

WESTLAW EDGE

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To use WestSearch Plus, enter your search query into the **Global Search** box. As you type, related suggestions will appear below your query. You can access:

- Suggestions
- Cases
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SAMPLE History Folders Favorites Community Notifications

fraudulent conveyance

All State & Federal Advanced

Suggestions

- Cases: Are punitive damages available on a **fraudulent** transfer claim?
All State & Federal
- Statutes & Court Rules: Is a transferee a necessary party in a **fraudulent conveyance** action?
All State & Federal
- Regulations: When is a transfer **fraudulent** under the Uniform **Fraudulent Transfer Act**?
All State & Federal
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Search Suggestions

- Cases with the Key Number for bankruptcy/ the estate/ fraudulent transfers/ **fraudulent conveyances** in general
- Cases with the Key Number for **fraudulent conveyances**/ criminal responsibility/ offenses
- Cases with the Key Number for exemptions/ forfeiture/ **fraudulent conveyance** or concealment
- Cases with the Key Number for **fraudulent conveyances**/ criminal responsibility/ criminal prosecutions
- Cases with the Key Number for **fraudulent conveyances**/ criminal responsibility/ penalties and actions therefor

Administrative Decisions & Guidance Proposed & Enacted Legislation

Arbitration Materials Trial Court Documents

Find Answers Faster

Click a **Suggestion** to see the most relevant text at along with links to relevant cases at the top of the results list.

Content types Set default

- Overview 15
- Cases** 5,470
- Statutes 71
- Secondary Sources 3,415
- Regulations 51
- Administrative Decisions & Guidance 10,000

Show more

Filter

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Restore previous filters

Search within results

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What facts can constitute an adverse action in an employment discrimination case? All state & federal

What constitutes an adverse employment action in the context of a discrimination case is not to be determined on a one-size-fits-all basis; rather, the elements of a prima facie case depend on the facts of the particular case.

Daniels v. School Dist. of Philadelphia | Helpful? Yes No

United States District Court, E.D. Pennsylvania. • November 07, 2013 • 982 F.Supp.2d 462 • 2013 WL 5964170

A reduction in responsibilities can constitute an adverse employment action in an employment discrimination case; it is an adverse employment action if the reduction causes the employee to experience materially adverse consequences affecting the terms, conditions, or privileges of employment or future employment opportunities such that a reasonable trier of fact could find objectively tangible harm.

Lee v. Mabus | Helpful? Yes No

United States District Court, District of Columbia. • July 26, 2013 • 955 F.Supp.2d 33 • 2013 WL 3835627

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Cases (5,470)

1 - 20 > Sort: Relevance

Select all items No items selected

Related documents

1. McDonnell Douglas Corp. v. Green

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Back to Search

What facts can constitute an adverse action in an employment discrimination case? All state & federal

Select all items No items selected

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Lee v. Mabus | Helpful? Yes No

United States District Court, District of Columbia. • July 26, 2013 • 955 F.Supp.2d 33 • 2013 WL 3835627

A denial of leave can constitute an adverse action in an employment discrimination case.

Click the **snippet text** to view the exact headnote for that point of law within the document.

What facts can constitute an adverse action in an employment discrimination case?

Lee v. Mabus

Document Filings (11) Negative Treatment (0) History (0) Citing References (14) Table of Authorities Powered by KeyCite

20 Civil Rights Promotion, demotion, and transfer Civil Rights Public employment

21 Civil Rights Adverse actions in general

A reduction in responsibilities can constitute an adverse employment action in an employment discrimination case; it is an adverse employment action if the reduction causes the employee to experience materially adverse consequences affecting the terms, conditions, or privileges of employment or future employment opportunities such that a reasonable trier of fact could find objectively tangible harm.

22 Civil Rights Motive or intent; pretext Civil Rights Motive or intent; pretext

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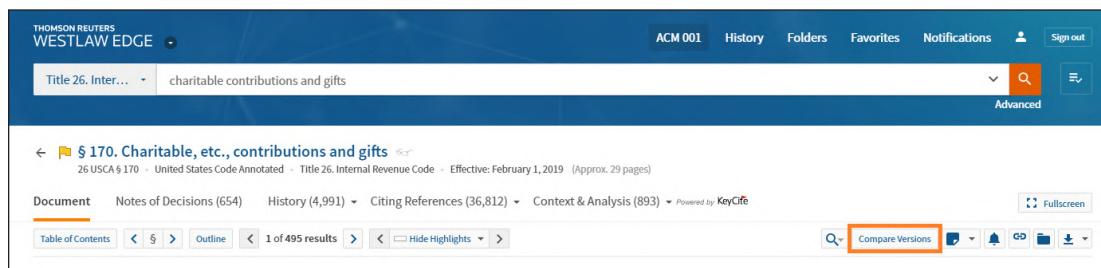
WESTLAW EDGE

STATUTES COMPARE AND REGULATIONS COMPARE

Use Statutes Compare and Regulations Compare on Westlaw Edge to discover how a statute or federal regulation has changed over time. Save time by eliminating the need to manually investigate session laws or Federal Register sections to understand how the law has changed and from what authority those changes came.

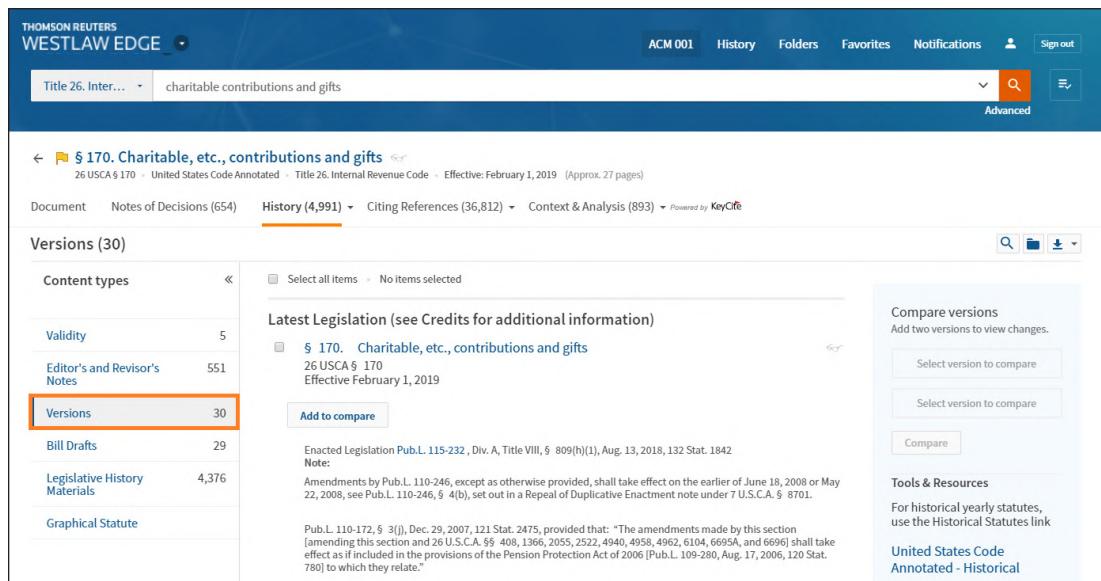
Compare Versions

You can compare versions in two ways. In a Document view, you can click the **Compare Versions** button to compare the current version and the previous version of the statute or federal regulation.



