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Lawyers have an obligation of means, not of result

O advogado tem obrigação de meio e não de resultado

El abogado tiene una obligación de medios y no de resultado

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Abstract:
This article analyzes the nature of lawyers' professional obligations, focusing on their characterization as obligations of means rather than of result within the Angolan legal system. It proceeds from the understanding that legal practice is an independent liberal profession requiring diligence, technical competence, independence and compliance with the legal and ethical duties inherent in professional practice. The study examines the lawyer-client relationship, obligations arising from representation, professional duties toward clients and lawyers' work at different procedural stages, considering the legal means available to defend entrusted interests. It argues that lawyers do not undertake to ensure a favorable judicial decision, since case outcomes depend on factors beyond their sphere of action. Their obligation consists of diligently, prudently and competently employing available personal and legal means to defend clients' interests. The research adopts a qualitative approach, using bibliographic and documentary research grounded in Angolan legislation, legal doctrine and case law concerning professional liability and the distinction between obligations of means and of result. It concludes that an obligation of means does not exclude lawyers' professional liability: their conduct must be assessed according to diligence, competence and compliance with the professional duties required in each specific case.

Keywords:
Lawyer. Obligation of means. Obligation of result. Professional liability. Legal profession in Angola.

Resumo:
O presente trabalho analisa a natureza da obrigação profissional do advogado, com enfoque na sua caracterização como obrigação de meios, e não de resultado, no contexto do ordenamento jurídico angolano. Parte-se da compreensão de que a advocacia constitui profissão liberal e independente, cujo exercício exige diligência, competência técnica, independência e observância dos deveres legais e deontológicos inerentes à atuação profissional. O estudo examina a relação entre advogado e cliente, as obrigações decorrentes do mandato, os deveres profissionais perante o constituinte e a atuação do advogado nas diferentes fases processuais, considerando os meios jurídicos disponíveis para a defesa dos interesses confiados. Sustenta-se que o advogado não assume o dever de assegurar a obtenção de decisão judicial favorável, uma vez que o resultado do processo depende de fatores que ultrapassam a sua esfera de atuação. A sua obrigação consiste em empregar, de maneira diligente, prudente e tecnicamente adequada, os meios pessoais e jurídicos disponíveis para a defesa dos interesses do cliente. A pesquisa adota abordagem qualitativa, de natureza bibliográfica e documental, fundamentada na análise da legislação angolana, da doutrina e de jurisprudência relacionada à responsabilidade profissional e à distinção entre obrigações de meios e de resultado. Conclui-se que a obrigação de meios não afasta a responsabilidade profissional do advogado, cuja

atuação deve ser avaliada segundo a diligência, a competência e o cumprimento dos deveres profissionais exigíveis em cada caso concreto.

Palavras-chave:
Advogado. Obrigação de meios. Obrigação de resultado. Responsabilidade profissional. Advocacia em Angola.

Resumen:
Este trabajo analiza la naturaleza de la obligación profesional del abogado, centrándose en su caracterización como obligación de medios y no de resultado dentro del ordenamiento jurídico angoleño. Se parte de la comprensión de que la abogacía constituye una profesión liberal e independiente, cuyo ejercicio exige diligencia, competencia técnica, independencia y observancia de los deberes legales y deontológicos propios de la actuación profesional. El estudio examina la relación entre abogado y cliente, las obligaciones derivadas del mandato, los deberes profesionales ante el representado y la actuación en las diferentes fases procesales, considerando los medios jurídicos disponibles para defender los intereses confiados. Se sostiene que el abogado no asume el deber de asegurar una resolución judicial favorable, ya que el resultado del proceso depende de factores que exceden su ámbito de actuación. Su obligación consiste en emplear diligente, prudente y técnicamente los medios personales y jurídicos disponibles para defender los intereses del cliente. La investigación adopta un enfoque cualitativo, bibliográfico y documental, fundamentado en el análisis de la legislación angoleña, la doctrina y la jurisprudencia sobre responsabilidad profesional y la distinción entre obligaciones de medios y de resultado. Se concluye que la obligación de medios no excluye la responsabilidad profesional del abogado, cuya actuación debe evaluarse según la diligencia, la competencia y el cumplimiento de los deberes profesionales exigibles en cada caso concreto.

