

**FIDEL M. BAÑARES II, LILIA C. VALERIANO, EDGAR M. BAÑARES,
EMILIA GATCHALIAN AND FIDEL BESARINO, PETITIONERS, VS.
ELIZABETH BALISING, ROGER ALGER, MERLINDA CAPARIC,
EUSTAQUIO R....**

G.R. No. 132624. March 13, 2000

Ponente: KAPUNAN, J.

Read online (full-text search, related cases, audio case brief): <https://batas.org/library/g-r-no-132624/>

KAPUNAN, J.:

This is a petition for review on certiorari under Rule 45 of the Decision of the Regional Trial Court of Antipolo, Rizal, Branch 71 dated August 26, 1997.[1]

The antecedent facts are as follows:

Petitioners Fidel M. Bañares II, Lilia C. Valeriano, Edgar M. Bañares, Emilia Gatchalian and Fidel Besarino were the accused in sixteen criminal cases for estafa[2] filed by the private respondents. The cases were assigned to the Municipal Trial Court of Antipolo, Rizal, Branch II.

After the petitioners were arraigned and entered their plea of not guilty,[3] they filed a Motion to Dismiss the aforementioned cases on the ground that the filing of the same was premature, in view of the failure of the parties to undergo conciliation proceedings before the Lupong Tagapamayapa of Barangay Dalig, Antipolo, Rizal.[4] Petitioners averred that since they lived in the same barangay as private respondents, and the amount involved in each of the cases did not exceed Two Hundred Pesos (P200.00), the said cases were required under Section 412 in relation to Section 408 of the Local Government Code of 1991[5] and Section 18 of the 1991 Revised Rule on Summary Procedure.[6] to be referred to the Lupong Tagapamayapa or Pangkat ng Tagapagkasundo of the barangay concerned for conciliation proceedings before being filed in court.[7]

The municipal trial court issued an Order, dated July 17, 1995[8] denying petitioners' Motion to Dismiss on the ground that they failed to seasonably invoke the non-referral of the cases to the Lupong Tagapamayapa or Pangkat ng Tagapagkasundo. It added that such failure to invoke non-referral of the case to the Lupon amounted to a waiver by petitioners of the right to use the said ground as basis for dismissing the cases.[9]

Petitioners filed a motion for reconsideration of the aforementioned Order, claiming that nowhere in the Revised Rules of Court is it stated that the ground of prematurity shall be deemed waived if not raised seasonably in a motion to dismiss.[10]

On November 13, 1995, the municipal trial court issued an Order dismissing the sixteen criminal cases against petitioners without prejudice, pursuant to Section 18 of the 1991 Revised Rule on Summary Procedure.[11]

More than two months later, on February 26, 1996, private respondents through counsel, filed a Motion to Revive the abovementioned criminal cases against petitioners, stating that the requirement of referral to the Lupon for conciliation had already been complied with.[12] Attached to the motion was a Certification dated February 13,

1996 from the Lupong Tagapamayapa of Barangay Dalig, Antipolo, Rizal[13] stating that the parties appeared before said body regarding the charges of estafa filed by private respondents against petitioners but they failed to reach an amicable settlement with respect thereto. Petitioners filed a Comment and Opposition to Motion to Revive claiming that the Order of the municipal trial court, dated November 13, 1995 dismissing the cases had long become final and executory; hence, private respondents should have re-filed the cases instead of filing a motion to revive.[14]

On March 18, 1996, the municipal trial court issued an Order[15] granting private respondents' Motion to Revive. Petitioners filed a Motion for Reconsideration[16] of the aforementioned Order which was denied by the municipal trial court.[17]

Petitioners thereafter filed with the Regional Trial Court of Antipolo, Rizal, a petition for certiorari, injunction and prohibition assailing the Order dated March 18, 1996 of the municipal trial court. They claimed that the said Order dated November 13, 1995 dismissing the criminal cases against them had long become final and executory considering that the prosecution did not file any motion for reconsideration of said Order.[18] In response thereto, private respondents filed their Comment,[19] arguing that the motion to revive the said cases was in accordance with law, particularly Section 18 of the Revised Rule on Summary Procedure.[20]

