

SOCIAL SECURITY SYSTEM, PETITIONER, VS. TERESITA JARQUE VDA. DE BAILON, RESPONDENT.

G.R. NO. 165545. March 24, 2006

Ponente: CARPIO MORALES, J.

Read online (full-text search, related cases, audio case brief): <https://batas.org/library/g-r-no-165545/>

CARPIO MORALES, J.:

The Court of Appeals Decision [1] dated June 23, 2004 [2] and Resolution dated September 28, 2004 [3] reversing the Resolution dated April 2, 2003 [4] and Order dated June 4, 2003 [5] of the Social Security Commission (SSC) in SSC Case No. 4-15149-01 are challenged in the present petition for review on certiorari.

On April 25, 1955, Clemente G. Bailon (Bailon) and Alice P. Diaz (Alice) contracted marriage in Barcelona, Sorsogon. [6]

More than 15 years later or on October 9, 1970, Bailon filed before the then Court of First Instance (CFI) of Sorsogon a petition [7] to declare Alice presumptively dead.

By Order of December 10, 1970, [8] the CFI granted the petition, disposing as follows:

WHEREFORE, there being no opposition filed against the petition notwithstanding the publication of the Notice of Hearing in a newspaper of general circulation in the country, Alice Diaz is hereby declared to [sic] all legal intents and purposes, except for those of succession, presumptively dead.

SO ORDERED. [9] (Underscoring supplied)

Close to 13 years after his wife Alice was declared presumptively dead or on August 8, 1983, Bailon contracted marriage with Teresita Jarque (respondent) in Casiguran, Sorsogon. [10]

On January 30, 1998, Bailon, who was a member of the Social Security System (SSS) since 1960 and a retiree pensioner thereof effective July 1994, died. [11]

Respondent thereupon filed a claim for funeral benefits, and was granted P12,000 [12] by the SSS.

Respondent filed on March 11, 1998 an additional claim for death benefits [13] which was also granted by the SSS on April 6, 1998. [14]

Cecilia Bailon-Yap (Cecilia), who claimed to be a daughter of Bailon and one Elisa Jayona (Elisa) contested before the SSS the release to respondent of the death and funeral benefits. She claimed that Bailon contracted three marriages in his lifetime, the first with Alice, the second with her mother Elisa, and the third with respondent, all of whom are still alive; she, together with her siblings, paid for Bailon's medical and funeral expenses; and all the documents submitted by respondent to the SSS in support of her claims are spurious.

In support of her claim, Cecilia and her sister Norma Bailon Chavez (Norma) submitted an Affidavit dated February 13, 1999 [15] averring that they are two of nine children of Bailon and Elisa who cohabited as husband and wife as early as 1958; and they were reserving their right to file the necessary court action to contest the

marriage between Bailon and respondent as they personally know that Alice is "still very much alive." [16]

In the meantime, on April 5, 1999, a certain Hermes P. Diaz, claiming to be the brother and guardian of "Aliz P. Diaz," filed before the SSS a claim for death benefits accruing from Bailon's death, [17] he further attesting in a sworn statement [18] that it was Norma who defrayed Bailon's funeral expenses.

Elisa and seven of her children [19] subsequently filed claims for death benefits as Bailon's beneficiaries before the SSS. [20]

Atty. Marites C. de la Torre of the Legal Unit of the SSS Bicol Cluster, Naga City recommended the cancellation of payment of death pension benefits to respondent and the issuance of an order for the refund of the amount paid to her from February 1998 to May 1999 representing such benefits; the denial of the claim of Alice on the ground that she was not dependent upon Bailon for support during his lifetime; and the payment of the balance of the five-year guaranteed pension to Bailon's beneficiaries according to the order of preference provided under the law, after the amount erroneously paid to respondent has been collected. The pertinent portions of the Memorandum read:

1. Aliz [sic] Diaz never disappeared. The court must have been misled by misrepresentation in declaring the first wife, Aliz [sic] Diaz, as presumptively dead.

x x x x

x x x the Order of the court in the "Petition to Declare Alice Diaz Presumptively Dead," did not become final. The presence of Aliz [sic] Diaz, is contrary proof that rendered it invalid.

