

Universal Citation

In February 2003 the ABA House of Delegates passed the Universal Citation Facilitation [resolution](#), submitted by the American Bar Association Standing Committee on Technology and Information Systems (SCOTIS). As stated in their [report](#), the purpose of the resolution is to facilitate discussion of universal citation among groups already in progress and to reflect the consensus of experts and organizations to benefit the legal profession and the public as technology makes increasing amounts of information available electronically.

ABA Citation Actions

- 2003 House of Delegates Universal Citation Facilitation [resolution](#)
- 2003 Standing Committee on Technology and Information Systems' [report](#) on universal citation facilitation
- [1996 Special Committee on Citation Issues](#) report
- [1997 House of Delegates Universal Citation](#) resolution
- [ABA Citation History](#)

US Citation Resources

- [American Association of Law Libraries](#)
 - [AALL Universal Citation Guide Version 2.1](#) now online for comment.
 - [Draft Universal Citation Guide to Administrative Decisions](#) online.
- [Conference of Chief Justices Committee on Opinions Citation Report \(01/99\)](#)
- [Comments to Federal Judicial Conference 1997](#) at Hyperlaw.com
- [Department of Justice Comments to Federal Judicial Conference 1997](#)

US Courts' Actions

A number of jurisdictions in the United States have adopted a uniform citation standard for use in their courts. For a partial listing, visit our [US Courts' Universal Citation page](#).

If you don't see your court listed, please let us know and we'll add it.

International Citation Resources

Australia/New Zealand/NSW

- [Australasian Legal Information Institute](#) (AUSTLII)

United Kingdom

- [BAILII](#) (British and Irish Legal Institute)
- [BILETA](#) (British and Irish Law, Education and Technology Association)

U.S. Citation Guides

- [AALL Universal Citation Guide](#) (now online in **PDF!**)
- [ALWD Citation Manual](#)
- [The Bluebook: A Uniform System of Citation](#)

Citation Technology Efforts

- [LegalXML Citations Standards Working Group](#)

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REPORT: Universal Citation Facilitation

Introduction

[The following report was submitted to the ABA House of Delegates, to provide background and support for a resolution to supplement the original [1996 resolution](#) on Universal Citation. In February 2003 the ABA House of Delegates passed the [Universal Citation Facilitation Recommendation](#), submitted by the Standing Committee on Technology and Information Systems .]

REPORT: Universal Citation Facilitation

Submitted by the Standing Committee on Technology and Information Systems (SCOTIS)

The American Bar Association House of Delegates passed a uniform citation resolution in 1996 that addressed the need for a uniform method of citing to American case law in a vendor- and media-neutral way. Since that time, technological and practical changes have led to a variety of citation efforts by legal and non-legal organizations. The ABA's case citation format, as described in the 1996 resolution, is now one of many competing for adoption in United States courts. The continued fragmentation of effort requires a change of ABA policy to supplement the original resolution and facilitate the creation of a universal citation format that will consider, but may not adopt, the ABA's preferred format.

The American Bar Association created a special committee to review the universal citation issue in 1995. The Committee sought input from throughout the legal profession, legal publishers, and other interested groups. The result of their extraordinary efforts was the resolution that the House of Delegates considered, and passed, in 1996. [1] The resolution stated a preferred format for citing to an American judicial opinion, expressing a vendor-neutral and medium-neutral set of terms to identify the court, page, and date the opinion was published. The ABA led the way in universal citation and this resolution acted as a spark for other organizations that were also considering the issue of uniformity.

It is worth taking a moment to explain the difference between universal citation formats – whether applied to cases, statutes, or other legal materials – and citation systems. [The Bluebook: a Uniform System of Citation](#), commonly referred to as the “Bluebook”, describes the mechanics of citing to a variety of materials. Other citation systems include the Association of Legal Writing Directors' (ALWD) and the University of Chicago's [Maroon Book](#). These systems do not create a citation format but rather they describe how to implement a specific format developed by others. For example, the state of Montana has created a uniform method of citing to all cases.[2] This citation format is included in the Bluebook and ALWD manual because that is the official citation format for Montana courts. The format does not change the mechanical process that the Bluebook and other systems attempt to impart.

Since 1996, a number of groups have addressed the universal citation issue. The American Association of Law Libraries' (AALL) Citation Formats committee developed a similar case citation format, although not identical.[3] The AALL committee has also developed prototype citation formats for statutes and administrative rules. Parallel to these efforts, some states have attempted to create their own citation formats. Fifteen state jurisdictions have addressed the issue of uniform case citation since the ABA resolution was passed.[4] Some jurisdictions, like Montana and Louisiana, adopted a uniform case citation format. Other states, like Arkansas and Tennessee, rejected citation efforts. Singularly, the Tennessee Supreme Court noted that they would invite a new proposal when there existed a consensus on the issue of universal citation among citation experts and national legal organizations. [5]

While the citation format efforts in the United States have progressed, other common law countries have adopted universal citation wholesale. Australia, Canada, and the United Kingdom have all moved ahead with universal citation systems within their respective jurisdictions. Admittedly, they face fewer hurdles in that they do not have the large number of distinct jurisdictions the United States has. However, their lead has encouraged non-lawyer groups to consider the universal citation issue.

LegalXML, Inc., a non-profit dedicated to the development of extensible markup language (XML) standards for lawyers, created a technical team to look at making a citation standard. XML is a way of describing the contents of a Web page or database. This technology did not exist when the House of Delegates passed the 1996 resolution. In 1996, a court opinion that appeared online might have used a programming tag that described how the judge's name should look, in this case, that it should use boldface type:

Judge Wilkie Collins

A person reading that opinion would see that the judge's name was darker, and would know that this was the judge's name because it says so. A computer is not able to make that distinction.

The revolution wrought by XML is that the judge's name can now be described in two ways: how it will look, and what it is. In this case, the programming tags indicate that this is the name of the opinion's judge and it should appear in boldface type:

<presiding_judge>Judge Wilkie Collins</presiding_judge>

A computer program can now "read" this document and identify which piece of information is the name of the presiding judge. The creation of a standard list of programming tags for citation requires development of citation format standards. LegalXML, Inc., which joined the larger OASIS XML standards organization in 2001, has begun looking at universal citation activities and attempting to create a standard set of citation format elements – how to describe the court, date, docket number, and so on – in order to start creating an XML citation standard for legal materials.

The passage of time since the ABA's 1996 resolution has yielded a splintering of opinion about the most appropriate way to create universal citation format. The American Bar Association must once again take the lead in developing a universal citation format that can be adopted by all American jurisdictions. The promise of new technologies such as XML and of refinements to case and other citation formats requires a change of Association policy. The 1996 resolution was ahead of its time but it created a specific citation format that is no longer necessarily the best format for a universal system. A resolution by the House of Delegates that allows the Association members and staff to work jointly with other organizations to develop a universal standard – that may or may not incorporate the 1996 resolution format – can dramatically change the universal citation format landscape in the United States. A universal citation system, reflecting the consensus of the experts and organizations marshaled by the ABA, will benefit the legal profession and the public as technology makes increasing amounts of information available electronically.

Respectfully submitted:

Don Bivens, Chair

Standing Committee on Technology and Information Systems

[1] RESOLVED, That the American Bar Association recommends that:

All jurisdictions adopt a system for official citation to case reports that is equally effective for printed case reports and for case reports electronically published on computer disks or network services, that system consisting of the following key elements: The court should include the distinctive sequential decision number described in paragraph C in each decision at the time it is made available to the public.