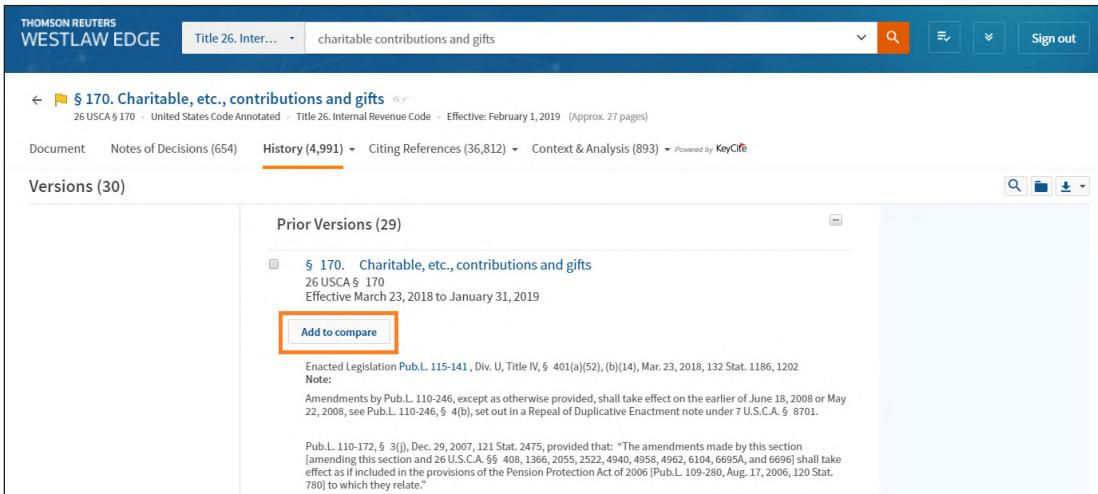
The screenshot shows the Westlaw Edge interface for Title 26, Internal Revenue Code, specifically Section 170. The page title is "charitable contributions and gifts". The top navigation bar includes "ACM 001", "History", "Folders", "Favorites", "Notifications", and "Sign out". The search bar contains "charitable contributions and gifts". The main content area displays the text of Section 170, with a note: "26 USC § 170 - United States Code Annotated - Title 26. Internal Revenue Code - Effective: February 1, 2019 (Approx. 29 pages)". Below the text, there are tabs for "Document", "Notes of Decisions (654)", "History (4,991)", "Citing References (36,812)", "Context & Analysis (893)", and "Powered by KeyCite". At the bottom of the content area, there is a "Compare Versions" button, which is highlighted with a red box.

To compare other versions of a statute or federal regulation, click the **History** tab and then click **Versions**.



The screenshot shows the Westlaw Edge interface for Title 26, Internal Revenue Code, specifically Section 170. The page title is "charitable contributions and gifts". The top navigation bar includes "ACM 001", "History", "Folders", "Favorites", "Notifications", and "Sign out". The search bar contains "charitable contributions and gifts". The main content area displays the text of Section 170, with a note: "26 USC § 170 - United States Code Annotated - Title 26. Internal Revenue Code - Effective: February 1, 2019 (Approx. 27 pages)". Below the text, there are tabs for "Document", "Notes of Decisions (654)", "History (4,991)", "Citing References (36,812)", "Context & Analysis (893)", and "Powered by KeyCite". A "Versions (30)" section is highlighted with a red box. The "Versions" tab is selected. On the right side of the screen, there is a "Compare versions" section, which is highlighted with a red box. This section includes a "Select version to compare" button and a "Compare" button.

Every available version appears in the list. Click the **Add to Compare** button under two versions to select them for comparison. You can compare any two versions of a statute or federal regulation at a time.



← **§ 170. Charitable, etc., contributions and gifts** ↗
 26 USC § 170 - United States Code Annotated - Title 26. Internal Revenue Code - Effective: February 1, 2019 (Approx. 27 pages)

Document Notes of Decisions (654) History (4,991) Citing References (36,812) Context & Analysis (893) Powered by KeyCite

Versions (30)

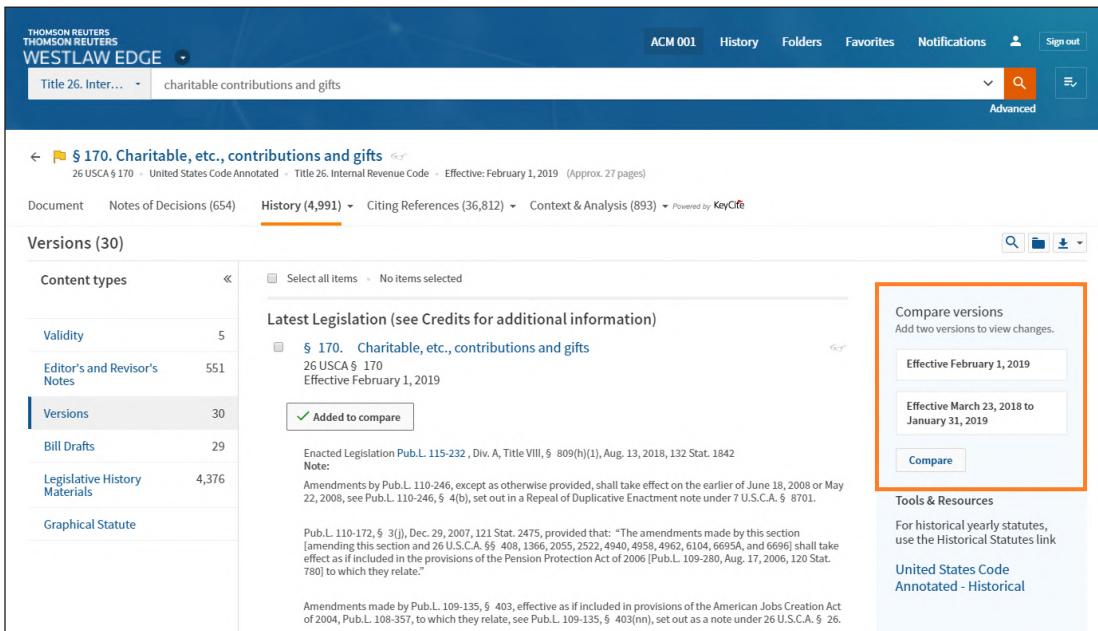
Prior Versions (29)