Palabras clave:
Abogado. Obligación de medios. Obligación de resultado. Responsabilidad profesional. Abogacía en Angola.

1. Introduction

Lawyers, like doctors and architects, practice a liberal profession characterized by technical autonomy and responsibility arising from the services provided. In Angola, legal practice is an institution essential to the administration of justice and is exercised as a liberal profession, subject to the Constitution of the Republic of Angola, Law No. 8/17 of March 13, the Statutes of the Angolan Bar Association and other rules applicable to professional practice (ANGOLA, 2017). In this context, lawyers must perform their duties independently, observing the legal, professional and ethical obligations governing their activity.

The lawyer-client relationship generally arises from a mandate and the provision of legal services, involving reciprocal rights, duties and responsibilities. Although lawyers must employ legal and technical means appropriate to defending entrusted interests, they are not required to ensure a favorable judicial decision. Case outcomes depend on circumstances that may exceed their sphere of action, which is why this study understands lawyers' professional obligations as

obligations of means. This does not, however, imply an absence of liability, since professionals may be held responsible for losses resulting from breaches of required duties or conduct lacking the technical and professional diligence appropriate to the specific case.

This study aims to analyze the nature of lawyers' professional obligations, paying particular attention to the distinction between obligations of means and obligations of result, considering the relationship with clients and professional conduct at different procedural stages. It thus seeks to understand the duties guiding legal practice and the criteria for assessing professional conduct when the client's desired outcome is not achieved.

The research adopts a qualitative approach grounded in bibliographic and documentary procedures. It examines doctrinal texts, Angolan legislation applicable to legal practice, institutional documents and case law used as supplementary material, particularly to analyze the distinction between obligations of means and of result and lawyers' professional liability. The method is predominantly deductive, starting from general duties inherent in legal practice to examine professional conduct at different procedural stages.

2. Theoretical and legal framework

2.1 Concepts of judicial proceedings

Judicial proceedings may be understood as the legal instrument through which a claim is submitted to a judicial body's consideration, by means of an ordered sequence of acts performed by the parties, their representatives and the court. In Angola, procedural analysis must consider the nature of the case and applicable procedural rules, distinguishing, in particular, civil, criminal and administrative matters (DIAS, 2013).

In judicial proceedings, compliance with legally prescribed forms and deadlines is essential to ensure adversarial proceedings, the right of defense and appropriate consideration of the parties' claims. Lawyers, as qualified professionals, participate through legal representation and advocacy under applicable legislation.

Lawyers' procedural work is not limited to filing pleadings. It includes legal analysis of facts, advising clients, preparing evidence, formulating requests and arguments, and monitoring the measures necessary to defend entrusted interests.

From this perspective, proceedings constitute an ordered set of legally relevant acts aimed at resolving a conflict or obtaining a judicial decision, and lawyers must act with technical competence and diligence at every stage in which they participate.

Accused persons have the right to defend themselves personally or through chosen or appointed counsel, in the cases provided by law. Lawyers' intervention must respect clients' procedural guarantees and the limits imposed by law and professional ethics.

Accused persons are certainly able to exercise all their defense rights fully and without constraints, personally or through chosen or appointed counsel. They may retain a lawyer at any stage and must be assisted by a lawyer whenever required by law.

2.2 The lawyer

The word for lawyer, advogado, originates in the Latin advocatus, etymologically meaning someone called to another person's side.

2.2.1 Brief historical development of the lawyer

2.2.1.1 Lawyers in the past

In the past, lawyers designated representatives defending the interests of the king and later those of the community. The term was retained in this sense in the organization of the Public Prosecution Service (MP), meaning a protector of society, where attorneys general of the republic are found.

In earlier times, the Public Prosecution Service, then associated with the king's prosecutor, performed legal functions and some economic activities, such as tax collection.