x x x x

3. It was the deceased member who abandoned his wife, Aliz [sic] Diaz. He, being in bad faith, and is the deserting spouse, his remarriage is void, being bigamous.

x x x x

In this case, it is the deceased member who was the deserting spouse and who remarried, thus his marriage to Teresita Jarque, for the second time was void as it was bigamous. To require affidavit of reappearance to terminate the second marriage is not necessary as there is no disappearance of Aliz [sic] Diaz, the first wife, and a voidable marriage [sic], to speak of. [21] (Underscoring supplied)

In the meantime, the SSS Sorsogon Branch, by letter of August 16, 2000,[22] advised respondent that as Cecilia and Norma were the ones who defrayed Bailon's funeral expenses, she should return the P12,000 paid to her.

In a separate letter dated September 7, 1999,[23] the SSS advised respondent of the cancellation of her monthly pension for death benefits in view of the opinion rendered by its legal department that her marriage with Bailon was void as it was contracted while the latter's marriage with Alice was still subsisting; and the December 10, 1970 CFI Order declaring Alice presumptively dead did not become final, her "presence" being "contrary proof" against the validity of the order. It thus requested respondent to return the amount of P24,000 representing the total amount of monthly pension she had received from the SSS from February 1998 to May 1999.

Respondent protested the cancellation of her monthly pension for death benefits by letter to the SSS dated October 12, 1999.[24] In a subsequent letter dated November 27, 1999 [25] to the SSC, she reiterated her request for the release of her monthly pension, asserting that her marriage with Bailon was not declared before any court of justice as bigamous or unlawful, hence, it remained valid and subsisting for all legal intents and purposes as in fact Bailon designated her as his beneficiary.

The SSS, however, by letter to respondent dated January 21, 2000, [26] maintained the denial of her claim for and the discontinuance of payment of monthly pension. It advised her, however, that she was not deprived of her right to file a petition with the SSC.

Respondent thus filed a petition [27] against the SSS before the SSC for the restoration to her of her entitlement to monthly pension.

In the meantime, respondent informed the SSS that she was returning, under protest, the amount of P12,000 representing the funeral benefits she received, she alleging that Norma and her siblings "forcibly and coercively prevented her from spending any amount during Bailon's wake." [28]

After the SSS filed its Answer [28] to respondent's petition, and the parties filed their respective Position Papers, one Alicia P. Diaz filed an Affidavit [30] dated August 14, 2002 with the SSS Naga Branch attesting that she is the widow of Bailon; she had only recently come to know of the petition filed by Bailon to declare her presumptively dead; it is not true that she disappeared as Bailon could have easily located her, she having stayed at her parents' residence in Barcelona, Sorsogon after she found out that Bailon was having an extramarital affair; and Bailon used to visit her even after their separation.

By Resolution of April 2, 2003, the SSC found that the marriage of respondent to Bailon was void and, therefore, she was "just a common-law-wife." Accordingly it disposed as follows, quoted verbatim:

WHEREFORE, this Commission finds, and so holds, that petitioner Teresita Jarque-Bailon is not the legitimate spouse and primary beneficiary of SSS member Clemente Bailon.

Accordingly, the petitioner is hereby ordered to refund to the SSS the amount of P24,000.00 representing the death benefit she received therefrom for the period February 1998 until May 1999 as well as P12,000.00 representing the funeral benefit.

The SSS is hereby ordered to pay Alice (a.k.a. Aliz) Diaz-Bailon the appropriate death benefit arising from the demise of SSS member Clemente Bailon in accordance with Section 8(e) and (k) as well as Section 13 of the SS Law, as amended, and its prevailing rules and regulations and to inform this Commission of its compliance herewith.

SO ORDERED. [31] (Underscoring supplied)

In so ruling against respondent, the SSC ratiocinated.