§ 170. Charitable, etc., contributions and gifts
 26 USC § 170
 Effective March 23, 2018 to January 31, 2019

Add to compare

Enacted Legislation Pub.L. 115-141, Div. U, Title IV, § 401(a)(52), (b)(14), Mar. 23, 2018, 132 Stat. 1186, 1202
 Note:
 Amendments by Pub.L. 110-246, except as otherwise provided, shall take effect on the earlier of June 18, 2008 or May 22, 2008, see Pub.L. 110-246, § 4(b), set out in a Repeal of Duplicative Enactment note under 7 U.S.C.A. § 8701.
 Pub.L. 110-172, § 3(j), Dec. 29, 2007, 121 Stat. 2475, provided that: "The amendments made by this section [amending this section and 26 U.S.C.A. §§ 408, 1366, 2055, 2522, 4940, 4958, 4962, 6104, 6695A, and 6696] shall take effect as if included in the provisions of the Pension Protection Act of 2006 [Pub.L. 109-280, Aug. 17, 2006, 120 Stat. 780] to which they relate."

After you have selected two versions, click the **Compare** button in the right column.



← **§ 170. Charitable, etc., contributions and gifts** ↗
 26 USC § 170 - United States Code Annotated - Title 26. Internal Revenue Code - Effective: February 1, 2019 (Approx. 27 pages)

Document Notes of Decisions (654) History (4,991) Citing References (36,812) Context & Analysis (893) Powered by KeyCite

Versions (30)

Content types

Select all items - No items selected

Latest Legislation (see Credits for additional information)

§ 170. Charitable, etc., contributions and gifts
 26 USC § 170
 Effective February 1, 2019

Added to compare

Enacted Legislation Pub.L. 115-232, Div. A, Title VIII, § 809(h)(1), Aug. 13, 2018, 132 Stat. 1842
 Note:
 Amendments by Pub.L. 110-246, except as otherwise provided, shall take effect on the earlier of June 18, 2008 or May 22, 2008, see Pub.L. 110-246, § 4(b), set out in a Repeal of Duplicative Enactment note under 7 U.S.C.A. § 8701.
 Pub.L. 110-172, § 3(j), Dec. 29, 2007, 121 Stat. 2475, provided that: "The amendments made by this section [amending this section and 26 U.S.C.A. §§ 408, 1366, 2055, 2522, 4940, 4958, 4962, 6104, 6695A, and 6696] shall take effect as if included in the provisions of the Pension Protection Act of 2006 [Pub.L. 109-280, Aug. 17, 2006, 120 Stat. 780] to which they relate."
 Amendments made by Pub.L. 109-135, § 403, effective as if included in provisions of the American Jobs Creation Act of 2004, Pub.L. 108-357, to which they relate, see Pub.L. 109-135, § 403(nn), set out as a note under 26 U.S.C.A. § 26.

Compare versions
 Add two versions to view changes.

Effective February 1, 2019

Effective March 23, 2018 to January 31, 2019

Compare

Tools & Resources
 For historical yearly statutes, use the Historical Statutes link

United States Code Annotated - Historical

A new window will appear with the comparisons. By default, the comparisons are shown using the **Highlights** method. Text that was deleted from the latest version is shown in red with strikethroughs and text that was added to the latest version is shown in blue with highlights. Click the **Jump to Next Difference** or **Jump to Previous Difference** buttons to navigate through the changes.

Compare versions

Showing differences between versions effective July 31, 2015 to December 17, 2015 [See Notes] and March 23, 2018 [current]

124 deletions · 134 additions | Key: deleted text | added text | Highlights

amount determined in clause (i), but without regard to this clause) exceeds twice the basis of such property.

(C) Special rule for contributions of food inventory.--

(i) General rule.--In the case of a charitable contribution of food from any trade or business of the taxpayer, this paragraph shall be applied--

(I) without regard to whether the contribution is made by a C corporation, and

(II) only to food that is apparently wholesome food.

(ii) limitation.--The aggregate amount of such contributions for any taxable year which may be taken into account under this section shall not exceed--

(i) (II) Limitation. In [in] the case of a [any] taxpayer other than a C corporation, the aggregate amount of such contributions for any taxable year which may be taken into account under this section shall not exceed 10 [15] percent of the taxpayer's aggregate net income for such taxable year from all trades or businesses from which such contributions were made for such year, computed without regard to this section, [and]

(II) in the case of a C corporation, 15 percent of taxable income (as defined in subsection (b)(2)(D)).

(iii) Rules related to limitation.--

(I) Carryover.--If such aggregate amount exceeds the limitation imposed under clause (ii), such excess shall be treated (in a manner consistent with the rules of subsection (d)) as a charitable contribution described in clause (i) in each of the 5 succeeding taxable years in order of time.

(ii) Apparently wholesome food. Coordination with overall corporate limitation. For purposes of this subparagraph, [In the case of any charitable contribution which is allowable after the term "apparently wholesome food" has the meaning given to such term by section 22 application of clause (ii)(II), subsection (b)(2)]

(A) shall not apply to such contribution, but the limitation imposed by such subsection shall be reduced (but not below zero) by the aggregate amount [of the Bill Emerson Good Samaritan Food Donation Act (42 U.S.C. 1771(b)(2)) such contributions. For purposes of subsection (b)(2)(B), [such contributions shall be treated] as in effect on the date of the enactment of this subparagraph allowable under subsection (b)(2)(A)].

(iv) Termination. Determination of basis for certain taxpayers. This subparagraph shall not apply to contributions made after December 31, 2014. [If a taxpayer--]

(D) (i) Special rule for contributions of book inventory to public schools. [does not account for inventories under section 471, and--]

(II) is not required to capitalize indirect costs under section 263A.]

Pub. L. 109-73, Title III, § 305(b), Sept. 23, 2005, 119 Stat. 2025, provided that: "The amendment made by

You can also view the changes in a textual format by clicking the **Highlights** slider. Plus and minus icons indicate text that has been added or removed from the latest version of the statute or federal regulation.

