



**BLUE  
BOOK  
WEDNESDAY**

Tip #63

**PRIMARY AND SUBSEQUENT  
CASE HISTORY**

Rule 10.7

As a clerk, I learned to not include the date of an opinion if you were also including another cite in the subsequent history of the decision with the same date. For example:

*Case A*, 123 So. 2d 456 (Court), *aff'd*, 789 So. 2d 123 (Court 2023).

This is one of those rules that I just followed without taking the time to look it up. I was working on something the other day that caused this rule to resurface, and I decided to do a deep-dive on how it's addressed in *The Bluebook*.

# RULE 10.7

Rule 10.7 addresses how to include the prior and subsequent history in a case citation. The general rule is stated in Rule 10.7.1(a): “Append the prior or subsequent history of a case to the primary citation. Introduce and explain each prior or subsequent decision with italicized words between each citation.”

Rule 10.7.1(a)

# AFTER PARENTHETICAL

Prior or subsequent history should be included after “any parenthetical information given for the primary citation.”

Example: *Case A*, 123 So. 2d 456 (Court 2019) (granting Defendant’s motion for summary judgment), *aff’d*, 789 So. 2d 123 (Court 2023).

Rule 10.7.1(a) also includes the nuance I was looking for: “If a subsequent disposition occurred in the same year as the primary citation, omit the year from the primary citation’s parenthetical.”

# PRIOR HISTORY FIRST

If you are providing both prior and subsequent history, “give the prior history first.”

# CHANGE IN CASE NAME

Where the “name of a case differs in subsequent history, the new name must be given, introduced by the phrase ‘*sub nom.*’”

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