

IBARRA P. ORTEGA, PETITIONER, VS. SOCIAL SECURITY COMMISSION, AND SOCIAL SECURITY SYSTEM, RESPONDENTS.

G.R. No. 176150. June 25, 2008

Ponente: CARPIO MORALES, J.

Read online (full-text search, related cases, audio case brief): <https://batas.org/library/g-r-no-176150/>

CARPIO MORALES, J.:

Petitioner Ibarra P. Ortega assails the Court of Appeals' August 7, 2006 Decision[1] dismissing his petition for review and upholding the denial by respondent Social Security Commission (SSC) of his application for total permanent disability benefits, and the Resolution[2] of January 16, 2007 denying his motions for reconsideration and inhibition.

Petitioner, a member of respondent Social Security System (SSS), filed claims for partial permanent disability benefits on account of his condition of Generalized Arthritis and Partial Ankylosis,[3] which claims the SSS granted for a total monthly pension of 23 months.[4]

After the expiration of his disability pension, petitioner filed with the SSS Malabon Branch Office on April 26, 2000 a claim for total permanent disability benefits.[5] His application, docketed as BO-0000-1755, was denied, however, on the ground that he was already granted disability benefits for the same illness and physical examination showed no progression of illness.[6] Dr. Juanillo Descalzo III, SSS Malabon Branch senior physician, observed that petitioner merely had a "slight limitation of grasping movement for both hands." [7]

Aggrieved, petitioner filed before the SSC an unverified Petition of June 19, 2000,[8] alleging that the SSS denied his application despite the fact that his attending physician, Dr. Rafael Recto, Jr., diagnosed him to be suffering from Trigger finger 4th (L) and thumb (L)[9] while another private medical practitioner, Dr. Flo dela Cruz, diagnosed him to be also suffering from Bronchial Asthma, Hypertension and Gastro-Esophageal Reflux Disease.[10]

Further claiming to be afflicted with rheumatoid arthritis of both hands affecting all fingers and both palms,[11] petitioner contended that the medical opinion of the SSS physician who interviewed him for less than three minutes cannot prevail over the findings of his physicians who have been treating him over a long period of time.

Before taking cognizance of his appeal, the SSC directed the exhaustion of administrative remedies, by letter of June 30, 2000. The matter was thus referred to the SSS Office of the Medical Program Director for review of petitioner's disability claim.[12]

Meanwhile, by letter of July 17, 2000, the SSS Legal Department denied a reconsideration of the denial of his claim,[13] prompting petitioner to submit a letter-opposition of August 15, 2000.[14]

Upon referral of the SSC, the SSS Medical Program Department, through Dr. Carlota A. Cruz-Tutaan and Dr. Jesus S. Tan, confirmed that, upon examination of petitioner, there was no progression of his illness,[15] prompting petitioner to submit a letter-opposition of November 11, 2000 charging the SSS medical officers of issuing fraudulent medical findings.[16] Unperturbed, the SSS Medical Program Department stood its ground and

denied with finality petitioner's claim, by letter of November 22, 2000.[17]

On January 29, 2001, SSC finally docketed petitioner's June 19, 2000 petition as SSC Case No. 1-15115-2001,[18] after petitioner complied with SSC's directives[19] to verify the petition and submit certain document-annexes. SSS then filed its Answer of May 31, 2001,[20] to which petitioner submitted a Reply of June 25, 2001.[21] After the August 10, 2001 pre-hearing conference,[22] the SSS filed its Position Paper of September 7, 2001 while petitioner submitted his Reply of October 19, 2001.

By Resolution of April 3, 2002,[23] the SSC denied petitioner's claim for entitlement to total permanent disability for lack of merit. And it opined that, considering that he had reached the retirement age of 60, on March 19, 1998, with 41 contributions to his name, petitioner may opt:

- (a) [t]o continue paying to the SSS monthly contributions (including employer's share) on his own to complete the required 120 monthly contributions in order to avail of the retirement pension benefit;
- (b) [to] leave his monthly contributions with the SSS for his and his family's future benefits; or
- (c) [to a]vail of the lump sum retirement benefit.[24]

Petitioner moved for reconsideration of the Resolution. The SSC thus directed the SSS to file its comment[25] and, by a subsequent order, to conduct a domiciliary visit and physical examination on petitioner to ascertain whether he could already qualify for such benefit.[26] In compliance therewith, Dr. Rebecca Sison, SSS senior physician, examined petitioner on August 29, 2002 and found no sufficient basis to warrant the granting of total permanent disability benefits to him.[27]

Petitioner's motion for reconsideration having been denied by Order[28] of January 29, 2003, petitioner appealed via Rule 43 to the Court of Appeals[29] which promulgated in CA-G.R. SP No. 75653 the assailed issuances affirming in toto the SSC Resolution and Order.

