

ADELINA GUERZON BARCENAS, MAXIMO T. GUERZON SR., MARINA T. GUERZON, GABRIEL T. GUERZON, AND ROWEL T. GUERZON, IN THEIR CAPACITY AS HEIRS TO VERONICA TOLENTINO, PETITIONERS, VS. ...

G.R. NO. 150321. March 31, 2005

Ponente: PANGANIBAN, J.

Read online (full-text search, related cases, audio case brief): <https://batas.org/library/g-r-no-150321/>

PANGANIBAN, J.:

Petitioners are required by the Rules of Court to provide appellate courts with certified true copies of the judgments or final orders that are the subjects of review, as well as the material portions of the record. The reason for such requirement is that these documents and pleadings are needed by the reviewing courts in resolving whether to give due course to petitions. Hence, this requirement cannot be perfunctorily ignored or violated. Failure to comply with it hinders the review of cases on the merits, deprives the appellate courts of definitive bases for their actions, results in frustrating delays, and contributes havoc to the orderly administration of justice.

The Case

Before us is a Petition for Review[2] under Rule 45 of the Rules of Court, assailing the October 11, 2001 Resolution[3] of the Court of Appeals (CA), which dismissed the Petition for Review in CA-GR SP No. 66490 because of procedural defects.[4] The Petition for Review before the CA questioned the Decisions of the Municipal Trial Court (MTC)[5] of Cuyapo, Nueva Ecija and of the Regional Trial Court (RTC),[6] Branch 33, of Guimba, Nueva Ecija in Civil Case No. 1695. Petitioners now ask this Court to pass upon these judgments of the lower courts (CA, RTC, and MTC). The MTC's Decision, which was affirmed by the RTC, disposed as follows:

“WHEREFORE, premises considered, judgment is hereby rendered in favor of the [respondents] directing [petitioners]/heirs of Veronica Tolentino including any and all persons acting in their behalf to:

“1. Immediately vacate the one-hectare portion of the property described in Transfer Certificate of Title No. 16390 of the Land Records of Nueva Ecija which was sold to the [respondents] and reconvey or turn over the same to the [respondents] the ownership, possession and occupancy thereof;

“2. To pay moral and exemplary damages of P10,000.00;

“3. To pay litigation expenses of P5,000.00;

“4. To pay attorney's fee of P10,000.00; and

“5. To pay costs of suit.”[7]

The Facts

A case for recovery of ownership and possession of real property with damages was filed by Respondent Spouses Anastacio Tomas and Candida Caliboso against the heirs of Veronica Tolentino. The Complaint stated, among

others, that after the death of her husband, Benedicto Guerzon, Veronica sold to respondents on May 7, 1969, a one-hectare portion of her undivided share in a 14.6-hectare property. Situated in Barangay Paitan Sur, Cuyapo, Nueva Ecija, the land was co-owned by her and her ten children. The entire property was registered in her name and that of her late husband and covered by Transfer Certificate of Title No. 16390.

Respondents took possession of the property immediately after the sale. In 1989, however, the couple migrated to the United States, leaving the lot in the possession of Victoriano Tomas, the husband's brother. On April 13, 1989, the heirs of Veronica executed an Extrajudicial Partition covering the entire property. As a result, a new title was issued in the name of one of the heirs, Maximo Guerzon, who in 1995 wrested possession of the lot from Victoriano Tomas.

During the trial, respondents presented a Deed of Sale (Exhibit "B") evidencing the sale of the one-hectare lot for P2,800. Moreover, an Affidavit (Exhibit "C") showed that Veronica's children had subsequently confirmed the sale. Petitioners, however, denied knowledge of the two documents and claimed that their signatures on the Affidavit had been forged.[8]

Ruling that respondents had the better right of possession and ownership of the land in question, the Municipal Trial Court of Cuyapo, Nueva Ecija held that the sale of the one-hectare portion to them had sufficiently been established by the notarized document of sale and by their continuous possession of the property from 1969 until its interruption by Maximo Guerzon in 1995. The MTC added that the authenticity and genuineness of the Deed of Sale, as well as of the Affidavit confirming it, could not be assailed by mere unsubstantiated denials that the documents were fake. It ordered the defendants to vacate the property immediately and to pay moral damages, litigation expenses, attorney's fees and the costs of the suit.

