

STYLE MANUAL



Supreme Court of the Republic of Palau
January 23rd, 2026

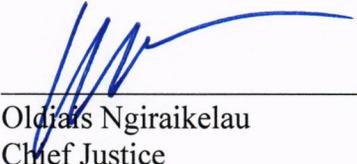
PREFACE

The Republic of Palau Supreme Court is a Court of Record consisting of an Appellate Division and a Trial Division. Pursuant to Article X, Section 14 of the Palau Constitution, the Supreme Court is constitutionally authorized to promulgate rules governing the administration of the legal profession. To promote consistency in the citation of cases, to set clear rules regarding punctuation, abbreviations, page and font size, and other issues inherent in the creation, filing, and citation to legal documents, the Supreme Court has promulgated this revised and amended Style Manual.

The Chief Justice takes this opportunity to thank all justices and judges for taking the time to review the Style Manual and provide helpful comments. Special thanks go to Ms. Heidi E. Johnson, former Senior Court Counsel and Dylan P.K. Houle, former Court Counsel, for their work in reviewing these materials, and Sherry M. Gilbertson, General Counsel, for editing and providing a final review before the Style Manual was circulated for approval.

Consistent with the command of Republic of Palau Const. Article X, Section 14, the Palau Supreme Court has approved the updated Style Manual. All inquiries regarding the Style Manual should be addressed to the Office of Court Counsel.

January 23rd, 2026



Oldias Ngiraikelau
Chief Justice

IN THE
SUPREME COURT OF THE REPUBLIC OF PALAU

ADOPTION :
OF :
STYLE MANUAL : **ORDER**

Pursuant to Article X, Section 14 of the Constitution of the Republic of Palau and 4 PNC § 105; in, the Style Manual of the Supreme Court of Palau, as provided below, is hereby approved and adopted as the official guide for the styles to be used in the publication of Judiciary decisions, opinions, and orders.

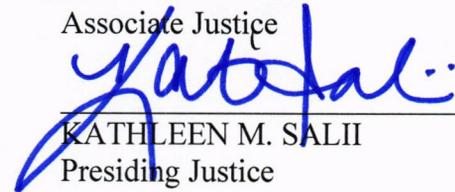
SO ORDERED this 28th day of January 2026.



OLDIAIS NGIRAIKELAU
Chief Justice



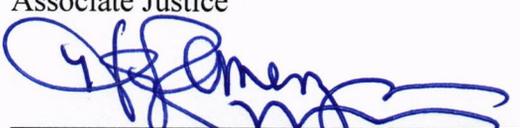
FRED M. ISAACS
Associate Justice



KATHLEEN M. SALII
Presiding Justice



LOURDES F. MATERNE
Associate Justice



HONORA E. REMENGESAU RUDIMCH
Associate Justice



PETER D. HUFFMAN
Associate Justice

INTRODUCTION

This Style Manual is adopted as the official reference for the styles to be used in the publication of court decisions pursuant to 4 PNC § 105. The Court provides this Manual to practitioners to provide the standards they should follow and to clarify common points of confusion. This Manual incorporates *The Bluebook: A Uniform System of Citation* (Columbia L. Rev. Ass'n, et al. eds., 22nd ed. 2025) but it is not identical, especially regarding citations to local sources. This Manual is not comprehensive and defaults to the Bluebook where it is silent. In short, this Manual is designed to supplement, not replace the Bluebook. The Bluebook remains the authoritative reference source for citation forms and practices and should be consulted for matters not covered in this Manual. If questions arise, please contact the Office of Court Counsel for assistance.

I. PALAUAN WORDS AND PHRASES

- 1) All Palauan words must be italicized.
- 2) Any substantive use of Palauan shall be accompanied by a footnote providing an English translation.

II. CITATION RULES IN GENERAL

- 1) Pincites to sections and paragraphs do not use “at.” Instead, separate the pincite by a comma. Only use “at” when the pincite is to a page number.
- 2) An en-dash (“-”), not a hyphen (“-”), is used when citing to a numerical range, *e.g.*, consecutive pages or sections.

III. TITLES

- 1) The full title contains the names of all parties and appears in the caption of an appellate opinion or order. The short title, or “running head” title, is abbreviated following this Style Manual, and appears at the top of each page of the opinion or order. This “running head” title is ordinarily used for citation purposes. While running head titles may employ a variety of standard abbreviations (*e.g.*, “&,” “Co.,” “Ins.”), full titles use abbreviations only if they are part of a party's true legal name.

