

**NATIONAL HOME MORTGAGE FINANCE CORPORATION,
PETITIONER, VS. MARIO ABAYARI, MAY ALMINE, MA. VICTORIA
ALPAJARO, FLORANTE AMORES, ANGELINA ANCHETA, ANGELINE
ODIEM-ARANETA, CECILIA ...**

G.R. No. 166508. October 02, 2009

Ponente: PERALTA, J.

Read online (full-text search, related cases, audio case brief): <https://batas.org/library/g-r-no-166508/>

PERALTA, J.:

In this petition for review[1] under Rule 45 of the Rules of Court, the National Home Mortgage Finance Corporation assails the August 20, 2004 Decision[2] of the Court of Appeals in CA-G.R. SP No. 82637, which dismissed its petition for certiorari from the October 14, 2003[3] and December 15, 2003[4] Orders issued by the Regional Trial Court (RTC) of Makati City, Branch 138.[5] The said Orders, in turn, respectively granted the issuance of a writ of execution and denied petitioner's motion for reconsideration in Civil Case No. 99-1209 - a case for mandamus.

The antecedents follow.

Petitioner, the National Home Mortgage Finance Corporation (NHMFC), is a government-owned and controlled corporation created under the authority of Presidential Decree No. 1267 for the primary purpose of developing and providing a secondary market for home mortgages granted by public and/or private home-financing institutions. [6] In its employ were respondents,[7] mostly rank-and-file employees, who all profess as having been hired after June 30, 1989.[8]

On July 1, 1989, Republic Act No. 6758, otherwise known as The Compensation and Position Classification Act of 1989, was enacted and was subsequently approved on August 21, 1989. Section 12 thereof directed that all allowances - namely representation and transportation allowance, clothing and laundry allowance, subsistence allowance, hazard pay and other allowances as may be determined by the budget department - enjoyed by covered employees should be deemed included in the standardized salary rates prescribed therein, and that the other additional compensation being received by incumbents only as of July 1, 1989 not integrated into the standardized salary rates should continue to be authorized. To implement the law, the Department of Budget and Management (DBM) issued Corporate Compensation Circular No. 10.[9] Section 5.5[10] thereof excluded certain allowances and benefits from integration into the standardized basic salary but continued their grant to those who were incumbents as of June 30, 1989 and who were actually receiving the benefits as of said date. These are the allowances involved in this case.

Respondents filed a petition for mandamus with the RTC of Makati City, Branch 138[11] to compel petitioner to pay them meal, rice, medical, dental, optical and children's allowances, as well as longevity pay, which allegedly were already being enjoyed by other NHMFC employees as early as July 1, 1989. In its April 27, 2001 Decision, the trial court ruled favorably and ordered petitioner to pay respondents the allowances prayed for, retroactive to the respective dates of appointment.[12] The dispositive portion of the Decision reads:

WHEREFORE, judgment is hereby rendered in favor of the petitioners and respondent is ordered to pay petitioners their meal allowance, rice allowance, medical allowance, longevity pay and children's allowance retroactive to the dates of their respective appointments up to the present or for the time that they were employed by the respondent.

SO ORDERED.[13]

In arriving at the conclusion that respondents were entitled to the prayed-for benefits, the trial court explained, thus,

The use of the word "only" before the words July 1, 1989 in section 12 of Republic Act No. 6758 appears to be the source of the dispute.

Section 12 is clear that other additional compensation being received by incumbents only as of July 1, 1989 that are not integrated into the standardized salary rates shall continue to be authorized. The law is prospective in effect and it does not say that such additional compensation shall not continue to be authorized for employees appointed after June 30, 1989. The use of the word "only" before the words "as of July 1, 1989" qualifies the additional compensation which can be continued. The foregoing applies to all employees whether permanent or casual.