Thus, since the French Revolution, public prosecution services became representatives of another category of agents to undertake and ensure the defense of individuals and, in certain cases, the state. Historically, this led to the creation of bar associations.

2.2.1.2 Lawyers under the current system

Under the current legal framework, legal practice in Angola is primarily regulated by Law No. 8/17 of March 13, the Legal Profession Act, which repealed Law No. 1/95 of January 6. References to Decree No. 28/96 of September 13 should be understood only historically, as they relate to the previous statutory framework of the Angolan Bar Association (ANGOLA, 2017).

Etymologically, lawyers are those called upon to defend a case. In professional practice, they must act with dignity and competence, guided by the pursuit of justice and fulfillment of their professional duties.

The Statutes of the Angolan Bar Association define lawyers as servants of justice and the law, both within and outside professional practice. Lawyers must contribute to the proper administration of justice and fulfill the ethical duties prescribed by law and the Statutes.

Under Article 3 of Law No. 8/17 of March 13, legal practice, as an institution essential to the administration of justice, is exercised as a liberal profession governed by the Constitution of the Republic of Angola, the Legal Profession Act itself, the Statutes of the Angolan Bar Association and other applicable legislation. The same law establishes that acts reserved to the profession may be performed only by lawyers with active registration in the Angolan Bar Association (ANGOLA, 2017).

2.3 Conditions for admission to the Bar Association

Registration with the Angolan Bar Association is grounded in Article 14 of Law No. 8/17 of March 13. Under this provision, Angolan nationals holding a university law degree who meet the other requirements established in the Statutes may register, as may foreign nationals holding law degrees from Angolan universities, subject to reciprocity (ANGOLA, 2017).

Persons meeting the following conditions may be admitted and registered with this institution:

Angolan nationals holding a university law degree, that is, law graduates;

Foreign law graduates from an Angolan university, if Angolan law graduates may enjoy the same privilege under equivalent circumstances in their respective countries;

Law No. 8/17 also regulates registration and professional practice, referring other professional requirements to the Statutes of the Angolan Bar Association. Active registration is thus a prerequisite for performing acts reserved to legal practice (ANGOLA, 2017).

2.3.1 Restrictions on the right to registration

The following persons may not register with the Bar Association:

Those lacking the moral fitness to practice the profession, particularly those convicted of a seriously dishonorable crime;

Those not in full enjoyment of their civil rights;

Those declared incapable of managing themselves and their property by a final judgment;

Those in a situation incompatible with, or barred from, legal practice;

Judges, prosecutors and officials who, through disciplinary proceedings, have been dismissed, retired or placed on inactive status for lack of moral fitness.

2.3.2 Traineeship period

Under Article 103(1) of the Statutes of the Angolan Bar Association, the traineeship lasts eighteen months. Article 104 establishes two distinct periods: the first lasting six months and the second twelve months (ORDEM DOS ADVOGADOS DE ANGOLA, n.d.).

The traineeship first provides an essentially practical deepening of subjects directly related to legal practice.

Second, it enables practical learning through contact with the workings of law firms, courts and other services connected with the administration of justice.

Its purpose is to familiarize trainee lawyers with the most common acts and terms of forensic practice and guide them regarding lawyers' rights and duties.

2.3.3 Exemption from traineeship

Article 108 of the Statutes of the Angolan Bar Association establishes that current and former law faculty professors and holders of doctorates in law are exempt from the traineeship.

Service as a judge or public prosecutor, with favorable reports, for a period equal to or longer than the traineeship is equivalent to completing it under Article 107 of the Statutes of the Angolan Bar Association.

2.3.4 Lawyers' professional identification card

Article 101 of the Statutes of the Angolan Bar Association stipulates that each lawyer or trainee lawyer admitted and registered with the institution shall receive a professional identification card serving as proof of Bar registration.

Cards are issued by the National Council and signed by the President of the Bar. Courts may always require lawyers and trainee lawyers appearing before them in professional practice to present their cards as proof of registration, with judicial seizure applicable.