Compare versions

Showing differences between versions effective December 22, 2017 to March 22, 2018 and March 23, 2018 [current]

Viewing 1 of 14 | 6 deletions · 8 additions | Key: << deleted text >> <<< added text >>> | Highlights

26 U.S.C.A. § 170, I.R.C. § 170

§ 170. Charitable, etc., contributions and gifts

(a) Allowance of deduction.--

(1) General rule.--There shall be allowed as a deduction any charitable contribution (as defined in subsection (c)) payment of which is made within the taxable year. A charitable contribution shall be allowable as a deduction only if verified under regulations prescribed by the Secretary.

(2) Corporations on accrual basis.--In the case of a corporation reporting its taxable income on the accrual basis, if--

(A) the board of directors authorizes a charitable contribution during any taxable year, and

(B) payment of such contribution is made after the close of such taxable year and on or before the 15th day of the fourth month following the close of such taxable year,

then the taxpayer may elect to treat such contribution as paid during such taxable year. The election may be made only at the time of the filing of the return for such taxable year, and shall be signified in such manner as the Secretary shall by regulations prescribe.

(3) Future interests in tangible personal property.--For purposes of this section, payment of a charitable contribution which consists of a future interest in tangible personal property shall be treated as made only when all intervening interests in, and rights to the actual possession or enjoyment of, the property have expired or are held by persons other than the taxpayer or those standing in a relationship to the taxpayer described in section 267(b) or 707(b). For purposes of the preceding sentence, a fixture which is intended to be severed from the real property shall be treated as tangible personal property.

(b) Percentage limitations.--

(1) Individuals.--In the case of an individual, the deduction provided in subsection (a) shall be limited as provided in the succeeding subparagraphs.

(A) General rule.--Any charitable contribution to--

(i) a church or a convention or association of churches,

(ii) an educational organization which normally maintains a regular faculty and curriculum and normally has a regularly enrolled body of pupils or students in attendance at the place where its educational activities are regularly carried on,

Click the **Delivery** button to print, download, or email the comparison.

Compare versions
Showing differences between versions effective December 22, 2017 to March 22, 2018 and March 23, 2018 [current]

Viewing 1 of 14 6 deletions · 8 additions Key: ~~deleted text~~ added text ⓘ

26 U.S.C.A. § 170, I.R.C. § 170
§ 170. Charitable, etc., contributions and gifts

(a) Allowance of deduction.--

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Delivery

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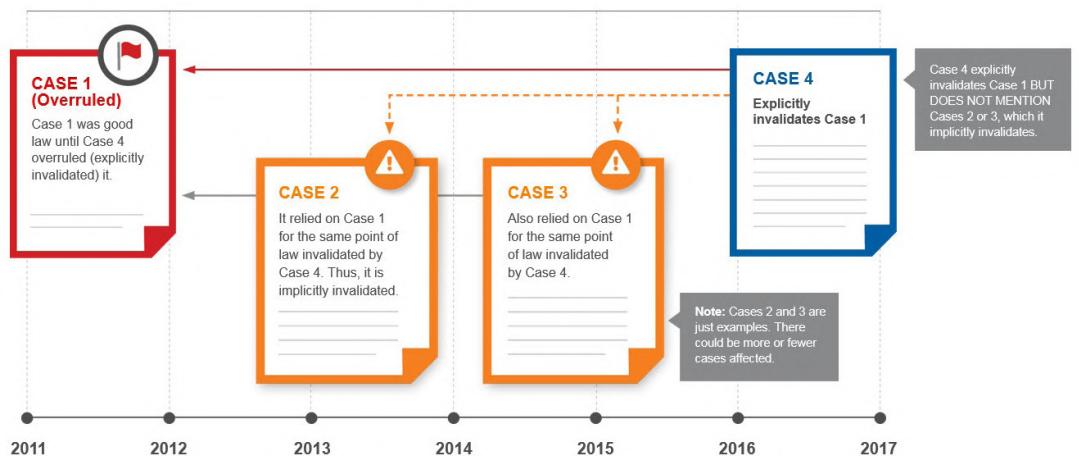
KEYCITE OVERRULING RISK

Use KeyCite® Overruling Risk to ensure you are citing good law. This feature, exclusive to Thomson Reuters Westlaw Edge, improves coverage of Westlaw KeyCite by marking cases that may have been implicitly undermined because they relied on an overruled or otherwise invalid prior decision.

What is an Overruling Risk?

Westlaw KeyCite status flags identify when a case opinion has been **explicitly** invalidated by a subsequent ruling. These cases are marked by yellow or red KeyCite status flags. However, these status flags do not extend to similar cases that may also have been **implicitly overruled or abrogated** by this initial overruling.

Westlaw Edge has bridged this gap with KeyCite Overruling Risk. This feature helps you identify cases that may have been implicitly overruled or abrogated by marking them with the KeyCite Overruling Risk icon (⚠).



1

The Overruling Risk Icon on Westlaw Edge

The Overruling Risk icon appears in several places in Westlaw Edge, namely in a Results list or on a Case Preview page. If there is more than one Overruling Risk for a case, the most severe Overruling Risk, based on court level and date, will be highlighted in these areas.

The screenshot shows two views of Westlaw Edge. The left view is a 'Case Preview' for 'Interscope Records v. Leadbetter'. It displays a summary of the case, including a note about 'Leadbetter' as a defendant and a link to the full document. The right view is a 'Results list' for the same case. It shows the document details and a list of '5 of 25 results'. A specific result is highlighted with an orange arrow pointing to the 'Overruling Risk' icon (a red triangle with a white exclamation mark) next to the citation 'Cadkin v. Loose, 9th Cir.(Cal.), June 26, 2009'. The results list also includes tabs for 'Document', 'Filings (26)', 'Negative Treatment (1)', 'History (6)', 'Citing References (8)', and 'Table of Authorities'.

By default, all inline KeyCite flags for Severe negative treatment (红旗), Overruling risk (橙旗), and federally Appealed cases (蓝旗) will display in the Document view of a case. KeyCite flags for Negative treatment (黄旗) are hidden. Use the *KeyCite* drop-down to customize which KeyCite flags display in the document.

The screenshot shows the 'Document' view for 'Interscope Records v. Leadbetter'. The 'KeyCite' dropdown menu is open, showing four options: 'Severe negative treatment' (red flag), 'Overruling risk' (orange flag, selected), 'Appealed (Federal)' (blue flag), and 'Negative treatment' (yellow flag). The 'Overruling risk' option is highlighted with an orange border. The results list on the right shows the same information as the previous screenshot, including the highlighted 'Overruling Risk' citation.