After the parties submitted additional pleadings to support their respective contentions,[21] the Regional Trial Court rendered the assailed Decision denying the petition for certiorari, injunction and prohibition, stating as follows:

Evaluating the allegations contained in the petition and respondents' comment thereto, the Court regrets that it cannot agree with the petitioner(sic). As shown by the records the 16 criminal cases were dismissed without prejudice at the instance of the petitioners for failure of the private respondent to comply with the mandatory requirement of PD 1508. Since the dismissal of said cases was without prejudice, the Court honestly believes that the questioned order has not attained finality at all.

WHEREFORE, premises considered, the petition is hereby DENIED for lack of merit.

SO ORDERED.[22]

The Regional Trial Court, likewise, denied petitioners' Motion for Reconsideration[23] of the aforementioned Decision for lack of merit.[24]

Hence, this Petition.

Petitioners raise the following questions of law:

1. Whether or not an order dismissing a case or action without prejudice may attain finality if not appealed within the reglementary period, as in the present case;
2. Whether or not the action or case that had been dismissed without prejudice may be revived by motion after the order of dismissal had become final and executory; and
3. Whether or not the court that had originally acquired jurisdiction of the case that was dismissed without prejudice still has jurisdiction to act on the motion to revive after the order of dismissal has become final and executory.[25]

Petitioners contend that an order dismissing a case or action without prejudice may attain finality if not appealed within the reglementary period. Hence, if no motion to revive the case is filed within the reglementary fifteen-day period within which to appeal or to file a motion for reconsideration of the court's order, the order of dismissal becomes final and the case may only be revived by the filing of a new complaint or information.[26] Petitioners

further argue that after the order of dismissal of a case attains finality, the court which issued the same loses jurisdiction thereon and, thus, does not have the authority to act on any motion of the parties with respect to said case.[27]

On the other hand, private respondents submit that cases covered by the 1991 Revised Rule on Summary Procedure such as the criminal cases against petitioners are not covered by the rule regarding finality of decisions and orders under the Revised Rules of Court. They insist that cases dismissed without prejudice for non-compliance with the requirement of conciliation before the *Lupong Tagapamayapa* or *Pangkat ng Tagapagkasundo* of the barangay concerned may be revived summarily by the filing of a motion to revive regardless of the number of days which has lapsed after the dismissal of the case.[28]

Petitioners' contentions are meritorious.

A "final order" issued by a court has been defined as one which disposes of the subject matter in its entirety or terminates a particular proceeding or action, leaving nothing else to be done but to enforce by execution what has been determined by the court.[29] As distinguished therefrom, an "interlocutory order" is one which does not dispose of a case completely, but leaves something more to be adjudicated upon.[30]

This Court has previously held that an order dismissing a case without prejudice is a final order[31] if no motion for reconsideration or appeal therefrom is timely filed.

In *Olympia International vs. Court of Appeals*,[32] we stated thus:

The dismissal without prejudice of a complaint does not however mean that said dismissal order was any less final. Such order of dismissal is complete in all details, and though without prejudice, nonetheless finally disposed of the matter. It was not merely an interlocutory order but a final disposition of the complaint.

The law grants an aggrieved party a period of fifteen (15) days from his receipt of the court's decision or order disposing of the action or proceeding to appeal or move to reconsider the same.[33]

After the lapse of the fifteen-day period, an order becomes final and executory and is beyond the power or jurisdiction of the court which rendered it to further amend or revoke.[34] A final judgment or order cannot be modified in any respect, even if the modification sought is for the purpose of correcting an erroneous conclusion by the court which rendered the same.[35]

After the order of dismissal of a case without prejudice has become final, and therefore becomes outside the court's power to amend and modify, a party wishes to reinstate the case has no other remedy but to file a new complaint.