The court should number the paragraphs in the decision.

The court should require all case authorities to be cited by stating the year, a designator of the court, the sequential number of the decision, and where reference is to specific material within the decision, the paragraph number at which that material appears.

Until electronic publications of case reports become generally available to and commonly relied upon by courts and lawyers in the jurisdiction, the court should strongly encourage parallel citations, in addition to the primary citation described in paragraph C, to commonly used printed case reports. When a cited authority is not available in those printed case reports, the court should require counsel to provide printed copies to opposing counsel and to the court. The parallel citation should only be to the first page of the report and parallel pinpoint citations should not be required.

The standard form of citation, shown for a decision in a federal court of appeals, should be:

Smith v. Jones, 1996 5Cir 15, ¶ 18, 22 F.3d 955.

1996 is the year of the decision; 5Cir refers to the United States Court of Appeals for the 5th Circuit; 15 indicates that this citation is to the 15th decision released by the court in the year; 18 is the paragraph number where the material referred to is located, and the remainder is the parallel citation to the volume and page in the printed case report where the decision may also be found.

[2] Montana Supreme Court Order Adopting Public Domain and Neutral Format Citation

<http://www.lawlibrary.state.mt.us/dscgi/ds.py/View/Collection-3818>

[3] American Association of Law Libraries Universal Citation Guide

<http://www.aallnet.org/committee/citation/ucg/index.html>

[4] ABA Legal Technology Resource Center Universal citation Online Resources

<http://www.lawtechnology.org/research/citation/uscourts.html>

[5] Order, Supreme Court of Tennessee, In Re: Petition of Tennessee Bar Association for the Approval of Citation System for Tennessee Appellate Decisions

<http://www.tsc.state.tn.us/OPINIONS/TSC/PDF/003/TBA.pdf>

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Universal Citation Facilitation (Report 101)

Introduction

In February 2003 the American Bar Association House of Delegates adopted the following resolution, the Universal Citation Facilitation, to advance the creation and adoption of a uniform citation system. This resolution is meant to supplement the [1996 Resolution](#). For further information see the 2003 Standing Committee on Technology and Information System's [report](#).

Universal Citation Facilitation (Report 101)

RESOLVED,

That the American Bar Association will facilitate discussion with organizations currently developing legal citation formats towards development of a universal American citation standard that reflects both existing ABA recommended citation formats and other formats proposed and adopted in U.S. jurisdictions ;

FURTHER RESOLVED,

That the American Bar Association urges cooperation amongst Federal, state, and territorial entities, law schools, research and writing organizations, and technology standards groups and others, to create a uniform citation standard that reflects the wide range of experience and research, as evidenced by the Association's own citation resolution, and that can be implemented in legislatures, agencies, and courts.

FURTHER RESOLVED,

That the American Bar Association urges all American jurisdictions to participate in the creation of an American universal system of citation for case reports, statutes, administrative documents, and other resources upon which the legal profession relies.

For more information regarding the ABA activities on this topic please see the [history](#) of uniform citation, and the Special Committee on Citation Issues [original report](#).

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ABA Citation History

The Special Committee on Citation Issues was created by the Board of Governors to recommend a policy concerning citation to reports of legal decisions. The Committee submitted a draft report on citations reform on March 18, 1996. This report recommended all jurisdictions adopt a system for citation to case reports that would be equally effective for printed case reports and for case reports electronically published on computer discs or network services.

The ABA Special Committee on Citation Issues then submitted their [Final Report and Recommendation](#) dated, May 23, 1996. On August 6, 1996, the American Bar Association's House of Delegates favorably passed a motion for a universal citation system recommendation to the courts. [The Resolution](#) from Report No. 107 recommends that courts adopt a universal citation system using sequential decision numbers for each year and internal paragraph numbers within the decision. The numbers should be assigned by the court and included in the decision at the time it is made publicly available by the court. It also recommends that parallel citations to commonly used print sources be strongly encouraged. The Citation system is equally adaptable to printed and electronic case reports and is thus medium neutral.

Report No. 107 was co-sponsored by the Committee, the Section of Litigation, the Tort and Insurance Practice Section, the Section of Science and Technology, the Massachusetts Bar Association, the State Bar of South Dakota, the State Bar of Wisconsin, the Atlanta Bar Association, the Milwaukee Bar Association, and the ABA Coordinating Commission on Legal Technology.

After the passage of the resolution in 1996 the Special Committee on Citation Issues was disbanded. The ABA's [Standing Committee on Technology and Information Services](#) (SCOTIS) was named to take on the implementation of the ABA Official Citation Resolution. Since the 1996 resolution a number of groups have addressed the universal citation issue, including the American Association of Law Libraries' (AALL) Citation Formats committee, the Association of Legal Writing Directors, and LegalXML, Inc., a non-profit dedicated to the development of extensible markup language (XML) standards for lawyers, to name a few. Fifteen state jurisdictions have addressed the issue of uniform case citation since the ABA resolution was passed. The passage of time since the ABA's 1996 resolution yielded a splintering of opinion about the most appropriate way to create universal citation format.

At the 2003 American Bar Association Midyear Meeting SCOTIS presented a supplementary [resolution](#) to the ABA House of Delegates to allow American Bar Association members and staff to work jointly with other organizations to develop a universal standard. Summed up in the SCOTIS [report](#), the goal of the resolution is help to yield a universal citation system, reflecting the consensus of the experts and organizations marshaled by the ABA, and benefiting the legal profession and the public as technology makes increasing amounts of information available electronically.

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[The American Bar Association Special Committee on Citation Issues released this report in 1996]

SPECIAL COMMITTEE ON CITATION ISSUES REPORT AND RECOMMENDATIONS

| | |
|--|--|
| BE IT RESOLVED, that the American Bar Association recommends that: | 1 2 |
| 1. All jurisdictions adopt a system for official citation to case reports that is equally effective for printed case reports and for case reports electronically published on computer disks or network services, that system consisting of the following key elements: | 3 4 5 6 7 |
| A. The court should include the distinctive sequential decision number described in paragraph C below in each decision at the time it is made available to the public. | 8 9 10 |
| B. The court should number the paragraphs in the decision. | 11 12 |
| C. The court should require all case authorities to be cited by stating the year, a designator of the court, the sequential number of the decision, and where reference is to specific material within the decision, the paragraph number at which that material appears. | 13 14 15 16 17 |
| D. Until electronic publications of case reports become generally available to and commonly relied upon by courts and lawyers in the jurisdiction, the court should strongly encourage parallel citations, in addition to the primary citation described in paragraph C above, to commonly used printed case reports. When a cited authority is not available in those printed case reports, the court should require counsel to provide printed copies to opposing counsel and to the court. The parallel citation should only be to the first page of the report and parallel pinpoint citations should not be required. | 18 19 20 21 22 23 24 25 26 27 28 |
| E. The standard form of citation, shown for a decision in a federal court of appeals, should be: | 29 30 |
| Smith v. Jones, 1996 5Cir 15, 18, 22 F.3d 955. | 31 |
| 1996 is the year of the decision; 5Cir refers to the United States Court of Appeals for the 5th Circuit; 15 indicates that this citation is to the 15th decision released by the court in the year; 18 is the paragraph number where the material referred to is located, and the remainder is the parallel citation to the volume and page in the printed case report where the decision may also be found. | 32 33 34 35 36 37 38 |

REPORT

1 The Special Committee on Citation Issues submits the following report concerning its recommendation to the House of Delegates:

I. Charge to the committee.

2 In recent years, growing numbers of court decisions have become available soon after their release, through electronic publication on computer bulletin boards, disks, and the Internet. The traditional method of citing to volume and page numbers in printed reports cannot be used effectively for these decisions because the printed reports typically are not published until considerably later. In an effort to develop citation methods that work effectively both with books and with computer databases, a number of jurisdictions are considering or have recently adopted new citation systems. While there are similarities, these new systems differ significantly among themselves.

