

WSR 26-02-022
RULES OF COURT
STATE SUPREME COURT
[December 4, 2025]

IN THE MATTER OF THE ) ORDER
SUGGESTED AMENDMENTS TO GR ) NO. 25700-A-1677
14—APPENDIX 1—OFFICE OF )
REPORTER OF DECISIONS STYLE )
SHEET )

Professor Robert Chang and the Washington Appellate Project, in separate proposals, having recommended suggested amendments to GR 14—Appendix 1—Office of Reporter of Decisions Style Sheet, and the Court having approved the suggested amendments for publication;

Now, therefore, it is hereby

ORDERED:

(a) That pursuant to the provisions of GR 9(g), the suggested amendments submitted both by Professor Chang and by the Washington Appellate Project as shown below are to be published for comment in the Washington Reports, Washington Register, Washington State Bar Association and Administrative Office of the Court's websites in January 2026.

(b) The purpose statements as required by GR 9(e) are published solely for the information of the Bench, Bar, and other interested parties.

(c) Comments are to be submitted to the Clerk of the Supreme Court by either U.S. Mail or Internet E-Mail by no later than April 30, 2026. Comments may be sent to the following addresses: P.O. Box 40929, Olympia, Washington 98504-0929, or supreme@courts.wa.gov. Comments submitted by e-mail message must be limited to 1500 words.

DATED at Olympia, Washington this 4th day of December, 2025.

For the Court

Stephens, C.J.

CHIEF JUSTICE

GENERAL RULE 9
RULE AMENDMENT COVER SHEET
PROPOSED AMENDMENT TO GR 14—Appendix 1, Exception 9
Office of Reporter of Decisions Style Sheet

- 1. Proponent Organization Professor Robert Chang, Executive Director, Fred T. Korematsu Center for Law and Equality.
2. Spokesperson & Contact Info. Robert Chang, rchang@law.uci.edu, (949) 824-3034.
3. Purpose of Proposed Rule Amendment. To simplify the style sheet, to improve the readability of briefing, to save client costs, and to reduce unnecessary work.
4. Is Expedited Consideration Requested? No.
5. Is a Public Hearing Recommended? No. This rule change is simple and follows on the recent rule change that eliminated the requirement to provide parallel citations to U.S. Supreme Court decisions. The current rule adds work for staff, costs to client, makes drafts less readable, and counts against word limits. The Rules Committee may easily render its decision based on any written submissions.

GR 14—APPENDIX 1  
OFFICE OF REPORTER OF DECISIONS STYLE  
SHEET

*Effective September 1, 2025 and Subject to Revision*

GENERAL PRINCIPLES

1. The Twentieth Edition of *The Bluebook: A Uniform System of Citation* is the basic citation resource for Washington appellate court opinions except as noted below.

2. The latest edition of *The Chicago Manual of Style* is the authority for punctuation and style matters.

3. *Webster's Third New International Dictionary of the English Language* (as updated by the online version, *Merriam-Webster Unabridged*) is the authority for spelling, including spacing and hyphens between nouns (e.g., website, seat belt, decision-maker). Where two or more spellings are listed, use *Webster's* preferred spelling rather than the variant.

4. For matters not covered by the *Bluebook*, *The Chicago Manual of Style*, or *Webster's*, the Office of Reporter of Decisions applies formal, traditional, noncolloquial English.

5. Use and cite to official sources, which in most instances are printed publications. Do not cite to an unofficial source unless the official source is unavailable.

ABBREVIATIONS

The following abbreviations are used for citing to primary Washington legal materials. The list replaces the list of abbreviations for Washington materials found in *Bluebook* table T1.3, at 300.

TITLE	ABBREVIATION
Washington Constitution	Const. art. VI, § 1
Revised Code of Washington (Official)	RCW
Revised Code of Washington Annotated (West)	RCWA
Annotated Revised Code of Washington (LEXIS)	ARCW
Session Laws	Laws of 2002, ch. 107, § 3
special sessions	Laws of 1995, 2d Spec. Sess., ch. 14, § 21
extraordinary sessions	Laws of 1963, 1st Ex. Sess., ch. 26
Washington Reports, 1 <sup>st</sup> & 2d Series	Wash.; Wn.2d
Washington Territory Reports	Wash. Terr.
Washington Appellate Reports	Wn. App.; Wn. App. 2d
Washington Administrative Code	WAC
Washington State Register	Wash. St. Reg.
<u>Early Statutes</u>	
Ballinger Code	Bal. Code
Code of 1881	Code of 1881
Hill's Code of Procedure	Hill's Code of Proc.
Hill's General Statutes	Hill's Gen. Stat.
Pierce's Code	Pierce's Code
Remington's Revised Statutes	Rem. Rev. Stat.
Remington's 1915 Code	Rem. 1915 Code