This was explained in *Ortigas & Company Limited Partnership vs. Velasco*,[36] where we ruled thus:

The dismissal of the case, and the lapse of the reglementary period to reconsider or set aside the dismissal, effectively operated to remove the case from the Court's docket. Even assuming the dismissal to be without prejudice, the case could no longer be reinstated or "revived" by mere motion in the original docketed action, but only by the filing of another complaint accompanied, of course, by the payment of the corresponding filing fees prescribed by law.

x x x

[S]ince theoretically every final disposition of an action does not attain finality until after fifteen (15) days therefrom, and consequently within that time the action still remains within the control of the Court, the plaintiff may move and set aside his notice of dismissal and revive his action before that period lapses. But after dismissal has become final after the lapse of the fifteen-day reglementary period, the only way by which the action may be resuscitated or "revived" is by the institution of a subsequent action through the filing of

another complaint and the payment of fees prescribed by law. This is so because upon attainment of finality of the dismissal through the lapse of said reglementary period, the Court loses jurisdiction and control over it and can no longer make a disposition in respect thereof inconsistent with such dismissal.[37] (Emphasis supplied.)

Contrary to private respondents' claim, the foregoing rule applies not only to civil cases but to criminal cases as well. In *Jaca vs. Blanco*,[38] the Court defined a provisional dismissal of a criminal case as a dismissal without prejudice to the reinstatement thereof before the order of dismissal becomes final or to the subsequent filing of a new information for the offense."[39]

Thus, the Regional Trial Court erred when it denied the petition for certiorari, injunction and prohibition and ruled that the order of the municipal trial court, dated November 13, 1995 dismissing without prejudice the criminal cases against petitioners had not attained finality and hence, could be reinstated by the mere filing of a motion to revive.

Equally erroneous is private respondents' contention that the rules regarding finality of judgments under the Revised Rules of Court[40] do not apply to cases covered by the 1991 Revised Rule on Summary Procedure. Private respondents claim that Section 18 of the 1991 Revised Rule on Summary Procedure allows the revival of cases which were dismissed for failure to submit the same to conciliation at the barangay level, as required under Section 412 in relation to Section 408 of the Local Government Code. The said provision states:

Referral to Lupon. – Cases requiring referral to the Lupon for conciliation under the provisions of Presidential Decree No. 1508[41] where there is no showing of compliance with such requirement, shall be dismissed without prejudice, and may be revived only after such requirement shall have been complied with. This provision shall not apply to criminal cases where the accused was arrested without a warrant.[42]

There is nothing in the aforecited provision which supports private respondents' view. Section 18 merely states that when a case covered by the 1991 Revised Rule on Summary Procedure is dismissed without prejudice for non-referral of the issues to the Lupon, the same may be revived only after the dispute subject of the dismissed case is submitted to barangay conciliation as required under the Local Government Code. There is no declaration to the effect that said case may be revived by mere motion even after the fifteen-day period within which to appeal or to file a motion for reconsideration has lapsed.

Moreover, the 1991 Revised Rule on Summary Procedure expressly provides that the Rules of Court applies suppletorily to cases covered by the former:

Sec. 22. Applicability of the regular rules. – The regular procedure prescribed in the Rules of Court shall apply to the special cases herein provided for in a suppletory capacity insofar as they are not inconsistent therewith.[43]

A careful examination of Section 18 in relation to Section 22 of the 1991 Revised Rule of Summary Procedure and Rule 40, Section 2 in relation to Rule 13, Sections 9 and 10,[44] and Rule 36, Section 2[45] of the 1997 Rules of Civil Procedure, as amended, leads to no other conclusion than that the rules regarding finality of judgments also apply to cases covered by the rules on summary procedure. Nothing in Section 18 of the 1991 Revised Rule on Summary Procedure conflicts with the prevailing rule that a judgment or order which is not appealed or made subject of a motion for reconsideration within the prescribed fifteen-day period attains finality.[46] Hence, the principle expressed in the maxim *interpretare et concordare legibus est optimus interpretandi*, or that every statute must be so construed and harmonized with other statutes as to form a uniform system of jurisprudence [47] applies in interpreting both sets of Rules.