3 The Board of Governors recognized the importance of avoiding a proliferation of varying citation systems and created this committee at the ABA Annual Meeting in August, 1995. The charge to the committee was:

The Committee shall (a) evaluate citation issues, inviting views from all ABA entities and organizations active in fields related to legal citation; (b) develop recommendations concerning a citation system which will be broadly acceptable to the bar and to the courts; and, (c) recommend action for consideration by the Board of Governors and the House of Delegates at the 1996 Annual Meeting.

II. The committee's study of citation issues.

4 The committee posted notices of its work on the ABA Network home page on the Internet and wrote to invite written submissions by interested individuals, ABA sections and divisions, state bar associations, state and federal judiciaries, the editors of the two leading citation manuals, publishers of legal decisions, law libraries, and other entities who had previously worked with citation issues. The first invitation was issued on October 17, 1995, and the period for submissions extended until May 5, 1996.

5 Based on the written submissions received by November 20, 1995, the committee selected entities and individuals to

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provide further information in oral presentations in Chicago on December 8, 1995. Those invited to make presentations represented the entire spectrum of views as to positions the ABA should take concerning citation issues. The following entities and individuals made presentations:

ABA Section of Intellectual Property Law
Sabina Assar
Gary D. Spivey

American Association of Legal Publishers
Eleanor J. Lewis
Alan D. Sugarman

Association of Reporters of Judicial Decisions
Frederick A. Muller

State Bar of South Dakota
Thomas C. Barnett, Jr.

Taxpayer Assets Project
James Love

West Publishing Company
Donna Bergsgard
Brady C. Williamson

Wisconsin State Bar
John H. Lederer

Christopher G. Wren
Jill Robinson Wren
(individual Wisconsin lawyers)

6 The committee drafted an initial outline of its report based on the written submissions received and the oral presentations at its meeting on December 8, 1995. After a number of revisions, a draft report was distributed for public comment on March 18, 1996. Copies were sent to all who had submitted material to the committee and to all who requested a copy, and the report was made generally available through the ABA Network.

7 The committee took into consideration all of the information and comments it received by May 9, 1996, and prepared this final report with recommendations for consideration by the Board of Governors and House of Delegates at the 1996 ABA Annual meeting.

8 The committee was fortunate to have the benefit of the advice of liaisons from other organizations with particular expertise and interest in citation issues. These

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liaisons were:

Noel J. Augustyn, Esq.
Administrative Office of the United States Courts

The Honorable Danny J. Boggs
Judicial Conference of the United States

Professor Rita T. Reusch
American Association of Law Libraries.

The liaison members participated fully in the meetings and discussions of the committee, but did not take any part in the decisions of the committee as to its report and recommendations. The members of the committee, who were solely responsible for these decisions, and the entities from which they were drawn were:

Robert W. Barger, Immediate Past Chair, ABA
Section of Science and Technology (New Jersey).

James E. Carbine, Co-chair, Trial Practice
Committee, ABA Section of Litigation
(Maryland).

J. D. Fleming, Jr., Chair (Georgia).

Professor Patricia B. Fry, Council Member, ABA
Section of Business Law (North Dakota).

Robert E. Hirshon, Chair Elect, ABA Tort and
Insurance Practice Section (Maine).

The Honorable Thomas S. Williams, Vice Chair,
Court Management and Administration Committee,
ABA Judicial Administration Division (Wisconsin).

Carolyn B. Witherspoon, President, Arkansas
Bar Association (Arkansas).

III. Summary of the Committee's Conclusions.

9 As directed by the Board of Governors, the committee evaluated the citation issues which were raised in the written and oral submissions it received. The primary issue of concern was whether or not the committee should recommend a new citation system which is not limited to references to volume and page numbers in printed case reports.

10 Comments submitted to the committee showed

substantial agreement on certain core points. While

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preferences were expressed for one form of citation or another, there is general recognition that courts should be and are free to prescribe a preferred or mandatory citation method, including new methods which do not rely on the traditional system of citing to volume and page numbers in printed reports. (E.g., West Publishing's Statement of Position to the American Bar Association Citation Issues Committee, p. 12 (Nov. 17, 1995.)) There also is general agreement that substantial uniformity of citation systems should be encouraged for all jurisdictions. The major point of disagreement is whether or not parallel citations to a specific source, such as Lexis, Westlaw, or the West National Reporter System, should be required in addition to a "generic" and medium neutral citation. (Id.)

- 11 Based upon the information it received, the committee recommends that courts adopt a universal citation system using sequential decision numbers for each year and internal paragraph numbers within the decision, these numbers being assigned by the issuing court and included in the decision at the time it is made publicly available by the court. The committee also recommends that parallel citations to commonly used print sources be strongly encouraged. This citation system is equally adaptable to printed and electronic case reports and is thus medium neutral.

IV. The Committee's Analysis of the Issues.

Issue No. 1: Is there a reason to change the existing citation system?

- 12 The existing citation system is based on a volume and page citation to a printed report of decisions. Some jurisdictions have official reports and a number of commercial vendors offer printed reports. These printed reports have earned universal acceptance by courts and lawyers, and a change in this citation system cannot be suggested absent a clear and convincing reason. The committee has no doubt that such a reason exists.
- 13 In recent years, computer-based technology has added capabilities which are now commonly recognized as offering significant improvements in the way that legal authorities are published and disseminated. Few courts still use typewriters. Decisions are largely prepared on computer word processors. As a result, decisions are generated as computer files that can be made available on online computer databases in a few hours instead of the several weeks that are often required to produce printed reports.

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- 14 In addition to substantial improvement in the speed of publication, electronic publishing offers significant reductions in the bulk of case reports. Reports that would require hundreds of volumes to print can be stored on a CD ROM disk far smaller than a paper back book, allowing a lawyer to carry a library and a computer to read it in a briefcase.
- 15 Another important factor is cost. For sole practitioners and small firms as well as for large firms, the current economic pressures on law practice demand that overhead costs be controlled. The cost of making legal research material available is therefore a key issue for most lawyers. The cost of a CD ROM library is often a small

fraction of the cost of a printed library and the space it occupies. This makes extensive collections of case reports widely available in smaller towns as well as in the cities, and significantly decreases the cost of those reports.

16 The committee recognizes that many lawyers prefer to use printed case reports for legal research, and that printed reports likely may remain the preferred source for some time. Just as clearly, a number of examples demonstrate that the publication of case reports is beginning to respond at an accelerating pace to the lower cost and more prompt availability of material that electronic publication makes possible. As of January 1, 1996, the federal judiciary was "in its seventh year offering various electronic public access services to federal court information. . . . The federal courts expect to complete the installation of an electronic public access service into every federal appellate, district, and bankruptcy court within the next several months. . . . All federal circuit courts now offer public users electronic access to appellate court decisions (slip opinions) and other court information" (Directory of Electronic Public Access Services, U.S. Federal Courts Home Page, Internet, <http://www.uscourts.gov>.) All new Supreme Court and United States Courts of Appeals decisions are available on searchable databases soon after they are released. Some law journals are now published only on the Internet, and not in print. South Dakota is an example in which electronic publication of case reports by a state bar association has made inexpensive libraries available to all lawyers in the state at a modest cost. At least one publisher of CDROM case reports has said "we are in the process of expanding our coverage to all 50 states and adding federal coverage as well." (Brochure, LOIS, Inc., page 3, January 1996.)

