BATAS.ORG · PHILIPPINE LAW LIBRARY



# KIMBERLY INDEPENDENT LABOR UNION FOR SOLIDARITY, ACTIVISM AND NATIONALISM (KILUSAN) – ORGANIZED LABOR ASSOCIATIONS IN LINE INDUSTRIES AND AGRICULTURE (OLALIA), AND ERNESTO I ACU...

*G.R. NOS. 149158-59. July 24, 2007*

Ponente: NACHURA, J.

Read online (full-text search, related cases, audio case brief): https://batas.org/library/g-r-nos-149158-59/

**NACHURA, J.:**

Before the Court are two consolidated petitions for review on certiorari under Rule 45 of the Rules of Court.

The antecedent facts common to the consolidated cases are as follows:

On June 30, 1986, the Collective Bargaining Agreement (CBA) executed by and between Kimberly-Clark (Phils.), Inc. (Kimberly), a Philippine-registered corporation engaged in the manufacture, distribution, sale and exportation of paper products,[1] and United Kimberly-Clark Employees Union-Philippine Transport and General Workers' Organization (UKCEO-PTGWO) expired.[2] Within the freedom period, on April 21, 1986, KILUSAN-OLALIA, then a newly-formed labor organization, challenged the incumbency of UKCEO-PTGWO, by filing a petition for certification election with the Ministry (now Department) of Labor and Employment (MOLE), Regional Office No. IV, Quezon City.[3]

A certification election was subsequently conducted on July 1, 1986 with UKCEO-PTGWO winning by a margin of 20 votes over KILUSAN-OLALIA. Remaining as uncounted were 64 challenged ballots[4] cast by 64 casual workers whose regularization was in question. KILUSAN-OLALIA filed a protest.[5]

On November 13, 1986, MOLE issued an Order stating, among others, that the casual workers not performing janitorial and yard maintenance services had attained regular status on even date. UKCEO-PTGWO was then declared as the exclusive bargaining representative of Kimberly's employees, having garnered the highest number of votes in the certification election.

On March 16, 1987, KILUSAN-OLALIA filed with this Court a petition for certiorari which was docketed as G.R. No. 77629 assailing the Order of the MOLE with prayer for a temporary restraining order (TRO).

During the pendency of G.R. No. 77629, Kimberly dismissed from service several employees and refused to heed the workers' grievances,[6] impelling KILUSAN-OLALIA to stage a strike on May 17, 1987.[7] Kimberly filed an injunction case with the National Labor Relations Commission (NLRC), which prompted the latter to issue temporary restraining orders (TRO's).[8] The propriety of the issuance of the TRO's was again brought by KILUSAN-OLALIA to this Court via a petition for certiorari and prohibition which was docketed as G.R. No. 78791.

G.R. Nos. 77629 and 78791 were eventually consolidated by this Court and decided on May 9, 1990.[9] The dispositive portion of the decision reads as follows:



Turn this case into an audio lecture - facts, issues, ruling and doctrine - at batas.org

> WHEREFORE, judgment is hereby rendered in G.R. No. 77629:
>
> - Ordering the med-arbiter in Case No. R04-OD-M-4-15-86 to open and count the 64 challenged votes, and that the union with the highest number of votes be thereafter declared as the duly elected certified bargaining representative of the regular employees of KIMBERLY;
>
> - Ordering KIMBERLY to pay the workers who have been regularized their differential pay with respect to minimum wage, cost of living allowance, 13th month pay, and benefits provided for under the applicable collective bargaining agreement from the time they became regular employees.
>
> All other aspects of the decision appealed from, which are not so modified or affected thereby, are hereby AFFIRMED. The temporary restraining order issued in G.R. No. 77629 is hereby made permanent.
>
> The petition filed in G.R. No. 78791 is hereby DISMISSED.
>
> SO ORDERED. [10]

G.R. Nos. 149158-59

On account of the May 17, 1987 strike, Kimberly filed on June 1, 1987 a complaint to declare the strike illegal.[11] As a counter-complaint, KILUSAN-OLALIA, its officers and members (herein petitioners) charged the company and its officers, among others, with unfair labor practice: union-busting and refusal to bargain; and violations of provisions of the Labor Code. On June 3, 1987, Kimberly dismissed a number of workers for knowingly participating in an illegal strike and for committing illegal acts.[12]