On appeal, the Regional Trial Court, Branch 33, of Guimba, Nueva Ecija affirmed the MTC Decision. Petitioners thereafter elevated the case to the CA under Rule 42 of the Rules of Court.

Ruling of the Court of Appeals

As earlier stated, the CA dismissed the Petition for Review because of the following procedural infirmities: (1) petitioners had merely referred to themselves as the "Heirs of Veronica Tolentino," instead of stating their full names as required under Section 2(a) of Rule 42; (2) the pleadings filed with the lower court had not been appended to the Petition, contrary to Section 2(d) of Rule 42; and (3) among petitioners, only one had signed the Verification and the Certification of non-forum shopping.

Hence this Petition.[9]

Issues

In their Memorandum, petitioners raise the following issues:

"I. Whether or not the challenged Decision dated October 11, 2001 of the Honorable Court of Appeals in CA-G.R. SP No. 66490 should be set aside in the interest of substantial justice [in] view of the facts obtaining in [the] case at bar clearly showing the superior claim of ownership of petitioners as against respondents over the land in question.

"II. Whether or not both the lower courts in Civil Case No. 1695 and 1695-G, respectively, have committed grave and serious error in giving evidentiary weight to the purported Deed of Sale (Exhibit 'B') and Affidavit (Exhibit 'C') as proof of the alleged sale by the late Veronica Tolentino in favor of respondents Anastacio Tomas [and] Candida Caliboso of the disputed land even if said documentary exhibits have not been properly identified by a competent witness.

“III. Whether or not both the lower courts in Civil Case No. 1695 and 1695-G committed grave and serious error in failing to rule that both Exhibits ‘B’ and ‘C’ are spurious and fictitious documents and therefore cannot transfer to them title or ownership over the land in question.

“IV. Whether or not both the lower courts in Civil Case No. 1695 and 1695-G committed grave and serious error in failing to rule that the purported sale by the late Veronica Tolentino of the disputed land to respondents was null and void because it was without the consent of herein petitioners who are her co-owners of said land.”[10]

In brief, petitioners ask this Court (1) to set aside the CA Resolution “in the interest of substantial justice”; and (2) to review and reverse the RTC and the MTC Decisions, despite the fact that the CA did not pass upon them on their merits.

The Court’s Ruling

The Petition has no merit.

First Issue:

Dismissal Due to Procedural Defects

Assailing the CA’s outright dismissal of their Petition for Review, petitioners contend that they have substantially complied with the procedural requirements, and that their substantive rights would be prejudiced by a strict observance of the rules.[11]

They point out that, with the exception of Patricio, four surviving heirs of Veronica Tolentino executed a Special Power of Attorney giving Adelina Guerzon Barcenas, one of herein petitioners, the right to represent them and to act on their behalf.

As to their failure to attach the material pleadings and other pertinent records, petitioners plead excusable neglect, inadvertence and limited time, as well as the alleged intransigence and uncooperative attitude of the lower courts’ personnel in furnishing them copies of the documents.

As to a petition for review of a decision of the RTC, the requirements as to form and content are laid down in Section 2 of Rule 42 of the Rules of Court, which provides thus:

Sec. 2. Form and contents. - The petition shall be filed in seven (7) legible copies, with the original copy intended for the court being indicated as such by the petitioner, and shall (a) state the full names of the parties to the case, without impleading the lower courts or judges thereof either as petitioners or respondents; (b) indicate the specific material dates showing that it was filed on time; (c) set forth concisely a statement of the matters involved, the issues raised, the specification of errors of fact or law, or both, allegedly committed by the Regional Trial Court, and the reasons or arguments relied upon for the allowance of the appeal; (d) be accompanied by clearly legible duplicate originals or true copies of the judgments or final orders of both lower courts, certified correct by the clerk of court of the Regional Trial Court, the requisite number of plain copies thereof and of the pleadings and other material portions of the record as would support the allegations of the petition.