The rationale behind the doctrine of finality of judgments and orders, likewise, supports our conclusion that said doctrine applies to cases covered by the 1991 Revised Rule on Summary Procedure:

The doctrine of finality of judgments is grounded on fundamental considerations of public policy and sound practice that at the risk of occasional error, the judgments of the courts must become final at some definite date set by law.[48]

It is but logical to infer that the foregoing principle also applies to cases subject to summary procedure especially since the objective of the Rule governing the same is precisely to settle these cases expeditiously.[49] To construe Section 18 thereof as allowing the revival of dismissed cases by mere motion even after the lapse of the period for appealing the same would prevent the courts from settling justiciable controversies with finality,[50] thereby undermining the stability of our judicial system.

The Court also finds it necessary to correct the mistaken impression of petitioners and the municipal trial court that the non-referral of a case for barangay conciliation as required under the Local Government Code of 1991[51] may be raised in a motion to dismiss even after the accused has been arraigned.

It is well-settled that the non-referral of a case for barangay conciliation when so required under the law[52] is not jurisdictional in nature[53] and may therefore be deemed waived if not raised seasonably in a motion to dismiss.[54] The Court notes that although petitioners could have invoked the ground of prematurity of the causes of action against them due to the failure to submit the dispute to Lupon prior to the filing of the cases as soon as they received the complaints against them, petitioners raised the said ground only after their arraignment.

However, while the trial court committed an error in dismissing the criminal cases against petitioners on the ground that the same were not referred to the Lupon prior to the filing thereof in court although said ground was raised by them belatedly, the said order may no longer be revoked at present considering that the same had long become final and executory, and as earlier stated, may no longer be annulled[55] by the Municipal Trial Court, nor by the Regional Trial Court or this Court.[56]

WHEREFORE, the petition is hereby GRANTED. The Decision of the Regional Trial Court of Antipolo, Rizal, Branch II dated August 26, 1997 and its Order dated January 29, 1998 in SCA Case No. 96-4092 are hereby SET ASIDE and Criminal Cases Nos. 94-0829, 94-0830, 94-0831, 94-0832, 94-0833, 94-0836, 94-0838, 94-0839, 94-0841, 94-0843, 94-0847, 94-0848, 94-0850, 94-0854 and 94-0058 of the Municipal Trial Court of Antipolo are ordered DISMISSED, without prejudice, pursuant to Sec. 18 of the 1991 Revised Rule on Summary Procedure.

SO ORDERED.

Davide, Jr., C.J., (Chairman), Puno, and Ynares-Santiago, JJ., concur.

Pardo, J., on official business abroad.

[1] SCA Case No. 96-4092.

[2] Docketed as Criminal Case Nos. 94-0829, 94-0830, 94-0831, 94-0832, 94-0833, 94-0836, 94-0838, 94-0839, 94-0841, 94-0843, 94-0847, 94-0848, 94-0850, 94-0854 and 94-0058 in the Municipal Trial Court of Antipolo Rizal, Branch II.

[3] Rollo, p. 91.

[4] Motion to Dismiss, Id., at. 22-24.

[5] Sections 412 and 408 of the Local Government Code of 1991 state thus:

Section 412 Conciliation.-- (a) Pre-condition to Filing of Complaint in Court. -- No complaint, petition, action or proceeding involving any matter within the authority of the lupon shall be filed or instituted directly in court or any other government office for adjudication, unless there has been a confrontation between the parties before the lupon chairman or the pangkat, and that no conciliation or settlement has been reached as certified

by the lupon secretary or pangkat secretary as attested to by the lupon or pangkat chairman or unless the settlement has been repudiated by the parties thereto.

(b) Where Parties May Go Directly to Court.-- The parties may go directly to court in the following instances:

(1) Where the accused is under detention;

(2) Where a person has otherwise been deprived of personal liberty calling for habeas corpus proceedings;

(3) Where actions are coupled with provisional remedies such as preliminary injunction, attachment, delivery of personal property, and support pendente lite; and

(4) Where the action may otherwise be barred by the statute of limitations.

(c) Conciliation among members of indigenous cultural communities. -- The customs and traditions of indigenous cultural communities shall be applied in settling disputes between members of the cultural communities.