DBM Circular No. 10, the Implementing Rules and Regulations particularly section 5.5 thereof...use the word "only" for incumbents as of June 30, 1989 and by implication the same shall not apply to employees appointed after June 30, 1989. This is in effect another qualification limiting the grant of benefits to those who are incumbents as of June 30, 1989, a condition not imposed by Section 12 of Republic Act No. 6758 for which reason it has to be strike (sic) down.[14]

Petitioner timely filed an appeal with the Court of Appeals.[15] In its November 21, 2001 Decision, the appellate court affirmed the trial court's ruling.[16] No appeal was taken from the decision and upon its finality,[17] respondents moved for execution.[18]

However, the motion for execution was withdrawn when on May 12, 2002, petitioner and respondents executed a Compromise Agreement in which petitioner bound itself to comply with the decision rendered in the case, except that the payment of the allowances adjudicated in favor of respondents would be made in four installments instead. It was, likewise stipulated therein that the parties waive all claims against each other. The trial court did not take any positive action on the compromise except to note the same since the parties did not intend to novate the April 27, 2001 Decision.[19] On that basis, petitioner had started paying respondents the arrears in benefits.

Conflict arose when the DBM sent a letter[20] dated July 15, 2003 to NHMFC President Angelico Salud disallowing the payment of certain allowances, including those awarded by the trial court to respondents. A reading of the letter reveals that the disallowance was made in accordance with the 2002 NHMFC Corporate Operating Budget previously issued by the DBM.

To abide by the DBM's directive, petitioner then issued a memorandum stating that effective August 2003, the grant of benefits to its covered employees, including those awarded to respondents, would be curtailed pursuant to the DBM letter.[21] This eventuality compelled respondents to file for the second time a motion for a writ of execution of the trial court's April 27, 2001 decision. [22]

In its October 14, 2003 Order,[23] the trial court found merit in respondents' motion; hence, it directed the execution of the judgment. Petitioner moved for reconsideration[24] but it was denied.[25] On February 16, 2004, the trial court issued a Writ of Execution/Garnishment with a directive to the sheriff to tender to respondents the amount of their collective claim equivalent to P4,806,530.00 to be satisfied out of petitioners goods and chattels and if the same be not sufficient, out of its existing real property.[26] Respondents then sought the garnishment of

its funds under the custody of the Land Bank of the Philippines.[27]

Bent on preventing execution, petitioner filed a petition for certiorari with the Court of Appeals, docketed as CA-G.R. SP No. 82637.[28] In it, petitioner ascribed grave abuse of discretion to the trial court in ordering the execution of the judgment. It pointed out that the trial court disregarded the fact that the DBM's issuance amounted to a supervening event, or an occurrence that changed the situation of the parties that would make the continued payment of allowances to respondents impossible and illegal, and disregarded the DBM's exclusive authority to allow or disallow the payment of the benefits in question.[29] It likewise faulted the trial court in ordering the garnishment of its funds despite the settled rule that government funds may not be garnished in the absence of an appropriation made by law.[30]

The Court of Appeals, however, found no grave abuse of discretion on the part of the trial court; hence, in its August 20, 2004 Decision, it dismissed the petition for lack of merit.[31]

In its present recourse, petitioner, on the one hand, insists that it is difficult not to consider the issuance of the DBM in this case as a supervening event that would make the execution of the trial court's decision inequitable and/or impossible, since the determination of entitlement to benefits and allowances among government employees is within the agency's exclusive authority. It argues that, hence, both the trial court and the Court of Appeals were in error to order the execution of the decision as the same totally disregards the rule that issuances of administrative agencies are valid and enforceable.[32] Again, it asserts that the garnishment of its funds was not in order as there was no existing appropriation therefor.[33]

Respondents, on the other hand, argue in the main that inasmuch as the core issue of whether they were entitled to the schedule of benefits under Section 12 of R.A. No. 6758 had already been settled by both the trial court in Civil Case No. 99-1209 and the Court of Appeals in CA-G.R. SP No. 66303, the DBM letter should not be allowed to interfere with the decision and render the same ineffective. Since the said decision had already attained finality, they posit that execution appeared to be the only just and equitable measure under the premises[34] and that garnishment lies against petitioner's funds inasmuch as it has a personality separate and distinct from the government.[35]

There is partial merit in the petition.