The petitioner shall also submit together with the petition a certification under oath that he has not theretofore commenced any other action involving the same issues in the Supreme Court, the Court of Appeals or different divisions thereof, or any other tribunal or agency; if there is such other action or proceeding, he must state the status of the same; and if he should thereafter learn that a similar action or proceeding has been filed or is pending before the Supreme Court, the Court of Appeals, or different divisions thereof, of any other tribunal or agency, he undertakes to promptly inform the aforesaid courts and other tribunal or agency thereof within five (5) days therefrom. (Italics supplied)

Under Section 3 of the same Rule, failure to comply with the above requirements “shall be sufficient ground for the dismissal thereof.”

Petition Defective in Form

A review of the Petition for Review easily confirms the defects adverted to by the CA in its assailed October 11, 2001 Resolution. In the title of the Petition, petitioners referred to themselves merely as the “Heirs of Veronica Tolentino,” without stating their full names or the fact that they were represented by Adelina Guerzon Barcenas. This lapse runs counter to the requirement of Section 2(a) of Rule 42, especially because the deficiency could not have been offset by the equally incomplete attachments.

Petitioners do not deny that the pertinent pleadings and portions of the record in support of their allegations were not attached to the Petition as required by Section 2(d) of Rule 42. They attribute this procedural lapse to personal shortcomings, as well as to the purported unwillingness of lower court personnel to provide the needed documents. No proof was adduced to validate these excuses, however.

Worst of all, only Adelina signed the Verification and the Certification of non-forum shopping. She did so despite her admission that, among petitioners, she was the only signatory; and despite the absence of proof that she had authority to sign for the others. *Loquias v. Office of the Ombudsman*[12] has categorically declared that where there are two or more petitioners, a petition signed by only one of them is defective, unless such signatory has been duly authorized by the co-parties to represent them and to sign the certification. For that matter, the Court notes that the Special Power of Attorney[13] in Adelina’s favor was executed only on November 14, 2001, when the CA Resolution was appealed by certiorari to this Court. It was therefore not intended for the subject CA Petition.

Admittedly, all the infirmities besetting the Petition before the CA affected only its form. In appropriate cases, they have been waived to give the parties a chance to argue their causes and defenses on the merits.[14] To justify the relaxation of the rules, however, a satisfactory explanation and a subsequent fulfillment of the requirements have always been required.[15]

Unfortunately, petitioners have not given any reasonable justification for liberalizing the rules here. As pointed out earlier, because they had not moved for a reconsideration of the CA Resolution -- for which they cited no reason -- they were not able to show reasonable diligence in subsequently complying with the requirements. They must be reminded that except for the most compelling grounds,[16] procedural rules must be strictly complied with to facilitate the orderly administration of justice.[17]

Petitioners are required by the Rules of Court to provide appellate courts with certified true copies of the judgments or final orders that are the subjects of review, as well as the material portions of the record. The reason for such requirement is that these documents and pleadings are needed by the reviewing courts in resolving whether to give due course to petitions. Hence, this requirement cannot be perfunctorily ignored or violated. Failure to comply with it hinders the review of cases on the merits, deprives the appellate courts of definitive bases for their actions, results in frustrating delays, and contributes havoc to the orderly administration of justice.

Second Issue: Review of RTC and MTC Decisions

At the outset, note is taken of petitioners’ error in appealing to this Court factual issues relating to the sale and the ownership of the lot in question. This common and persistent procedural misstep, which has long plagued earlier recourse of this nature, has spelt disaster to many a petition. Thus, for the guidance of the bench and the bar, we now discuss the requirements of appeals under Rule 45.

Section 1 of Rule 45 of the Rules of Court provides:

SECTION 1. Filing of petition with Supreme Court. – A party desiring to appeal by certiorari from a judgment or final order or resolution of the Court of Appeals, the Sandiganbayan, the Regional Trial Court or other courts whenever authorized by law, may file with the Supreme Court a verified petition for review on certiorari. The petition shall raise only questions of law which must be distinctly set forth.