Section 408. Subject Matter for Amicable Settlement; Exception Thereto. -- The lupon for each barangay shall have authority to bring together the parties actually residing in the same city or municipality for amicable settlement of all disputes except:

(a).....Where one party is the government, or any subdivision or instrumentality thereof;

(b).....Where one party is a public officer or employee, and the dispute relates to the performance of his official functions;

(c).....Offenses punishable by imprisonment exceeding one (1) year or a fine exceeding Five thousand pesos (P5,000.00); Ncmms

(d).....Offense where there is no private offended party;

(e).....Where the dispute involves real properties located in different cities or municipalities unless the parties thereto agree to submit their differences to amicable settlement by an appropriate lupon;

(f).....Disputes involving parties who actually reside in barangays of different cities or municipalities, except where such barangay units adjoin each other and the parties thereto agree to submit their differences to amicable settlement by an appropriate lupon;

(g).....Such other classes of disputes which the President may determine in the interest of justice or upon the recommendation of the secretary of Justice.

The court in which non-criminal cases not falling within the authority of the lupon under this Code are filed may, at any time before trial, motu proprio refer the case to the lupon concerned for amicable settlement.

[6] Section 18 of the 1991 Revised Rule on Summary Procedure provides:

Referral to Lupon. – Cases requiring referral to the Lupon for conciliation under the provisions of Presidential Decree No. 1508 where there is no showing of compliance with such requirement, shall be dismissed without prejudice, and may be revived only after such requirement shall have been complied with. This provision shall not apply to criminal cases where the accused was arrested without a warrant.

[7] Id., Rollo, pp. 22-23.

[8] Rollo, p. 25.

[9] Ibid.

[10] Rollo, pp. 26-27.

[11] Order dated November 13, 1995; Rollo, p. 32.

- [12] *Id.*, at 33.
- [13] *Rollo*, p. 35.
- [14] *Id.*, at 36.
- [15] *Id.*, at 37.
- [16] *Id.*, at 38-40.
- [17] Order, dated May 22, 1996, *Rollo*, p. 41.
- [18] Petition, *Id.*, at 43-45.
- [19] *Rollo*, pp. 51-53.
- [20] *Id.*, at 51-52.
- [21] See private respondents' Manifestation for the Record, *Rollo*, pp. 54-55 and petitioners' Supplement to the Petition; *Id.*, at p. 56.
- [22] Decision, dated August 26, 1997, *Id.*, at 19-20.
- [23] *Id.*, at 57-61.
- [24] Order, dated January 15, 1998, *Id.*, at 21.
- [25] Petition for Review, *Id.*, at 14.
- [26] *Id.*, at 9-10, 14.
- [27] *Id.*, at 14.
- [28] Comment; *Rollo*, pp. 79-80.
- [29] *People vs. Bans*, 239 SCRA 48, 54 (1994), per Bidin, J., citing *Marcelo vs. De Guzman*, 114 SCRA 657 (1982); *Hydro Resources contractors Corporation vs. Court of Appeals*, 204 SCRA 309, 318-319 (1991), per Padilla, J., citing *De la Cruz vs. Paras*, 69 SCRA 75, (1976)
- [30] *People vs. Bans*, *supra* Note 29.
- [31] *Olympia International vs. Court of Appeals*, 180 SCRA 353, 361 (1989), per Fernan, C.J.
- [32] *Ibid.*
- [33] Rule 40, Section 2 in relation to Rule 13, Sections 9 and 10, 1997 Rules of Civil Procedure, as amended.
- [34] *Alabanzas vs. Intermediate Appellate Court*, 204 SCRA 304, 307-308 (1991), per Paras, J., citing *Turquieza vs. Hernando*, 97 SCRA 483 (1980); *Heirs of Patriaca vs. Court of Appeals*, 124 SCRA 410 (1983); *Javier vs. Madamba, Jr.*, 174 SCRA 495 (1989), *Galindez vs. Rural Bank of Llanera, Inc.*, 175 SCRA 132 (1989), *Olympia International vs. Court of Appeals*, 180 SCRA 353, 361 (1989), at 308; *Borillo vs. Court of Appeals*, 209 SCRA 130, 140 (1992), per Davide, J.
- [35] *Alabanzas vs. Intermediate Appellate Court*, *supra* Note 34.
- [36] 234 SCRA 455, 486-487 (1994), per Narvasa, C.J.
- [37] *Ibid.*
- [38] 47 O.G. Sup. 108, 110 (1950), per Ozaeta, J.
- [39] *Ibid.*
- [40] Rule 40, Section 2 in relation to Rule 13, Sections 9 and 10, 1997 Rules of Civil Procedure, as amended.
- [41] Later replaced by the Provisions of the Local government Code of 1991. See provisions under Chapter 7 of said law.
- [42] Section 18, 1991 Revised Rule on Summary Procedure.
- [43] Section 22, 1991 Revised Rule on Summary Procedure.
- [44] Rule 40, Section 2 of the 1997 Rules of Civil Procedure provides: Jurissc

