

Citators

Legal Research Center Video Series

Learning Objectives

Students will be able to...

1. Explain why researchers use citators.
2. Identify the different treatment indicators used in citators.
3. Use citators in Lexis and Westlaw **to determine validity** of a point of law in a case by looking at both **direct appellate history** and **negative citing cases** in the same jurisdiction.
4. Use citators in Lexis and Westlaw **to research** additional cases or sources that support a 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 determine the **validity** of a case or statute they plan to cite or rely upon
 - *Is this case or statute still good law for the point of law I am citing it for?*
- To **research** a legal issue found in a case or statute
 - *Are there other cases or sources that have discussed my legal issue?*






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 (Westlaw)

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 (Lexis)

Shepard's has more signals than 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. Using citators for validity

Citators for validity

You must look in two places to determine if a case is still good law:

- **Direct Appellate History** (Same Case, Same Parties)
 - Ask: What happened to this case after it was decided?
 - *Was the case appealed?*
 - *Did a higher court in the direct line of appeal affirm or reverse it?*
- **Negative Citing Cases** (may also be called **Negative Treatment**)
(Different Cases/Parties, Same Legal Issue)
 - Ask: Has another court said this case was wrong on this point of law?
 - *Did other courts in the same jurisdiction overrule or criticize your case on this point of law?*
 - *Any new legislation that overrides your case may also be flagged.*

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 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



All content

Enter terms, citations, databases, questions, anything ...

All State & Federal

Search Tips >
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§ 3101. Stepparent's visitation rights

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

Document

Notes of Decisions (12)

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Context & Analysis (45) ▾

Powered by KeyCite

Fullscreen

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Outline



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)



Notes

Outlines

 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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Search Terms

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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



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

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Compare Versions

Shepard's

Warning

Citing Decisions 12

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● Neutral	1
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Shepardize document

Search Terms

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Research Reference...

4. Using citators for research

Citators for research

You can and should use citators to help you research your legal issue. Look in the citing references for:

- Other cases that cite your case positively or neutrally
- Secondary sources that cite your case

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

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 Quick Check

Synopsis

West Headnotes

Attorneys and Law Firms

 Opinion

All Citations

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