Subject of Appeal

Section 1 of Rule 45 clearly states that the following may be appealed to the Supreme Court through a petition for review by certiorari: 1) judgments; 2) final orders; or 3) resolutions of the Court of Appeals, the Sandiganbayan, the Regional Trial Court or similar courts, whenever authorized by law. The appeal must involve only questions of law, not of fact.[18]

This Court has, time and time again, pointed out that it is not a trier of facts; and that, save for a few exceptional instances, its function is not to analyze or weigh all over again the factual findings of the lower courts.[19] There is a question of law when doubts or differences arise as to what law pertains to a certain state of facts, and a question of fact when the doubt pertains to the truth or falsity of alleged facts.[20]

Under the principle of the hierarchy of courts, decisions, final orders or resolutions of an MTC should be appealed to the RTC exercising territorial jurisdiction over the former.[21] On the other hand, RTC judgments, final orders or resolutions are appealable to the CA through either of the following: an ordinary appeal if the case was originally decided by the RTC;[22] or a petition for review under Rule 42, if the case was decided under the RTC's appellate jurisdiction.[23]

Nonetheless, a direct recourse to this Court can be taken for a review of the decisions, final orders or resolutions of the RTC, but only on questions of law. Under Section 5 of Article VIII of the Constitution, the Supreme Court has the power to

(2) Review, revise, reverse, modify, or affirm on appeal or certiorari as the law or the Rules of Court may provide, final judgments and orders of lower courts in:

x x x x x x x x

(e) All cases in which only an error or question of law is involved.

This kind of direct appeal to this Court of RTC judgments, final orders or resolutions is provided for in Section 2(c) of Rule 41, which reads:

SEC. 2. Modes of appeal. –

x x x x x x x x

(c) Appeal by certiorari. – In all cases where only questions of law are raised or involved, the appeal shall be to the Supreme Court by petition for review on certiorari in accordance with Rule 45.

Procedurally then, petitioners could have appealed the RTC Decision affirming the MTC (1) to this Court on questions of law only; or (2) if there are factual questions involved, to the CA -- as they in fact did. Unfortunately for petitioners, the CA properly dismissed their petition for review because of serious procedural defects. This action foreclosed their only available avenue for the review of the factual findings of the RTC.[24]

No Factual Challenges to
RTC Decision Before the SC

Petitioners' plea for a review by the Supreme Court of the Decisions of the RTC and the MTC is untenable. First,

the questions raised are factual in nature. To reiterate, only questions of law involved in lower court decisions may be brought directly to this Court. Second, assuming that reversible factual errors were committed by the RTC and the MTC, these should be reviewed and corrected first by the CA, not by this Court, which -- to repeat -- does not review factual findings of the trial courts. For us to do otherwise is to shortcut the procedures. Certainly, such shortcircuiting would stretch the Court's liberality way beyond the limits of judicial discretion.

Moreover, the argument that this Court should reverse the factual findings because certain facts or circumstances of import have allegedly been overlooked or misinterpreted by the lower courts is unavailing. That kind of review is done only with regard to factual findings of the CA -- and there are none here -- not of the RTC or the MTC.

Finally, to satisfy the incessant call of petitioners for a factual review, the Court -- despite the foregoing invocations -- nonetheless looked over the records. It found no adequate basis for their claims. We shall now run through the issues.

First, the evidence did not show that petitioners had presented strong, complete, and conclusive proof[25] that the notarized Deed of Sale was false.[26] Without that sort of evidence, the presumption of regularity, the evidentiary weight conferred upon such public document[27] with respect to its execution, as well as the statements and the authenticity of the signatures thereon,[28] stand.

Second, no evidence was presented to establish the fact that the Affidavit confirming the sale (Exhibit "C") had been forged.[29] Forgery cannot be presumed.[30] Whoever alleges it must prove it by clear and convincing evidence.[31]

Third, the sale of the undivided share of Veronica Tolentino was valid even without the consent of the other co-owners. Both law[32] and jurisprudence[33] have categorically held that even while an estate remains undivided, co-owners have each full ownership of their respective aliquots or undivided shares and may therefore alienate, assign or mortgage them.[34] Here, the one-hectare portion sold to respondents was very much less than the ideal share of Tolentino consisting of her conjugal partnership share of one half of the 14.6-hectare lot (or 7.3 hectares) plus her equal share of 1/11 (0.66 hectare) of the other half.[35]

In sum, the Court has bent over backwards and patiently given this case more than adequate review and found absolutely no basis to reverse or modify the Decisions of the three lower courts.