17 Examples such as these have convinced the committee that the continued growth of electronic publication of case reports is certain. It is clear that citation methods which are satisfactory for printed reporters are not well suited to electronic databases and reporters. The volume and page

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numbers which describe very naturally where material can be located in printed reporters are not meaningful or convenient to apply to computer files, which are far more easily indexed sequentially as they are released. In addition, requiring electronic reports to use the page numbers from printed reports is impractical since those page numbers are not available until quite some time after the electronic report is published. The adoption of a new citation method is essential to allow electronic publication of case reports to reach its full potential.

18 The committee concludes that it will be necessary to adopt a new citation system suited as well to print publication as to electronic publication. This new system should be medium neutral in that it should be as easily used with printed reports as with electronic reports. The principal objective is to enhance the use of all forms of case reports, and not at all to impede the use of printed reports.

19 The committee recommends that the new citation system be applied to all decisions released to the public after the date of adoption of the system by the court.

Issue No. 2: What citation convention should be specified for reports of decisions?

20 As outlined in the following paragraphs, the committee recognizes that any citation system that will be equally useful for printed and electronic case reports must depend on the assignment of specific references by the courts at the time their decisions are released. The courts are in the best position to decide what those references should be, weighing such factors as administrative burdens and costs,

convenience for the courts and practicing lawyers, and the advantages of uniformity among the various jurisdictions. The committee's recommendations in the following paragraphs are intended to suggest a beginning point for these decisions.

21 There are clear advantages to using a consistent locator system for printed reports and for electronic reports. This will allow lawyers and others to use the types of reports that best suit their needs and preferences, and to use the same citations in the works of a variety of publishers of printed and electronic reports.

22 The use of a universal citation system throughout all jurisdictions also has clear advantages. The free flow of commerce encourages interstate business operations and the result is that lawyers often practice in many different jurisdictions and courts increasingly take advantage of reasoned decisions from other jurisdictions. A system of

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universal, permanent, immediately available citations for electronic media will greatly ease the burden of those users.

23 In the following paragraphs, the committee has suggested a specific format for the universal citation system. While it is clear that some courts may find it necessary to implement the system with modifications in the recommended format, as noted in 20, the benefits from uniformity across the nation will be realized only if the courts adopt consistent formats whenever reasonably possible. The committee would, for example, urge all federal courts of appeals to use consistent court designators.

24 Some have suggested that reports be cited by case docket numbers since these numbers could be used for electronic reports as well as for printed reports. This choice would entail several disadvantages, the most significant of which is that multiple decisions in a case would produce multiple reports with the same citation.

25 We recommend that each court assign distinctive sequential indexing numbers to decisions it decides should be released for general distribution to the public. These sequential numbers can be used easily both in electronic reporters and in printed reporters.

26 The committee recommends a universal system of citing to a decision by stating the year, a unique designator selected by the court, and a sequential number assigned to the decision.¹ This combination of identifiers creates a unique designation of that decision. The committee suggests that all jurisdictions adopt the mandatory use of this universal citation system.

Fn 1. Each jurisdiction will decide which of its decisions will receive a sequential number designation. See 31.

27 An example of the decision designator in the uniform citation system for a federal district court is:

Smith v. Jones, 1996 SDNY 15

in which 1996 is the year of the decision, SDNY is the United States District Court for the Southern District of New York, and 15 represents the 15th decision of the court during the year.

28 Standard forms of other decision designators in the uniform citation system are given in Appendix A.

29 The committee recommends the use of this citation

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form by all state and federal appellate courts and trial courts for which case reports are customarily published.

Issue No. 3: How should sequential decision numbers be assigned?

30 The committee concludes that the courts in which the cases are decided should control the assignment of sequential decision numbers.

31 The committee recommends that each court assign a sequential number to each decision that the court decides should be released for general distribution to the public.² The court may also wish to add brief supplemental signals to the universal citation to give additional information such as non-precedential decisions, NP, or "uncitable" decisions, U.³ An example is:

Smith v. Jones, 1996 9Cir 33 U.

Fn 2. All decisions, whether or not assigned a number by the court indicating release for general public distribution, are of course public records and may be obtained by anyone for any purpose from the clerk.

Fn 3. A decision not to number the decision will not prevent its being cited, to the extent permitted by the forum court, in the same manner as formerly, for example by docket number.

Issue No. 4: What locator should be used for pinpoint citations within case reports?

32 The committee concludes that a uniform system of pinpoint citation is highly desirable, for the same reasons that support a uniform system of identifying decisions. With the proliferation of case reporters, it is entirely possible that the lawyers and the court may, in a given case, use different sources for their legal citations. A common reference point through a uniform system of pinpoint citation will be of significant help in avoiding the confusion that will result if different systems are in use among different publishers and different jurisdictions.

33 Location markers in printed case reports have been dependent on the format of the printed text, such as page, column, or line numbers. A selection of one or two columns per page, different page sizes, or different type fonts would

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change the location marker at which particular text appears within the report in various editions or formats.

34 For electronic case reports, the location markers used for printed reports are less meaningful. In a word processing file, for example, the page, column, or line location can be changed immediately by selecting different fonts or margins in the software. Fixed locators independent of formatting may be specified in many ways, such as by an arbitrary sequential number inserted after each 100 words of the report, but most readers feel that these arbitrary markers detract from printed reports.

35 One locator as suitable for printed reports as for electronic reports is the beginning of a paragraph. The committee concludes that the use of sequential paragraph

numbers, such as those used in this report, within case reports offers a universal locator for case reports independent of the medium. Paragraph numbers can be applied easily, whether manually or through the use of a macro in a word processing program. If errors occur, the result would merely be that the locator is not quite as precise as it might be, so that multiple paragraphs fall within a single paragraph number, or that a single paragraph may be assigned more than one number. In either event the locator is still considerably more precise than a page number in a printed report and therefore is more usable.

36 The committee recommends that all jurisdictions adopt the use of paragraph numbers assigned by the court as locator markers within decisions. The paragraph numbers should become part of the official text of the decision.⁴

Fn 4. The use of the paragraph numbers is illustrated in 40 below.

Issue No. 5: Should parallel citations be employed in addition to the recommended universal citation?

37 Any new citation system must be designed to ease, not impede, the access of courts and lawyers to case reports. The system therefore should maximize the utility and comfort of the citation system for those who prefer printed case reports and for those who prefer electronic case reports. The committee's approach to its recommendation concerning parallel citations reflects this commitment.

38 The committee is convinced that over time, primary reliance on printed case reports will shift to primary reliance on electronic case reports. The duration of this transition period is likely to be determined by the reaction

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of the legal market. During the transition period, the committee recommends that in addition to the universal citation, all jurisdictions strongly encourage parallel citation to a print source, if there is one that is commonly used in the jurisdiction. Examples are a parallel citation to U.S.P.Q. (United States Patent Quarterly), the West National Reporter System, an official court reporter, and the BNA Labor Relations Reporter. If the report is not available in commonly used printed reporters, the committee recommends that the court require copies of the decision to be furnished to the court and opposing counsel.