On November 25, 1998, Labor Arbiter Pedro C. Ramos resolved the case in this wise:[13]

> WHEREFORE, premises considered, judgment is hereby rendered as follows:
>
> - Declaring the parties to be in pari delicto;
>
> - Ordering the parties to cease and desist from committing the same or similar acts complained of;
>
> - Ordering Kimberly Clark (Phil.), (sic) Inc. to reinstate all respondents and counter-complainants listed in Annex "A" hereof, except those who already died, to their former or equivalent positions, without loss of seniority rights and other privileges, either physically or in the payroll, at the option of the company;
>
> - Ordering Kimberly Clark (Phil.), (sic) Inc. to pay the respondents and counter-complainants whose names appear in Annex "A" hereof their respective backwages or separation pay in the total sum of P2,144,592.08;
>
> - Ordering Kimberly Clark (Phil.), (sic) Inc. to pay attorney's fees in the amount of P214,459.28;
>
> - All other claims are denied for lack of merit.
>
> SO ORDERED.[14]

On appeal by both parties, the NLRC rendered its decision[15] on April 28, 1999 finding no basis in KILUSAN-OLALIA's contention that the action of the company in recognizing and concluding a CBA with UKCEO-PTGWO amounted to refusal to bargain. Thus, Kimberly was held not guilty of an unfair labor practice, precluding the application of the in pari delicto doctrine. The NLRC disposed of the case as follows:

> WHEREFORE, premises considered, the assailed decision is hereby AFFIRMED in so far as declaring the strike illegal is concerned and the finding that the company is not guilty of unfair labor practice. The same is however modified with our finding: (1) that the in pari delicto doctrine is not applicable to the instant case; (2) that the officers of KILUSAN-OLALIA are hereby declared to have lost their employment status for staging an illegal strike; (3) that the union members listed in Annex "A" are hereby ordered to be paid separation pay at


*Bar review courses, mock exams and a study planner that keeps you on pace - batas.org*

> the rate of one half (1/2) month pay for every year of service a fraction of six (6) months is considered one (1) year and in no case it should be less than one (1) month pay computed on the basis of their salary received at the time of dismissal up to and until the promulgation of this decision.
>
> All other claims are hereby dismissed for lack of merit.
>
> SO ORDERED.[16]

Both parties filed their respective motions for reconsideration, which were denied by the NLRC.[17] The NLRC, nonetheless, corrected its computation of the separation pay and made the following disposition:

> WHEREFORE, premises considered, our resolution dated April 28, 1999 is hereby, RECONSIDERED only insofar as the award of separation pay to the respondents is concerned whereby an additional one half (1/2) month pay for every year of service and a fraction of six months is considered7 one year is hereby ordered to be paid to them as separation pay.
>
> The motions for reconsideration are hereby, DENIED for lack of merit.
>
> SO ORDERED.[18]

Aggrieved, KILUSAN-OLALIA instituted a Petition for Certiorari[19] with the Court of Appeals, docketed as CA-G.R. SP No. 60035.

The records disclose that Kimberly also filed a Petition for Certiorari before the CA questioning the same Orders of the NLRC. This was docketed as CA-G.R. SP No. 60001.[20]

On September 5, 2000, the CA dismissed KILUSAN-OLALIA's petition on procedural grounds,[21] thus:

> This Court resolved to DISMISS the above-entitled petition on the following grounds:
>
> - The verification was signed only by petitioners' president, sans any board resolution or power of attorney authorizing anybody to sign the same and the certificate on non-forum shopping; and
>
> - The attached complaint and amended complaint thereof are not legible copies.
>
> IT IS SO ORDERED.[22]

In the Resolution dated July 19, 2001, the CA denied the motion for reconsideration. Hence, the instant petition for review on certiorari (G.R. Nos. 149158-59)[23] raising the following:

> I
>
> WITH DUE RESPECT, THE RESPONDENT COURT HAS COMMITTED REVERSIBLE, PATENT AND PALPABLE ERROR IN DISMISSING THE ABOVE-ENTITLED CASE BASED ON SHEER TECHNICALITY AND NOT IN THE MERIT OF THE PETITION ITSELF.[24]
>
> II
>
> WITH DUE RESPECT, THE RESPONDENT COURT HAS UNCONSTITUTIONALLY APPLIED THE RULES BY SHEER RESORT TO TECHNICALITY.[25]
>
> Ill
>
> WITH DUE RESPECT, THE RESPONDENT COURT HAS COMMITTED REVERSIBLE, PATENT AND PALPABLE ERROR IN DISMISSING THE PETITION FILED BY THE PETITIONERS WITH IT WHEN, OBVIOUSLY, THE UNION PRESIDENT IS DULY AUTHORIZED TO FILE AND SIGN THE SAID PETITION AS WELL AS TO EXECUTE A CERTIFICATE OF NON-FORUM SHOPPING.[26]


*Study hands-free: podcast-style lessons with read-along highlighting - batas.org*

> IV
>
> WITH DUE RESPECT, THE RESPONDENT COURT HAS COMMITTED REVERSIBLE, PATENT AND PALPABLE ERROR IN DISMISSING THE ABOVE-ENTITLED CASE WHEN, OBVIOUSLY, SUCH ACTION WILL UNFAIRLY AND UNDULY PREJUDICED (SIC) THE MEMBERS OF THE PETITIONER UNION AND FAVOR THE RESPONDENT COMPANY WHICH ALSO FILED A PETITION FOR CERTIORARI WITH THE RESPONDENT COURT ASSAILING THE QUESTIONED JUDGMENT OF THE NLRC.[27]
>
> V
>
> WITH DUE RESPECT, THE RESPONDENT COURT HAD COMMITTED (SIC) REVERSIBLE, PATENT AND PALPABLE ERROR IN DISMISSING THE ABOVE-ENTITLED CASE WHEN, OBVIOUSLY:
>
> - THE COPIES OF THE COMPLAINT AND AMENDED COMPLAINT ARE NOT EXACTLY ILLEGIBLE AS IT COULD BE READ BY NAKED EYES;
>
> - IT IS NOT THE FAULT OF THE PETITIONERS BECAUSE THE SAID PLEADINGS WERE PREPARED AND FILED BY THE RESPONDENT COMPANY IN THE COURT BELOW;
>
> - THE SAID PLEADINGS ARE ANCIENT DOCUMENTS HAVING BEEN PREPARED AND FILED SOMETIME ON (sic) JUNE, 1987; AND
>
> - THE SECOND AMENDED COMPLAINT (ANNEX "F") IS IDENTICAL TO THE CLEAR COPY OF THE FIRST AMENDED COMPLAINT (ANNEX "E") EXCEPT THAT THE ANNEXES THERETO WERE RE-MARKED IN THE SECOND AMENDED COMPLAINT AND THE INCLUSIONS OF PARAGRAPHS 14, 15, 16, 17 AND 18 WHICH COULD BE READ BY NAKED EYES.[28]

Petitioners further prayed for the remand of this case to the CA and its consolidation with CA-G.R. SP No. 60001.[29]

Due to the elevation of CA-G.R. SP No. 60035 to this Court, the CA held in abeyance action on CA-G.R. SP No. 60001 until after this case had been decided with finality.

G.R. No. 156668

On the Decision of the Court dated May 9, 1990, KILUSAN-OLALIA and 76 individual complainants filed a motion for execution with the DOLE (formerly MOLE). In an Order[30] issued on June 29, 2000, the DOLE considered as physically impossible, and moot and academic the opening and counting of the 64 challenged ballots because they could no longer be located despite diligent efforts, and KILUSAN-OLALIA no longer actively participated when the company went through another CBA cycle. However, the DOLE ordered the payment of the differential wages and other benefits of the regularized workers, to wit:

> ACCORDINGLY, let a partial writ of execution issue to enforce payment of the sum of (sic) P576,510.57 to the 22 individual workers listed in ANNEX A of Kimberly's Comment/Reply dated 31 October 1991 representing their differential pay with respect to the minimum wage, cost of living allowance, 13[th] month pay and benefits provided under the applicable collective bargaining agreement from the time they became regular employees as above-indicated.
>
> Further, the Bureau of Working Conditions is hereby directed to submit, within twenty (20) days from receipt of this Order, a list of workers who have been regularized and the corresponding benefits owing to them from the time they became regular employees.
>
> SO ORDERED.[31]