To begin with, a writ of mandamus is a command issuing from a court of law of competent jurisdiction, in the name of the state or sovereign, directed to an inferior court, tribunal, or board, or to some corporation or person, requiring the performance of a particular duty therein specified, which duty results from the official station of the party to whom the writ is directed, or from operation of law.[36] It is employed to compel the performance, when refused, of a ministerial duty[37] which, as opposed to a discretionary one, is that which an officer or tribunal performs in a given state of facts, in a prescribed manner, in obedience to the mandate of legal authority, without regard to or the exercise of his or its own judgment upon the propriety or impropriety of the act done.[38]

A favorable judgment rendered in a special civil action for mandamus is in the nature of a special judgment. As such, it requires the performance of any other act than the payment of money or the sale or delivery of real or personal property the execution of which is governed by Section 11, Rule 39 of the Rules of Court[39] which states:

SECTION 11. Execution of Special Judgment.--When the judgment requires the performance of any act other than those mentioned in the two preceding sections, a certified copy of the judgment shall be attached to the writ of execution and shall be served by the officer upon the party against whom the same is rendered, or upon any other person required thereby, or by law, to obey the same, and such party or person may be punished for contempt if he disobeys such judgment.

While the April 17, 2001 Decision of the trial court ordered petitioner to pay the benefits claimed by respondents, it by no means ordered the payment of a specific sum of money and instead merely directed petitioner to extend to respondents the benefits under R.A. No. 6758 and its implementing rules. Being a special judgment, the decision may not be executed in the same way as a judgment for money handed down in an ordinary civil case governed by Section 9, Rule 39 of the Rules Court which sanctions garnishment of debts and credits to satisfy a monetary award. Garnishment is proper only when the judgment to be enforced is one for payment of a sum of money. It cannot be employed to implement a special judgment such as that rendered in a special civil action for mandamus.[40]

On this score, not only did the trial court exceed the scope of its judgment when it awarded the benefits claimed by respondents. It also committed a blatant error when it issued the February 16, 2004 Order directing the garnishment of petitioner's funds with the Land Bank of the Philippines equivalent to P4,806,530.00, even though the said amount was not specified in the decision it sought to implement.

Be that as it may, assuming for the sake of argument that execution by garnishment could proceed in this case against the funds of petitioner, it must bear stress that the latter is a government-owned or controlled corporation with a charter of its own. Its juridical personality is separate and distinct from the government and it can sue and be sued in its name.[41] As such, while indeed it cannot evade the effects of the execution of an adverse judgment and may not ordinarily place its funds beyond an order of garnishment issued in ordinary cases,[42] it is imperative in order for execution to ensue that a claim for the payment of the judgment award be first filed with the Commission on Audit (COA).[43]

Under Commonwealth Act No. 327,[44] as amended by P.D. No. 1445,[45] the COA, as one of the three independent constitutional commissions, is specifically vested with the power, authority and duty to examine, audit and settle all accounts pertaining to the revenue and receipts of, and expenditures or uses of funds and property owned or held in trust by the government, or any of its subdivisions, agencies or instrumentalities, including government-owned and controlled corporations.[46] To ensure the effective discharge of its functions, it is vested with ample powers, subject to constitutional limitations, to define the scope of its audit and examination and establish the techniques and methods required therefor, to promulgate accounting and auditing rules and regulations, including those for the prevention and disallowance of irregular, unnecessary, excessive, extravagant or unconscionable expenditures or uses of government funds and properties.[47] Section 1,[48] Rule II of the COA Rules of Procedure materially provides:

Section 1. General Jurisdiction.--The Commission on Audit shall have the power, authority and duty to examine, audit and settle all accounts pertaining to the revenue and receipts of, and expenditures or uses of funds and property, owned or held in trust by, or pertaining to the Government, or any of its subdivisions, agencies or instrumentalities, including government owned and controlled corporations with original charters, and on a post-audit basis: (a) constitutional bodies, commissions and offices that have been granted fiscal autonomy under the Constitution; (b) autonomous state colleges and universities; (c) other government-owned or controlled corporations and their subsidiaries; and (d) such non-governmental entities receiving subsidy or equity directly or indirectly, from or through the government, which are required by law or the granting institution to submit to such audit as a condition of subsidy or equity. However, where the internal control system of the audited agencies is inadequate, the Commission may adopt such measures, including temporary or special pre-audit, as are necessary or appropriate to correct the deficiencies. It shall keep the general accounts of the Government, and for such period as may be provided by law, preserve the vouchers and other supporting papers pertaining thereto.