When to appeal. – An appeal may be taken within fifteen (15) days after notice to the appellant of the judgment or final order appealed from. Where a record on appeal is required, the appellant shall file a notice of appeal and record on appeal within thirty (30) days after notice of the judgment or final order.

Rule 13, Sections 9 and 10 thereof state:

Section 9. Service of judgments, final orders or resolutions. – Judgments, final orders or resolutions shall be served either personally or by registered mail. When a party summoned by publication has failed to appear in the action, judgments, final orders or resolutions against him shall be served upon him also by publication at the expense of the prevailing party.

Section 10, Completeness of service.– Personal service is complete upon actual delivery. Service by ordinary mail is complete upon the expiration of ten (10) days after mailing, unless the court otherwise provides. Service by registered mail is complete upon actual receipt by the addressee, or after five (5) days from the date he received the first notice of the postmaster, whichever date is earlier.

[45] Rule 36, Section 2 of the 1997 Rules of Civil Procedure reads, thus:

Entry of judgments and final orders. – If no appeal or motion for new trial or reconsideration is filed within the time provided in these Rules, the judgment or final order shall forthwith be entered by the clerk in the book of entries of judgments. The date of finality of the judgment or final order shall be deemed to be the date of its entry. The record shall contain the dispositive part of the judgment or final order and shall be signed by the clerk, with a certificate that such judgment or final order has become final and executory.

[46] Rule 40, Section 2, in relation to Rule 13, Sections 9 and 10, and Rule 36, Section 2, 1997 Rules of Civil Procedure, as amended.

[47] Valera vs. Tuason, Jr., 80 Phil. 823, 827 (1948), per Tuason, J.

[48] Alabanzas vs. Intermediate Appellate Court, supra Note 34, citing Turqueiza vs. Hernando, 97 SCRA 483 (1980); Heirs of Patriaca vs. Court of Appeals, 124 SCRA 410 (1983); Edra vs. Intermediate Appellate Court, 179 SCRA 344 (1989), at 308.

[49] First paragraph, Resolution of the Supreme Court En Banc dated October 15, 1991 Providing for the revised Rule on Summary Procedure for Metropolitan Trial Courts, Municipal Trial Courts in Cities, Municipal Trial Courts and Municipal Circuit Trial Courts.

[50] Alabanzas vs. Intermediate Appellate Court, supra note 34, citing Farescal Vda. De Emnas vs. Emans, 95 SCRA 470 and Heirs of Patriaca vs. Court of Appeals, 124 SCRA 410 (1983)

[51] Section 412 in relation to Section 408.

[52] Ibid.

[53] Millare vs. Hernando, 151 SCRA 484, 489 (1987), per Feliciano, J.

[54] Royales vs. Intermediate Appellate Court, 127 SCRA 470 (1984), per Escolin, J.; Ebol vs. Amin, 135 SCRA 438 (1985), per Aquino, J.; Gonzales, vs. Court of Appeals, 151 SCRA 289 (1987), per Sarmiento, J.

[55] Alabanzas vs. Intermediate Appellate Court, supra note 54.

[56] Ibid., citing Carbonel vs. Court of Appeals, 147 SCRA 656 (1987); Republic vs. Reyes, 155 SCRA 313 (1987)

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.