39 The parallel citation should be to the beginning of the decision in the format employed by the print source. As noted in 47 through 49, publishers of printed reports have incorporated paragraph numbers assigned by the court into their reporters. Repeating the pinpoint citation in the parallel citation is thus unnecessary.

40 An example of the recommended parallel citation form for a federal court of appeals is:

Smith v. Jones, 1996 5Cir 15, 18, 22 F.3d 955.

Other standard forms are set out in Appendix A.

41 The paragraph number format used in this report assists in locating a paragraph quickly, but some courts and publishers have expressed a preference for a different format. The Supreme Court of Canada, for example, uses numbers in the margin without the paragraph symbol. West Publishing Company uses paragraph symbols and numbers aligned with the left text margin in printing the South Dakota reports. As long as the paragraph numbers are easily recognized in the report of a decision, any format will suffice. While the paragraph symbol is readily typed using most word processing software, the committee recommends that the use of a recognized alternative,

such as par., be permitted in a citation just as sec. is widely accepted as an alternative to the section symbol, .

Issue No. 6: Primary contentions of proponents of the present citation system.

42 Early in the committee's study, those who favored retaining the present citation system without change suggested many reasons for doing so. The committee considered these suggestions at length and took them into account in arriving at the system tentatively recommended by the committee in its preliminary report. Some responses to the preliminary report, which was widely distributed for public comment, expressed very strong preferences for one system or another without

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explaining the grounds for those preferences. A number of comments recommended additional features or refinements of the new system, but did not contend that the new system would be seriously flawed. Only three primary arguments remained in any significant number of comments opposing the system recommended in the preliminary report. The committee does not question the sincerity of the exponents of these arguments but concludes that the arguments are not well founded.

43 The first argument was stated with admirable precision by a judge. With reference to the existing citation system, the judge said "If it ain't broke, don't fix it -- it ain't broke."

44 The present citation system does function well for conventional printed reports, as the committee recognized in 12. It does not, however, afford a citation suited to the electronic publication of a court decision when it is first released to the public. Printed volume and page numbers are not available until weeks or months later. Requiring electronic case reports to use these printed citation references deprives users of the speed of publication, lower cost, and lower space requirements of electronic case reports, as is explained at length in 13 through 18. The universal citation system recommended by the committee is intended to meet this problem.

45 The second argument is that the recommended citation system is a "citation to nowhere" because it does not identify the source of the citation. In fact, the recommended citation system is the ultimate citation to somewhere, because it is a citation directly to the court's decision in the form in which it was released by the court. The court assigns the decision number and places the paragraph numbers when it releases the decision to the public and files it in the record of the case. Every citation using those reference numbers is a citation to that original decision.

46 The last remaining argument is that formidable burdens will be imposed if courts are responsible for assigning sequential numbers to their decisions and numbering the paragraphs. While this argument has been advocated with skill, no factual support for it was offered to the committee. Since several courts have already implemented such systems, and major print publishers, including West Publishing Co., have begun printing reports using those systems, the committee concludes that no insurmountable burdens are involved.

47 Many Canadian courts have used paragraph numbering in their decisions for a number of years, and the Supreme Court of Canada has numbered the paragraphs in its reports since January 1, 1995. The committee was advised that

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implementation of this system required only a few hours for the first secretary to be trained in using a word processing macro to place the numbers, and less than an hour to train each of the other secretaries. The court reports the cost of implementing this system as being modest. The paragraph numbered reports released by the Supreme Court are used by online services and almost all Canadian publishers of printed case reports. Copies of a few pages from a decision of the Supreme Court of Canada are attached.

48 The new citation system adopted by Louisiana uses slip opinion page numbers instead of paragraph numbers. These slip opinion page numbers are printed in the West National Reporter System, along with West's own page numbers. Copies of a few pages from the West reporter are attached. Louisiana is pleased with its system and no significant problems with its use have been reported.

49 South Dakota has adopted a system very similar to that recommended by the committee. Copies of pages from a South Dakota Supreme Court decision, the report of the decision in WestLaw, the report in the CD ROM produced by the State Bar of South Dakota, and the report published by West in N.W.2d are attached. The committee is informed that no substantial burdens were encountered in implementing the system.

50 The experience of courts that have already implemented citation systems similar to that recommended in this report has convinced the committee that no substantial burdens will be imposed on the courts or publishers by the recommended system.

Special Committee on Citation Issues
J. D. Fleming, Jr., Chair
August 1996

APPENDIX A

Standard citations for representative types of decisions are set out in this appendix. They are intended only to be illustrative, not exhaustive.

The committee recommends that at the time of release, each judicial decision should include a distinctive sequential designation unique to that decision by stating the year, the court designator and the sequential number of that decision within the calendar year cycle. For state courts, the committee recommends the use of two-letter postal codes. (Example: 1996 MD 15 or 1996 WI 15). The following is a series of examples of how the new universal form of citation would work in a state court jurisdiction, accompanied by a parallel citation to a print source.

1. Smith v. Jones, 1996 MD 15, 696 A2d 321.

2. Smith v. Jones, 1996 MD App 16, 696 A2d 436.
3. With a pinpoint citation: Smith v. Jones, 1996 MD 15, 23, 696 A2d 321.
4. With a citation to material in a footnote: Smith v. Jones, 1996 MD 15, n.4, 696 A2d 321.
5. Under the new system, a decision is "published" when it is first released to the public. If later revised, the modified decision or errata should be assigned a new sequential number. Smith v. Jones, 1996 MD 15, 696 A2d 321, modified, 1996 MD 47, 697 A2d 457; Smith v. Jones, 1996 MD 15, 696 A2d 321, errata 1996 MD 47.

The recommended citation system is especially suited to single court jurisdictions and can be made equally suitable for multiple court jurisdictions, such as the federal court system, by breaking down each larger jurisdiction into its natural subparts. How the recommended universal form of citation would work for the various federal jurisdictions is shown by the following examples.

6. Supreme Court: Smith v. Jones, 1996 US 15, 124 Sct 432.
7. United States Court of Appeals for the Fourth Circuit: Smith v. Jones, 1996 4Cir 22, 85 F3d 567.
8. United States District Court for the District of Maryland: Smith v. Jones, 1996 DMD 17, 923 F. Supp. 835.
9. United States District Court for the Southern District of New York: Smith v. Jones, 1996 SDNY 15, 922 F. Supp. 214.

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10. For a federal court patent case the citation might be: Smith v. Jones, 1996 EDVA 34, 23 USPQ2d 456.

Where courts in different locations are part of a single system, they may well wish to draw their sequential numbers from a central source rather than creating a sequence for each location. The committee understands that some court executives have concluded that inexpensive technology is already available to assign numbers from a central computer instantaneously over a phone line. This technology is widely used at present to record credit card purchases and issue approval numbers.

Other federal tribunals could use analogous conventions.

11. The Tax Court: Smith v. Commissioner, 1996 TC 3.
12. The Occupational Safety and Health Review Commission: Secretary of Labor v. Smith, 1996 OSHRC 7.

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 NOTE: Excerpts from the following decisions, mentioned in 47-49, were attached to the report filed with the House of Delegates. Online sources are given below.