You can deliver the document with inline KeyCite flags included or excluded. Click the *Delivery* drop-down and select your delivery method. On the Delivery window in the Layout and Limits tab, select or deselect the *Inline KeyCite Flags* check box to include or exclude inline KeyCite flags.

Email This Document

Recipients **Layout and Limits** **Content to Append**

Page Layout

Dual column layout for Cases

Page Ranges

Full text
 Synopsis Only
 Star pages e.g., 194-196, 201

Footnotes

End of document

Links

Blue **Font Size** Normal Underline

Include

Inline KeyCite Flags Original Image Link
 Expanded Margin for Notes West Headnotes
 Show the full Key Number hierarchy Cover Page

Email **Cancel**

The Negative Treatment Tab

All overruling risks for a case are outlined on the Negative Treatment tab. The Overruling Risk table at the bottom of the page contains links to the overruled or abrogated case along with the overruling or abrogating case.

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All content Interscope v Leadbetter All state & federal

← **Interscope Records v. Leadbetter** ↗
United States District Court, W.D. Washington, at Seattle. · September 6, 2007 · Not Reported in F.Supp.2d · 2007 WL 2572336 (Approx. ...)

Document Filings (26) **Negative Treatment (1)** History (6) Citing References (8) Table of Authorities Powered by KeyCite

KeyCite Negative Treatment

Overruling Risk (1)
The KeyCited document has potentially been negatively impacted by the following events or decisions in other litigation or proceedings:

Treatment	Title	Date	Type	Depth	Headnote(s)
<input type="checkbox"/> Overruling Risk	1. Cadkin v. Loose 569 F.3d 1142	June 26, 2009	Case	—	—

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Overruling Corcoran v. Columbia Broadcasting System

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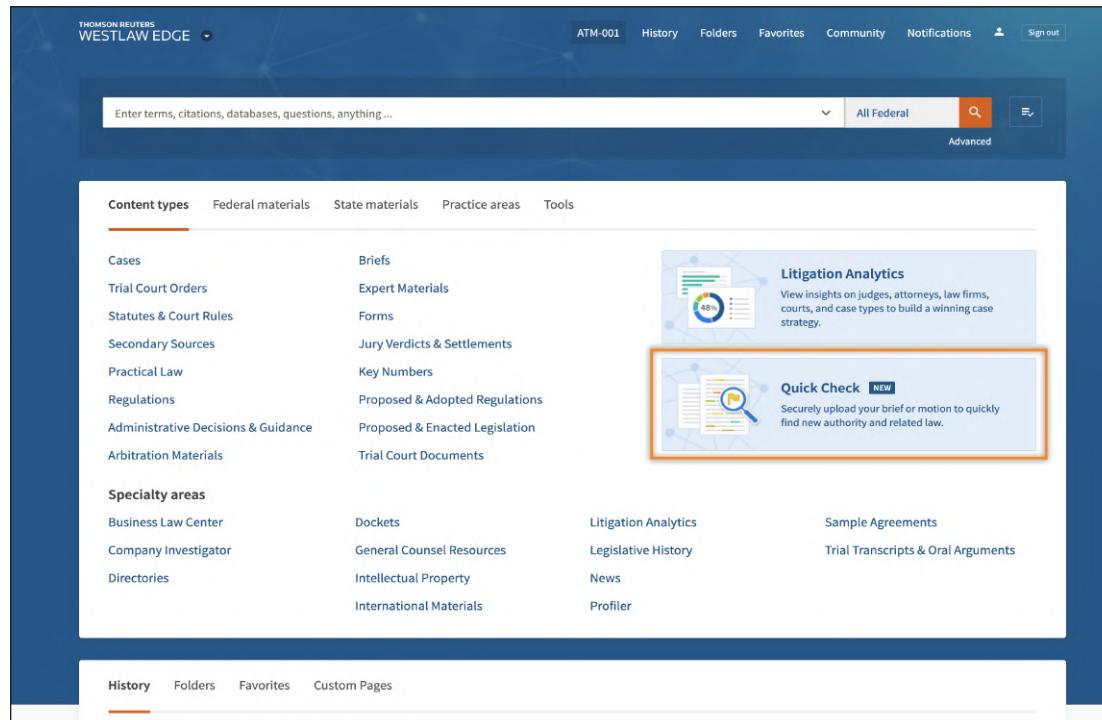
ANALYZE YOUR WORK AND YOUR OPPONENT'S WORK WITH QUICK CHECK

Quick Check is a powerful new tool in Westlaw Edge that allows you to check your work to ensure the most relevant and important authority is included. After analyzing the uploaded document, Quick Check provides an easy-to-review report that includes relevant content recommended for the legal issues identified, which may not have appeared in your own research.

Quick Check can be used to update an old brief or memo, finish work already in progress, or as a final check on completed work.

Accessing Quick Check And Uploading Your Work Product

On the Westlaw Edge home page, click the Quick Check tile along the right side below the Litigation Analytics tile.



The screenshot shows the Westlaw Edge interface. At the top, there is a search bar with the placeholder "Enter terms, citations, databases, questions, anything ...". To the right of the search bar are buttons for "All Federal", "Advanced", and a magnifying glass icon. Above the search bar, there are navigation links for "ATM-001", "History", "Folders", "Favorites", "Community", "Notifications", and "Sign out". Below the search bar, there is a "Content types" section with categories like "Cases", "Trial Court Orders", "Statutes & Court Rules", "Secondary Sources", "Practical Law", "Regulations", "Administrative Decisions & Guidance", and "Arbitration Materials". To the right of this, there is a "Briefs" section with categories like "Expert Materials", "Forms", "Jury Verdicts & Settlements", "Key Numbers", "Proposed & Adopted Regulations", "Proposed & Enacted Legislation", and "Trial Court Documents". Further to the right is the "Litigation Analytics" section, which includes a "Quick Check" tile. The "Quick Check" tile is highlighted with an orange border. It features a magnifying glass icon and the text "Securely upload your brief or motion to quickly find new authority and related law." At the bottom of the page, there is a navigation bar with links for "History", "Folders", "Favorites", and "Custom Pages".