- 2) Complaints and petitions in the trial court must include the names of all parties, but in subsequent pleadings or other filings, it is sufficient to state only the name of the first party on each side with an appropriate indication of the other parties, *i.e.*, “et al.”

IV. LOCAL CASES

- 1) Citations to Palauan opinions, decisions, orders, and filings should be as follows:

- a) **For cases from 2026 onward**

- i) **Published Decisions**

- (1) **Appellate Division.** All opinions of the Appellate Division are published. The opinions should be cited as follows:

- (a) Full Cite: *Lorem v. Ipsum*, 2026 Palau 1.¹
 - (b) Pincite: *Lorem v. Ipsum*, 2026 Palau 1, ¶ 7.
 - (c) Short Cite: *Lorem*, 2026 Palau, ¶ 7.

- (2) **Trial Division.** At the conclusion of each year, the Chief Justice may designate Trial Division decisions to be published. Published decisions should be cited as follows:

- (a) Full Cite: *Lorem v. Ipsum*, 2026 ROP Tr. Div. 1.
 - (b) Pincite: *Lorem v. Ipsum*, 2026 ROP Tr. Div. 1, ¶ 7.
 - (c) Short Cite: *Lorem*, 2026 ROP Tr. Div., ¶ 7.

- (3) **Land Court.** At the conclusion of each year, the Chief Justice may designate Land Court adjudications and determinations to be published. Published adjudications and determinations should be cited as follows:

- (a) Full Cite: *In re 10 Parcels of Land*,² 2025 ROP L. Ct. 1.
 - (b) Pincite: *In re 10 Parcels of Land*, 2025 ROP L. Ct. 1, ¶ 7
 - (c) Short Cite: *In re 10 Parcels of Land*, 2025 ROP L. Ct., ¶ 7.

- (4) **Court of Common Pleas.** At the conclusion of each year, the Chief Justice may designate Court of Common Pleas decisions to be published. Published decisions should be cited as follows:

- (a) Full Cite: *In re Robert Downing*,³ 2025 ROP COCP 1.
 - (b) Pincite: *In re Robert Downing*, 2025 ROP COCP 1, ¶ 7.
 - (c) Short Cite: *In re Downing*, 2025 ROP COCP, ¶ 7.

¹The filing number of the opinion.

² This is one example of a way to cite to Land Court cases. More variations are included under unpublished decisions.

³ As with the Land Court cases, there are multiple ways the Plaintiff and Defendant can be listed depending on the type of case. See more variations under unpublished decisions.

ii) **Unpublished Orders, or Misc. Documents**

(1) **Appellate Division**

- (a) Full Cite: *Terekieu Clan v. Masami*, Civ. No.⁴ 23-012 (App. Div. Mar. 13, 2023).
- (b) Pincite:⁵ *Terekieu Clan v. Masami*, Civ. No. 23-012 (Order Gr. Appt's Mot. Enl. Time File Tr.) (App. Div. July 4, 2023).⁶
- (c) Short Cite: *Terekieu Clan*, Civ. No. 23-012 (Order Gr. Appt's Mot. Enl. Time File Tr.).

(2) **Trial Division.** The first two digits of the case number reflect the year filed. The final three digits indicate the case filing number for the designated year. In the example below, the case was the first case filed in the year 2026.

- (a) Full Cite: *Lorem v. Ipsum*, Civ. No. 26-001 (Tr. Div. month, day, year); or you may have to substitute for *Plaintiff v. Defendant, In re _____* (subject's name) or *In the Matter of _____* (subject's name).
- (b) Pincite: Indicate by paragraph number⁷, see *Lorem v. Ipsum*, Civ. No. 26-001 (Judgment, ¶ 2) (Tr. Div. month, day, year).
- (c) Short Cite: *Lorem*, Civ. No. 26-001 (Judgment, ¶ 2).

(3) **Land Court.** As with the trial court, the first two digits of the case number are the year of filing, and the last digits are the case filing number for that year. In the example below, the case was filed in 2026 and was the 109th case filed that year.

- (a) Full Cite: *In re 10 Parcels of Land and then List All Claimants v. List all Defendants, L. Ct./_* (Letter code for one of the sixteen states) 26-00109 (month, day, year). Note: there are some case captions that start with *In the matter of the ownership of*.

These letter codes are:

Aimeliik	M
Airai	N
Angaur	S
Hatoholbei	Y
Kayangel	G
Koror	A, B

⁴ Substitute Crim. No. when it is a criminal case.