After a thorough examination of the evidence at hand, this Commission comes to the inevitable conclusion that the petitioner is not the legitimate wife of the deceased member.

x x x x

There is x x x ample evidence pointing to the fact that, contrary to the declaration of the then CFI of Sorsogon (10th Judicial District), the first wife never disappeared as the deceased member represented in bad faith. This Commission accords credence to the findings of the SSS contained in its Memorandum dated August 9, 1999, [32] revealing that Alice (a.k.a. Aliz) Diaz never left Barcelona, Sorsogon, after her separation from Clemente Bailon x x x.

As the declaration of presumptive death was extracted by the deceased member using artifice and by exerting fraud upon the unsuspecting court of law, x x x it never had the effect of giving the deceased member the right to marry anew. x x x [I]t is clear that the marriage to the petitioner is void, considering that the first marriage on April 25, 1955 to Alice Diaz was not previously annulled, invalidated or otherwise dissolved during the lifetime of the parties thereto. x x x as determined through the investigation conducted by the SSS, Clemente Bailon was the abandoning spouse, not Alice Diaz Bailon.

x x x x

It having been established, by substantial evidence, that the petitioner was just a common-law wife of the deceased member, it necessarily follows that she is not entitled as a primary beneficiary, to the latter's death benefit. x x x

x x x x

It having been determined that Teresita Jarque was not the legitimate surviving spouse and primary beneficiary of Clemente Bailon, it behooves her to refund the total amount of death benefit she received from the SSS for the period from February 1998 until May 1999 pursuant to the principle of solutio indebiti x x x

Likewise, it appearing that she was not the one who actually defrayed the cost of the wake and burial of Clemente Bailon, she must return the amount of P12,000.00 which was earlier given to her by the SSS as funeral benefit. [[33]] (Underscoring supplied)

Respondent's Motion for Reconsideration [34] having been denied by Order of June 4, 2003, she filed a petition for review [35] before the Court of Appeals (CA).

By Decision of June 23, 2004, the CA reversed and set aside the April 2, 2003 Resolution and June 4, 2003 Order of the SSC and thus ordered the SSS to pay respondent all the pension benefits due her. Held the CA:

x x x [T]he paramount concern in this case transcends the issue of whether or not the decision of the then CFI, now RTC, declaring Alice Diaz presumptively dead has attained finality but, more importantly, whether or not the respondents SSS and Commission can validly re-evaluate the findings of the RTC, and on its own, declare the latter's decision to be bereft of any basis. On similar import, can respondents SSS and Commission validly declare the first marriage subsisting and the second marriage null and void?

x x x x

x x x while it is true that a judgment declaring a person presumptively dead never attains finality as the finding that "the person is unheard of in seven years is merely a presumption juris tantum," the second marriage contracted by a person with an absent spouse endures until annulled. It is only the competent court that can nullify the second marriage pursuant to Article 87 of the Civil Code and upon the reappearance of the missing spouse, which action for annulment may be filed. Nowhere does the law contemplates [sic] the possibility that respondent SSS may validly declare the second marriage null and void on the basis alone of its own investigation and declare that the decision of the RTC declaring one to be presumptively dead is without basis.

Respondent SSS cannot arrogate upon itself the authority to review the decision of the regular courts under the pretext of determining the actual and lawful beneficiaries of its members. Notwithstanding its opinion as to the soundness of the findings of the RTC, it should extend due credence to the decision of the RTC absent of [sic] any judicial pronouncement to the contrary. x x x

x x x [A]ssuming arguendo that respondent SSS actually possesses the authority to declare the decision of the RTC to be without basis, the procedure it followed was offensive to the principle of fair play and thus its findings are of doubtful quality considering that petitioner Teresita was not given ample opportunity to present evidence for and her behalf.

x x x x

Respondent SSS is correct in stating that the filing of an Affidavit of Reappearance with the Civil Registry is no longer practical under the premises. Indeed, there is no more first marriage to restore as the marital bond between Alice Diaz and Clemente Bailon was already terminated upon the latter's death. Neither is there a second marriage to terminate because the second marriage was likewise dissolved by the death of Clemente Bailon.

However, it is not correct to conclude that simply because the filing of the Affidavit of Reappearance with the Civil Registry where parties to the subsequent marriage reside is already inutile, the respondent SSS has now the authority to review the decision of the RTC and consequently declare the second marriage null and void. [36] (Emphasis and underscoring supplied)

The SSC and the SSS separately filed their Motions for Reconsideration [37] which were both denied for lack of merit.