There is at the outset a need to thresh out procedural issues attending the petition drafted by petitioner himself, apparently without the aid of counsel. While the petition was admittedly filed as a petition for certiorari under Rule 65, it contains a rider averring that it was filed also as a petition for review on certiorari under Rule 45.[30]

In not granting imprimatur to this type of unorthodox strategy, the Court ruled, in a similar case,[31] that a party should not join both petitions in one pleading. A petition cannot be subsumed simultaneously under Rule 45 and Rule 65 of the Rules of Court, nor may it delegate upon the court the task of determining under which rule the petition should fall.[32] It is a firm judicial policy that the remedies of appeal and certiorari are mutually exclusive and not alternative or successive.[33]

Palpably, petitioner crafted this unconventional two-headed petition under no other pretext but to second-guess at the appropriate remedy. His apparent bewilderment led him to later rectify a supposed typographical error in the caption such that instead of "petition for review," the title be read as a "petition for certiorari." [34] The subsequent filing of the Correction of Clerical Errors served no redeeming purpose as it only evinced petitioner's decision to consider the petition as a special civil action for certiorari, which is an improper remedy.

It bears stressing that Rule 45 and Rule 65 pertain to different remedies and have distinct applications.[35] It is axiomatic that the remedy of certiorari is not available where the petitioner has the remedy of appeal or some other plain, speedy and adequate remedy in the course of law.[36] The petition for review under Rule 45 covers the mode of appeal from a judgment, final order, resolution or one which completely disposes of the case, like the herein assailed Decision and Resolution of the appellate court. There being already a final judgment at the time of the filing of the petition, a petition for review under Rule 45 is the appropriate remedy.

Petitioner failed to carve out an exception to this rule, as he did not- and could not- illustrate the inadequacy of an appeal as a remedy that could promptly relieve him from the injurious effects of the assailed judgment.[37] In fact, by seeking the same kind of reliefs via two remedies rolled into one pleading, he implicitly admits that an appeal suffices. Moreover, the probability of divergent rulings, a scenario transpiring in *G & S Transport Corp. v. CA*,[38] is far from obtaining in this case since the assailed issuances emanated from only one court and cannot be elevated separately in different fora.

While the Court may dismiss a petition outright for being an improper remedy,[39] it may, in certain instances where a petition was filed on time both under Rules 45 and 65 and in the interest of justice, proceed to review the substance of the petition and treat it as having been filed under Rule 45.[40] Either way, however, the present petition just the same merits dismissal since it puts to issue questions of fact rather than questions of law which are appropriate for review under a Rule 45 petition.

It is settled that the Court is not a trier of facts and accords great weight to the factual findings of lower courts or agencies whose function is to resolve factual matters.[41] It is not for the Court to weigh evidence all over again.[42] Moreover, findings of fact of administrative agencies and quasi-judicial bodies, which have acquired expertise because their jurisdiction is confined to specific matters, are generally accorded not only respect but finality when affirmed by the Court of Appeals.[43]

The requisite quantum of proof in cases filed before administrative or quasi-judicial bodies is neither proof beyond reasonable doubt nor preponderance of evidence. In this type of cases, a fact may be deemed established if it is supported by substantial evidence, or that amount of relevant evidence which a reasonable mind might accept as adequate to justify a conclusion.[44] In this case, substantial evidence abounds.

The conclusion that petitioner is not entitled to total permanent disability benefits under the Social Security Law was reached after petitioner was examined not just by one but four SSS physicians, namely, Dr. Juanillo Descalzo III, Dr. Carlota A. Cruz-Tutaan, Dr. Jesus S. Tan and Dr. Rebecca Sison.