⁵ Use the abbreviations listed in The Bluebook, Bluepages Rule 6.1 and Tables 1-16.

⁶ For any pincite citations, if the document does not contain paragraph numbers, you may refer to the page number. However, the paragraph number is preferred and must be used when available.

⁷ As previously mentioned, if a documents does not contain paragraph numbers, you may cite to the page number.

Melekeok	C
Ngaraard	E
Ngarchelong	F
Ngardmau	H
Ngatpang	L
Ngchesar	P
Ngaremlengui	K
Ngiwal	D
Peleliu	R
Sonsorol	T

- (b) Pincite: Indicate by paragraph number, *see e.g. In re 10 Parcels of Land and then List All Claimants v. All Defendants*, L. Ct./_, 26-00109 (Disposition, ¶ 10) (month, day, year).
- (c) Short Cite: *In re 10 Parcels of Land*, L. Ct./_, 26-00109, (Disposition, ¶ 10).

(4) Court of Common Pleas.

- (a) Full Cite: *In re Robert Downing*, CP/CA⁸ No. 26-078 (month, day, year), or you may have to substitute for *Plaintiff v. Defendant, Petitioner v. Respondent*, or *In the matter of the Estate of _____*. Note for cases in the Court of Common Pleas the Clerk’s Office does not use Civil Number (Civ. No.).
- (b) Pincite: Indicate by paragraph number, *see e.g. In re Robert Downing*, CP/CA No. 26-078, (Disposition, ¶ 10) (month, day, year).
- (c) Short Cite: *Downing*, CP/CA No. 26-078 (Disposition, ¶ 10).

b) For cases from 2016 to 2025:

(1) Appellate Division

- (a) Full Cite: *Keptot v. Republic of Palau*,⁹ 2018 Palau¹⁰ 2 (App. Div.)
- (b) Pincite: *Keptot v. Republic of Palau*, 2018 Palau 2 ¶ 7 (App. Div.)
- (c) Short Cite: *Keptot*, 2018 Palau 2 ¶ 7.

(2) Trial Division

- (a) Full Cite: *In re Rois Kebesang*, 2021 Palau 38 (Tr. Div.¹¹)
- (b) Pincite: *In re Rois Kebesang*, 2021 Palau 38 ¶ 6 (Tr. Div.)
- (c) Short Cite: *In re Rois Kebesang*, 2021 Palau 38 ¶ 6.

(3) Land Court or Court of Common Pleas. Follow the guidelines for unpublished opinions applicable to decisions from 2026 onward.

⁸ The Court of Common Pleas uses the following: in domestic abuse cases it could either be CP/CA or CP/DA; in small claims cases, SM No.; in criminal cases, Cr. No.; in special proceedings, S.P. No.; and in disciplinary Proceedings by Disc. No.

⁹ “Republic of Palau” should always be spelled out in case citations.

¹⁰ Following publication of this Style Manual, the Court will use “Palau” only in connection with decisions of the Appellate Division.

¹¹ For Court of Common Pleas, replace “(Tr. Div.)” with “(Ct. CP);” for Land Court, replace with “(Land Ct./___).”

c) For cases from 1982 to 2016 (Republic of Palau Reporter):

- i) *Matlab v. Melimarang*, 9 ROP 93 (2002).
 - a. Pincite: *Matlab v. Melimarang*, 9 ROP 93, 96 n.2 (2002).
 - b. Short Cite: *Matlab*, 9 ROP at 96.
- ii) *Filibert v. Ngirmang*, 8 ROP Intrm. 273 (2001).
 - a. Pincite: *Filibert v. Ngirmang*, 8 ROP Intrm. 273, 276 (2001).
 - b. Short Cite: *Filibert*, 8 ROP Intrm. at 276.
- iii) *Rteai Chiefs of Ngarchelong v. Ongidobel*, 19 ROP 204 (Tr. Div. 2010).
 - a. Pincite: *Rteai Chiefs of Ngarchelong v. Ongidobel*, 19 ROP 204, 206–07 (Tr. Div. 2010).
 - b. Short Cite: *Rteai Chiefs*, 19 ROP at 206–07.
- iv) *In re Lots in Iyebukel Hamlet*, 21 ROP 129 (Land Ct. 2014).
 - a. Pincite: *In re Lots in Iyebukel Hamlet*, 21 ROP 129, 130 (Land Ct. 2014).
 - b. Short Cite: *In re Lots in Iyebukel Hamlet*, 21 ROP at 130.
- v) *Republic of Palau v. Mobel*, 13 ROP 283 (C.C.P. 2006).
 - a. Pincite: *Republic of Palau v. Mobel*, 13 ROP 283, 284 (C.C.P. 2006).
 - b. Short Cite: *Mobel*, 13 ROP at 284.