1. R. v. Edwards, 1996 Canada 24297, 1-7. Available through the Internet at <http://champlain.ic.gc.ca/opengov/supreme.court/sc.home.html>
2. Clement v. Frey, 1996 LA 95-C-1119, pl-3, 666 So.2d 607. (Louisiana uses slip opinion page numbers rather than paragraph numbers.) Available through Westlaw by entering fi 95-1119 (La. 1/16/96) and Lexis by searching for 95-1119.
3. Schroeder v. Department of Social Services, 1996 SD 34, 1-3, 545 N.W.2d 223. Available through Westlaw by entering

fi 1996 SD 34 and Lexis by searching for 1996 SD 34.

Universal Citation Resolution

[The American Bar Association House of Delegates adopted the following resolution relating to uniform case citation in 1996]

RESOLVED,

That the American Bar Association recommends that:

All jurisdictions adopt a system for official citation to case reports that is equally effective for printed case reports and for case reports electronically published on computer disks or network services, that system consisting of the following key elements:

The court should include the distinctive sequential decision number described in paragraph C in each decision at the time it is made available to the public.

The court should number the paragraphs in the decision.

The court should require all case authorities to be cited by stating the year, a designator of the court, the sequential number of the decision, and where reference is to specific material within the decision, the paragraph number at which that material appears.

Until electronic publications of case reports become generally available to and commonly relied upon by courts and lawyers in the jurisdiction, the court should strongly encourage parallel citations, in addition to the primary citation described in paragraph C, to commonly used printed case reports. When a cited authority is not available in those printed case reports, the court should require counsel to provide printed copies to opposing counsel and to the court. The parallel citation should only be to the first page of the report and parallel pinpoint citations should not be required.

The standard form of citation, shown for a decision in a federal court of appeals, should be:

Smith v. Jones, 1996 5Cir 15, ¶ 18, 22 F.3d 955.

1996 is the year of the decision; 5Cir refers to the United States Court of Appeals for the 5th Circuit; 15 indicates that this citation is to the 15th decision released by the court in the year; 18 is the paragraph number where the material referred to is located, and the remainder is the parallel citation to the volume and page in the printed case report where the decision may also be found.

[Click here to read the Special Committee's report](#)

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Universal Citation - US Courts

Below is a partial listing of the jurisdictions currently employing a universal citation standard. If your court has a universal citation standard that isn't listed below, please [let us know!](#)

[Arizona](#) | [Arkansas](#) | [Colorado](#) | [Guam](#) | [Louisiana](#) | [Maine](#) | [Mississippi](#) | [Montana](#) | [New Mexico](#) | [New York](#) | [North Dakota](#) | [Northern Mariana Islands](#) | [Ohio](#) | [Oklahoma](#) | [Pennsylvania Superior Court](#) | [South Dakota](#) | [Tennessee](#) | [Utah](#) | [Wisconsin](#) | [Wyoming](#) | [6th Circuit Court of Appeals](#)

ARIZONA

Action: Paragraph numbering of opinions from the Supreme Court and Court of Appeals.

Summary: All opinions, including opinion orders, issued by an AZ appellate court on or after January 1, 1998 will include paragraph numbers. When referring to specific portions or passages of these opinions, employ the paragraph numbers as pinpoint citations; and pinpoint citations to a case reporter service will be optional. In all other respects, the appellate courts' citations practices are not affected by this order.

See full text: [Supreme Court of the State of Arizona, Administrative Order No. 97-67](#)

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ARKANSAS

Action: The Arkansas Judiciary Reporter of Decisions Style guide does not allow "vendor neutral" citations.

Summary: A note in the Style Guide under the case citation section mentions "electronic 'vendor neutral' citations have not been adopted and are not recognized. Another notation under the examples for citing computer resources reads "The so-called 'vendor-neutral' citation format has not been approved by the Arkansas Supreme Court and should not be used."

See full text: [Arkansas Judiciary Reporter of Decisions House Style Guide](#)

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COLORADO

Action: Allows publishers to number paragraphs following court guidelines.

Summary: In May, 1994 a policy was adopted by the Supreme Court of Colorado allowing pinpoint citations to be made using a page number from West's Pacific Reporter or a paragraph number in the opinion. Rather than design their own numbering system, the court has issued guidelines for publishers who wish to publish Supreme Court or Court of Appeals opinions to implement a paragraph numbering system.

See full text: [Memo from Mac V. Danford, Supreme Court of Colorado](#)

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GUAM

Summary: Guam's Supreme Court has followed a neutral citation standard from its inception in 1996. Cases may be cited in the following format: (Year) Guam (Opinion Number).

Example:

Doe v. Smith, 2007 Guam 53

See also: [Guam Supreme Court](#)

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LOUISIANA

Action: Change in citation rules to incorporate "uniform public domain citation" format to appellate court decisions, mandatory in court documents filed after July 1, 1994.

Summary: Opinions and actions issued by LA Supreme Court and Courts of Appeal after Dec. 31, 1993 should be cited according to a uniform public domain citation form which shall consist of: the case name, docket number excluding letters, court abbreviation, and month/day/year of issue; to be followed by a parallel citation to West's Southern Reporter. If a pinpoint citation is needed, the page number designated by the court shall follow the docket number and be set off with a comma and the abbreviation "p".

Examples:

Smith v. Jones, 93-2345 (La. 7/15/94); 650 So.2d 500

Smith v. Jones, 93-2345 (La. App. 1 Cir. 7/15/94); 660 So.2d 400

Smith v. Jones, 94-2345, p. 7 (La. 7/15/94); 650 So.2d 500, 504

See full text: [Rules of the Supreme Court of Louisiana, Part G, Section 8](#)

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MAINE

Action: The Supreme Judicial Court of Maine will include a sequential number assigned to opinions for each calendar year and assign paragraph numbers.

Summary: Opinions issued on or after Jan. 1, 1997 shall include the calendar year and the sequential number assigned to the opinion. The paragraphs in the opinion will be numbered. The official publication of each opinion issued will include the sequential number in the caption of the opinion and the paragraph numbers assigned by the courts.

Examples:

Smith v. Jones, 1997 ME 7, 685 A.2d 110

Smith v. Jones, 1997 ME 7, ¶14, 685 A.2d 110

See full text: [State of Maine Supreme Judicial Court Order, Docket No. SJC-216](#)

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MISSISSIPPI

Action: The Supreme Court and Court of Appeals shall assign paragraph numbers in all published opinions and will

be cited (after July 1, 1997) to the case numbers assigned by the Clerk's office.

Summary: Cases shall be cited to either the Southern Reporter (and, in cases prior to 1967 the official Mississippi Reports) **OR** the case numbers as assigned by the Clerk for cases cited from and after July 1, 1997. If quotations appear they should be cited: a.) to the page in the Southern Reporter and/or the MS Reports b.) in cases decided from and after July 1, 1997 cited to the paragraph number of the decision after the case number assigned by the clerk's office c.) in cases decided from and after July 1, 1997 cited to the paragraph number of the decision in the Southern Reporter d.) in cases decided prior to July 1, 1997 cited to the paragraph number of the decision after the case number assigned by the clerk's office as the cases are added to the Court's Internet web site.

Examples:

Smith v. Jones, 95-KA-01234-SCT (Miss. 1997)
Smith v. Jones, 95-KA-01234-SCT(¶1) (Miss. 1997)
Smith v. Jones, 699 So. 2d 100 (C1) (Miss. 1997)

See full text: [Mississippi Rules of Appellate Procedure, Rule 28 \(e\)](#)

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MONTANA

Action: From and after January 1, 1998 the Supreme Court will assign to all opinions and substantive orders a public domain or neutral format citation which will appear on the title page of each opinion.