The initial physical examination and interview revealed that petitioner had slight limitation of grasping movement for both hands. According to Dr. Descalzo, this finding was not enough to grant an extension of benefit since petitioner had already received benefits equivalent to 30% of the body. Responding to the allegation that the April 2000 physical examination was performed in a short period of time, the doctor credibly explained that petitioner's movements were already being monitored and evaluated from a distance as part of the examination of his extremities in order to minimize malingering and overacting.[45]

Meanwhile, the medical findings of Dr. Carlota A. Cruz-Tutaan and Dr. Jesus S. Tan in August and September 2000 were summarized as follows:

Heart:

- manifest regular rhythm
- no murmurs

Lungs:

- on auscultation showed no evidence of wheezing
- breath sounds are normal and;
- he is not in a state of respiratory distress

Hypertension:

- Blood Pressure is 140/80, hence, under control

Extremities: (Hands)

- No deformities noted except for the right small finger, the distal interphalangeal joint is bent at about 30°. No abnormal limitation of movement noted on all the fingers, grasping has improved.[46]

Contrary to petitioner's asseverations, the SSC did not ignore the certifications of petitioner's attending physicians as, in fact, it ordered the SSS in June 2001 to conduct an investigation as to the medical findings and final diagnosis by his attending physicians.[47] It was surfaced that petitioner's medical records in the custody of Dr. Flo dela Cruz could not be found as they were allegedly destroyed by inundation.[48] And it was found that the July 10, 2001 letter-certification by Dr. Rafael Recto, Jr. only narrated the recurring condition of petitioner's trigger finger, the administration to him of local steroid injections, and the performance of surgical release on his left 4th trigger finger on June 16, 1998; and that he was diagnosed on August 28, 2000 with mallet finger (R, 5th), for which he was advised to undergo reconstructive surgery.[49]

Adopting a liberal attitude and exercising sound discretion, the SSC even directed the conduct of another physical examination on petitioner to judiciously resolve his motion for reconsideration. Pursuant thereto, Dr. Sison physically examined petitioner in August 2002, the results of which were reflected in a medical report, viz:

Physical Examination:

General Survey: well nourished, well developed, conscious, coherent but talks with sarcasm and arrogance.

EENT: normocephalic, pinkish conjunctiva, anicteric sclerae; negative tonsillo-pharyngeal congestion

C/L: clear breath sounds, no wheezes; (-) dyspnea

Heart: normal rate, regular rhythm.

Abdomen: negative tenderness

Extremities: no neurological and sensory deficit

no gross deformity, (+) scar, 4th finger (L)

no loss of grasping power for large and small objects

no loss of opposition between thumb and forefingers

can bend fully to reach toes

can bend both knees fully without pain or difficulty

can raise both arms above shoulder level without pain and difficulty

can bend both elbows without limitation

The member was requested to submit recent ECG, x-rays and other laboratory work-up results but he could not locate them during visit and would still look for the said medical documents and mail them to SSS.

He was then advised to come to SSS, Diliman Branch for ECG and x-ray, however he refused.

He also refused to affix his signature on the medical field service form to confirm the visit of our Medical Officer.

Based on these recent physical examination findings and functional assessment and the medical certificate (Form MMD 102) with final diagnosis of Trigger Finger, there is no sufficient basis that warrants the granting

of Total Permanent disability.[50] (Underscoring supplied)

Dr. Sison subsequently noted that petitioner's Electrocardiograph, Chest X-ray, Kidney and Urinary Bladder Ultrasound indicated his condition as normal,[51] which conclusion was arrived at by going through the same medical documents presented by petitioner following a series of tests conducted on him by hospitals of his choice.