d) For cases prior to 1982 (Trust Territories Reporter):

- i) *Lajutok v. Kabua*, 3 TTR 630 (1968).
 - a. Pincite: *Lajutok v. Kabua*, 3 TTR 630, 634 (1968).
 - b. Short Cite: *Lajutok*, 3 TTR at 634.
- ii) *Lalou v. Aliang*, 1 TTR 94 (Palau Tr. Div. 1954).
 - a. Pincite: *Lalou v. Aliang*, 1 TTR 94, 99–100 (Palau Tr. Div. 1954).
 - b. Short Cite: *Lalou*, 1 TTR 94 at 99.

V. CASE NAMES

- 1) Omit all parties other than the first listed on each side. Refer to The Bluebook, Bluepages, Rule 10.2.1(a). If the case is a consolidation of two or more actions, only cite the first listed case. Refer to Bluebook Rule 10.2.1(a).
 - *Bin-Fang v. Mobel*, 2020 Palau 7 (App. Div.).
 - **NOT** *Shih Bin-Fang, et al. v. Mobel, et al.*, 2020 Palau 7
 - **NOT** *Shih Bin-Fang v. Mobel, et al.*, 2020 Palau 7
 - **NOT** *Shih Bin-Fang, Asia Pacific International Investment Inc., and Maria Tanaka v. Sidley Eichi Mobel, Individually and on Behalf of His Sibling*, 2020 Palau 7.

- *Edaruchei Clan of Ngerkeyukl v. Edaruchei Clan of Ngerdelolk*, 2024 Palau 12 (App. Div.).
 - **NOT** *Edaruchei Clan of Ngerkeyukl v. Edaruchei Clan of Ngerdelolk, Estate of Itaru Kishigawa v. Edaruchei Clan of Ngerkeyukl*, 2024 Palau 12 (App. Div.).
- 2) Procedural phrases should be abbreviated and properly capitalized. Refer to Bluebook Rule 10.2.1(b).
 - *In re Munguy*, 6 ROP Intrm. 22 (1996).
 - **NOT** *In Re Munguy*, 6 ROP Intrm. 22 (1996).
 - **NOT** *In the Matter of the Application of James Anet Munguy*, 6 ROP Intrm. 22 (1996).
- 3) Case citations should be abbreviated in accordance with the Bluebook. Refer to Bluebook Rule 10.2.2.
 - *Roll 'Em Prods., Inc. v. Diaz Broad. Co.*, 21 ROP 96 (2014)
 - **NOT** *Roll 'Em Productions, Inc. v. Diaz Broadcasting Company*, 21 ROP 96 (2014)

VI. LOCAL STATUTES AND RULES

- 1) The Palau National Code is cited as P.N.C. not P.N.C.A. *See* 1 P.N.C. § 110(b).
- 2) When referring to a specific section of the PNC in a textual sentence, “section” and “title” should not be capitalized. Except when it is the first word in the sentence, “section” can be abbreviated (§) when referring to the P.N.C. Refer to Bluebook Rules 6.2(c), 12.2, and T1.
 - Pursuant to title 1, section 303 of the Palau National Code, the rules of the common law as generally understood in the United States shall be the rules of decision in the courts of Palau.
 - **OR** Pursuant to 1 PNC § 303, the rules of the common law as generally understood in the United States shall be the rules of decision in the courts of Palau.
- 3) Court Rules and the Constitution should include Republic of Palau before them, i.e., “ROP R. Civ. P.” Citations to the U.S. or other jurisdictions should clarify the country of jurisdiction, i.e., “U.S. Fed. R. Civ. P.”

VII. OTHER PUBLICATIONS

- 1) Citations to books, reports, and periodical materials should name all the authors in the order in which they appear on the title page in the full citation.
 - Douglas W. Arner, Giuliana G. Castellano & Eriks K. Selga, *The Transnational Data Governance Problem*, 37 Berkeley Tech. L.J. 623 (2022).

