTDI the opportunity to submit evidence in support of its opposition to quash search warrant. (Emphasis added)[21]

But private respondent's bare claim of ownership does not entitle it to an award of the possession of the seized bottles through the expediency of search warrant proceedings. The title to and possession of the bottles are very much disputed, petitioners having asserted ownership of the same property by lawful acquisition for value,[22] in addition invoking § 5 of R.A. No. 623 as a defense. These considerations preclude private respondent's possession of the property under the search warrant.

Indeed in *Vlasons Enterprises Corporation v. Court of Appeals*,[23] we held, through then Justice Narvasa, that if no criminal case is instituted after the seizure made pursuant to a search warrant, the property seized should be delivered "to its rightful owner, or at least to the person from whom it had been seized." The property "could not be permitted to stay in a perpetual state of custodia legis." [24] To sustain the challenged decision of the Court of Appeals in this case would be to keep the seized bottles in a "perpetual state of custodia legis," if not to give their custody to private respondent for an indefinite period of time, the effect of which would be the summary adjudication of the possession of the bottles in favor of private respondent without the benefit of a proper action for that purpose. This certainly cannot be countenanced under any regime.

A search warrant proceeding is not a criminal action, much less a civil action.[25] It is a special criminal process, the order of issuance of which cannot and does not adjudicate the permanent status or character of the seized property.[26] It cannot therefore be resorted to, as was done here by private respondent, as a means of acquiring property or of settling a dispute over the same. The proper remedy is for private respondent or for the Government itself, assuming the role of a stakeholder, to bring the appropriate action.[27]

Second. Petitioners contend that, contrary to the ruling of the Court of Appeals, Judge Descallar had authority to quash the search warrant previously issued by Judge De la Rosa. This contention is well taken. It is settled that a judge may revoke the orders of another judge in a litigation subsequently assigned to him. In this case, the fact that Judge De la Rosa was the executive judge is not material, because jurisdiction is vested in the court, not in him qua executive judge.[28] Applications for search warrant are made to the executive judge only for administrative purposes.[29] Judge Descallar, as assisting judge, was competent to resolve the motion seeking to quash the search warrant.

Nor is there basis for private respondent's claim that Judge Descallar did not conduct a personal examination of complainant before he issued his order. The requirement of personal examination refers to the determination of probable cause for purposes of issuing a search warrant,[30] not to resolve a motion to quash such warrant.

Third. The Court of Appeals, citing the ruling in *Malaloan v. Court of Appeals*,[31] held that the RTC of Manila had no authority to issue a warrant effective outside its territorial jurisdiction. This issue was not raised by the private respondent in their petition for certiorari. Although this is a question about jurisdiction it is not a matter which could be raised in a certiorari proceeding. The RTC may have erred in holding that the warrant issued by Judge De la Rosa could not be enforced outside the territorial jurisdiction of the RTC of Manila but this is not a jurisdictional error correctible by certiorari. The fact is that Judge Descallar did not act without jurisdiction or in excess of his jurisdiction or with grave abuse of discretion. It cannot be said that, in ruling that the search warrant could not be enforced in San Fernando, Pampanga, Judge Descallar acted with grave abuse of discretion by disregarding a decision of this Court. For Judge Descallar issued his order on August 31, 1993, whereas our decision in *Malaloan* came down only on May 6, 1994. What is more, as this Court said, the question was "prima facie impressionis." In fact there may be a serious problem of retroactivity in applying the new ruling in this case.[32] But for now it is enough to say that the error sought to be corrected by certiorari by private respondent *La Tondeña* was not an error of jurisdiction but if at all, only an error of judgment.