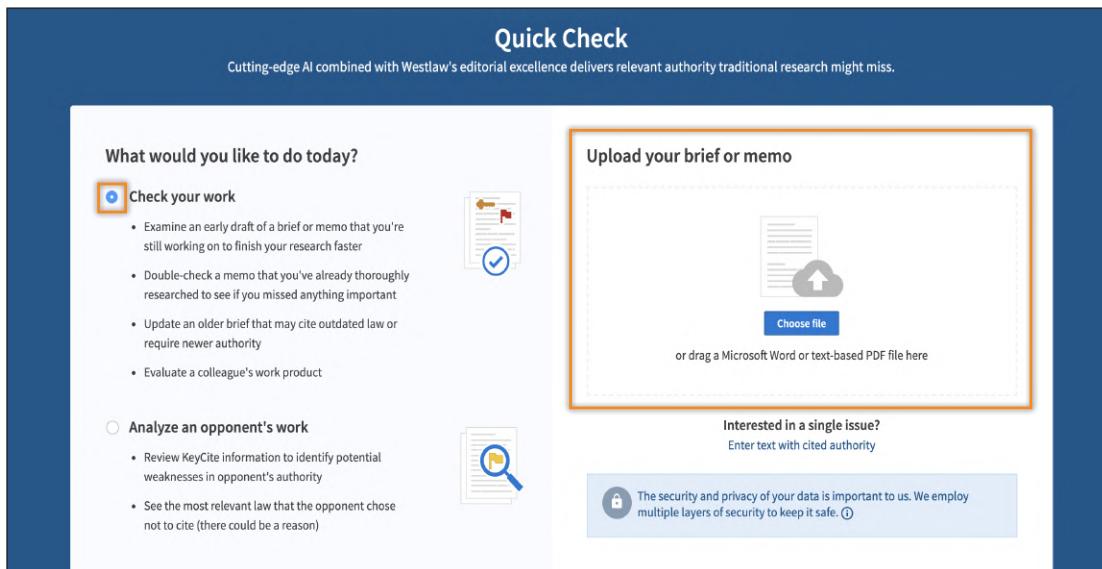
In addition, you can access Quick Check from the *Tools* tab.

Note: Drafting Assistant users can review the document they are working on in Quick Check with the click of a button. Look for the *Quick Check* button on the left side of the Drafting Assistant page.

Within the Quick Check tool, click the **Check your work** radio button in the left column. You can upload your brief or memo by dragging the document into the upload box, or by clicking **Choose File** and selecting the desired file.

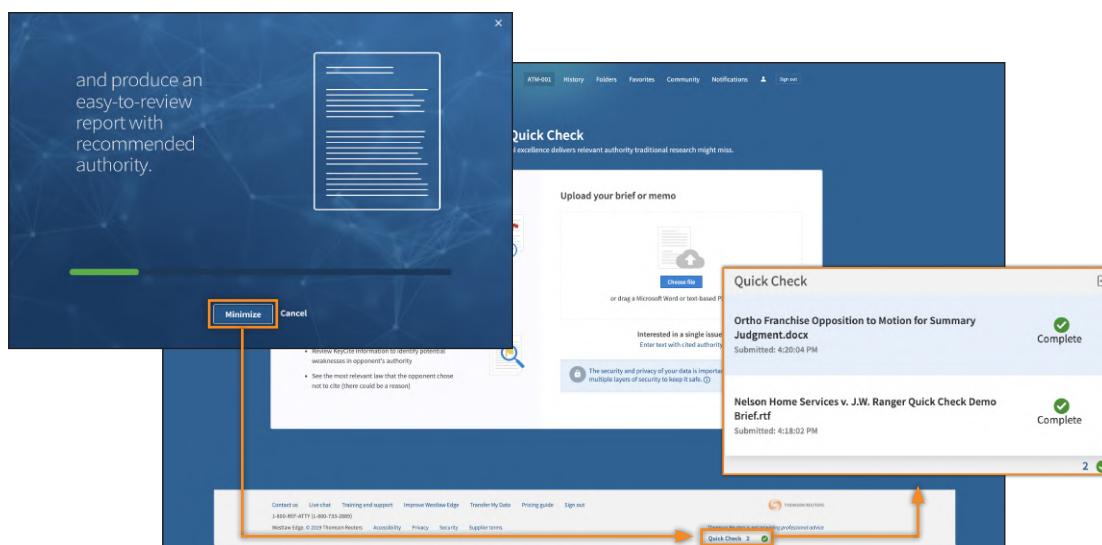
Quick Check is compatible with Microsoft Word documents as well as text-based PDFs.

Note: To protect the security and privacy of your data, all documents in Quick Check are securely encrypted during the upload process. Following the analysis, Westlaw destroys the copy you uploaded, and no copy of your work product is retained on Westlaw servers. The report that is created remains available in History for up to 24 hours and is deleted from Westlaw servers within 48 hours.



The tool will begin analyzing the text and citations within your document for relevant facts and legal issues. Using the latest in machine learning and AI technology, Quick Check appraises hundreds of connections between the uploaded document and Westlaw content like Key Numbers, Westlaw headnotes, KeyCite citing references, notes of decisions and more, to recommend relevant cases, secondary sources, or other briefs and memoranda.

While Quick Check is working, you can hide the dialogue box by clicking **Minimize**. The final report will appear in your tray for viewing.



Reviewing The Quick Check Report

Once ready, the report will display three different tabs:

- **Recommendations:** identifies headings in your document and recommends relevant cases, secondary sources, and other briefs and memoranda for your headings
- **Warnings for cited authority:** extracts the case citations already cited in your document that have negative KeyCite treatment, so you can perform a quick review of the validity of the cases upon which you are relying
- **Table of authorities:** puts all the cases cited in your document in a sortable list for easy printing, emailing or downloading

The screenshot shows the WESTLAW EDGE interface with the 'Quick Check' report open. The 'Recommendations' tab is selected. The main content area is titled 'Cases (10)' and shows a single recommendation: '1. No Article III Case Or Controversy Exists.' Below this, there is a section for 'Cases (5) See additional cases (25)' which includes a link to '1. Spokeo, Inc. v. Robins'.

RECOMMENDATIONS TAB

The Recommendations tab provides relevant authority organized by the headings found in your document. Recommendations include cases, secondary sources, and other briefs and memoranda.

You can easily jump to the heading of your document that is most important to you by clicking the **Navigate headings** button. In addition, you can use the **Document Headings** filter in the left column to view recommendations for specific parts of your documents.

Note: Quick Check only displays a heading from your document when recommendations or additional cases are available.

The screenshot shows the WESTLAW EDGE interface with the 'Quick Check' report open. The 'Recommendations' tab is selected. The 'Document headings' filter is applied, and the main content area displays 'Cases (10)'. One of the cases listed is '1. Spokeo, Inc. v. Robins', which is described as 'Outcome: Consumer could not satisfy the injury-in-fact demands of Article III standing by alleging a bare procedural violation of the FCRA.' Below this description are classification tags: 'High court' and 'Frequently cited'. The left sidebar shows a list of document headings and a search bar.