VIII. INTRODUCTORY SIGNALS

- 1) Introductory signals are italicized except when used as a verb. Refer to Bluebook Rule 1.2.
 - See *Henry v. Shizushi*, 21 ROP 79 (2014) (discussing how the Rules of Appellate Procedure control the time limits in which to file a notice of appeal).
 - **OR** See *Henry v. Shizushi*, 21 ROP 79 (2014) for a discussion on how the Rules of Appellate Procedure control the time limits in which to file a notice of appeal.
 - **NOT** See *Henry v. Shizushi*, 21 ROP 79 (2014) (discussing how the Rules of Appellate Procedure control the time limits in which to file a notice of appeal).

IX. PUNCTUATION/ABBREVIATIONS

- 1) “Paragraph” and “section” should not be abbreviated in textual sentences, except when referring to a provision in the P.N.C. or a regulation. Refer to Bluebook Rule 6.2(c).
 - 1 P.N.C. § 303
- 2) Abbreviated citations should not be used in textual sentences except for abbreviations previously shortened by a “hereinafter.”
 - b. “Hereinafter” may be used to refer to court filings, books, reports, unpublished materials, periodicals, regulations, and nonprint sources. After the first full citation of the authority, but before any explanatory parenthetical, place “hereinafter” and the shortened form in square brackets. Refer to Bluebook Rule 4.2(b).
 - Order Granting Def. Josepha’s Mot. for Summ. J., *Estate of Luisa Ngeribongel Pedro v. Estate of Lorenza Pedro*, CA No. 22-135, at 2 (Tr. Div. Sept. 7, 2023) [hereinafter 2023 Order]. When Luisa Pedro passed away, the estate was not opened. 2023 Order, at 2.
 - c. “Hereinafter” may also be used to abbreviate cumbersome proper nouns, e.g., name of a party or organization. After the first appearance of the proper noun fully spelled out, place “hereinafter” and the shortened form in parentheses.
 - Appellant terminated her contract with Pacifica Development Corporation (hereinafter, “PDC”). PDC argues that Appellant materially breached the contract.

X. EXHIBITS

- 1) In the trial courts, pre-trial orders typically address the submission of exhibits. However, if the pre-trial order is silent on an issue, the following guidelines should be utilized.
- 2) All exhibits must be identified with either a paper, electronic, or self-adhesive label containing an abbreviation for the party submitting the exhibit and a unique exhibit number or letter that is assigned sequentially. If the exhibit has sub-parts, the sub-parts should repeat the identifier used on the main exhibit and then contain an additional identifier that serves to

ensure the sub-parts remain with the main exhibit. For example, if there is one exhibit with two sub-parts the following designations could be used. P.¹² Ex. 1A, P. Ex. 1B, P. Ex. 1C.

- 3) The label should be placed in the bottom right-hand corner without visibly obscuring any text or important parts of a photograph, illustration, or map. If placing the label on the front will obscure an important part of the exhibit, the label may be placed on the back.
- 4) For digital evidence, the digital file itself must be named in such a method as to serve at its own label. The naming convention should include the party, the exhibit number, and a brief neutral description. For example, P_Ex_1_emails.mp4.
- 5) For large physical items such as an ax, a string tag with the exhibit label affixed to it should be used. For smaller physical items such as a key, the item should be placed in a clear plastic sealable bag with the exhibit label affixed directly to the bag.
- 6) If an exhibit contains multiple pages, each page should contain the party identifier, the exhibit number or letter, and the page number. For example, P. Ex. 1 pg. 2, P. Ex. 1 pg. 3, and so on.
- 7) In cases where there is a single party on each side of the case, designations such as P. or Pl., Movant, Cl., Nat. Gov., or State, should be used for the party who invoked the jurisdiction of the court. The responding party should use a designation such as D. Def., Deft., or Resp. The party designation should be followed by sequential numbers or alphabetical characters. Unless otherwise directed by the court, the same method should be used in identifying exhibits during the entire pendency of the case including any appeal.
- 8) In cases where one or both sides have multiple parties, the attorneys should agree on a standardized method to identify the parties and number or letter the exhibits. The agreed upon method of identifying exhibits should be used during the entire pendency of the case including any appeal. For example, in a land court case, Cl. 1 Ex. 1, or similar designation may be used. If the document is submitted in a court proceeding, the party is permitted to refer to exhibits by utilizing a designation indicating such, for example, Cl. 1 Tr. Ex. 1.
- 9) Prior to submission of any exhibits whether with a brief or in open court, an exhibit list should be prepared that contains the party submitting the exhibits, the exhibit numbers, each followed by a brief identifier (*e.g.*, Dec. 12, 2025, letter). Any exhibit descriptions should be concise and factual, avoiding argumentative language.

¹² P. or Pl. for Plaintiff.