



## Chastek Library

# READING A HEADNOTE ON WESTLAW AND IN A WEST REPORTER

Research Guide

### THE WEST TOPIC & KEY NUMBER SYSTEM ON WESTLAW AND IN WEST REPORTERS

A headnote on Westlaw looks dramatically different than a headnote in the West Reporters. Below is an example of a headnote as it appears in a West Reporter (North Western Reporter). This headnote is from *Bronsen v. Dawes County*, 272 Neb. 320, 722 N.W.2d 17 (2006).

#### 7. Courts ⇐ 89

Doctrine of stare decisis is not absolute because no court is infallible.

The topic is **Courts** and the key number is **89**; however, the same headnote looks dramatically different on Westlaw.

[7]  [KeyCite Citing References for this Headnote](#)

⇐ [106](#) Courts

⇐ [106II](#) Establishment, Organization, and Procedure


⇐ [106II\(G\)](#) Rules of Decision

⇐ [106k88](#) Previous Decisions as Controlling or as Precedents

⇐ [106k89](#) k. In General. [Most Cited Cases](#)


Doctrine of stare decisis is not absolute because no court is infallible.

Westlaw adds a lot of additional information which can lead to confusion.

- Westlaw assigns a numeric code to each topic in addition to key numbers. For this example, the number **106** represents the topic **Courts**. This first number should not be confused with the key number which is **89**. The **k** means key.
- Westlaw includes numerous subdivisions for the topic. Usually, the most relevant information to determine the topic and key number is the last key symbol. For this example, the topic and key number is **106k89** which translates to **Courts**  **89**.

Here is an example where West editors have assigned one topic and two key numbers to one headnote. This headnote is from *U.S. Olympic Committee v. American Media, Inc.*, 156 F.Supp.2d 1200 (D. Colo. 2001). This is what the headnote looks like on Westlaw:

[3]  [KeyCite Citing References for this Headnote](#)


 [170A](#) Federal Civil Procedure

 [170AXI](#) Dismissal

 [170AXI\(B\)](#) Involuntary Dismissal

 [170AXI\(B\)5](#) Proceedings

 [170Ak1827](#) Determination

 [170Ak1829](#) k. Construction of Pleadings. [Most Cited Cases](#)

 [170A](#) Federal Civil Procedure  [KeyCite Citing References for this Headnote](#)

 [170AXI](#) Dismissal

 [170AXI\(B\)](#) Involuntary Dismissal

 [170AXI\(B\)5](#) Proceedings

 [170Ak1827](#) Determination

 [170Ak1835](#) k. Matters Deemed Admitted. [Most Cited Cases](#)

On motion to dismiss for failure to state a claim upon which relief could be granted, all well pleaded allegations in the complaint are accepted as true and viewed in the light most favorable to the non-moving party. [Fed.Rules Civ.Proc.Rule 12\(b\)\(6\), 28 U.S.C.A.](#)

If one were to look at this headnote in a West Reporter (Federal Supplement), it would look like this:

### 3. Federal Civil Procedure ↻ 1829, 1835

On motion to dismiss for failure to state a claim upon which relief could be granted, all well pleaded allegations in the complaint are accepted as true and viewed in the light most favorable to the non-moving party. Fed.Rules Civ.Proc.Rule 12(b)(6), 28 U.S.C.A.

Here is an example where West editors have renumbered the key numbers in a particular topic. In some instances, West editors revise and renumber topics to reflect new judicial developments within topics. This headnote is taken from *United States v. Waltzer*, 682 F.2d 370 (2d. Cir. 1982).

[3]  [KeyCite Citing References for this Headnote](#)

↻ [349](#) Searches and Seizures

↻ [349I](#) In General

↻ [349k13](#) What Constitutes Search or Seizure

↻ [349k22](#) k. Scent; Use of Dogs. [Most Cited Cases](#)  
(Formerly 349k1)

Canine sniffing is neither “search” nor “seizure” for purposes of Fourth Amendment.  
[U.S.C.A.Const.Amend. 4.](#)

If one were to look at this headnote in a West Reporter (Federal Reporter), it would look like this:

### 3. Searches and Seizures ↻ 1

Canine sniffing is neither “search” nor “seizure” for purposes of Fourth Amendment.  
U.S.C.A.Const.Amend. 4.