Under the Recommendations tab, you can select and view each case that Quick Check has recommended. To ensure that you are able to quickly find what is important to you and determine whether recommendations are helpful for not, Quick Check provides a suite of tools to assist in your review, including:

- **Outcome:** the holding most related to the issue for which a recommended case is being provided, so you can verify immediately whether the case is in your favor or not
- **Relevant Portion:** relevant text to quickly discern whether the recommendation is helpful or not
- **Related cases already cited in your document:** shows you the cases in your document to which the recommendation relates to provide context and help you associate the recommendation to the discrete legal points in your document
- **Recommendations tags:** show when a case has been frequently cited, is from a high court or has been decided in the past 2 years

Recommendation type

- Cases 10
- Briefs and memoranda 4
- Secondary sources 4
- All recommendations 18

Filter

Document headings

Search within results

Recommendation tag

- Frequently cited 5
- High court 5
- Last 2 years 0

Jurisdiction

Cases (10)

1. No Article III Case Or Controversy Exists.

Cases (5) See additional cases (25)

1. Spokeo, Inc. v. Robins
Supreme Court of the United States - May 16, 2016 - 2016 WL 2842447 - 136 S.Ct. 1540

Outcome: Consumer could not satisfy the injury-in-fact demands of Article III standing by alleging a bare procedural violation of the FCRA.

Article III standing requires a concrete injury even in the context of a statutory violation. U.S.C.A. Const. Art. 3, § 2, cl. 1.

Consumer could not satisfy the injury-in-fact demands of Article III standing by alleging a bare procedural violation of the Fair Credit Reporting Act (FCRA) by website operator, in allegedly publishing inaccurate information about consumer; a violation of one of the FCRA's procedural requirements could have resulted in no harm, as not all inaccuracies caused harm or presented any material risk of harm. U.S.C.A. Const. Art. 3, § 2, cl. 1; Fair Credit Reporting Act of 1970, § 602 et seq., 15 U.S.C.A. § 1681 et seq.

This recommendation relates to cases already cited in your document

- Valley Forge Christian College v. Americans United for Separation of Church and State, Inc. 454 U.S. 464
- Hollingsworth v. Perry 570 U.S. 693
- Clapper v. Amnesty Intern. USA 568 U.S. 398
- Summers v. Earth Island Institute 555 U.S. 488

Additional Cases

To view up to 25 of the next most relevant cases, click **See additional cases**.

Recommendation type

- Cases 10
- Briefs and memoranda 4
- Secondary sources 4
- All recommendations 18

Filter

Document headings

Cases (10)

1. No Article III Case Or Controversy Exists.

Cases (5) See additional cases (25)

1. Spokeo, Inc. v. Robins
Supreme Court of the United States - May 16, 2016 - 2016 WL 2842447 - 136 S.Ct. 1540

Outcome: Consumer could not satisfy the injury-in-fact demands of Article III standing by alleging a bare procedural violation of the FCRA.

Original report recommendations

Additional cases (25)

1 - 25

1. Family & Children's Center, Inc. v. School City of Mishawaka
United States Court of Appeals, Seventh Circuit - January 05, 1994 - 1994 WL 1349 - 11 F.3d 1032

Minor or noneconomic injury will satisfy strictures of Article III's standing requirements, although purely psychological harm will not. U.S.C.A. Const. Art. 3, § 1 et seq.

Although defendant did not challenge plaintiff's contention that it met Article III's standing requirements, Court of Appeals nevertheless consider sufficiency of plaintiff's allegations because standing is jurisdictional matter. U.S.C.A. Const. Art. 3, § 1 et seq.

2. Remijas v. Neiman Marcus Group, LLC
United States Court of Appeals, Seventh Circuit - July 20, 2015 - 2015 WL 4394814 - 794 F.3d 688

Outcome: The Court of Appeals, Wood, Chief Judge, held that customers plausibly alleged standing.

Filter recommendations

Use filters to help you focus on the recommendations that are most relevant to your research. Filters are specific to the type of content you are viewing.

Quick Check is integrated with Westlaw Edge so you can filter based on prior research. For example, you can ignore or take a second look at documents that you viewed in the last 30 days, foldered, or annotated.

Viewed in the last 30 days

with Client ID ATM-001

- Viewed 0
- Not viewed 10

Documents in folders

WARNINGS FOR CITED AUTHORITY TAB

In addition to finding new authority related to the issues in your document, you can also use Quick Check to review the validity of the cases you've already cited. The **Warnings for cited authority** tab lists any cases cited in your brief or memo that have received negative treatment in order of severity, with the citations that are in the most jeopardy at the top.

KeyCite warnings

- Severely negative 1
- Overruling risk 1
- Negative 10
- Pending appeal 0

See all negative treatment (3)

Below each citation in the list, Quick Check displays the criticizing case along with a portion of the text.

Filter by KeyCite treatment for fast review and delivery of only those KeyCite warning categories you are interested in. In addition, any case citations that could not be found on Westlaw Edge can be found by clicking on the **Unverified Citations** button. Typically citations cannot be verified if there is a typo or misspelling, or the document is not available on Westlaw. This is a helpful feature to identify errors before you file a document.

The screenshot shows the Westlaw Edge interface with the 'Quick Check' tab selected. On the left, a sidebar displays 'KeyCite warnings' with categories: Severely negative (1), Overruling risk (1), Negative (10), and Pending appeal (0). The main content area shows a list of 'Cited authority (11)' with the first item being '1. Babbitt Ford, Inc. v. Navajo Indian Tribe'. A callout box highlights the 'Unverified citations (1)' button in the top right corner of the list. An arrow points from this button to a modal window titled 'Unverified citations' which contains the text: 'Below are items from your document that appear to be citations, but cannot be verified. The citations may contain potential errors or cite to something that cannot be found on Westlaw.' It lists one item: '1. State ex rel. Purcell v. Superior Court, 535 P. 1299, 1301 (1975)'. A 'Close' button is at the bottom of the modal.

TABLE OF AUTHORITIES TAB

The *Table of authorities* tab puts the cases already cited in your document in a sortable list for easy printing, emailing or downloading.

The screenshot shows the Westlaw Edge interface with the 'Table of authorities' tab selected. On the left, a sidebar shows a 'Filter' section with options like 'Clear', 'Jurisdiction', 'Date', 'KeyCite treatment', 'Viewed in the last 30 days', 'Documents in folders', and 'Annotated documents'. The main content area shows a list of 'Table of authorities (16)' with the first four items being: '1. Babbitt Ford, Inc. v. Navajo Indian Tribe', '2. Best Choice Fund, LLC v. Low & Childers, P.C.', '3. Blackford v. Neaves', and '4. Bradley v. Nevada-California-Oregon Ry.'. A callout box highlights the 'Sort' dropdown menu which includes options: 'Alphabetically by title' (which is checked), 'Appearance in document', 'Severity of treatment', and 'Date'.

