



Virginia Workers' Compensation Commission
Citation Reference for Attorneys

April 1, 2025

VWC CITATION REFERENCE FOR ATTORNEYS
April 1, 2025

Introduction

This **VWC Citation Reference for Attorneys**, approved by the Commission, takes effect on **April 1, 2025**. This Manual has been prepared for any party presenting legal documents to the Commission.

The **VWC Citation Reference for Attorneys**, dated April 1, 2025, employs citation forms found in *The Bluebook: A Uniform System of Citation*, Twentieth Edition, with various deviations approved by the full Commission. If a citation rule is not covered in this Manual, refer to *The Bluebook* for the applicable rule.

The **VWC Citation Reference for Attorneys**, dated April 1, 2025, was prepared, formatted, and edited by Nancy Truman, Executive Judicial Assistant, with the much appreciated and valuable assistance from Staff Attorney Patricia Sherron.

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⇒ Indicates a note with additional significant information related to that particular section.

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COMMON CITATIONS:



NOTES:

1. Abbreviations noted in citations below are **not** meant to be used within a textual sentence. *See* Common Citations, Sections I.A. and I.E., and Rules for Case Citations, Section XII.

Examples:

- a. Virginia Code § 65.2-503 provides guidance regarding permanent loss.
 - b. The claimant is awarded 15% permanent loss of use of his right arm. *See* Va. Code § 65.2-503.
2. The Commission italicizes the style of a case. Underlining the style of a case is used only when quoting a document in which the case style was originally underlined.

I. Virginia Workers' Compensation Act, Rules, and Opinions

A. Virginia Workers' Compensation Act ("the Act"):

Example: Va. Code § 65.2-503

- The Commission has opted to include "Va." within cites referencing the Act. The Supreme Court of Virginia and the Court of Appeals of Virginia do not include "Va." when citing references to the Act in their opinions.



NOTE:

In a sentence, Virginia is spelled out. In subsequent usage, Virginia may be dropped; simply identify Code § 65.2-____. Code may also be dropped in subsequent references which then requires that Section be spelled out rather than using the section symbol.

- A space should be placed between § and 65.2.
- In Microsoft Word, the section symbol is found by clicking on the Insert tab; then, click on Symbols, click on More Symbols, click on Special Characters, click on § Section, click on Insert, and close the Symbol box.

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B. *Rules of the Virginia Workers' Compensation Commission:*

Va. Workers' Comp. R. 3.1

(When a Commission rule is used in a sentence, the rule is stated as follows:
Rule 3.1 of the *Rules of the Virginia Workers' Compensation Commission*
provides)

C. Virginia Workers' Compensation Commission Regulations:

16 VAC 30-91-10

D. Virginia Workers' Compensation Commission Opinions:

1. *Williams v. Oberthur Card Sys.*, JCN 210-54-73 (June 1, 2011); *Moore v. Dickenson Cty. Ambulance Serv., Inc.*, JCN VA00000203521 (May 10, 2011); *Echols v. Rite-Aid Corp.*, VWC File No. 185-92-20 (Jan. 26, 1999).
2. *Hawkins v. Lane Co.*, 49 O.I.C. 144, 147 (1967).
3. *Miller v. Canon of Va., Inc.*, 79 O.W.C. 56 (2000).

⇒ **NOTE:** O.W.C. opinions begin with Volume 71 (1992).

E. Virginia Workers' Compensation Commission Opinions Affirmed in Unpublished Opinions:

Crawford v. Va. Elec. & Power Co., VWC File No. 190-16-53 (Apr. 23, 1999), *aff'd*, No. 1125-99-3 (Va. Ct. App. Oct. 5, 1999).

- Most words within case names are not abbreviated as above when used within a textual sentence. *See* Rules for Case Citations, Section XII. *See also* Rule 10.1(vi), *The Bluebook*, 20th Edition, for further explanation.

⇒ **NOTE:** There is no period following *aff'd* (or *rev'd*) within the cite. *See* Rules for Case Citations, Section III.