From the foregoing recital of petitioner's medical history, the SSC concluded that petitioner is not entitled to total permanent disability benefits under the Social Security Law, the pertinent provisions of which read:

x x x x

(d) The following disabilities shall be deemed permanent total:

- Complete loss of sight of both eyes;
- Loss of two limbs at or above the ankle or wrists;
- Permanent complete paralysis of two limbs;
- Brain injury resulting to incurable imbecility or insanity; and
- Such cases as determined and approved by the SSS.

x x x x

(f) If the disability is permanent partial and such disability occurs after thirty-six (36) monthly contributions have been paid prior to the semester of disability, the benefit shall be the monthly pension for permanent total disability payable not longer than the period designated in the following schedule:

COMPLETE AND PERMANENT LOSS OF USE OF
NUMBER OF MONTHS

One thumb

10

One index finger

8

One middle finger

6

One ring finger

5

One little finger

3

One big toe

6

One hand

39

One arm

50

One foot

31

One leg

46

One ear

10

Both ears

20

Hearing of one ear

10

Hearing of both ears

50

Sight of one eye

25

(g) The percentage degree of disability which is equivalent to the ratio that the designated number of months of compensability bears to seventy-five (75), rounded to the next higher integer, shall not be additive for distinct, separate and unrelated permanent partial disabilities, but shall be additive for deteriorating and related permanent partial disabilities to a maximum of one hundred percent (100%), in which case, the member shall be deemed as permanently totally disabled.[52]

Indeed, the evidence indicates that petitioner's condition at the time material to the case does not fall under the enumeration in the above-quoted provisions of the Social Security Law. Moreover, as correctly held by the appellate court, the proviso of such provisions on the percentage degree of disability applies when there is a related deterioration of the illness previously considered as partial permanent disability. In this case, there is dearth of evidence on the proposition that petitioner's array of illnesses is related to Generalized Arthritis and Partial Ankylosis of the specific body parts.

Petitioner's reliance on jurisprudence[53] on work-connected disability claims insofar as it relates to a demonstration of disability to perform his trade and profession[54] is misplaced.

Claims under the Labor Code for compensation and under the Social Security Law for benefits are not the same as to their nature and purpose. On the one hand, the pertinent provisions of the Labor Code govern compensability of work-related disabilities or when there is loss of income due to work-connected or work-aggravated injury or illness.[55] On the other hand, the benefits under the Social Security Law are intended to provide insurance or protection against the hazards or risks of disability, sickness, old age or death, inter alia, irrespective of whether they arose from or in the course of the employment.[56] And unlike under the Social Security Law, a disability is total and permanent under the Labor Code if as a result of the injury or sickness the employee is unable to perform any gainful occupation for a continuous period exceeding 120 days regardless of whether he

loses the use of any of his body parts.[57]

The Court notes that the main issue petitioner proffers is whether he is entitled to total permanent disability benefits from the SSS given his "angioplasty operation of the heart, coronary artery disease, ischemic heart disease, severe hypertension and a host of other serious illnesses filed with the SSS[.]"[58]

A perusal of the records shows that when the case was already submitted for decision before the appellate court, petitioner manifested that he suffered a heart attack on February 25, 2004,[59] for which he claimed to have undergone a coronary angiogram on March 9, 2005 and a coronary angioplasty on September 27, 2005 at the Philippine Heart Center.[60]

Unfortunate as these events were, the appellate court correctly ruled that it could not consider such allegation of subsequent events since "a factual question may not be raised for the first time on appeal[,] and documents forming no part of the proofs before the appellate court will not be considered in disposing of the issues of an action."[61]

The issues in every case are limited to those presented in the pleadings. The object of the pleadings is to draw the lines of battle between the litigants and to indicate fairly the nature of the claims or defenses of

both parties.[62] A change of theory on appeal is not allowed.[63] In this case, the matter of petitioner's serious heart condition was not raised in his application before the SSS or in his June 19, 2000 petition before the SSC.

Fair play dictates that the SSS be afforded the opportunity to properly meet the issue[64] with respect to the new ailments besetting petitioner, in line with the actual practice that only qualified government physicians, by virtue of their oath as civil service officials, are competent to examine persons and issue medical certificates which will be used by the government for a specific official purpose.[65] This holds greater significance where there exist differences or doubts as to the medical condition of the person.

In this case, the SSS medical examiners are tasked by law to analyze the extent of personal incapacity resulting from disease or injury. Oftentimes, a physician who is adequately versed in the knowledge of anatomy and physiology will find himself deficient when called upon to express an opinion on the permanent changes resulting from a disability. Unlike the general practitioner who merely concerns himself with the examination of his patient for purposes of diagnosis and treatment, the medical examiner has to consider varied factors and ascertain the claimant's related history and subjective complaints.[66] The members of this Court cannot strip their judicial robe and don the physician's gown, so to speak, in a pretense to correlate variances in medical findings.