Pursuant thereto, on August 1, 2000, the Bureau of Working Conditions (BWC) submitted its report finding 47 out of the 76 complainants as entitled to be regularized.[32]

Kimberly filed a motion for reconsideration of the DOLE Order as well as the BWC Report, arguing in the main that the decision in G.R. Nos. 77629 and 78791 only pertained to casuals who had rendered one year of service as of April 21, 1986, the filing date of KILUSAN-OLALIA's petition for certification election. On December 6, 2000, however, the DOLE denied the motion,[33] disposing of it as follows:

> WHEREFORE, the motion for reconsideration filed by the COMPANY is hereby DENIED for lack of merit. No further motion of the same nature shall be entertained. Further, the Report of computation submitted by the Bureau of Working Conditions is hereby APPROVED and made an integral part of this Order.[34]
>
> Let a writ of execution be issued immediately.
>
> SO ORDERED.[35]

Kimberly, steadfast in its stand, filed a petition for certiorari[36] before the appellate court, which was docketed as CA-G.R. SP No. 62257 alleging that the employees who were dismissed due to the illegal strike staged on May 17, 1987 (the subject of G.R. Nos. 149158-59) should not be awarded regularization differentials.[37]

On June 27, 2002, the CA dismissed Kimberly's petition, and disposed of the case as follows:[38]

> WHEREFORE, the instant petition is DISMISSED for failure to show grave abuse of discretion. The questioned orders dated June 29, 2000 and December 6, 2000 of the Secretary of Labor are AFFIRMED. Costs against petitioners.
>
> SO ORDERED.[39]

With the denial of its motion for reconsideration,[40] Kimberly elevated the case before this Court, on the following grounds:

> - The Court of Appeals committed serious error in affirming the ruling of the Secretary of Labor that even casual employees who had not rendered one year of service were considered regular employees, thereby nullifying and disregarding the Honorable Court's Decision dated May 9, 1990 that only casual employees who had rendered at least one (1) year of service were considered regular employees.
>
> - The Court of Appeals also gravely erred in upholding the ruling of Labor Secretary that persons not party to the petition in G.R. No. 77629 were entitled to regularization differentials, thereby amending the Honorable Court's decision.

On the recommendation[41] of the Division Clerk of Court and in the interest of an orderly administration of justice, the Court, on May 24, 2004, ordered the consolidation of this case, G.R. No. 156668, with G.R. Nos. 149158-59.[42]

After thoroughly studying the voluminous records of these consolidated cases, however, the Court finds that petitioners KILUSAN-OLALIA, et al. in G.R. Nos. 149158-59 are raising essentially a procedural issueï¿½whether the CA erred in dismissing the petition on the sheer grounds of non-compliance with the requirements of the rule on verification and certification against non-forum shopping, and of non-submission of the legible copies of the pleadings filed in the labor tribunal. Petitioners have not brought up for our resolution the substantial issue of the legality of the May 17, 1987 strike. In fact, the petitioners prayed for a remand of their case to the CA which was the proper court to resolve said issue.

On the other hand, petitioner Kimberly in G.R. No. 156668 raises the issue of the propriety of the inclusion in the


Bar review courses, mock exams and a study planner that keeps you on pace - batas.org

DOLE Order of the two groups of employees: (1) casuals who have not rendered one year of service as of April 21, 1986, the filing date of KILUSAN-OLALIA's petition for certification election; and (2) the employees who were dismissed due to the illegal strike staged on May 17, 1987 (the subject of G.R. Nos. 149158-59). Kimberly contends in the main that only those employees who were parties in G.R. Nos. 77629 and 78791 should be included in the implementation order.

As the consolidated cases do not involve a common question of law,[43] the Court resolves to de-consolidate them.

We, however, note the considerable period of time the case has been pending in this Court. Thus, we dispose with dispatch the procedural issues raised in G.R. Nos. 149158-59.