Suspended lawyers or those whose registration has been canceled must return their professional cards to the Provincial Council where they are registered. If they fail to do so within fifteen days, judicial seizure may follow.

2.3.5 Lawyers' independence

Article 60 of the Statutes of the Angolan Bar Association establishes that lawyers must consider themselves servants of justice and the law, within and outside professional practice, and demonstrate themselves worthy of its inherent honor and responsibilities. The same article reinforces lawyers' independence and impartiality (ORDEM DOS ADVOGADOS DE ANGOLA, n.d.).

2.3.6 Lawyers' duties toward the community

Article 60 of the Statutes of the Angolan Bar Association establishes the following duties toward the community:

Advocate for proper application of the law, prompt administration of justice and improvement of legal institutions;

Refrain from arguing against express legal provisions, using illegal means or devices, or promoting measures known to be dilatory, useless or detrimental to the correct application of the law or discovery of the truth;

Refuse representation in matters considered manifestly unjust;

Protest human rights violations and combat arbitrary acts discovered through professional practice;

Refrain from soliciting or recruiting clients personally or through intermediaries;

Refuse mandates or professional services that do not, under any circumstances, result from the direct and free choice of the client or interested party.

2.3.7 Lawyers' duties toward clients

Lawyers' duties in their dealings with clients include:

Giving clients a conscientious opinion on the merits of their claimed rights or demands, and providing, whenever requested, information on the progress of entrusted matters (ORDEM DOS ADVOGADOS DE ANGOLA, n.d.);

Studying entrusted matters carefully and handling them zealously, using all resources of their experience, knowledge and activity;

Maintaining professional secrecy;

Advising any settlement considered fair and equitable.

Legal doctrine states that lawyers must account to clients for all money received from them, regardless of its origin, and provide an itemized statement of fees and expenses upon request. Lawyers must make every effort, refrain from reprisals against opponents and behave properly toward opposing counsel, judges and any other participants in proceedings.

2.3.8 Lawyers' duties toward judges

Article 71 of the Statutes of the Angolan Bar Association establishes that “lawyers must, always without prejudice to their independence, treat judges with the respect due to their office and refrain from interfering in their decisions, whether directly, in conversation or in writing, with the party itself considered.” Paragraph 2 of the same article explains that “lawyers must send or arrange to send judges any memoranda or resort to unfair procedures to defend the parties' interests.”

2.3.9 Lawyers' duties toward the Bar Association

Article 63 of the Statutes of the Angolan Bar Association states that lawyers may not undermine the Association's purposes or prestige;

Lawyers must collaborate in pursuing the Association's responsibilities, hold offices to which they have been elected or appointed and fulfill entrusted mandates;

Observe professional customs and practices;

Immediately suspend professional practice and request suspension of registration within thirty days whenever a subsequent incompatibility arises;

Pay membership dues and other charges established by the Statutes and regulations promptly; voting and eligibility rights for Bar bodies are suspended if payments are more than three months overdue;

Diligently supervise trainee lawyers and prepare their final assessment;

Report any case of unlawful legal practice that comes to their attention to the Bar Association; and finally;

Report any change of office within thirty days.

2.4 Lawyers' obligations toward clients

This section highlights and analyzes the concept of obligations in two directions: first, clients' obligations toward their lawyers; and second, lawyers' obligations toward their clients.

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2.4.1 The concept of obligations

According to Professor Kalongo Bikay, an obligation is a legal bond under which a creditor may demand a certain performance from a debtor.

Article 397 of the Civil Code establishes that an obligation is a legal bond by which one person is bound to render performance to another. Article 398 provides that the parties may freely determine the positive or negative content of the performance within legal limits, and that it need not have monetary value but must correspond to an interest of the creditor worthy of legal protection (ANGOLA, 1966).

2.4.2 Clients' obligations toward their lawyers

In principle, the lawyer-client relationship creates reciprocal obligations when the parties enter into the relevant contract or establish representation in a legally permissible manner. Article 405 of the Civil Code enshrines contractual freedom, allowing parties, within legal limits, to determine contractual content and establish the clauses they consider appropriate. Article 406(1), in turn, establishes the principle of due performance of contracts. Clients must therefore fulfill their obligations, particularly paying fees and providing the information and documents necessary for the assignment, while lawyers must diligently fulfill the professional duties arising from the relationship.