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F. Other Virginia Rules:

1. Supreme Court of Virginia: Va. Sup. Ct. R. 4:1 (b)
2. Rules of Evidence in Virginia: Va. R. Evid. 2:103(a)

II. Virginia Appellate Courts**NOTE:**

The Commission has discontinued the use of parallel resources in its judicial opinions (e.g., S.E.2d reporter). Unless there is a necessity for clarity or to locate a citation, the parallel resource should not be used.

While the Commission does not use Lexis citations in judicial opinions, the Commission encourages the continued use of Lexis citations for unpublished decisions of the Court of Appeals of Virginia or decisions pending publication. For example, ___ Va. App. ___ (2025), followed by the Lexis citation.

Exception: If quoted material contains a parallel resource, it should be maintained.

A. Court of Appeals of Virginia:

United Airlines, Inc. v. Hayes, 58 Va. App. 220, 232 (2011).

B. Unpublished Court of Appeals:

Murphy-Brown, LLC v. Budnick, No. 2752-08-2 (Va. Ct. App. Apr. 14, 2009).

C. Supreme Court of Virginia:

Morris v. Morris, 238 Va. 578, 585 (1989).

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III. United States Constitution, Statutes, Rules, and Opinions

⇒ **NOTE:** The Commission has discontinued the use of parallel resources in its judicial opinions. Unless there is a necessity for clarity or to locate a citation, the parallel resource should not be used.

While the Commission does not use Lexis citations in judicial opinions, the Commission encourages the continued use of Lexis citations for unpublished decisions or decisions pending publication.

Exception: If quoted material contains a parallel resource, it should be maintained.

A. United States Constitution:

U.S. Const. amend. XIV, § 2

B. United States Code:

26 U.S.C. §§ 3101(a), 3111(a)

Federal Mine Safety and Health Act of 1977, 30 U.S.C. § 801

Federal Old-Age Survivors and Disability Insurance Act, 42 U.S.C. § 423

- Subsequent references may be abbreviated as Social Security Act or SSA.
- The writer may use the popular name (i.e., Social Security Act) when generally citing to this statute.

Longshore and Harbor Workers' Compensation Act, 33 U.S.C. § 905

- Subsequent references may be abbreviated as LHWCA.

C. Federal Rules of Civil Procedure:

Fed. R. Civ. P. 12(b)(1)

D. United States Federal District Courts:

Stancil v. United States, 200 F. Supp. 36 (E.D.Va. 1961).

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E. United States Court of Appeals:

Cryder v. Oxendine, 24 F.3d 175 (11th Cir. 1994).

F. United States Supreme Court:

Dillard v. Indus. Comm'n of Va., 416 U.S. 783 (1974).

- Indicating a footnote in cite:

Example: *Dillard*, 416 U.S. at 796 n.17.

(There is no comma after 796 and no space between n. and 17.)

IV. Other Commonly Used Resources

A. *AMA Guides to the Evaluation of Permanent Impairment*:

AMA Guides to the Evaluation of Permanent Impairment, Table 16-12, 534-35 (6th Ed. 2008).

B. Larson:

2 Arthur Larson & Lex. K. Larson, *Larson's Workers' Compensation Law* § 23.02 (2012).

C. Law Reviews:

William S. Mattingly, *National Coal Issue Article*, 105 W.Va. L. Rev. 791, 798 (2003).

D. Virginia Birth-Related Neurological Injury Compensation Act

Virginia Birth-Related Neurological Injury Compensation Act, Va. Code §§ 38.2-5000 et seq.

- Subsequent references may be abbreviated as the Birth Injury Act.

E. Compensating Victims of Crime Act

Compensating Victims of Crime Act, Va. Code §§ 19.2-368.1 et seq.

- Subsequent references may be abbreviated as the Crime Victims Act.

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RULES FOR CASE CITATIONS

NOTES:

Surnames in case cites: (*See The Bluebook*, 20th Ed., Rule 10.2.1(g).)

1. Do not omit any part of a surname consisting of more than one word.
2. In names such as Chinese, Korean, or Vietnamese, retain the full name when the surname is given first.
3. In names such as Spanish or Portuguese, the surname and all names following should be cited.

- I. The month is abbreviated, except May, June, and July (*see The Bluebook*, 20th Ed.).
- II. Explanatory parentheticals: “citing” and “quoting” are always placed in parentheses and are never underlined or italicized.

