

## Chapter 2

---

### HOW TO READ A LEGAL CITATION

---

A citation (or cite) in legal research is a reference to a specific legal source, such as a constitution, statute, reported case, treatise<sup>1</sup> or law review article. Like non-legal citations, it is a shorthand method of identifying an authority. One basic format of a legal citation includes the volume number, the title of the publication, the page or section number, and date. The titles of primary<sup>2</sup> legal authorities are generally abbreviated. This format may look unfamiliar at first to non-law librarians who are accustomed to seeing citations where the title is unabbreviated, followed by the volume and page numbers. This chapter will describe citations to cases, statutes or codes, and law reviews and treatises. A short discussion of legal citation manuals and a list of common abbreviations are also included in this chapter.

#### *Contents:*

- [Cases](#)
- [Statutes or Codes](#)
- [Law Reviews and Treatises](#)
- [Citation Manuals](#)

#### *Cases*

Court cases (i.e., judicial opinions) can be published by more than one publisher. Because of this, there can be more than one citation appearing after the name of the case. The first citation given in this string of numbers and letters is to the official reports for a particular court, and is called the official citation. The official reports are published by the publisher with whom that court has contracted to publish its cases. For example, in California, the official reports for the state Supreme Court and Courts of Appeal are currently published by LexisNexis. The California Supreme Court cases are published

---

<sup>1</sup> Treatises are books on legal topics.

<sup>2</sup> Primary legal authorities are constitutions, statutes/codes, case decisions (also known as judicial opinions), and regulations and regulatory decisions.

**LOCATING THE LAW, FIFTH EDITION, 2011**

---

in the *California Reports* (1st - 4th series)<sup>3</sup> and the Courts of Appeal cases in *California Appellate Reports* (1st - 4th series).<sup>4</sup>

The citations given after the first, official cite are known as unofficial or parallel citations. The text of the opinion is the same in all sources, whether they are designated as official or unofficial. Here is an example:

Lyle v. Warner Bros. Television Prods., 38 Cal. 4th 264, 132 P.3d 211, 42 Cal. Rptr. 3d 2 (2006)

The citation in our example above begins with the case name, which includes the plaintiff/appellant’s last name, Lyle, and an abbreviated version of the defendants/respondents’ name, Warner Brothers Television Productions. The first citation, to the *California Reports*, is the official citation. The second and third citations are considered parallel citations because they refer to unofficial sources—to the *Pacific Reporter* and *California Reporter*, respectively. The goal is to provide the researcher with several options by which to locate the same judicial opinion. Case reporters are hundreds of volumes and a library may only have space (and the budget) for one of these sets.

Below you will find additional examples of the official and parallel citations for a California Supreme Court case and a California Court of Appeal case.

CALIFORNIA SUPREME COURT CITATIONS		
Name of Parties	Official Citation	Parallel Citations
<p><b>Marvin v. Marvin</b></p> <p>↓                      ↓</p> <p>Plaintiff v. Defendant</p>	<p><b>18 Cal. 3d 660</b></p> <p>↙                      ↓                      ↘</p> <p>Volume                      Page</p> <p>Number 18</p> <p>↓</p> <p>California Reports, Third Series</p>	<p><b>557 P.2d 106, 134 Cal. Rptr. 815 (1976)</b></p> <p>↓    ↓</p> <p>Pacific Reporter,                      Year of</p> <p>Second Series                                      decision</p> <p>↓</p> <p>California Reporter</p>

<sup>3</sup> Abbreviated Cal. or C. 1st series, 1850-1934 (vol. 1-220); 2d series, 1943-1969 (vol. 1-71); 3d series, 1969-1991 (vol. 1-54); 4th series, 1991-present (vol. 1 - )

<sup>4</sup> Abbreviated Cal. App. or C.A. 1st series, 1905-1934 (vol. 1-140); 2d series, 1934-1969 (vol. 1-276); 3d series, 1969-1991 (vol. 1-235); 4th series, 1991- present (vol. 1 - )

## CHAPTER 2: HOW TO READ A LEGAL CITATION

CALIFORNIA COURT OF APPEAL CITATIONS		
Name of Parties	Official Citation	Parallel Citation
<p><b>Daniels v. Weigum</b></p> <p>↓                      ↓</p> <p>Plaintiff v. Defendant</p>	<p><b>194 Cal. App. 2d 620</b></p> <p>↙                      ↓                      ↘</p> <p>Volume                      Page</p> <p>Number 194</p> <p>↓</p> <p>California Appellate Reports, Second Series</p>	<p><b>15 Cal. Rptr. 57 (1961)</b></p> <p>↙                      ↓                      ↘</p> <p>Volume                      Year of</p> <p>Number 15                      decision</p> <p>↓</p> <p>California Reporter</p>

The California Supreme Court case has two parallel citations. The first is to the *Pacific Reporter*, and the second is to the *California Reporter*. The Court of Appeal case has one parallel citation, to the *California Reporter*.