x x x x

Specifically, such jurisdiction shall extend over but not limited to the following: x x x Money claims due from

or owing to any government agency x x x.[49]

Clearly, the matter of allowing or disallowing a money claim against petitioner is within the primary power of the COA to decide. This no doubt includes money claims arising from the implementation of R.A. No. 6758.[50] Respondents' claim against petitioner, although it has already been validated by the trial court's final decision, likewise belongs to that class of claims; hence, it must first be filed with the COA before execution could proceed. And from the decision therein, the aggrieved party is afforded a remedy by elevating the matter to this Court via a petition for certiorari[51] in accordance with Section 1 Rule XI, of the COA Rules of Procedure. It states:

Section 1. Petition for Certiorari. - Any decision, order or resolution of the Commission may be brought to the Supreme Court on certiorari by the aggrieved party within thirty (30) days from receipt of a copy thereof in the manner provided by law, the Rules of Court and these Rules.

When the decision, order or resolution adversely affects the interest of any government agency, the appeal may be taken by the proper head of the agency.

At this juncture, it is unmistakable that the recourse of respondents in CA-G.R. SP No. 82637 as well as in the petition before us is at best premature. Thus, the Court cannot possibly rule on the merits of the petition lest we would only be preempting the action of the COA on the matter. Suffice it to say that the propriety or regularity of respondents' claim under the judgment of the trial court may properly be addressed by the COA in an appropriate action. And even if we endeavor to take great lengths in deciding the merits of the case and determine the propriety of the DBM's issuance, its sufficiency to prevent the execution of the final judgment rendered in this case, and the entitlement or non-entitlement of each one of the respondents to the benefits under R.A. No. 6758, the same would nevertheless be a futile exercise. This, because after having pored over the records of the case, we found nothing sufficient to support respondents' uniform claim that they were incumbents as of July 1, 1989 - the date provided in Section 12 of R.A. 6758 - except perhaps their bare contention that they were all hired after June 30, 1989.

With this disquisition, we find no compelling reason to unnecessarily lengthen the discussion by undeservingly proceeding further with the other issues propounded by the parties.

WHEREFORE, the petition is GRANTED IN PART. The Writ of Execution dated February 16, 2004 issued in Civil Case No. 99-1209 is hereby SET ASIDE. The Regional Trial Court of Makati, Branch 138 is DIRECTED to issue a writ of execution in accordance with this Decision and execute the judgment pursuant to Section 11, Rule 39, of the Rules of Court.

SO ORDERED.

Ynares-Santiago, (Chairperson), Chico-Nazario, Velasco, Jr., and Nachura, JJ., concur.

[1] Rollo, pp. 9-36.

[2] The decision was rendered by the Special Seventeenth Division and was penned by Associate Justice Andres B. Reyes, with Associate Justices Japar B. Dimaampao and Monina Arevalo-Zeñarosa (now retired) concurring; rollo, pp. 40-47.

[3] Records, Vol. I, p. 441.

[4] Id. at 451.

[5] Presided by Judge Sixto Marella, Jr. (now Court of Appeals Associate Justice).

[6] Presidential Decree No. 1267, which carried the title "Creating a National Home Mortgage Finance Corporation, Defining Its Powers and Functions, and for Other Purposes," was signed on December 22, 1977.