Example: *Id.* (citing *Burlington Mills Corp. v. Hagood*, 177 Va. 204, 210-11 (1941)).

NOTE:

Be sure to include the closing parenthesis for the parenthetical following the parenthesis for the year.

- III. Subsequent history: “*aff’d*” and “*rev’d*” are italicized and placed between commas; there is no period after either.

Example: *Lee v. Master Cleaners*, VWC File No. 227-73-40 (Aug. 24, 2007), *aff’d*, No. 2276-07-1 (Va. Ct. App. Mar. 11, 2008).

- IV. Never use *supra* in relation to case citations.

- V. Short form citations:

- Citing to the case directly above: *Id.* at 215. (Italicize the period following “*Id.*”)
- Citing a Commission case directly above: *Id.* at 8.

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- Citing to a case previously cited above but not directly above:

Examples:

- Supreme Court of Virginia: *Morris*, 238 Va. at 585.
- Court of Appeals of Virginia: *Redmond*, 12 Va. App. at 614.
- Court of Appeals of Virginia (unpublished): *Budnick*, 2752-08-2.
- Virginia Workers' Compensation Commission: *Moore*, JCN VA00000203521

VI. For string citations:

- Place the citations in the following order: Constitutions, Statutes, Treaties, and Cases.
- Arrange cases first from highest to lowest court; if more than one cite to a court, place in reverse chronological order.
- Additional information may be found in *The Bluebook*, 20th Edition, regarding introductory signals (Rule 1.2) and order of signals (Rule 1.3).

VII. Italicize the following: *See, id., see also*.

Example: *See Pinkerton's Inc. v. Helmes*, 242 Va. 378, 380-81 (1991).

VIII. If using a pinpoint page citation in a sentence, do not repeat the citation at the end of that sentence.

IX. When needed, use (emphasis added), but:

Per Rule 5.2(d)(iii), *The Bluebook*, Twentieth Edition, “[d]o not indicate that emphasis in the quotation appears in the original.”

X. When citing footnotes, use “n.”

Example: *Dillard*, 416 U.S. at 796 n.17.

⇒ **NOTE:** There is no comma after 796 and no space between the n. and 17.

XI. Citation abbreviations may be found in *The Bluebook*, Twentieth Edition, Table 6 (or see Table 1 attached to this manual.).

Example: School[s] Sch.

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- XII. When referencing a case name in a textual sentence, whether in the main text or footnote text, abbreviate only widely known acronyms and these eight words (*See* Rule 10.1.1(vi), *The Bluebook*, 20th Ed.):

&, Ass'n, Bros., Co., Corp., Inc., Ltd., No.

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RULES FOR CITING COMMISSION AND OTHER COURT DOCUMENTS

I. Award Order, Agreement to Pay Benefits, and any official titled document of the Commission should be capitalized when referring to the specific document.

II. Titles of specific motions are capitalized.

Example: The claimant's May 12, 2024 Motion to Compel . . .

III. Citing written statements, position statements, transcripts, depositions, depositions with page number(s) and line number(s), recorded statements, opinions, affidavits:

(Cl.'s W.S. 1.); (Defs.' W.S. 1.); (Med. Prov.'s W.S. 1.)
 (Cl's Pos. S. 1.); (Defs.' Pos. S. 1.); (Med. Prov.'s Pos. S.1.)
 (Tr. 18.)
 (Dep. 28.)
 (Dep. 28:10 or Dep. 28:10-29:15)
 (Rec. S. 4.)
 (Op. 5.)
 (Aff. 2)

⇒ **NOTE:** *Id.* may be used when identifying subsequent references to court documents or legal memoranda if significant space will be saved. See *The Bluebook*, 20th Edition, B.17.2.

⇒ **NOTE:** Additional information regarding common abbreviations of court documents may be found at Table BT1 in *The Bluebook*, Twentieth Edition.

IV. For multiple documents:

- If there is more than one deposition transcript for an individual, use the date of the transcript to distinguish which transcript is being referenced: (Dep. 4, May 18, 2018.)
- If there are deposition transcripts for multiple individuals, include the last name of the deposition being referenced: (Scott Dep. 4.)