In the above examples, note the inclusion of the series number after *California Reports* (3d series) and after *Pacific Reporter* (2d series). This is a crucial part of the citation because publishers start numbering from volume 1 when they begin a new series. Therefore, there is more than one volume with the number 18 on it in the *California Reports*: there is a volume 18 in the first series, another volume 18 in the second series, another volume 18 in the third series, and yet another volume 18 in the fourth series. (The absence of a 2d, 3d or 4th from a citation indicates that the volume is part of the first series.)

The following is an example of a citation for a United States Supreme Court case:

UNITED STATES SUPREME COURT CITATIONS		
Name of Parties	Official Citation	Parallel Citations
<p><b>Brown v. Board of Education</b></p> <p>↓                      ↓</p> <p>Plaintiff v. Defendant</p>	<p><b>347 U.S. 483</b></p> <p>↙                      ↓                      ↘</p> <p>Volume                      Page</p> <p>Number 347</p> <p>↓</p> <p>United States Reports</p>	<p><b>74 S.Ct. 686, 98 L.Ed. 873 (1954)</b></p> <p>↓                      ↓                      ↓</p> <p>Supreme Court                      Year of</p> <p>Reporter                      decision</p> <p>↓</p> <p>U.S. Supreme Court Reports, Lawyer's Edition</p>

**LOCATING THE LAW, FIFTH EDITION, 2011**

As with the California Supreme Court case, there are two parallel citations. Here, the first one is to the *Supreme Court Reporter* and the second is to the *U.S. Supreme Court Reports, Lawyers' Edition*.

Cases from the thirteen United States Courts of Appeals and the trial level United States District Courts are published by West in the *Federal Reporter* and *Federal Supplement*, respectively. The *Federal Appendix* includes decisions from the Courts of Appeals that were not selected for publication in the *Federal Reporter* and are generally of lesser precedential value. Like other case reporters, the *Federal Reporter*, *Federal Appendix*, and *Federal Supplement* are arranged in series. Unlike other case citations, however, there are no parallel citations to these reporters.

Examples of citations from each of these reporters are shown below. Note that these citations include the court that issued the decision.

<b>UNITED STATES COURT OF APPEALS &amp; DISTRICT COURT CITATIONS</b>	
Name of Parties	Citations
<p><b>Mattel, Inc. v. MCA Records, Inc.</b></p> <p>↓                      ↓</p> <p>Plaintiff v. Defendant</p>	<p><b>296 F.3d 894 (9th Cir. 2002)</b></p> <p>Volume                      Page                      Year of Number 296                      ↓                      Decision</p> <p>↓                      ↓                      ↓</p> <p>Federal Reporter,                      U.S. Court of Appeals Third Series                      for the Ninth Circuit</p>
<p><b>United States v. Ramirez</b></p> <p>↓                      ↓</p> <p>Plaintiff-Appellee v. Defendant-Appellant</p>	<p><b>44 F. App'x 80 (9th Cir. 2002)</b></p> <p>Volume                      Page                      Year of Number 44                      ↓                      Decision</p> <p>↓                      ↓                      ↓</p> <p>Federal Appendix                      U.S. Court of Appeals for the Ninth Circuit</p>
<p><b>Butler v. Target Corp.</b></p> <p>↓                      ↓</p> <p>Plaintiff v. Defendant</p>	<p><b>323 F. Supp. 2d 1052 (C.D. Cal. 2004)</b></p> <p>Volume                      Page                      Year of Number 323                      ↓                      Decision</p> <p>↓                      ↓                      ↓</p> <p>Federal Supplement,                      U.S. District Court, Central Second Series                      District of California</p>

## CHAPTER 2: HOW TO READ A LEGAL CITATION

---

### *Statutes or Codes*

Another common type of legal citation likely to be encountered is a citation to a statute or code.<sup>5</sup> The major difference between a case citation and a statute or code citation is that the latter will usually not include a parallel citation. Also, the year of publication of the print volume is used, not the year of enactment or amendment.

Here are two examples: Cal. Rev. & Tax Code § 2280 (West 1998) and Cal. Lab. Code § 5304 (Deering 2006). The year next to the publisher refers to the publication date of the print volume.

The first citation refers to section 2280 of the California Revenue and Taxation Code published in *West's Annotated California Codes*. The second citation is to section 5304 of the California Labor Code published in *Deering's California Codes Annotated*. Again, note the absence of parallel citations for code sections.