Fourth. Petitioners finally contend that Judge Descallar's order quashing the search warrant should have been upheld because the warrant was obtained by forum-shopping. Judge Descallar based his order not only on the theory that a search warrant cannot be enforced outside the territorial jurisdiction of the court which issued it but also upon his finding that private respondent was guilty of forum-shopping. "There is forum-shopping whenever as a result of an adverse opinion in one forum, a party seeks a favorable opinion (other than by appeal or certiorari) in another." [33] This is exactly what private respondent did in seeking the issuance of a search warrant from the Manila Regional Trial Court, after failing to obtain warrants from the Pampanga courts. It is noteworthy that the ruling of Judge Descallar on this point was not assailed in the certiorari proceeding before the Court of Appeals. Hence, even though his ruling on the territorial reach of the warrant issued by Judge De la Rosa was erroneous in light of the subsequent ruling in *Malaloan*, the Court of Appeals should have sustained Judge Descallar's order quashing the warrant on the ground that private respondent *La Tondeña* was guilty of forum-shopping.

It cannot be contended that the rule against forum-shopping applies only to actions, but not to a search warrant because the latter is simply "a process" incidental to a criminal action. Circular No. 28-91 requires parties to certify under oath that they have not "theretofore commenced any other action or proceeding involving the same issues in the Supreme Court, the Court of Appeals, or any other tribunal or agency" and that to the best of their knowledge "no such action or proceeding is pending" in said courts or agencies.

Indeed, the policy against multiple court proceedings clearly applies to applications for search warrants. If an application for search warrant can be filed even where there are other applications pending or denied in other courts, the situation would become intolerable. Our ruling in *Malaloan* recognized this problem and implied that

forum-shopping is prohibited even in search warrant proceedings.[34] Therefore, although Judge Descallar's ruling limiting the search warrant issued by the Manila court to its territorial jurisdiction is erroneous, it should nevertheless have been sustained on the ground of forum-shopping.

To summarize, the decision of the Court of Appeals should be reversed because:

(1) The search warrant issued against petitioners lost its validity as a result of the failure of the NBI to commence criminal prosecution and the bottles seized from them should be returned to petitioners in the absence of any civil action for their recovery.

(2) Respondent Judge Descallar, as assisting judge of Branch XXVIII of the RTC of Manila, had authority to quash the search warrant issued by the regular judge, Hon. De la Rosa.

(3) Although respondent Judge Descallar's ruling that the second warrant could not be enforced in San Fernando, Pampanga is erroneous in view of our later ruling in *Malaloan v. Court of Appeals*, his ruling should have been sustained on the other ground on which it is based, i.e., violation by private respondent La Tondeña of the rule against forum-shopping in obtaining the search warrant.

WHEREFORE, the decision dated June 27, 1994 and the resolution dated December 1, 1994 of the Court of Appeals are REVERSED and SET ASIDE, and the orders dated August 31, 1993 and November 26, 1993 of Branch XXVIII, Regional Trial Court, Manila are hereby REINSTATED.

SO ORDERED.

Regalado (Chairman), Romero, and Puno, JJ., concur.

Torres, Jr., J., no part being a former member of the CA which renders the decision under review.

[1] Penned by Associate Justice Bernardo P. Pardo, and concurred in by Associate Justices Corona Ibay-Somera and Justo P. Torres, Jr., Chairman.

[2] Presided over by Assisting Judge Antonio L. Descallar.

[3] Republic Act No. 623 ("An Act to Regulate the Use of Duly Stamped or Marked Bottles, Boxes, Casks, Kegs, Barrels and Other Similar Containers") provides:

§2. It shall be unlawful for any person, without the written consent of the manufacturer, bottler or seller who has successfully registered the marks of ownership in accordance with the provisions of the next preceding section, to fill such bottles, boxes, kegs, barrels, or other similar containers so marked or stamped for the purpose of sale, or to sell, dispose of, buy, or traffic in, or wantonly destroy the same, whether filled or not, or to use the same for drinking vessels or glasses or for any other purpose than that registered by the manufacturer, bottler or seller. Any violation of this section shall be punished by a fine of not more than one hundred pesos or imprisonment of not more than thirty days or both.

[4] Certificate of Registration, Rollo, p.57.

[5] Rollo, p. 65.

[6] Affidavit of Atty. De la Cruz, Rollo, p.48.

[7] Affidavit of NBI Agent Florencio Corpuz, Rollo, p.50.

[8] Rollo, p.68.

[9] Compliance/Return of Search Warrant, Record, p.26.