We find as sufficient in form the disputed verification and certification against forum shopping.

We have emphasized, time and again, that verification is a formal, not a jurisdictional requisite, as it is mainly intended to secure an assurance that the allegations therein made are done in good faith or are true and correct and not mere speculation. The Court may order the correction of the pleading, if not verified, or act on the unverified pleading if the attending circumstances are such that a strict compliance with the rule may be dispensed with in order that the ends of justice may be served.[44]

Further, in rendering justice, courts have always been, as they ought to be, conscientiously guided by the norm that on the balance, technicalities take a backseat vis-a-vis substantive rights, and not the other way around. This principle finds greater application in labor cases where social justice should be emphasized.[45]

In the instant case, despite the fact that Ernesto Facundo, the union president, was not shown to have been duly authorized to sign the verification on behalf of the other petitioners, the CA should not have been too strict in the application of the Rules. Necessarily, Facundo, being the union president, was in a position to verify the truthfulness and correctness of the allegations in the petition. Further, the petition was signed by the union's lawyer, who had been authorized by a majority of the petitioners to represent them and to sign on their behalf all pleadings and appeals relative to the labor dispute.

With regard to the certification against forum shopping, suffice it to state that in Cavile v. Heirs of Cavile,[46] we took cognizance of a petition although its certification was executed and signed by only one of several petitioners, thus:

> The rule is that the certificate of non-forum shopping must be signed by all the petitioners or plaintiffs in a case and the signing by only one of them is insufficient. However, the Court has also stressed that the rules on forum shopping, which were designed to promote and facilitate the orderly administration of justice, should not be interpreted with such absolute literalness as to subvert its own ultimate and legitimate objective. The rule of substantial compliance may be availed of with respect to the contents of the certification. This is because the requirement of strict compliance with the provisions regarding the certification of non-forum shopping merely underscores its mandatory nature in that the certification cannot be altogether dispensed with or its requirements completely disregarded. It does not thereby interdict substantial compliance with its provisions under justifiable circumstances.
>
> We find that the execution by Thomas George Cavile, Sr. in behalf of all the other petitioners of the certificate of non-forum shopping constitutes substantial compliance with the Rules. All the petitioners, being relatives and co-owners of the properties in dispute, share a common interest thereon. They also share a common defense in the complaint for partition filed by the respondents. Thus, when they filed the instant petition, they filed it as a collective, raising only one argument to defend their rights over the properties in question. There is sufficient basis, therefore, for Thomas George Cavili, Sr. to speak for and in behalf of his co-petitioners that

> they have not filed any action or claim involving the same issues in another court or tribunal, nor is there other pending action or claim in another court or tribunal involving the same issues. Moreover, it has been held that the merits of the substantive aspects of the case may be deemed as "special circumstance" for the Court to take cognizance of a petition for review although the certification against forum shopping was executed and signed by only one of the petitioners.[47]

On the legibility of the attached pleadings, particularly the complaint and the amended complaint, we find that the same may be excused given the antiquity of the said documents. Nevertheless, a perusal of the records reveals that the said pleadings are legible enough. Again, the rules of procedure shall be liberally construed in order to promote their objective of securing a just, speedy and inexpensive disposition of every action and proceeding.[48]

While the right to appeal is a statutory and not a natural right, it is nonetheless an essential part of our judicial system. Courts are, therefore, advised to proceed with caution, so as not to deprive a party of the right to appeal. Litigants should have the amplest opportunity for a proper and just disposition of their cause ï¿½ free, as much as possible, from the constraints of procedural technicalities.[49]

IN VIEW OF THE FOREGOING, the Courts therefore, resolves, as, follows:

1) The Resolution of the Court, dated May 24, 2006, ordering the consolidation of G.R. Nos. 149158-59 and G.R. No. 156668 is RECALLED. The said cases are hereby DE-CONSOLIDATED;

2) In G.R. Nos. 149158-59: The petition is PARTIALLY GRANTED. The petition is REMANDED to the Court of Appeals for adjudication on the merits. The CA is further DIRECTED TO CONSOLIDATE CA-G.R. SP No. 60035 with CA-G.R. SP No. 60001, and to resolve the cases with dispatch.