CALIFORNIA CODE CITATIONS		
Title of Code	Section Number	Publisher & Date
<b>Cal. Rev. &amp; Tax. Code</b> [California Revenue & Taxation Code]	§ 2280	<b>(West 1998)</b>
<b>Cal. Lab. Code</b> [California Labor Code]	§ 5304	<b>(Deering 2006)</b>

The following are examples of citations to the U.S. Code.

UNITED STATES CODE CITATIONS		
Title of Code	Section Number	Publisher & Date
<b>8 U.S.C.</b> [United States Code]	§ 1152	<b>(2006)</b>

---

<sup>5</sup> The terms *statutes* and *codes* are generally used interchangeably.

<b>15 U.S.C.A.</b> [United States Code Annotated]	<b>§ 1601</b>	<b>(West 2009)</b>
<b>42 U.S.C.S.</b> [United States Code Service]	<b>§ 2000e-3</b>	<b>(LexisNexis 2005)</b>

The major difference between the California Codes and the *United States Code* is that titles in the former are identified by subject (Civil, Penal, Family, etc.), whereas titles of the *U.S. Code* are arranged by number. In the examples above, title 8 of the *U.S. Code* is Aliens and Nationality; title 15 is Commerce and Trade; and title 42 is the Public Health and Welfare.<sup>6</sup> Also note that the United States Code is the official government publication, while the other two are commercially published.

### *Law Reviews and Treatises*

Law review and other legal periodical citations follow the standard format of author, title, volume number, abbreviated title of the law review, beginning page number, and date. An example would be:

Jonathan Zasloff, *Law and the Shaping of American Foreign Policy: From the Gilded Age to the New Era*, 78 N.Y.U. L. Rev. 239 (2003).

Note that the title of the law review is abbreviated. Sources to decipher such abbreviations are listed below.

Treatises, books on a particular legal topic, are generally cited by author, title and year. Unlike other citation systems, the publisher is usually not included in the citation.

### *Citation Manuals*

Further discussion on citations and guidance as to the proper citation format can be found in *The Bluebook: A Uniform System of Citation* (19th ed. Cambridge, Mass.: Harvard

---

<sup>6</sup> GPO Access provides the [U.S. Code](#) by year and by title.

## CHAPTER 2: HOW TO READ A LEGAL CITATION

---

Law Review Association, 2010), and in Edward W. Jessen, *California Style Manual: A Handbook of Legal Style for California Courts and Lawyers* (4th ed. West Group, 2000). There is also a newer citation manual which is beginning to gain acceptance in law schools: Association of Legal Writing Directors & Darby Dickerson, *ALWD Citation Manual: A Professional System of Citation* (4th ed. Aspen Publishers, 2010). For further assistance with both the *Bluebook* and *ALWD Citation Manual*, consult Peter W. Martin, [Introduction to Basic Legal Citation](#) (Legal Information Institute, fall 2011). This online resource introduces the reader to the basics of legal citation principles, illustrating throughout with examples from each citation system.

Citations are necessarily in an abbreviated form. To assist you with deciphering some of the more common abbreviations used in legal citations, a list of abbreviations follows this section. The above mentioned style manuals may be of help in understanding abbreviations. For more complete lists of legal abbreviations, see the following works:

*Black's Law Dictionary*, 9th ed. St. Paul, MN: West, 2009 (Appendix A).

Mary Miles Prince, *Prince's Bieber Dictionary of Legal Abbreviations*, 6th ed. Buffalo, NY: William S. Hein & Co., 2009.

Steven M. Barkan, Roy M. Mersky & Donald J. Dunn, *Fundamentals of Legal Research*, 9th ed. New York, NY: Foundation Press, 2009 (Appendix A).

University of Washington Marion Gould Gallagher Law Library, [Acronyms and Abbreviations](#)

Please note that most law book publishers devise their own system of abbreviations that may vary from the examples shown below. Therefore, check the preface to each source for their in-house abbreviation explanations. Although many legal researchers are now relying on the online citators, the print version of *Shepard's Citations* is a leading example of a legal research tool that uses unique symbols and abbreviations.

Also, there is a movement in some states (but not yet California) to move toward a publisher and format neutral/vendor neutral citation style. There is a list of "Jurisdiction-Specific Citation Rules and Style Guides" in the 19th edition of the Harvard Bluebook in Table BT2 (on pages 30-51) that includes citations to court rules dealing with public domain citations. In any case, older sources will continue to use the more traditional publisher based systems.



*Internet Sources Cited in this Chapter*

U.S. Code, Browse by Year and by Title:

<http://www.gpo.gov/fdsys/browse/collectionUSCode.action?collectionCode=USCODE>

*Introduction to Basic Legal Citation:* <http://www.law.cornell.edu/citation/>

*Acronyms and Abbreviations,* University of Washington Marion Gould Gallagher Law Library:

<http://lib.law.washington.edu/pubs/acron.html>