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- If there are multiple hearing transcripts, identify the hearing transcript by page number and date of hearing (Tr. 25, April 20, 2024.)

The writer need not be this specific if it is clear from the context which document is being referenced.

V. Exhibits: (Cl.'s Ex. 2.) (Defs.' Ex. 3.) (Fund's Ex. 2.) (Comm.'s Ex. 1.) (Emp.'s Ex 1.)[♦] (Ins.'s Ex. 1.)[♦]



NOTES:

1. Include periods where indicated. If the employer is self-insured, the exhibits are identified as Def.'s Ex. (note placement of period and apostrophe).
 2. Proffered exhibits should be identified within the opinion, either immediately following the exhibits accepted into evidence or as a separate paragraph.
- ♦ Emp.'s Ex. and Ins.'s Ex. are used only when the employer and insurer have separate interests or when the employer has separate interests from the UEF.

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TABLE 1 CASE NAMES AND INSTITUTIONAL AUTHORS IN CITATIONS
(*The Bluebook*, 20th Ed., Table 6)

T6 CASE NAMES AND INSTITUTIONAL AUTHORS IN CITATIONS

Abbreviate case names in citations by abbreviating any word listed below (rule 10.2.2). It is permissible to abbreviate other words of eight letters or more if *substantial* space is thereby saved and the result is unambiguous in context. (Thus, it would be permissible to abbreviate “Encyclopaedia Britannica” to “**Encyc. Britannica**,” “Attorney” to “**Att’y**,” or “Petroleum” to “**Petrol**.”) Unless otherwise indicated, plurals are formed by adding the letter “s.” Abbreviate any word in the possessive form by adding an apostrophe if the word is plural and an apostrophe with the letter “s” if the work is singular (Thus, abbreviate “Employees” to “**Emps.**” and “Employee’s” to “**Emp.’s**”).

▸ Academi[ic, y]	Acad.	▸ Commissioner	Comm’r
▸ Administrat[ive, ion]	Admin.	▸ Committee	Comm.
▸ Administrat[or, rix]	Adm’[r, x]	▸ Communication	Commc’n
▸ Advertising	Advert.	▸ Community	Cmty.
▸ Agricultur[e, al]	Agric.	▸ Company	Co.
▸ Alliance	All.	▸ Compensation	Comp.
▸ Alternative	Alt.	▸ Computer	Comput.
▸ America[n]	Am.	▸ Condominium	Condo.
▸ and	&	▸ Congress[ional]	Cong.
▸ Associate	Assoc.	▸ Consolidated	Consol.
▸ Association	Ass’n	▸ Construction	Constr.
▸ Atlantic	Atl.	▸ Continental	Cont’l
▸ Authority	Auth.	▸ Cooperative	Coop.
▸ Automob[ile, tive]	Auto.	▸ Corporat[e, ion]	Corp.
▸ Avenue	Ave.	▸ Correction[s, al]	Corr.
▸ Bankruptcy	Bankr.	▸ County	Cty.
▸ Board	Bd.	▸ Defen[der, se]	Def.
▸ Broadcast[er, ing]	Broad.	▸ Department	Dep’t
▸ Brotherhood	Bhd.	▸ Detention	Det.
▸ Brothers	Bros.	▸ Development	Dev.
▸ Building	Bldg.	▸ Digital	Dig.
▸ Business	Bus.	▸ Director	Dir.
▸ Casualty	Cas.	▸ Discount	Disc.
▸ Cent[er, re]	Ctr.	▸ Distribut[or, ing]	Distrib.
▸ Central	Cent.	▸ District	Dist.
▸ Chemical	Chem.	▸ Division	Div.
▸ Coalition	Coal.	▸ East[ern]	E.
▸ College	Coll.	▸ Econom[ic, ical, ics, y]	Econ.
▸ Commission	Comm’n	▸ Education[al]	Educ.