3) As to G.R. No. 156668, the Court will resolve the same in a separate decision after the de-consolidation.

**SO ORDERED.**

Ynares-Santiago (Chairperson), Austria-Martinez, and Chico-Nazario, JJ., concur.

---

[1] Rollo (G.R. No. 156668), pp. 11-12.

[2] Id. at 13.

[3] Rollo (G.R. Nos. 149158-59), p. 38.

[4] The results of the certification election are as follows:

KILUSAN-OLALIA: 246 votes

UKCEO-PTGWO: 266 votes

NO UNION:
1 vote

SPOILED BALLOTS: 4 votes

CHALLENGED BALLOTS: 64 votes

**TOTAL:**

581 votes (Rollo [G.R. No. 156668], p. 15.)

[5] Id.

[6] CA rollo (CA-G.R. SP No; 60035), pp. 36-39.

[7] Id. at 39-40.

[8] Id. at 41.

[9] Kimberly Independent Labor Union for Solidarity, Activism And Nationalism-Organized Labor Association In Line Industries And Agriculture v. Drilon, G.R. Nos. 77629 and 78791, May 9, 1990, 185 SCRA190, 206.

[10] Kimberly Independent Labor Union for Solidarity, Activism And Nationalism-Organized Labor Association In Line Industries And Agriculture v. Drilon, id. at 206.

[11] Kimberly's complaint was later amended on June 6, 1987 and July 20, 1987 to include additional respondents and allegations. (CA rollo [CA-G.R. SP No. 60035], p. 198.)

[12] CA rollo (CA-G.R. SP No. 60035), pp. 198-203.

[13] Id. at 193-213.

[14] Id. at 208-209.

[15] Id. at 214-238.

[16] Id. at 237-238.

[17] May 31, 2000 Decision; id. at 239-250.

[18] Id. at 249.

[19] Id. at 2-191.

[20] On February 13, 2001, initially, CA-G.R. SP No. 60001 and CA-G.R. SP No. 60035 were consolidated. The order of consolidation was later recalled on June 27, 2001 because of the order of dismissal already issued in CA-G.R. SP No. 60035.

[21] CA rollo (CA-G.R. SP No. 60035), pp. 531-532.

[22] Id. at 532.

[23] In the motion for extension of time to file petition for review filed before this Court, the petitioners indicated therein that the docket numbers of the Court of Appeals' resolutions they were to question were CA-G.R. SP Nos. 60001 and 60035; hence, the Court allotted two (2) docket numbers for their case. However, after receipt of the petition for review and the other records of the case, the Court ascertained that the resolutions being questioned were only those rendered in CA-G.R. SP No. 60035. Petitioners KILUSAN-OLALIA, et al. were apparently confused when the CA initially consolidated the two cases, and then later recalled the order of consolidation as the Eighth Division had already rendered one of the assailed resolutions dismissing their CA petition.

[24] CA rollo, p. 58.

[25] Id. at 73.


*Bar review courses, mock exams and a study planner that keeps you on pace - batas.org*

[26] Id. at 80.

[27] Id. at 88.

[28] Id. at 89-90.

[29] Id. At 91-92.

[30] Id. at 38-42.

[31] Id. at 42.

[32] Id. at 98-135.

[33] Id. at 43-44.

[34] Id. at 42.

[35] Id. at 44.

[36] Id. at 3-34.

[37] Id. at 225-228.

[38] Id. at 284-293.

[39] Id. at 292.

[40] Id. at 323-324.

[41] Id. at 174-176.

[42] Id. at 177.

[43] RULES OF COURT, Rule 31, Section 1.

[44] Joson v. Torres, 352 Phil. 888, 911-912 (1998).

[45] Ballao v. Court of Appeals, G.R. No. 162342, October 11, 2006, 504 SCRA 227, 233.

[46] 448 Phil. 302 (2003).

[47] Cavile v. Heirs of Cavile, supra, at 311-312.

[48] Mendoza V. David, G.R. No. 147575, October 22, 2004,441 SCRA 172, 179.

[49] Novelty Phils., Inc. v. Court of Appeals, 458 Phil. 36, 48 (2003).

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.