Hence, the SSS' present petition for review on certiorari [38] anchored on the following grounds:

I

THE DECISION OF THE HONORABLE COURT OF APPEALS IS CONTRARY TO LAW.

II

THE HONORABLE COURT OF APPEALS GRAVELY ABUSED ITS DISCRETION AMOUNTING TO LACK OF JURISDICTION.[39]

The SSS faults the CA for failing to give due consideration to the findings of facts of the SSC on the prior and subsisting marriage between Bailon and Alice; in disregarding the authority of the SSC to determine to whom, between Alice and respondent, the death benefits should be awarded pursuant to Section 5 [40] of the Social Security Law; and in declaring that the SSS did not give respondent due process or ample opportunity to present evidence in her behalf.

The SSS submits that "the observations and findings relative to the CFI proceedings are of no moment to the present controversy, as the same may be considered only as obiter dicta in view of the SSC's finding of the existence of a prior and subsisting marriage between Bailon and Alice by virtue of which Alice has a better right to the death benefits." [41]

The petition fails.

That the SSC is empowered to settle any dispute with respect to SSS coverage, benefits and contributions, there is no doubt. In so exercising such power, however, it cannot review, much less reverse, decisions rendered by courts of law as it did in the case at bar when it declared that the December 10, 1970 CFI Order was obtained through fraud and subsequently disregarded the same, making its own findings with respect to the validity of Bailon and Alice's marriage on the one hand and the invalidity of Bailon and respondent's marriage on the other.

In interfering with and passing upon the CFI Order, the SSC virtually acted as an appellate court. The law does not give the SSC unfettered discretion to trifle with orders of regular courts in the exercise of its authority to determine the beneficiaries of the SSS.

The two marriages involved herein having been solemnized prior to the effectivity on August 3, 1988 of the Family Code, the applicable law to determine their validity is the Civil Code which was the law in effect at the time of their celebration. [42]

Article 83 of the Civil Code [43] provides:

Art. 83. Any marriage subsequently contracted by any person during the lifetime of the first spouse of such person with any person other than such first spouse shall be illegal and void from its performance, unless:

(1) The first marriage was annulled or dissolved; or

(2) The first spouse had been absent for seven consecutive years at the time of the second marriage without the

spouse present having news of the absentee being alive, or if the absentee, though he has been absent for less than seven years, is generally considered as dead and believed to be so by the spouse present at the time of contracting such subsequent marriage, or if the absentee is presumed dead according to Articles 390 and 391. The marriage so contracted shall be valid in any of the three cases until declared null and void by a competent court. (Emphasis and underscoring supplied)

Under the foregoing provision of the Civil Code, a subsequent marriage contracted during the lifetime of the first spouse is illegal and void ab initio unless the prior marriage is first annulled or dissolved or contracted under any of the three exceptional circumstances. It bears noting that the marriage under any of these exceptional cases is deemed valid "until declared null and void by a competent court." It follows that the onus probandi in these cases rests on the party assailing the second marriage. [44]

In the case at bar, as found by the CFI, Alice had been absent for 15 consecutive years [45] when Bailon sought the declaration of her presumptive death, which judicial declaration was not even a requirement then for purposes of remarriage. [46]

Eminent jurist Arturo M. Tolentino (now deceased) commented:

Where a person has entered into two successive marriages, a presumption arises in favor of the validity of the second marriage, and the burden is on the party attacking the validity of the second marriage to prove that the first marriage had not been dissolved; it is not enough to prove the first marriage, for it must also be shown that it had not ended when the second marriage was contracted. The presumption in favor of the innocence of the defendant from crime or wrong and of the legality of his second marriage, will prevail over the presumption of the continuance of life of the first spouse or of the continuance of the marital relation with such first spouse. [47] (Underscoring supplied)

Under the Civil Code, a subsequent marriage being voidable, [48] it is terminated by final judgment of annulment in a case instituted by the absent spouse who reappears or by either of the spouses in the subsequent marriage.