Within this contractual relationship, clients must fulfill their obligations, including paying agreed fees and providing the information and documents necessary for professional work. Article 406(1) of the Civil Code enshrines the principle of due performance of contracts (ANGOLA, 1966).

Fees arise when both parties sign the contract, which creates an obligation. Regarding clients' obligations toward their lawyers, the former are required to pay the latter's fees.

Clients are obliged to pay their lawyers' fees.

Clients must deliver or pay fees because the contracting parties have consented. The word “deliver” refers to the legal operation transferring ownership.

Clients are obliged to tell their lawyers the truth.

Clients must be honest with their lawyers and provide complete details of their address and that of the defendant or claimant, as applicable. They must specify their requests.

2.4.3 Lawyers' obligations toward their clients

Within the professional relationship, lawyers must fulfill obligations assumed toward clients and duties arising from law and professional ethics. These include careful analysis of entrusted matters, information about case progress, legal advice, professional confidentiality and diligent use of available technical resources. The Statutes of the Angolan Bar Association expressly require lawyers to study entrusted matters carefully and handle them zealously, using their experience, knowledge and activity (ORDEM DOS ADVOGADOS DE ANGOLA, n.d.).

Once lawyers receive their clients' fees and information about the conflict, crime or dispute, they are obliged to defend them. Lawyers begin by delivering the fee payment undertaking to their clients and establishing the power of attorney, then proceed from the preparatory stage through the final trial; that is, they must pursue their clients' claims.

2.4.3.1 Fee payment undertaking

The fee agreement or undertaking must clearly identify the services contracted, the amount or criteria for determining fees, payment terms and, where applicable, foreseeable expenses. Charging fees does not, however, turn lawyers' work into a promise of results. The Statutes of the Angolan Bar Association permit advance fee agreements but prohibit making payment exclusively contingent on the outcome of litigation or the transaction (ORDEM DOS ADVOGADOS DE ANGOLA, n.d.).

I undertake to pay fees fixed at USD 17,000.00 for interim relief proceedings No. 50/12-D before the Second Civil and Administrative Division of the Provincial Court of Luanda, with a claim value of Kzs 600,000.00.

2.4.4 Establishment of the power of attorney by the lawyer

Once the fee payment undertaking is established, lawyers must provide their clients with the power of attorney, which is the authority one person grants another to act or intervene on their behalf, or a legal document granting this representative authority. To be valid, this document must be authenticated by the competent authorities (a notary).

3. Materials and methods

The research is qualitative, using bibliographic and documentary research. It considers doctrinal texts, Angolan legislation applicable to legal practice and institutional documents, as well as case law used supplementarily to analyze the distinction between obligations of means and of result. The method is predominantly deductive, proceeding from lawyers' general duties to analyze their work at different procedural stages.

4. Results and discussion

4.1 Lawyers' obligation of means

Once the professional relationship between client and lawyer is established, lawyers undertake to provide the agreed legal services in accordance with the law, professional ethics and the case's specific circumstances. Their professional obligation is to diligently employ appropriate legal and professional means to defend entrusted interests, rather than guarantee a favorable decision. The Statutes of the Angolan Bar Association require lawyers to study entrusted matters carefully and handle them zealously using their experience, knowledge and activity (ORDEM DOS ADVOGADOS DE ANGOLA, n.d.). In comparative case law, the Cour d'appel de Dijon reaffirmed on January 30, 2024, that lawyers are subject to an obligation of means associated with competence and the performance of measures useful to clients' defense (COUR D'APPEL DE DIJON, 2024).

Professional liability may arise when a specific failure to fulfill duties of diligence, competence, information or advice is demonstrated. An unfavorable decision alone is insufficient to establish professional breach. The Angolan Statutes reinforce this by requiring care and zeal in handling entrusted matters and establishing that fees cannot depend exclusively on the outcome of litigation (ORDEM DOS ADVOGADOS DE ANGOLA, n.d.).