[10] Order, CA Rollo, p.144.

[11] §5. "No action shall be brought under this Act against any person to whom the registered manufacturer, bottler or seller, has transferred by way of sale, any of the containers herein referred to, but the sale of the beverage contained in the said containers shall not include the sale of the containers unless specifically so provided."

[12] CA-G.R. SP No. 32758, Rollo, Aug. 28, 1994, Rejoinder, Annex B.

[13] Rollo, p. 115.

[14] 232 SCRA 249 (1994).

[15] E.g., *La Chemise Lacoste, S.A. v. Fernandez*, 129 SCRA 373 (1984); *Columbia Pictures, Inc. v. Flores*, 223 SCRA 761 (1993); *20th Century Fox Film Corp. v. Court of Appeals*, 164 SCRA 655 (1988).

[16] *La Chemise Lacoste, S.A. v. Fernandez*, 129 SCRA 373 (1984).

[17] *Columbia Pictures, Inc. v. Flores*, 223 SCRA 761 (1993); see *20th Century Fox Film Corp. v. Court of Appeals*, 164 SCRA 655 (1988).

[18] Record, Vol. II, p. 4.

[19] Decision, Civil Case No. 87-42639, Rollo, p. 95.

[20] Sheriff's Report, Record, Vol. II, p. 114.

[21] Comment, Rollo, p. 163.

[22] *Cagayan Valley Enterprise, Inc. v. Court of Appeals*, 179 SCRA 218 (1989).

[23] 155 SCRA 186, 192 (1987).

[24] *Id.*

[25] *Malaloan v. Court of Appeals*, 232 SCRA 249.

[26] *Vlasons Enterprise Corporation v. Court of Appeals*, 155 SCRA 186.

[27] *Ibid.*

[28] *Mina v. National Labor Relations Commission*, 246 SCRA 229 (1995); *People v. Court of First Instance*, 227 SCRA 457 (1993); *Medina v. De Guia*, 219 SCRA 153 (1993).

[29] Administrative Order No. 6, s. 1975; Administrative Circular No. 13, s. 1984.

[30] CONST., Art. III, § 2.

[31] 232 SCRA 249.

[32] Cf. *Magtoto v. Manguera*, 63 SCRA 4 (1975) (1973 CONST., Art. IV, § 20 on right to counsel in custodial investigation held not applicable to a confession obtained before January 17, 1973); *People v. Nabaluna*, 142 SCRA 446 (1986) (refusing to give retroactive application to the decision in *People v. Galit*, 135 SCRA 465 (1985) which adopted a flat rule requiring the assistance of counsel before a suspect under custodial interrogation may be allowed to waive the right to counsel, thus overruling the previous decision in *People v. Caguioa*, 95 SCRA 2 (1980) which prescribed a case-to-case approach to questions of voluntariness of waivers).

[33] Villanueva v. Adre, 178 SCRA 876, 882 (1989). Accord, First Philippine Int'l Bank v. Court of Appeals, G.R. No. 115849, Jan. 24, 1996; Earth Minerals Exploration, Inc. v. Macaraig, Jr., 194 SCRA 1 (1991); Crisostomo v. Securities and Exchange Commission, 179 SCRA 147 (1989).

[34] Cf. 232 SCRA, at 265 and 268:

Nor are we swayed by the professed apprehension that the law enforcement authorities may resort to what could be a permutation of forum shopping, by filing an application for the warrant with a "friendly" court. It need merely be recalled that a search warrant is only a process, not an action. Furthermore, the constitutional mandate is translated into specifically enumerated safeguards in Rule 126 of the 1985 Rules on Criminal Procedure for the issuance of a search warrant, and all these have to be observed regardless of whatever court in whichever region is importuned for or actually issues a search warrant . . .

In order to prevent forum shopping, a motion to quash shall consequently be governed by the omnibus motion rule, provided, however, that objections not available, existent or known during the proceedings for the quashal of the warrant may be raised in the hearing of the motion to suppress. The resolution of the court on the motion to suppress shall likewise be subject to any proper remedy in the appropriate higher court.

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.