Under the Family Code, no judicial proceeding to annul a subsequent marriage is necessary. Thus Article 42 thereof provides:

Art. 42. The subsequent marriage referred to in the preceding Article shall be automatically terminated by the recording of the affidavit of reappearance of the absent spouse, unless there is a judgment annulling the previous marriage or declaring it void ab initio.

A sworn statement of the fact and circumstances of reappearance shall be recorded in the civil registry of the residence of the parties to the subsequent marriage at the instance of any interested person, with due notice to the spouses of the subsequent marriage and without prejudice to the fact of reappearance being judicially determined in case such fact is disputed. (Emphasis and underscoring supplied)

The termination of the subsequent marriage by affidavit provided by the above-quoted provision of the Family Code does not preclude the filing of an action in court to prove the reappearance of the absentee and obtain a declaration of dissolution or termination of the subsequent marriage. [49]

If the absentee reappears, but no step is taken to terminate the subsequent marriage, either by affidavit or by court action, such absentee's mere reappearance, even if made known to the spouses in the subsequent marriage, will not terminate such marriage. [50] Since the second marriage has been contracted because of a presumption that the former spouse is dead, such presumption continues in spite of the spouse's physical reappearance, and by fiction of law, he or she must still be regarded as legally an absentee until the subsequent marriage is terminated as provided by law. [51]

If the subsequent marriage is not terminated by registration of an affidavit of reappearance or by judicial declaration but by death of either spouse as in the case at bar, Tolentino submits:

x x x [G]enerally if a subsequent marriage is dissolved by the death of either spouse, the effects of dissolution of valid marriages shall arise. The good or bad faith of either spouse can no longer be raised, because, as in annulable or voidable marriages, the marriage cannot be questioned except in a direct action for annulment. [52] (Underscoring supplied)

Similarly, *Lapuz v. Eufemio* [53] instructs:

In fact, even if the bigamous marriage had not been void ab initio but only voidable under Article 83, paragraph 2, of the Civil Code, because the second marriage had been contracted with the first wife having been an absentee for seven consecutive years, or when she had been generally believed dead, still the action for annulment became extinguished as soon as one of the three persons involved had died, as provided in Article 87, paragraph 2, of the Code, requiring that the action for annulment should be brought during the lifetime of any one of the parties involved. And furthermore, the liquidation of any conjugal partnership that might have resulted from such voidable marriage must be carried out "in the testate or intestate proceedings of the deceased spouse," as expressly provided in Section 2 of the Revised Rule 73, and not in the annulment proceeding. [54] (Emphasis and underscoring supplied)

It bears reiterating that a voidable marriage cannot be assailed collaterally except in a direct proceeding. Consequently, such marriages can be assailed only during the lifetime of the parties and not after the death of either, in which case the parties and their offspring will be left as if the marriage had been perfectly valid. [55] Upon the death of either, the marriage cannot be impeached, and is made good ab initio.[56]

In the case at bar, as no step was taken to nullify, in accordance with law, Bailon's and respondent's marriage prior to the former's death in 1998, respondent is rightfully the dependent spouse-beneficiary of Bailon.

In light of the foregoing discussions, consideration of the other issues raised has been rendered unnecessary.

WHEREFORE, the petition is DENIED.

No costs.

SO ORDERED.

Carpio, (Acting Chairperson) and Tinga, JJ. concur.

Quisumbing, (Chairperson), J., on official leave.

[1] Penned by Justice Remedios A. Salazar-Fernando and concurred in by Justices Mariano C. del Castillo and Edgardo F. Sundiam.

[2]CA rollo, pp. 147-157.

[3] Id. at 195.

[4] Id. at 47-55.

[5] Id. at 56.

[6] SSC records, p. 112.

[7] Id. at 65-67.

[8] CA rollo, pp. 6-9.

[9] Id. at 8-9.

[10] SSC records, p. 127.

[11] CA rollo, p. 11.

[12] SSC records, p. 48.

[13] Ibid.

[14] Id. at 96-97.

[15] Id. at 55.

[16] Ibid.

[17] Id. at 109.

[18] Id. at 110.