4.2 Preliminary investigation

In Angolan criminal proceedings, the preliminary investigation is the stage devoted to measures necessary to determine whether a criminal offense occurred, identify its perpetrators and determine their responsibility, gathering evidence needed to bring charges or discontinue proceedings. This stage is directed by the Public Prosecution Service, assisted by criminal

police bodies. Lawyers intervene to defend their clients' rights and interests as defined by criminal procedural law (ANGOLA, 2020).

At this stage, lawyers provide the accused's technical defense or represent other participants legally entitled to intervene, submitting evidence and requesting measures they consider necessary. The Angolan Code of Criminal Procedure recognizes accused persons' right to choose counsel and receive assistance in procedural acts in which they participate, and their right to intervene in preliminary and adversarial investigations as prescribed by law (ANGOLA, 2020).

Lawyers' work must be adapted to the nature of the proceedings. In criminal cases, technical defense follows the stages and acts provided by the Code of Criminal Procedure. In civil cases, lawyers' intervention follows civil jurisdiction rules and the procedural acts specifically permitted. It is therefore inappropriate to present a single sequence of stages as universally applicable to all proceedings.

At the pleadings stage, the case-management and issue-definition stage or early judgment stage, the investigation or evidentiary stage, the hearing stage and the judgment stage, lawyers may use their technical competence to attempt conciliation.

4.3 Attempted conciliation stage

Conciliation is a mechanism intended to encourage consensual settlement where the law and the nature of the dispute permit. Lawyers may advise and assist clients in evaluating settlement proposals, always respecting their granted authority and clients' legally protected interests. In labor matters, the current Labor Procedure Code contains specific rules on conciliation and case processing (ANGOLA, 2024).

In labor matters, conciliation must specifically observe the Labor Procedure Code approved by Law No. 2/24 of March 19. Special rules confirm the need to distinguish lawyers' work in this article according to the nature of the proceedings (ANGOLA, 2024).

When no agreement is reached, lawyers must continue defending or representing clients through legally appropriate procedural means, including, according to the case's nature, filing pleadings, requesting evidence and participating in subsequent acts.

4.4 Pleadings stage

At this stage, lawyers retained by claimants initiate legal action by filing the initial petition or procedural documents.

Lawyers representing defendants submit a defense or rebuttal; the claimant then replies, the defendant rejoins, and the claimant responds to that rejoinder. Both parties may submit supplemental pleadings, responses to supplemental pleadings and separate applications.

Generally, at this stage lawyers may submit an initial petition or application, a defense and other pleadings or applications permitted by applicable procedural legislation, and identify and request relevant evidence.

Initial petition (claimant); defense (defendant); reply (claimant); rejoinder (defendant); response to rejoinder (claimant); supplemental pleadings (claimant and defendant); responses to supplemental pleadings (claimant and defendant); separate applications (claimant and defendant).

4.5 Hearing stage (discussion)

At the hearing and trial, where provided for, matters of fact and law are examined under applicable procedural rules. Lawyers participate in producing evidence, ask permissible questions or submit applications, exercise the right to challenge opposing arguments and present the factual and legal submissions supporting their clients' position.

Lawyers must also question the civil party and contest claims by the Public Prosecution Service and opposing counsel, always within the limits of law and professional ethics.

4.6 Lawyers' competence to defend their clients

Lawyers' work varies according to the accused's procedural position and the available legal and evidentiary elements.

4.6.1 Lawyers' conduct when their clients are guilty

Even when evidence is unfavorable to clients, lawyers must focus on technical defense, examining the lawfulness of procedural acts, the validity and weight of evidence, circumstances relevant to liability and, where legally appropriate, factors that may favor clients' procedural position.

An unblemished record as a good citizen and parent, a difficult and troubled childhood, and so forth.

4.6.2 Lawyers' conduct when their clients are not guilty

When the defense maintains clients' lack of guilt, lawyers must seek to refute prosecution arguments, legally challenge unfavorable evidence and present facts and legal grounds that may lead to a favorable decision, always within the limits of law and professional ethics.