[7] Namely, Mario Abayari, May Almine, Ma. Victoria Alpajaro, Florante Amores, Angelina Ancheta, Angeline Odiem-Araneta, Cecilia Apacible, Miriam Bajado, Eduardo Balauro, Evangelina Baliao, Luisa Banua, Rizalina, Benlayo, Marjorie Binag, Cresencia Bisnar, Carmelita Breboneria, Joselyn Bunyi, Emilio Cabmongan, Jr., Paz Divina Cabanero, Raul Cabanilla, Leonila Wynda Cada, Celestina Casao, Elizabeth Casas, Arnulfo Catalan, Francis dela Chica, Jaime Cortes, Jaime dela Cruz, Johnny Custodio, Ma. Belinda Dapula, Remedios Debuque, Rebecca Decara, Jocelyn Diego, Jaime Duque, Lucia Enriquez, Ma. Lucia Esperos, Helen Evangelista, Celso Fernandez, Edilberto San Gabriel, Reynaldo San Gabriel, Edmundo Garais, Jennilyn Gozado, Evelyn Guevarra, Ma. Magdalena Hidona, Victorino Indefonso, Jr., Grace Cecille Javier, Marieta Jose, Ma. Cecilia Kapaw-an, Evangeline Labay, Senora Lacunsay, Milagroso Allan Lamban, Violeta De Leon, Charito Lontayo, Remedios Loyola, Nora Malaluan, Alberto Malificiado, Dennis Manzano, Ma. Concepcion Marquez, Reynaldo Masilang, Magdalena Mendoza, Melchor Nanud, Milagros Nepomuceno, Rosemarie Nepomuceno, Apolo Nisperos, Annaliza Nobrera, Evangeline Nuesca, Yumina Pablo, Gloria Panganiban, Rogelio Paquiz, Rolando Paredes, Nora Pedroso, Maria Hilna Dela Pena, Victoria Penarada, Melvin Peralta, Dorothy Perez, Frederick Michael Portacion, Rommel Rabaca, Roderick Realubit, Gwendolyn Remorin, Antonio Delos Reyes, Nerrisa Reyes, Nenita Robrigado, Allan Romero, Ma. Rosario Romulo, Luis Del Rosario, Cristina Rosas, Dexter Salazar, Magdalena Salomon, Olivia Salomon, Elenita Sanchez, Angelita Santelices, Anabelle Santos, Aurea Santos, Nelia Santos, Sharlene Santos, Jaime Singh, Delmasingun, Evelyn So, Jeanne Socorro, Milagros Solmirano, Christine Talusik, Cyril Romuado Teja, Efren Tesorero, Pennylane Tiongson, Cipriano Tomines, Ronilo Umali, Ma. Lourdes Valdueza, Ma. Antonia Valenzuela, Edwin Vanguardia, Carlo Vega, Annamor Velasco, Estefania Villanueva, Candelaria Yodico

[8] Records, Vol. I, p. 5.

[9] It carries the title "Rules and Regulations for the Implementation of the Revised Compensation and Position Classification System Prescribed under R.A. No. 6758 For Government-Owned and/or Controlled Corporations (GOCCs) and Financial Institutions (GFIs)." For lack of the requisite publication, the Circular was declared ineffective in the case of *De Jesus v. Commission on Audit*, 355 Phil. 584 (1998), but it was subsequently re-issued on February 15, 1999 and published on March 1, 1999. See *Magno v. Commission on Audit*, G.R. No. 149941, August 28, 2007, 531 SCRA 339.

[10] Section 5.5. The following allowances/fringe benefits authorized to GOCCs/GFIs pursuant to the aforementioned issuances are not likewise to be integrated into the basic salary and allowed to be continued only for incumbents of positions as of June 30, 1989 who are authorized and actually receiving said allowances/benefits as of said date at the same terms and conditions prescribed in said issuances:

- 5.5.1. Rice Subsidy;
- 5.5.2. Sugar Subsidy;
- 5.5.3. Death Benefits other than those granted by the GSIS;
- 5.5.4. Medical/dental/optical allowances/benefits;
- 5.5.5. Children's Allowance;
- 5.5.6. Special Duty Pay/Allowance;
- 5.5.7. Meal Subsidy;
- 5.5.8. Longevity Pay; and
- 5.5.9. Teller's Allowance.

[11] Supra note 5.

[12] Records, Vol. I, p. 207.

[13] Id.

[14] Id. at 206-207.

[15] The appeal was docketed as CA-G.R. SP No. 66303.

[16] See the Decision in CA G.R. SP No. 66303, CA rollo, p. 37.

[17] Records, Vol. I, p. 392.

[18] Id. at 395-398.

[19] See Order dated May 20, 2002, records, vol. I, p. 391.

