

# Citators

## Legal Research Center Video Series



Melissa Abernathy

# Learning Objectives

## Students will be able to...

1. Understand why researchers use citators.
2. Identify the different treatment indicators used in citators.
3. Identify negative treatment of a point of law by considering factors such as jurisdiction, court level, and depth of discussion..
4. Identify positive or neutral treatment of a point of law to yield additional cases or sources that support your legal argument.

# 1. Why do researchers use citators?

# Why do researchers use citators?

**Citators are tools meant to assist us in critically assessing points of law in a case or statute**

- To find the direct history of a case
- To find negative treatment and determine what point of law is being treated negatively
- To find positive or neutral treatment and identify similar cases or useful secondary sources
- Citators can also be used to update statutes and law review articles






# 2. Treatment Indicators

# Treatment indicators

**KeyCite flags and Shepard's signals are different symbols that alert you to positive or negative references or events that may impact the validity of that document. They do not alone determine validity.**








# Keycite flags

**KeyCite Flags alert you to negative references or events that may impact the validity of that document. They do not alone determine validity. No flag indicates positive treatment.**

-  • **Red:** no longer good for at least one point of law
-  • **Red and white striped:** no longer good for at least one identified point of law
-  • **Orange:** document may no longer be good for at least one point of law based on its reliance on an overruled or otherwise invalid prior decision.
-  • **Yellow:** some negative treatment, but not reversed or overruled
-  • **Blue and white striped:** appealed

# Shepard's signals

Shepard's has more signals than Westlaw's Keycite but that doesn't necessarily mean one is better or one is more detailed.

-  **Red stop sign:** negative treatment is indicated. There is no red striped indicator as in Westlaw.
-  **Red exclamation mark:** negative treatment is indicated for a statute
-  **Orange:** validity questioned by citing references
-  **Yellow triangle:** possible negative treatment indicated
-  **Green diamond:** positive treatment indicated
-  **Blue A:** neutral, citing references with analysis
-  **Blue I:** cited by

# 3. Identify negative treatment (using citators for validity)

[View Cal./Cal App. version](#)

 Disapproved of by Conservatorship of O.B., Cal., July 27, 2020

40 Cal.3d 848

Supreme Court of California.

**In re the MARRIAGE OF Eileen K. and Ernest J. SASLOW.**

**Eileen K. SASLOW, Appellant,**

**v.**





**Ernest J. SASLOW, Respondent.**

S.F. 24613.

Dec. 31, 1985.

**Synopsis**

In dissolution of marriage action, the Superior Court, Kern County, John D. Jelleich, J., entered judgment determining bulk of couple's substantial assets to belong to community and he divided them equally, determined benefits to be paid to husband from disability policies were

  Notes  Outlines  Quick Check

← **§ 3101. Stepparent's visitation rights** 🔖 🔗

CA FAM § 3101 · West's Annotated California Codes · Family Code (Approx. 2 pages)

Document Notes of Decisions (12) **History (11)** Citing References (131) Context & Analysis (45) Powered by KeyCite

Fullscreen

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West's Annotated California Codes

Family Code (Refs & Annos)

Division 8. Custody of Children (Refs & Annos)

Part 2. Right to Custody of Minor Child (Refs & Annos)

Chapter 5. Visitation Rights (Refs & Annos)

Unconstitutional or Preempted · Unconstitutional as Applied by · [In re Marriage of W.](#) · Cal.App. 2 Dist. · Dec. 09, 2003

West's Ann.Cal.Fam.Code § 3101

## § 3101. Stepparent's visitation rights

Currentness

- (a) Notwithstanding any other provision of law, the court may grant reasonable visitation to a stepparent, if visitation by the stepparent is determined to be in the best interest of the minor child.
- (b) If a protective order, as defined in [Section 6218](#), has been directed to a stepparent to whom visitation may be granted pursuant to this section, the court shall consider whether the best interest of the child requires that any visitation by the stepparent be denied.
- (c) Visitation rights may not be ordered under this section that would conflict with a right of custody or visitation of a birth parent who is

# In re Marriage of Saslow

Supreme Court December 31, 1985 40 Cal. 3d 848



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## In re Marriage of Saslow

Copy Citation

Request Law School Case Briefs

Supreme Court of California

December 31, 1985

S.F. No. 24613

### Reporter

40 Cal. 3d 848 \* | 710 P.2d 346 \*\* | 221 Cal. Rptr. 546 \*\*\* | 1985 Cal.

LEXIS 438 \*\*\*\*

In re the Marriage of EILEEN K. and ERNEST J. SASLOW. EILEEN K. SASLOW, Appellant, v. ERNEST J. SASLOW, Appellant

Footnotes

Cal Fam Code § 3101

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History

# Cal Fam Code § 3101

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Deering's California Codes are current through the 2024 Regular Session  
Ch 164

## Heading

Deering's California Codes Annotated

FAMILY CODE (§§ 1 – 20104)

Division 8 Custody of Children (Pts. 1 – 3)

Part 2 Right to Custody of Minor Child (Chs. 1 – 13)

Chapter 5 Visitation Rights (§§ 3100 – 3105)

Info

Notes

Compare Versions

Shepard's

Warning

Citing Decisions 12

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Shepardize document

Search Terms

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4. Identify positive or neutral treatment (using citators for research)

[View Cal./Cal.App. version](#)

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40 Cal.3d 848

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  Notes  Outlines  Quick Check

**Synopsis**

West Headnotes

Attorneys and Law Firms

 Opinion

All Citations

Footnotes

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Footnotes

# LRC Reference Desk

Email: [lrcrefer@san Diego.edu](mailto:lrcrefer@san Diego.edu)

Phone: (619) 260-4612

Chat: [sandiego.edu/law/library](https://sandiego.edu/law/library)

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