Finding no cogent reason to discuss the ancillary issues, the Court dismisses the petition, without prejudice to the filing of a new application by petitioner who is not left without any recourse in his legal bout respecting his supervening claims anchored mainly on Coronary Artery Disease 1VD and Diabetes Mellitus Type 2, these illnesses having been found to be dissimilar from the subject matter of the present action.[67]

WHEREFORE, the petition is, in light of the foregoing disquisitions, DENIED.

SO ORDERED.

Quisumbing, (Chairperson), Tinga, Velasco, Jr., and Leonardo-De Castro, JJ., concur.

* Additional member per Raffle dated April 16, 2008 pursuant to Administrative Circular No. 84-2007 in lieu of Justice Arturo D. Brion who inhibited.

[1] Penned by Justice Arturo G. Tayag with the concurrence of Justices Elvi John S. Asuncion and Jose Catral

Mendoza, rollo, pp. 55-71;

[2] Id. at 72-77.

[3] Illness coded as 1373 (General Arthritis) and as 1414, 1416 and 1418 (Partial Ankylosis) based on the Manual on Ratings of Physical Impairments; records, Vol. I, pp. 133-134.

[4] Id. at 132. Petitioner received partial permanent disability benefits twice: first, on February 10, 1998 for 15 months; and second, on August 25, 1999 for eight months or for a total monthly pension of 23 months or a cash equivalent of P66,700.00.

[5] Id. at 14.

[6] Id. at 13, 61-62 on the letter-reports of April 23, 2001 and May 29, 2001.

[7] Letter-reports of April 23, 2001 and May 29, 2001; id. at 61-62.

[8] Id. at 2-10.

[9] Medical Certificate of March 6, 2000; id. at 87.

[10] Medical Certificate of April 5, 2000; id. at 15.

[11] Id. at 6.

[12] Signed by Merceditas G. Caculitan, SSC Corporate Secretary; id. at 39.

[13] Signed by Amador M. Monteiro, SSS Senior Vice President - Legal and Collection; id. at 36.

[14] Id. at 29-35.

[15] Medical Report of August 3, 2000; id. at 63, 137. Medical Fieldwork Service Request Form of September 14, 2000; id. at 138.

[16] Id. at 40-51.

[17] Id. at 140, signed by Dr. Vicente A. Curimao, Jr.

[18] Id. at 85.

[19] CA rollo, p. 68.

[20] Records, Vol. I, pp. 58-60.

[21] Id. at 70-84.

[22] Petitioner adopted his complaint/petition and other pleadings as his Position Paper but reserved to file a Reply and additional evidence; id. at 116, 122.

[23] Rollo, pp. 78-83; penned by Commissioner Efren P. Aranzamendez.

[24] Id. at 82.

[25] Order of May 17, 2002; records, Vol. I, p. 214.

[26] Order of July 31, 2002; id. at 221.

[27] Memorandum of September 2, 2002 with attached Medical Report; id. at 242-244.

[28] Rollo, pp. 84-87; penned by Commissioner Efren P. Aranzamendez.

[29] The appellate court initially dismissed outright his petition for having been filed out of time as it only granted an extension of 15 days instead of the requested 45 days. Upon motion, the appellate reconsidered its earlier resolution and reinstated the petition; CA rollo, pp. 7, 145, 199-200.

[30] Rollo, pp. 1-2.

[31] Nagkahiusang Mamumuo sa PICOP Resources, Inc.- Southern Philippines Federation of Labor v. Court of Appeals, G.R. No. 148839-40, November 2, 2006, 506 SCRA 542.

[32] Ybañez v. Court of Appeals, 323 Phil. 643 (1996).

[33] Young v. Sy, G.R. No. 157745, September 26, 2006, 503 SCRA 151.

[34] Rollo, p. 11.