[20] The letter was signed by then DBM secretary Emilia Boncodin, CA rollo, pp. 40-42.

[21] Records, Vol. II, p. 157.

[22] Records, Vol. I, pp. 395-398.

[23] Id. at 441.

[24] Id. at 442-444.

[25] Id. at 451.

[26] Records, p. 157.

[27] While petitioner claims that respondents had sought the garnishment of its funds, the supposed notice of garnishment does not appear in the records.

[28] CA rollo, pp. 2-16.

[29] Id. at 7-13.

[30] Id. at 135.

[31] Id. at 147. The dispositive portion of the decision reads:

WHEREFORE, premises considered, the Petition for Certiorari is hereby DISMISSED for lack of merit.

SO ORDERED.

[32] Rollo, pp. 20-21.

[33] Id. at 257.

[34] Id. at 193, 195-197.

[35] Id. at 194-195.

[36] 34 Am Jur. Mandamus, §2.

[37] Angchangco, Jr. v. Ombudsman, G.R. No. 122728, February 13, 1997, 268 SCRA 301, 306.

[38] Kapisanan ng mga Manggagawa sa Manila Railroad Company Credit Union, Inc. v. Manila Railroad

Company, G.R. No. L-25316, February 28, 1979, 88 SCRA 616, 621.

[39] FERIA NOCHE, Civil Procedure Annotated, Vol. 2, 2001 ed. pp. 56, 501.

[40] National Electrification Administration v. Morales, G.R. No. 154200, July 24, 2007, 528 SCRA 79, 88-89.

[41] Section 5 of Presidential Decree No. 1267, dated December 21, 1977, provides:

Section 5. Powers of the Corporation. The corporation shall have the following powers and functions:

x x x x

(f) To adopt, alter and use a corporate seal; to sue and be sued; and generally, to exercise all the powers of a corporation under the Corporation Law which are not inconsistent herewith x x x.

[42] See National Electrification Administration v. Morales, supra note 40, 89-90, citing National Housing Authority v. Heirs of Guivelondo, 452 Phil 481, 495 (2003); Rizal Commercial Banking Corporation v. De Castro, G.R. No. L-34548, November 29, 1988, 168 SCRA 49, 59; Philippine Rock Industries, Inc. v. Board of Liquidators, G.R. No. 84992, December 15, 1989, 180 SCRA 171, 174-175; Philippine National Railways v. Court of Appeals, G.R. No. L-55347, October 4, 1985, 139 SCRA 87, 91 and Philippine National Bank v. Pabalan, G.R. No. L-33112, June 15, 1978, 83 SCRA 595, 601-602.

[43] National Electrification Administration v. Morales, supra note 40, at 90, citing Parreno v. Commission on Audit, G.R. No. 162224, June 7, 2007, 523 SCRA 390. (2007).

[44] Entitled "An Act Fixing the Time within which the Auditor General Shall render His Decisions and Prescribing the Manner of Appeal Therefrom."

[45] Section 26 of Presidential Decree No. 1445 (Ordaining and Instituting a Government Auditing Code of the Philippines). Signed on June 11, 1978.

[46] National Electrification Administration v. Morales, supra note 40, National Irrigation Administration v. Enciso, G.R. No. 142571, May 6, 2006; Commissioner of Internal Revenue v. Commission on Audit, G.R. No. 101976, January 29, 1993, 218 SCRA 203, 211-212.

[47] National Irrigation Administration v. Enciso, supra, Commissioner of Internal Revenue v. Commission on Audit, supra note 46.

[48] This provision is also found in Section 2(1), Article IX(D) of the 1987 Constitution.

[49] Emphasis ours.

[50] See National Electrification Administration v. Morales, supra note 40.

[51] Public Estates Authority v. Commission on Audit, G.R. No. 156537, January 24, 2007, 512 SCRA 428; Philippine National Bank v. Palma, G.R. No. 157279, August 9, 2005, 466 SCRA 307; Philippine Ports Authority v. Commission on Audit, G.R. No. 100773, October 16, 1992, 214 SCRA 653, 660; Manila International Airport Authority v. Commission on Audit, G.R. No. 104217, December 4, 1994, 238 SCRA 714.

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.