Summary: At the time of issuance the Court will assign a citation which will include the case name, year of decision, 2 letter postal code, and a sequential number assigned by the court. Beginning with the first paragraph of text, each paragraph will be numbered consecutively beginning with a mark. In the case of opinions not to be cited as precedent ("unpublished") the consecutive court assigned number will be followed by an "N", cases which have been withdrawn or vacated will be designated with a "W", and cases which are amended will be appointed an "A". These citation formats are in addition to and supplement the current citation formats. The Montana Reports is the official reporter of the court and the court will continue to cite to the official reporter and the regional, Pacific, reporter in addition to the public domain, neutral format citation. In turn the State Reporter Publishing Company and West Group have been asked to publish the public domain, neutral format citation within the heading of each opinion. The court encourages the adoption and use of these formats in all briefs, memoranda and other documents filed with the court.

Examples:

Doe v. Roe, 1998 MT 12,286 Mont. 175,989 P2d. 1312
Doe v. Roe, 1998 MT 12,¶¶44-45,286 Mont. 175,¶¶44-45,989 P2d. 1312,¶¶ 44-45
Doe v. Roe, 1998 MT12N (unpublished opinions)
Doe v. Roe, 1998 MT 12W (withdrawn or vacated opinions)
Doe v. Roe, 1998 MT 12A (amended opinions)
Doe v. Roe, 1998 MT 12A,¶13a (pinpoint cite for new paragraphs in an amended opinion)
Doe,¶¶44-45 (pinpoint cite)

See full text: [Montana Court Uniform Rules \(RTF\)](#)

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NEW MEXICO

Action: The New Mexico Supreme Court granted a motion to adopt a vendor neutral citation for appellate opinions,

New Mexico Statutes Annotated, Court Rules, and Uniform Jury Instructions as the official citations for all pleadings and other papers filed in the courts of the state of New Mexico.

Summary: On or after January 1, 1996, the Supreme Court clerk will publish all appellate opinions with vendor neutral citations, which will serve as the official citation for appellate opinions. Vendor neutral citation should be cited with the state reporter or the regional reporter. When citing subsequent history, the Supreme Court docket number should be substituted for a vendor neutral citation. Pinpoint citations will be to paragraph numbers when available.

When applying vendor neutral citations to New Mexico Statutes Annotated it is unnecessary to refer to "Cum. Supple." Or "Repl. Pamp.", rather reference should be made to the applicable date of enactment as set forth in the "History Note" following each statute.

Examples:

State v. Ray, 1998-NMSC-001 (Supreme Court)
State v. Ray, 1998-NMCA-001 (Court of Appeals)
State v. Ray, 1998-NMCA-001, ¶2 (with pinpoint citation)
NMSA 1978, Section 5 (1999) (NM Statutes Annotated)
Rule 78 NMRA 1998 (NM Rules)
UJI 123 NMRA 1998 (NM Uniform Jury Instructions)

See full text: [New Mexico Citation Rules](#)

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NEW YORK

Action: The *New York Law Reports Style Manual* contains a section on "Public Domain (Vendor or Medium Neutral Citation)" for "Out-of-State and Unofficial Case Citations"

Summary: The *Manual* states in section 2.3(c)(1), "Where Official Reports Available," "Out-of-state cases are cited to the state official reports where available, followed by the parallel National Reporter System citation"; in 2.3(c)(4), "Public Domain (Vendor or Medium Neutral) Citation," it states, "When a public domain citation is provided, supply a parallel citation to a published source"

Examples:

Alberte v Anew Health Care Servs., 232 Wis 2d 587, 595, 605 NW2d 515, 519, 2000 WI 7, ¶ 12 [2000]

See full text: [New York Law Reports Style Manual \(2007\)](#)

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NORTH DAKOTA

Action: North Dakota Supreme and Appellate Courts ordered that decisions after Jan. 1, 1997 would include a medium-neutral case citation in the initial citation, with paragraph numbers assigned to decisions for pinpoint cites.

Summary: After January 1, 1997 when available, initial citations must include the volume and initial page number of the North Western Reporter. The initial citation after this date must also include a reference to the calendar year in which the decision was filed, followed by court designation of ND or ND App, followed by a sequential number assigned by the Clerk of the Supreme Court. A paragraph citation should be placed following the sequential number assigned to the case.

Examples:

Smith v. Jones, 1997 ND 15, 600 N.W.2d 900
Smith v. Jones, 1997 ND 15, ¶21, 600 N.W.2d 900
Smith, 1997 ND 15, ¶21-25, 600 N.W.2d 900
Id. at ¶15

See full text: [ND Supreme Court Rules, Rule 11.6 Medium-Neutral Case Citations](#)

See also: [ND Supreme Court Citation Manual](#)

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NORTHERN MARIANA ISLANDS

Action: On March 13, 2001 the Supreme Court of the Commonwealth of the Northern Mariana Islands issued General Order No. 2004-100 adopting the universal citation format.

Summary: Per General Order 2001-100, NMI Supreme Court opinions are to be cited in the following format: (Year of Issuance) MP (Sequential Opinion Number). Pinpoint citations are to be made to the paragraph number designating the precise location of the cited language. The universal citation system was retroactively applied to Supreme Court decisions dating back to 1996 via a series of subsequent orders.

Example:

Francis v. Welly, 1999 MP 26

See full text: [General Order 04-100 \(see first paragraph\)](#)

See also: [NMI Style Guide](#)

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OHIO

Action: OIn July 2002, the Ohio Supreme Court Reporter ordered the implementation of a media-neutral citation system.

Summary: In-state references to decisions issued after 2002 must include a vendor-neutral citation constructed as follows: Year-Ohio-Decision Number. Pinpoint cites should be made to paragraph numbers assigned by the court reporter or, for pre-2002 decisions, to the official report. Also, in-state references to decisions appearing in the Ohio State Reports, Ohio Appellate Reports, or Ohio Miscellaneous Reports should (if possible) include citations to those reports.

Example:

Office of Disciplinary Counsel v. Shrode, 95 Ohio St. 3d 137, 2002-Ohio-1759, 766 N.E.2d 597, at ¶8.

See full text: [Revisions to the Manual of Citations](#)

See also: [Ohio Court Rules](#)

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OKLAHOMA

Action: Published opinions of the OK Supreme Court and Court of Civil Appeals will bear as an official cite a paragraph citation form after May 1, 1997.

Summary: The court designation for the Supreme Court is "OK" when the paragraph citation form is used. The designations for the Court of Civil Appeals is "OK CIV APP" and for the Court of Appeals of Indian Territory is "IT" when the paragraph citation form is used to cite the opinions of those courts. Prior to May 1, 1997 parallel citation to Oklahoma Reports should not be made when the Supreme Court's official paragraph citation form is used. After May 01, 1997 opinions filed shall be cited by reference to the Supreme Court's official paragraph citation form with subsequent parallel citation to Pacific Reporters required.

Examples:

Skinner v. Braum, 1997 OK 11, 890 P.2d 922

Skinner v. Braum, 1997 OK 11, ¶9, 890 P.2d 922

Skinner v. Braum, 1997 OK 11, ¶9, 890 P.2d 922, 925

Smith v. Braum, 1997 OK CIV APP 11, 890 P.2d 922 (OK Court of Civil Appeals)

Smith v. Braum, 1997 IT 11, ¶9

See full text: [OK Supreme Court Rules, Rule 1.200](#)

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PENNSYLVANIA SUPERIOR COURT

Action: Effective January 1, 1999, opinions issued by the Pennsylvania Superior Court must contain a Universal Citation.