WHEREFORE, the Petition is DENIED and the assailed Resolution AFFIRMED. Costs against petitioners.

SO ORDERED.

Sandoval-Gutierrez, Corona, Carpio-Morales, and Garcia, JJ., concur.

[1] The Petition included the "HONORABLE COURT OF APPEALS" as a respondent. However, under §4 of Rule 45 of the Rules of Court, the CA should no longer be impleaded in a petition for review under Rule 45. Hence, the CA is now excluded from the title of this case.

[2] Rollo, pp. 7-29.

[3] Seventh Division. Penned by Justice Godardo A. Jacinto (Division chair) and concurred in by Justices Bernardo P. Abesamis and Eliezer R. de los Santos (members).

[4] CA Resolution, p. 2; rollo, p. 31. The procedural defects will be discussed later.

[5] Rollo, pp. 63-70.

[6] Id., pp. 72-75.

[7] MTC Decision, p. 8; rollo, p. 70.

[8] The facts are culled from the MTC Decision dated November 26, 1999, pp. 1-6; rollo, pp. 63-68.

[9] The Petition was deemed submitted for decision on January 15, 2004, upon the Court's receipt of respondents' Memorandum, signed by Atty. Efren M. G. Bascos of Bascos and Associates Law Office. Petitioners' Memorandum, signed by Atty. Felix B. Lerio, was received by this Court on January 5, 2004.

[10] Petitioners' Memorandum, pp. 5-6; rollo, p. 285-286. Original in upper case.

[11] This argument was pleaded by petitioners in their Petition, filed on October 30, 2002. The same issue was, however, not reiterated in their Memorandum dated January 15, 2004.

[12] 392 Phil. 596, 603-604, August 15, 2000 (cited in *Gudoy v. Guadalquiver*, GR No. 151136, May 27, 2004, p. 5).

[13] Rollo, p. 91.

[14] *El Reyno Homes, Inc. v. Ong*, 397 SCRA 563, 570, February 17, 2003.

[15] *Bank of the Philippine Islands v. CA*, 402 SCRA 449, 449, April 30, 2003; *Shipside Incorporated v. CA*, 352 SCRA 334, 347, February 20, 2001; *Uy v. Landbank*, 391 Phil. 303, 313, July 24, 2000.

[16] *Torres v. Specialized Packaging Development Corp.*, GR No. 149634, July 6, 2004, pp. 1 & 16-18.

[17] *El Reyno Homes, Inc. v. Ong*; *supra*, p. 572.

[18] See also *Spouses Firme v. Bukal Enterprises and Development Corporation*, 414 SCRA 190, 201, October 23, 2003; *Metropolitan Bank and Trust Co. v. Wong*, 412 Phil. 207, 216, June 26, 2001; *Batingal v. CA*, 351 SCRA 60, 66, February 1, 2001.

[19] *Potenciano v. Reynoso*, 401 SCRA 391, 397, April 22, 2003; *Fortune Guarantee & Insurance Corp. v. CA*, 428 Phil. 783, 797, March 12, 2002; *Heirs of Brusas v. CA*, 372 Phil. 47, 59, August 26, 1999.

[20] *Sps. Calvo v. Sps. Vergara*, 423 Phil. 939, 947, December 19, 2001 (citing *Reyes v. CA*, 328 Phil. 171, 179, July 11, 1996; *China Road and Bridge Corporation v. CA*, 348 SCRA 401, 408, December 15, 2000).

[21] §1 of Rule 40 of the Rules of Court.

[22] §2(a) of Rule 41 of the Rules of Court.

[23] §2(b) of Rule 41.

[24] Errors of fact or law, or both may be raised in a petition for review under Rule 42. §2(c) of this Rule, which provides the form and content of a petition for review from the RTC to the CA, states that the petition shall

(c) set forth concisely a statement of the matters involved, the issues raised, the specification of errors of fact or law, or both, allegedly committed by the Regional Trial Court, and the reasons or arguments relied upon for the allowance of the appeal.