During both preliminary and judicial investigations, they may present evidence contradicting or weakening the accusation and challenge the applicability of the legal provision invoked to the facts for which the client is prosecuted.

4.6.3 Lawyers' conduct following acquittal or release

When a favorable decision is issued, lawyers must analyze its content and reasoning and, if procedural or legal issues require further action, take legally appropriate measures. Obtaining a favorable decision must not be confused with a prior obligation to guarantee that result.

4.6.4 Lawyers' conduct following their clients' conviction

When clients are convicted and legal grounds exist for challenging the decision, lawyers must assess the admissibility and usefulness of remedies provided by law, including appeals where legally permissible, informing clients about procedural possibilities and respecting applicable deadlines.

4.7 Lawyers' obligation is not an obligation of result

Lawyers' obligations are generally not obligations of result. In comparative analysis, French case law expressly uses the distinction between obligations of means and of result to assess lawyers' professional liability. On January 30, 2024, the Cour d'appel de Dijon recognized lawyers' obligation as one of means, and on June 26, 2025, the Tribunal judiciaire de Dijon reaffirmed duties of information, advice and diligence in defending clients' interests (COUR D'APPEL DE DIJON, 2024; TRIBUNAL JUDICIAIRE DE DIJON, 2025). These decisions are used exclusively as comparative-law references, not as direct foundations for Angolan law.

When accepting a case, lawyers must be fully aware of their professional and ethical duties. This entails technical competence, diligence, independence, adequate information to clients and appropriate legal means for each case. The Statutes of the Angolan Bar Association establish among duties toward clients the provision of conscientious opinions, careful study and zealous handling of entrusted matters (ORDEM DOS ADVOGADOS DE ANGOLA, n.d.).

It must therefore be emphasized that lawyers' obligation consists of employing personal, technical and legal means appropriate to defending clients' interests without turning professional work into a promise of success. An obligation of means does not mean absence of liability: liability must be assessed from actual conduct, required diligence and fulfillment of professional duties.

Indeed, lawyers' obligations are classified as obligations of means, not of result. This means that lawyers undertake to adopt prudent, diligent and technically appropriate conduct in the specific case rather than guarantee a favorable decision.

However, the means employed must be appropriate and diligent. Lawyers must apply the personal, technical and legal means available according to each case's specific circumstances, seeking to defend clients' interests without promising an outcome dependent on the judicial authority's decision. An obligation of means thus does not imply absence of liability: potential professional liability must be assessed according to actual conduct and compliance with professional duties (ANGOLA, 2017; ORDEM DOS ADVOGADOS DE ANGOLA, n.d.).

5. Final considerations

This study's essential objective is to analyze, under Angolan law, the idea that lawyers undertake an obligation of means rather than of result in professional practice. Lawyers serve justice and the law and must act with independence, diligence and respect for imposed ethical duties (ANGOLA, 2010; ORDEM DOS ADVOGADOS DE ANGOLA, n.d.).

Lawyers are considered servants of justice and the law and must contribute to its proper administration, observing ethical duties prescribed by law and the Statutes of the Angolan Bar Association. Their duties toward clients include conscientious opinions, information about entrusted matters' progress, and careful and zealous handling of cases (ORDEM DOS ADVOGADOS DE ANGOLA, n.d.).

Lawyers must, always without prejudice to their independence, treat judges with respect for their office and refrain from interfering in their decisions. The professional relationship

entails reciprocal duties but does not constitute a promise of victory. Lawyers commit to using appropriate legal and professional means to defend entrusted interests.

Lawyers may therefore be held liable when it is demonstrated that they failed to fulfill required professional duties or diligently employ means appropriate to clients' defense. Losing a case does not itself turn their professional obligation into an obligation of result.

The central conclusion therefore remains: lawyers are not contractors guaranteeing completed work by a particular date. They cannot guarantee success or a favorable result. They must, however, act competently, diligently, independently and responsibly, employing personal and legal means appropriate to each case.

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