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▸ Electr[ic, ical, icity, onic]	Elec.	▸ Limited	Ltd.
▸ Employee	Emp.	▸ Litigation	Litig.
▸ Employ[er, ment]	Emp'[r, t]	▸ Machine[ry]	Mach.
▸ Enforcement	Enf't	▸ Maintenance	Maint.
▸ Engineer	Eng'r	▸ Management	Mgmt.
▸ Engineering	Eng'g	▸ Manufacturer	Mfr.
▸ Enterprise	Enter.	▸ Manufacturing	Mfg.
▸ Entertainment	Entm't	▸ Maritime	Mar.
▸ Environment	Env't	▸ Market	Mkt.
▸ Environmental	Envtl.	▸ Marketing	Mktg.
▸ Equality	Equal.	▸ Mechanic[al]	Mech.
▸ Equipment	Equip.	▸ Medic[al, ine]	Med.
▸ Examiner	Exam'r	▸ Memorial	Mem'l
▸ Exchange	Exch.	▸ Merchan[t, dise, dising]	Merch.
▸ Executive	Exec.	▸ Metropolitan	Metro.
▸ Execut[or, rix]	Ex'[r, x]	▸ Mortgage	Mortg.
▸ Explorat[ion, ory]	Expl.	▸ Municipal	Mun.
▸ Export[er, ation]	Exp.	▸ Mutual	Mut.
▸ Federal	Fed.	▸ National	Nat'l
▸ Federation	Fed'n	▸ Natural	Nat.
▸ Fidelity	Fid.	▸ North[ern]	N.
▸ Financ[e, ial, ing]	Fin.	▸ Northeast[ern]	Ne.
▸ Foundation	Found.	▸ Northwest[ern]	Nw.
▸ General	Gen.	▸ Number	No.
▸ Global	Glob.	▸ Opinion	Op.
▸ Government	Gov't	▸ Organiz[ation, ing]	Org.
▸ Group	Grp.	▸ Pacific	Pac.
▸ Guaranty	Guar.	▸ Parish	Par.
▸ Hospital[ity]	Hosp.	▸ Partnership	P'ship
▸ Housing	Hous.	▸ Person[al, nel]	Pers.
▸ Import[er, ation]	Imp.	▸ Pharmaceutic[s, al, als]	Pharm.
▸ Incorporated	Inc.	▸ Preserv[e, ation]	Pres.
▸ Indemnity	Indem.	▸ Probat[e, ion]	Prob.
▸ Independen[ce, t]	Indep.	▸ Product[ion]	Prod.
▸ Industr[y, ies, ial]	Indus.	▸ Professional	Prof'l
▸ Information	Info.	▸ Property	Prop.
▸ Institut[e, ion]	Inst.	▸ Protection	Prot.
▸ Insurance	Ins.	▸ Public	Pub.
▸ International	Int'l	▸ Publication	Publ'n
▸ Investment	Inv.	▸ Publishing	Publ'g
▸ Investor	Inv'r	▸ Railroad	R.R.
▸ Laboratory	Lab.	▸ Railway	Ry.
▸ Liability	Liab.	▸ Refining	Ref.

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▸ Regional	Reg'l
▸ Rehabilitat[ion, ive]	Rehab.
▸ Reproduct[ion, ive]	Reprod.
▸ Resource[s]	Res.
▸ Restaurant	Rest.
▸ Retirement	Ret.
▸ Road	Rd.
▸ Savings	Sav.
▸ School[s]	Sch.
▸ Scien[ce, tific]	Sci.
▸ Secretary	Sec'y
▸ Securit[y, ies]	Sec.
▸ Service	Serv.
▸ Shareholder	S'holder
▸ Social	Soc.
▸ Society	Soc'y
▸ Solution	Sol.
▸ South[ern]	S.
▸ Southeast[ern]	Se.
▸ Southwest[ern]	Sw.
▸ Steamship[s]	S.S.
▸ Street	St.
▸ Subcommittee	Subcomm.
▸ Surety	Sur.
▸ System[s]	Sys.
▸ Techn[ical, ological, ology]	Tech.
▸ Telecommunication	Telecomm.
▸ Tele[phone, graph]	Tel.
▸ Temporary	Temp.
▸ Township	Twp.
▸ Transcontinental	Transcon.
▸ Transport[ation]	Transp.
▸ Trust[ee]	Tr.
▸ Turnpike	Tpk.
▸ Uniform	Unif.
▸ University	Univ.
▸ Utility	Util.
▸ Village	Vill.
▸ West[ern]	W.