[25] Proof of this nature is needed to overcome the presumption of regularity that is accorded to a notarized instrument. Here, what appeared on record were petitioners' bare denials, but nothing more. In contrast, it was established by the testimony of respondents' witness Adriano Diaz, an eyewitness to the execution of the Deed of Sale, that this Deed was the same document executed by Veronica Tolentino and respondents in 1969. See Yason

v. Arciaga, GR No. 145017, January 28, 2005, p. 17 (citing *Chilianchin v. Coquinco*, 84 Phil. 714, 718, October 12, 1949; *Jimenez v. Commission on Ecumenical Mission and Relations of the United Presbyterian Church in the United States of America*; 432 Phil. 895, 909, June 10, 2002).

[26] Diaz's un rebutted testimony, in particular, unveiled the fallacy of petitioners' contention that Notary Public Justiniano Domingo had served as both witness to and notarizing officer of the document. Clear and categorical was his testimony that Jun Domingo, the other witness signing the document, was not the same Justiniano Domingo who had notarized the Deed of Sale in May 1969. Transcript of Stenographic Notes, August 19, 1999, pp. 5-6; rollo, pp. 183-184.

[27] Under §19(b), Rule 132 of the Rules of Court, "documents notarized before a notary public except last wills and testaments" are public documents.

[28] *Potenciano v. Reynoso* (supra, p. 398); *Jimenez v. Commission on Ecumenical Mission and Relations of the United Presbyterian Church in the United States of America* (supra, p. 911); *Basilio v. CA*, 346 SCRA 321, 324, November 29, 2000; *Lao v. Villones-Lao*, 366 Phil. 49, 58, April 29, 1999. §30 of Rule 132 of the Rules of Court provides:

"SEC. 30. Proof of notarial documents. – Every instrument duly acknowledged or proved and certified as provided by law, may be presented in evidence without further proof, the certificate of acknowledgment being prima facie evidence of the execution of the instrument or document involved."

[29] Other than denying they signed the Affidavit, Maximo, Gabriel, Marina and Patricio Guerzon did not even try to establish the fact of forgery by comparing the allegedly false signatures on Exhibit "C" with their authentic signatures; or by summoning the assistance of handwriting experts. Questions over Veronica Tolentino's alleged use of a thumbprint are also of no moment. One may, even though able to read and write, affix one's signature to a document with a cross, a mark or a thumbprint. (See *Yason v. Arciaga*; supra, p. 15). Furthermore, there is no evidence that would show that Veronica Tolentino was forced or coerced to affix her thumbmark on the Deed of Sale.

[30] *Jimenez v. Commission on Ecumenical Mission and Relations of the United Presbyterian Church in the United States of America* (supra, p. 904); *American Express International v. CA*, 367 Phil. 333, 341, June 8, 1999 (citing *Tenio-Obsequio v. CA*, 230 SCRA 550, 558, March 1, 1994).

[31] *Basilio v. CA*, supra.

[32] Article 493 of the Civil Code states:

"Each co-owner shall have the full ownership of his part and of the fruits pertaining thereto, and he may therefore alienate, assign or mortgage it, and even substitute another person in its enjoyment, except when personal rights are involved. But the effect of the alienation or mortgage, with respect to the co-owners, shall be limited to the portion which may be allotted to him in the division upon the termination of the co-ownership."

[33] *Heirs of Balite v. Lim*, GR No. 152168, December 10, 2004, p. 19; *Del Campo v. CA*, 351 SCRA 1, 7, February 1, 2001; *Tomas Claudio Memorial College, Inc. v. CA*, 374 Phil. 859, 865, October 12, 1999.

[34] However, the sale or mortgage is limited only to the portion that may be allotted to him upon the termination of the co-ownership; he cannot sell a specific or determinate part of it. Such sale effectively transfers to the buyer the seller's ideal share in the co-ownership, thereby making the former a co-owner of the property.

[35] Under Article 996 of the Civil Code, "the surviving spouse has in the succession the same share as that of

each of the children” if she and legitimate children are left. Accordingly, Veronica Tolentino gets the same share as that of each of the 10 children.

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.