[35] In Mackay v. Judge Angeles, 458 Phil. 1031, 1037-1038 (2003), it was held that "[c]ertiorari as a mode of appeal under Rule 45 should be distinguished from certiorari as an original action under Rule 65. In an appeal by certiorari, the petition is based on questions of law which the appellant desires the appellate court to resolve. In certiorari as an original action, the only question that may be raised is whether or not the lower court acted without or in excess of jurisdiction or with grave abuse of discretion. x x x" (Italics omitted)

[36] Vide Rules of Court, Rule 65, Sec. 1.

[37] Cf. Bristol Myers Squibb, (Phils.), Inc. v. Vilorio, G.R. No. 148156, September 27, 2004, 439 SCRA 202 for instances where certiorari may be granted despite the availability of appeal after trial, which presupposes that an appeal is not available until after trial.

[38] 432 Phil. 7 (2002).

[39] Vide Mercado v. Court of Appeals, G.R. No. 150241, November 4, 2004, 441 SCRA 463-470 which states that the liberality of construction of the rules should not be a panacea for all procedural maladies as it is not invoked to cover up a party's neglect or sheer ignorance of procedure.

[40] Vide Nuñez v. GSIS Family Bank, G.R. No. 163988, November 17, 2005, 475 SCRA 305; Republic v. Court of Appeals, 379 Phil. 92 (2000).

[41] Lazaro v. Social Security Commission, 479 Phil. 384 (2004).

[42] Chua v. Court of Appeals, G.R. No. 125837, October 6, 2004, 440 SCRA 121.

[43] Reyes v. National Labor Relations Commission, G.R. No. 160233, August 8, 2007, 529 SCRA 487.

[44] Rules of Court, Rule 133, Sec. 5.

[45] Records, Vol. I, p. 61.

[46] Memorandum of September 20, 2000 signed by senior physician, Dr. Vicente A. Curimao, Jr.; id. at 52-53.

[47] Order of June 19, 2001; id. at 65.

[48] Id. at 103.

[49] Id. at 96-97.

[50] Id. at 243-244; after presenting the "conditions as alleged by [petitioner]."

[51] Memorandum of November 19, 2002 with attachments; id. at 245-248.

[52] Id., Sec. 13-A (d), (f)-(g).

[53] *Vicente v. Employees' Compensation Commission*, G.R. No. 85024, January 23, 1991, 193 SCRA 190 and other cases cited in the petition; rollo, pp. 41-42.

[54] Petitioner's occupations include "consultant," "security consultant," "security officer," and "investigator."

[55] *Vide Candano Shipping Lines, Inc. v. Sugata-on*, G.R. No. 163212, March 13, 2007, 518 SCRA 221.

[56] *Valencia v. Manila Yacht Club, Inc.*, 138 Phil. 761, 764-765 (1969).

[57] *Vide Labor Code*, Arts. 173, 192; *Amended Rules on Employees' Compensation*, Rule VII, Sec. 2 (b); *Palisoc v. Easways Marine, Inc.*, G.R. No. 152273, September 11, 2007, 532 SCRA 585.

[58] Rollo, pp. 19-20.

[59] CA rollo, pp. 278.

[60] Id. at 287, 299.

[61] Rollo, p. 76 citing *F.F. Marine Corporation v. National Labor Relations Commission*, Second Division, G.R. No. 152039, April 8, 2005, 455 SCRA 154 which adds that the rule also applies to decisions elevated for review which originated from a quasi-judicial body.

[62] *Lianga Lumber Co. v. Lianga Timber Co, Inc.*, 166 Phil. 661-686 (1977).

[63] *Drilon v. CA*, 336 Phil. 949-956 (1997).

[64] *Vide Bank of the Philippine Islands v. ALS Management and Development Corporation*, G.R. No. 151821, April 14, 2004, 427 SCRA 564, 578-579.

[65] *People v. Court of Appeals*, G.R. No. 144332, June 10, 2004, 431 SCRA 610, 621.

[66] SSS Medical Department's Manual on Disability Rating; records, Vol. I, pp. 142-143. Varied factors come into play in the proper analysis of a disability- the anatomical alterations involved, the permanent residual effects, the date when the permanency of the condition has set in, the occupation of the claimant, and foremost of all is the problem of ascertaining how the resulting depreciated physique could presently adapt to the circumstances of the environment.

[67] Rollo, pp. 76-77.

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.