[19] Herminia Bailon-Argente, Cecilia Bailon-Yap, Norma Bailon-Chavez, Roselyn Bailon-Ladesma, Susan J. Bailon, Charito Bailon-Soriano, and Clemente J. Bailon, Jr.

[20] SSC records, pp. 113-120.

[21] Id. at 135-136.

[22] Id. at 137.

[23] Id. at 124.

[24] Id. at 125.

[25] Id. at 129-130.

[26] Id. at 134.

[27] CA rollo, pp. 12-14.

[28] SSC records, p. 149.

[28] CA rollo, pp. 15-19.

[30] Id. at 144.

[31] Rollo, pp. 56-57.

[32] Pertinent portions of the Memorandum provide:

x x x x

- Based on the interview conducted by our Account Officer, Mr. Rolando G. Gomez to [sic] the relatives of Alice (not Aliz) Diaz namely: Rogelio Del Prado and Emelita Diaz at Poblacion Sur, Barcelona, Sorsogon they alleged that subject deceased member and Alice live [sic] as husband and wife for only a year. Alice never left Barcelona, Sorsogon since their separation and is not dependent for support nor received support from the deceased member. x x x

[33] Rollo, pp. 53-56.

[34] SSC records, pp. 172-174.

[35] CA rollo, pp. 2-5.

[36] Rollo, pp. 41-44.

[37] CA rollo, pp. 161-170.

[38] Rollo, pp. 10-34.

[39] Id. at 22.

[40] SEC. 5. Settlement of Disputes. — (a) Any dispute arising under this Act with respect to coverage, benefits, contributions and penalties thereon or any other matter related thereto, shall be cognizable by the Commission, and any case filed with respect thereto shall be heard by the Commission, or any of its members, or by hearing officers duly authorized by the Commission and decided within the mandatory period of twenty (20) days after the submission of the evidence. The filing, determination and settlement of disputes shall be governed by the rules and regulations promulgated by the Commission.

x x x x

[41] Rollo, p. 28.

[42] Article 256 of the Family Code itself limited its retroactive governance only to cases where it thereby would not prejudice or impair vested or acquired rights in accordance with the Civil Code or other laws.

[43] Article 41 of the Family Code now provides:

Art. 41. A marriage contracted by any person during the subsistence of a previous marriage shall be null and void, unless before the celebration of the subsequent marriage, the prior spouse had been absent for four consecutive years and the spouse present had a well-founded belief that the absent spouse was already dead. In case of disappearance where there is danger of death under the circumstances set forth in the provisions of Article 391 of the Civil Code, an absence of only two years shall be sufficient.

For the purpose of contracting the subsequent marriage under the preceding paragraph, the spouse present must institute a summary proceeding as provided in this Code for the declaration of presumptive death of the absentee, without prejudice to the effect of reappearance of the absent spouse.

[44] *Armas v. Calisterio*, 386 Phil. 402, 409 (2000).

[45] CA rollo, p. 8.

[46] *Jones v. Hortiguella*, 64 Phil. 179, 183 (1937).

[47] I A. Tolentino, *Commentaries and Jurisprudence on the Civil Code of the Philippines* 282 (1999 ed.). (Citations omitted)

[48] Art. 85. A marriage may be annulled for any of the following causes, existing at the time of the marriage:

x x x x

(2) In a subsequent marriage under Article 83, Number 2, that the former husband or wife believed to be dead was in fact living and the marriage with such former husband or wife was then in force;

x x x x (Underscoring supplied)

Art. 87. The action for annulment of marriage must be commenced by the parties and within the periods as follows:

x x x x

(2) For causes mentioned in number 2 of Article 85, by the spouse who has been absent, during his or her lifetime; or by either spouse of the subsequent marriage during the lifetime of the other;

x x x x

[49] Supra note 47, at 284.

[50] Ibid.

[51] Id. at 285-286.

[52] Supra note 47, at 287.

[53] 150 Phil. 204 (1972).

[54] Id. at 213.

[55] Niñal v. Bayadog, 384 Phil. 661, 673 (2000). (Citations omitted)

[56] Id. at 674.

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.