Cases are listed alphabetically by default. You can also sort the list by the order of appearance, severity of negative treatment, or date.

DELIVERY OF YOUR REPORT

Quick Check reports can also be delivered using all of the same options available for delivering in Westlaw Edge. You can *Email*, *Print*, *Download*, use *Dropbox* or *Deliver to a Kindle*. You also have the option to deliver a list of the recommendations or to deliver the actual documents. Finally, you may also add recommendations to your research folders.

The screenshot shows the Westlaw Edge interface with the 'Table of authorities' section open. On the left, there is a 'Filter' sidebar with options like 'Jurisdiction', 'Date', 'KeyCite treatment', 'Viewed in the last 30 days', 'Documents in folders', and 'Annotated documents'. The main area displays a list of 16 cases under the heading 'Table of authorities (16)'. A context menu is open over the fourth case in the list, showing options: 'Email', 'Print', 'Download' (which is highlighted with a red box), 'Dropbox', and 'Kindle'. At the top of the page, there are tabs for 'Recommendations', 'Warnings for cited authority', and 'Table of authorities', with 'Table of authorities' being the active tab. The top navigation bar includes 'ATM-001', 'History', 'Folders', 'Favorites', 'Community', 'Notifications', and 'Sign out'.

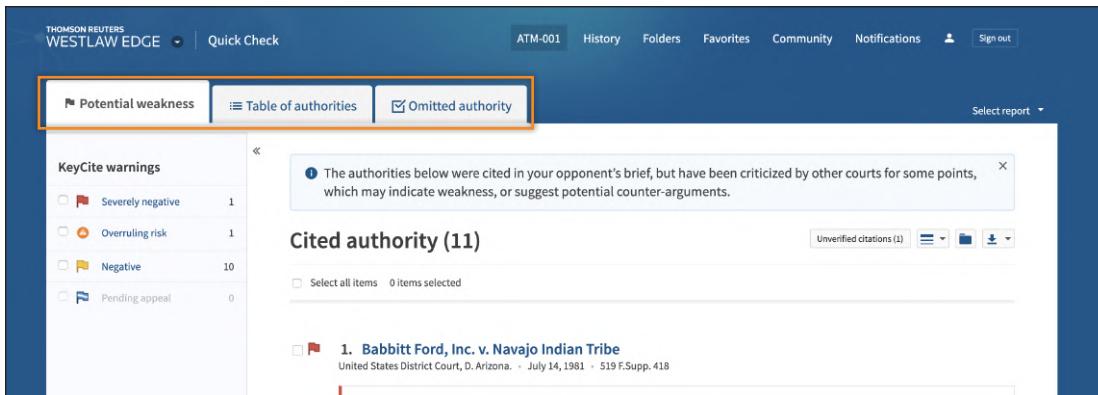
HISTORY

Your report is available for 24 hours in your History. Always re-run your documents through Quick Check to ensure you are receiving the most up-to-date recommendations and KeyCite information.

Analyze Your Opponent's Work With Quick Check

In addition to checking your own work, Quick Check provides you with the ability to analyze your opponent's work to identify potential weaknesses in their arguments. Simply upload your opponent's document and Quick Check will provide you with any negative KeyCite information for their citations, a list of their cited authority, and relevant cases that your opponent left out.

The screenshot shows the Quick Check landing page. At the top, it says 'Quick Check' and 'Cutting-edge AI combined with Westlaw's editorial excellence delivers relevant authority traditional research might miss.' Below this, there are two main sections: 'What would you like to do today?' and 'Upload your brief or memo'. The 'Analyze an opponent's work' option under the first section is highlighted with a red box. The 'Upload your brief or memo' section, which includes a file upload area and a 'Choose file' button, is also highlighted with a red box. At the bottom, there is a note about data security: 'The security and privacy of your data is important to us. We employ multiple layers of security to keep it safe.' There is also a field for 'Interested in a single issue? Enter text with cited authority'.



The screenshot shows the Westlaw Edge Quick Check interface. At the top, there are tabs for 'Potential weakness' (highlighted with a red box), 'Table of authorities', and 'Omitted authority' (also highlighted with a red box). Below these, a sidebar on the left lists 'KeyCite warnings' with categories: 'Severely negative' (1), 'Overruling risk' (1), 'Negative' (10), and 'Pending appeal' (0). The main content area shows a list of 'Cited authority (11)' with a sub-section for '1. Babbitt Ford, Inc. v. Navajo Indian Tribe'. A callout box points to this section with the text: 'The authorities below were cited in your opponent's brief, but have been criticized by other courts for some points, which may indicate weakness, or suggest potential counter-arguments.' At the bottom right of the main content area, there is a 'Select report' dropdown menu.

POTENTIAL WEAKNESS TAB

On the **Potential Weakness** tab, you will find a complete list of your opponent's citations that have been criticized by other courts, listed in order from the most negative KeyCite treatment to the least negative KeyCite Treatment. The criticizing case is listed below each citation along with a portion of text from the criticizing case that is responsible for the KeyCite flag.

TABLE OF AUTHORITIES TAB

The **Table of Authorities** tab provides an easily deliverable list of all of your opponent's cases in alphabetical order, including any KeyCite treatment flags. With the **Sort** drop-down menu, you have the ability to reorder the list as you see fit - either by the order the cites appear in the document, by severity of KeyCite treatment, or by the date.

Additionally, by clicking on the **Unverified Citations** button, you can view citations that Quick Check could not find, which may alert you to an error in your opponent's citation.

OMITTED AUTHORITY TAB

The **Omitted Authority** tab provides you with cases not cited by your opponent as well as secondary sources, briefs, and memoranda that our algorithm determined are most relevant to your opponent's arguments. The recommendations are organized by the headings from your opponent's document and can be reviewed quickly using features including filtering, recommendation tags, outcomes, and other enhancements.

We Made Your Analysis "Quick"

However you use Quick Check, we have worked hard to make reviewing the report as efficient as possible, so you can focus-in-on particular document headings, easily identify helpful recommendations, and verify that cases you have cited are still good law, allowing for a quick check of your work and your opponent's.

LOOKING FOR MORE INFORMATION?

Westlaw Edge is available on the Web at westlaw.com/edge.

For assistance using Westlaw Edge, call the Reference Attorneys at 1-800-REF-ATTY (1-800-733-2889).

For free reference materials, visit legalsolutions.com/edge-training.