
Universal Citations: Coming [REALLY] Soon to Briefs Near You

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Guides for North Carolina Appeals: Part IV

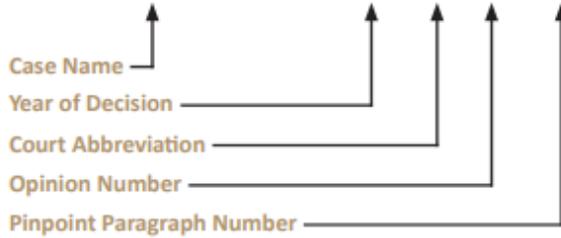
When the news dropped about a year ago that North Carolina would be adopting universal citations beginning January 1, 2021, we published the skinny of what we knew at the time in our post, *Universal Citations: Coming Soon to Briefs Near You*. At that time, this announcement left some citation freaks, like me, with more questions than answers. Fortunately, however, the “powers that be” have since provided all necessary guidance. Here’s the latest scoop:

On November 23, 2020, the Supreme Court of North Carolina published a press release, reminding practitioners that universal citations’ red carpet debut was on track to occur on January 1, 2021. In said press release, Associate Supreme Court Justice Anita Earls reiterated why “change is good” in this particular instance. Justice Earls explained that the “transition to universal citation will make it less burdensome to search content on electronic publications and make opinions publically available with a permanent citation.”

In November 2020, the Supreme Court also published a two-page “Fact Sheet” to further highlight the benefits of this shift and provide the following examples of this newly adopted universal citation format:

- o Supreme Court of North Carolina

State v. Smith, ^(official citation) 375 N.C. 152, ^(parallel citation) 2020-NCSC-45, ¶ 16.



- o North Carolina Court of Appeals

State v. Smith, ^(official citation) 255 N.C. App. 43, ^(parallel citation) 2020-NCCOA-118, ¶ 23.

Although this diagram makes my nerdy heart very happy, don't fret if your eyes just glazed over. The *only* sources that you will be expected to cite according to this new format are brand new opinions that have been published by either the Supreme Court of North Carolina or the North Carolina Court of Appeals on or after January 1, 2021. Continue to utilize your familiar formats when citing all other sources, including any opinions published by either the Supreme Court of North Carolina or the North Carolina Court of Appeals on or before December 31, 2020.^[1]

- *TIP:* Moving forward, all new opinions published by either of North Carolina's Appellate Courts will reflect paragraph numbers in the left column. These paragraph numbers will appear regardless of whether you review the new opinion in WestLaw, Lexis, or directly from the nccourts.gov website. (*Translation:* You only need to break out this new universal citation method when you see numbered paragraphs in a brand new opinion published by either of North Carolina's Appellate Courts.)

As always, please let us know your thoughts or if you have any questions. We would love to talk nerdy with you.

[1] *Hint:* If you would like a refresher on which citation methods are recommended in North Carolina, check out the latest and greatest edition of *The Guidebook: Citation, Style, and Usage at the Supreme Court of North Carolina* which the Supreme Court recently revamped on September 23, 2020.

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