Summary: All opinions issued by the Pennsylvania Superior Court contain a universal citation in the following format: (Year) PA Super (Court-issued number). The opinions also have numbered paragraphs to be used for pinpoint citations. Citations made to opinions not yet issued by the Atlantic 2d must use the Universal Citation. Once the official citation has been issued, however, citation is to be made only to the official citation and not the Universal Citation.

Examples:

Jones v. Smith, 1999 PA Super 1

Jones v. Smith, 1999 PA Super 1, ¶15

See full text: [Notice to the Bar](#)

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SOUTH DAKOTA

Action: The South Dakota Supreme Court, the US District Court for SD, and the US Bankruptcy Court for SD have all adopted the "universal citation system" for identifying their written opinions.

Summary: The initial citation of any published opinion of the Supreme Court released on or after January 1, 1996 in a brief, memorandum, or other document filed with the Court and the citation in the table of cases in a brief shall include a reference to the calendar year in which the decision was announced, the Court designation of "SD", and a sequential number assigned by the Clerk of the Supreme Court. Citation to specific portions of the opinion will be

made to paragraph numbers. When available, initial citations shall include the volume and initial page number of the North Western Reporter.

Examples:

Hoogestraat v. Barnett, 2001 SD 104
Erickson v. County of Brookings, 1996 SD 1, 541 NW2d 734
Smith v. Jones, 1996 SD 15, ¶21, 600 NW2d 900 (with pinpoint citation)
Yankton Sioux Tribe v. Janklow, 2001 DSD 24 (District Court of SD)
In re Greene, 2001 BkDSD 16 (Bankruptcy Court of SD)

See full text: [SD Unified Judicial System Court Procedure Section 15-26A-69.1 \(scroll down\)](#)

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TENNESSEE

Action: Supreme Court of Tennessee denied petition by the Tennessee Bar Association to approve a "Citation System for Tennessee Appellate Decisions".

Summary: The court invites the Bar Association to file another proposal for a universal citation system when it determines that there is a greater consensus among citation experts and national legal organizations regarding the components and form of a universal citation system.

See full text: [In re: Petition of TN Bar Association for the Approval of Citation System...](#)

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UTAH

Action: The Utah Supreme Court and Utah Court of Appeals adopt a universal citation form effective March 1, 2000.

Summary: The initial citation of any published opinion of the Utah Supreme Court or Utah Court of Appeals released on or after January 1, 1999 in any brief, table of cases in the brief, memorandum, or other document filed with these courts shall include case name, the year the opinion was issued, identification of the court that issued the opinion, and the sequential number assigned by the respective court. A comma and then a paragraph symbol will denote pinpoint citations. Initial citations should also include either the Utah Advance Report Citation or the volume and initial page number of the Pacific Reporter in which it is published. The year the case was published and the parallel page number for pinpoint citation to the Pacific Reporter is not required since the paragraph numbers will be included in the Pacific Reporter and the year will be evident from the initial citation.

Examples:

Smith v. Jones, 1999 UT 16 (before publication in Utah Advance Reports)
Smith v. Jones, 1999 UT App 16
Smith v. Jones, 1999 UT 16, 380 Utah Adv. Rep. 24 (before publication in Pacific Reporter)
Smith v. Jones, 1999 UT 16, 998 P.2d 250 (after publication in Pacific Reporter)
Smith v. Jones, 1999 UT 16, ¶21, 998 P.2d 250 (pinpoint citation after publication in Pacific Reporter)

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WISCONSIN

Action: In the Supreme Court of Wisconsin and the Court of Appeals, the official publication of each opinion, rule, order, and other item to be published on or after January 1, 2000, shall set forth the public domain citation of the opinion, rule, order, or other item and shall include the paragraph numbering of the opinion.

Summary: "Public domain citation" means the calendar year in which an opinion, rule, order, or other item that is to be published is issued or ordered to be published, whichever it later, followed by the designation of the court, followed by the sequential number assigned by the clerk of the court. Citation to specific portions of an opinion issued on or after January 1, 2000 shall be by reference to paragraph numbers. Citation to published opinions to the courts in both table of cases and initial citation shall include in the following order: public domain citation (if it exists), volume/page number of the WI Reports, and volume/page number of the North Western Reporter.

Examples:

Smith v. Jones, 2000 WI 14
Smith v. Jones, 2000 WI App 9
Smith v. Jones, 2000 WI 14, 214 Wis. 2d 408,595 N.W.2d 346
Smith v. Jones, 2000 WI 14, ¶6
Smith v. Jones, 2001 WI App 9, ¶17

See full text: [Order No. 95-01 In the Matter of the Amendment of Supreme Court Rules: SCR Chapter 80](#)

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WYOMING

Action: In October 2000, the Supreme Court of the State of Wyoming ordered adoption of a public domain or neutral-format citation format.

Summary: The court shall assign to all opinions and orders designated for publication, a citation which shall include the calendar year in which the opinion is issued, followed by the Wyoming postal Code, followed by a consecutive number beginning each year with "1". This citation will appear on the title page of each opinion issued by the court. All publishers of Wyoming Supreme Court materials are requested to include this public domain, neutral-format citation within the heading of each opinion they publish. Beginning with the first paragraph of text, each paragraph of such opinions will be numbered consecutively beginning with a ¶ symbol followed by an Arabic numeral, flush with the left margin, opposite the first word in the paragraph. All publishers are requested to include these paragraph numbers in each opinion they publish. In cases of opinion not to be cited as precedent, the consecutive number in the public domain citation will be followed by the letter "N" to indicate that the opinion should not be cited as precedent. In the case of withdrawn or vacated order, the letter "W" will be assigned. For amended opinions the public domain citation shall be the same as the original public domain citation, but followed by a letter "A". In these amended opinions any additional paragraphs will be numbered with the same paragraph number as the original with a lower case letter added behind the number. If the paragraph is deleted then the paragraph numbering will remain the same as the original, skipping the deleted paragraph in the numbering system. For cases decided between January 1, 2001 and December 31, 2003 a proper citation will also include the volume and initial page number of the West Pacific Reporter. For cases decided after December 31, 2003, reference to the Pacific Reporter in which the opinion is published shall be optional. The Wyoming Reporter will remain the official reporter for this court's opinions.

Examples:

Doe v. Roe, 2001 WY 12,989 P.2d 1312 (Wyo. 2001) (between 01/01/01 and 12/31/03)
Doe v. Roe, 2001 WY 12, ¶44, 989 P.2d 1312, ¶44 (Wyo.2001)
Doe v. Roe, 2003 WY 12 (after Dec. 31, 2003)
Doe v. Roe, 2003 WY 12, ¶44 (after Dec. 31, 2003)

See full text: [In the Matter of Adopting a Public Domain, Neutral-Format Citation Format](#)

COURT OF THE SIXTH CIRCUIT

Action: The Sixth Circuit court has adopted an "Electronic Citation System".

Summary: Beginning with opinions issued by the court in 1994, a special electronic citation has been assigned to each opinion designated for publication by the court. The citation will be at the top of the opinion along with its computer file name. The format of the citation includes the case name, year issued, FED identifier, unique opinion number, "P" for published, pinpoint cite to slip opinion page number, and court. The Court has not adopted any rules or guidelines concerning the use of the citation and its use is not required in citing to the court.

Examples:

Jones v. Smith, 1994 FED App. 1234P at 12 (6th Circuit)

See full text: [Sixth Circuit Electronic Citation](#)