Note: In citations, "Const.," "Laws of," and the names of codes and statutes (e.g., "Code of 1881," "Rem. Rev. Stat.") are printed in the official reports in large and small caps, but ordinary typeface is acceptable in manuscript opinions. In text, both the official reports and manuscript opinions use ordinary typeface.

EXCEPTIONS TO *BLUEBOOK*

1. Exception to *Bluebook* rules 2.1 & 2.2, at 67-70: Ignore rules about using roman type for case names. Case names should be in italics no matter where or how they are used.

2. Exception to *Bluebook* rule 5.3 (b) (iv) at 86: The deletion of matter after the final punctuation of a sentence may be indicated by a three-dot ellipsis.

3. Exception to *Bluebook* rule 6.1(b) at 88: Do not use abbreviations for entities with widely recognized initials in text (unless previously set out in a parenthetical), in case citations (unless abbreviated in source) (this is also an exception to *Bluebook* rule 10.2.1(c) at 98), or as institutional authors.

4. Exceptions to *Bluebook* rule 6.2(a) at 88-89: In text, spell out numbers zero to nine. Use arabic numerals for higher numbers. Use commas in numbers 1,000 and higher (e.g., 9,876) except when citing a page number in a case or court document.

5. Exception to *Bluebook* rule 6.2(d) at 89: In text, always write out "percent" rather than using a percentage sign (%).

6. Exception to *Bluebook* rule 8, at 91-93: Ignore this section. The Reporter's Office generally follows *The Chicago Manual of Style* to resolve capitalization issues although, other than capitalizing proper nouns and maintaining consistency throughout the opinion, the judicial author's preference governs.

7. Exception to *Bluebook* rule 9(a) at 94: When a judge is named in text, the use of the judge's first and middle names/initials is discretionary with the author.

8. Exception to *Bluebook* rule 10.2.1(a) at 97: When a case has both an adversary and a nonadversary name, cite to only the first case name in the official reports caption.

9. Exception to *Bluebook* rule 10.3.1, at 102-103 and Table T1: Cite official reports and ~~regional reporters~~ for all cases for which official reports are published. ~~Include public domain citations when available. For California, Illinois, and New York, include the state specific reporter (Cal. Rptr. 3d, Ill. Dec., N.Y.S.2d) in addition to the official reports and regional reporters.~~ For Washington cases, pinpoint citations are made to Wn.2d or Wn. App. pages, paragraph numbers, or both; ~~pinpoint citations to P., P.2d, or P.3d pages are optional; pinpoint citations should not be made to P.3d paragraph numbers.~~ For non-Washington cases, ~~pinpoint citations are made to the official report or the unofficial report. Maintain consistency throughout the opinion.~~

10. Exception to *Bluebook* rule 10.7, at 109-11: *Review denied* and *review granted*: for Washington cases, cite to Wash. or Wn.2d; citing P., P.2d, or P.3d in addition to Wash. or Wn.2d is optional; for non-Washington cases: cite to the regional reporter; citing the official reporter in addition to the regional reporter is optional. *Cert. granted* or *cert. denied* in the United States Supreme Court: cite only to U.S. if therein; otherwise, cite to one of the following: S. Ct., L. Ed. or L. Ed. 2d, or U.S.L.W. in that order of preference. When subsequent history results in an opinion (such as *aff'd*, *rev'd*, *vacated*, *overruled by*, and *abrogated by*), use a full case citation.

11. Exception to *Bluebook* rule 10.7.1(c) at 110: "Overruled by" (or "abrogated by") is appropriate when a case explicitly repudiates (or effectively overrules or departs from) an earlier decision of a lower court as well as an earlier decision of the same court. Do not use "superseded by statute" or "superseded by constitutional amendment" subsequent history.

12. Exception to *Bluebook* rule 12.3.1(d) at 124: When citing to a current or former, official or unofficial, version of a statute that is published by a private publisher, do not add the name of the publisher and year of publication, e.g., "(West)" or "(LexisNexis 2003)," unless the volume is being cited for something other than the text of the statute, in which case include the publisher name and year.

13. Exception to *Bluebook* rule 12.3.2, at 124-25: Do not add the year in parentheses after a citation to a presently effective version of a statute or code.

14. Exception to *Bluebook* rule 12.9.2, at 130: Do not add "Wash." for codes and ordinances of Washington local governments. Do not add the year in parentheses after a citation to a presently effective version of a local code or ordinance.

15. Exception to *Bluebook* rule 12.10(c) at 134: "Section" may be spelled out in text when referring to U.S.C. sections.

16. Exception to *Bluebook* table T1.3, at 289: For Pennsylvania Superior Court cases, omit the public domain citation after the A.3d citation becomes available.

[Adopted effective September 1, 2003; amended effective February 19, 2009; December 28, 2010; December 8, 2015; July 3, 2018; September 1, 2025.]

## GENERAL RULE 9

## RULE AMENDMENT COVER SHEET

PROPOSED AMENDMENT TO GR 14—Appendix 1, Exceptions 9 & 10, Office of Reporter of Decisions Style Sheet

1. Proponent: The Washington Appellate Project
2. Spokesperson: Christopher Petroni, [chris@washapp.org](mailto:chris@washapp.org), 206-587-2711
3. Purpose: To improve the readability of briefs, reduce unnecessary words by eliminating the requirement for any parallel citations, and simplify the style sheet. Earlier this year, this Court adopted Professor Robert S. Chang's proposed amendment to GR 14—Appendix 1, Exception 16, and eliminated the requirement for parallel citations for United States Supreme Court cases. The amended rule recognizes the prevalence and accessibility of online research has eliminated the need for parallel reporter citations. The amendments also improve briefs by eliminating needless clutter and improving readability. We propose the Court extend this rule and eliminate the requirement for parallel citations for all cases. Instead, the Court should require citation to the official reporter for Washington cases and regional reporters for cases in other states.
4. Hearing: No public hearing is necessary or requested.
5. Expedited consideration: Expedited consideration seems appropriate, considering the simplicity of the rule and proposed amendments and the unlikelihood of controversy. The current rule requiring parallel citations is unnecessary in the age of electronic research. Requiring parallel citations makes it harder to read briefs but adds no benefit and needlessly uses words.

**Proposed Amendments to GR 14—Appendix 1, Exceptions 9 & 10**

9. Exception to *Bluebook* rule 10.3.1, at 102-103 and Table T1: ~~Cite official reports and regional reporters for all cases for which official reports are published. Include public domain citations when available. For California, Illinois, and New York, include the state specific reporter (Cal. Rptr. 3d, Ill. Dec., N.Y.S.2d) in addition to the official reports and regional reporters. For Washington cases, pinpoint citations are made to Wash., Wn.2d, Wn.3d, Wn. App., or Wn. App. 2d pages, paragraph numbers, or both; pinpoint citations to P., P.2d, or P.3d pages are optional; pinpoint citations should not be made to P.3d paragraph numbers. For non-Washington cases, pinpoint citations are made to the official report or the unofficial report. Maintain consistency throughout the opinion. For Washington cases, cite the official reports (Wash., Wn.2d, Wn.3d, Wn. App., or Wn. App. 2d) if therein; otherwise cite the regional reports (P., P.2d, or P.3d).~~

10. Exception to *Bluebook* rule 10.7, at 109-11: *Review denied and review granted*: for Washington cases, cite to Wash., Wn.2d, or Wn.3d if therein; otherwise cite the regional reports (P., P.2d, or P.3d). ~~if citing P., P.2d, or P.3d in addition to Wash., Wn.2d, or Wn.3d is optional; for non-Washington cases: cite to the regional reporter; citing the official reporter in addition to the regional reporter is optional. *Cert. granted* or *cert. denied* in the United States Supreme Court: cite only to U.S. if therein; otherwise, cite to one of the following: S. Ct., L. Ed. or L. Ed. 2d, or U.S.L.W. in that order of preference. When subsequent history results in an opinion (such as *aff'd*, *rev'd*, *vacated*, *overruled by*, and *abrogated by*), use a full case citation.~~

**Reviser's note:** The typographical error in the above material occurred in the copy filed by the state supreme court and appears in the Register pursuant to the requirements of RCW 34.08.040.