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OLSI CIVIL LEGAL GUIDE · FLORIDA STATE TRIAL COURTS

Conducting Legal Research

How to research Florida law for free — finding cases, statutes, and rules, telling binding authority from persuasive, checking whether a case is still good law, and using AI tools safely under the new 2026 certification rule. For self-represented litigants, rigorous enough for new counsel.

JURISDICTION	AUDIENCE	LAST REVIEWED
Florida State Courts	Self-Represented & New Counsel	June 2026
READING TIME		
~50 min		

WHAT THIS GUIDE COVERS

- 01 Research without Westlaw or Lexis
- 02 The six stages of research
- 03 The free Florida research ecosystem
- 04 Court & clerk sites, forms, journals
- 05 Reading the Southern Reporter
- 06 Citing Florida cases correctly
- 07 Binding vs. persuasive authority
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IMPORTANT — PLEASE READ

Open Law Services Institute is not a law firm and does not provide legal advice. This guide gives general legal information to help you understand court procedure. It cannot tell you what to do in your specific case, and using it does not create an attorney–client relationship. For advice about your situation, consult a Florida-licensed attorney. Learn more at www.openlawservices.org.

This is legal information, not legal advice, and is not a substitute for consultation with a licensed attorney. Viewing this guide does not create an attorney–client relationship with Open Law Services Institute. Laws and court procedures change; verify current requirements for your court before acting.

START HERE

You can research Florida law without paying for anything

The big subscription databases — Westlaw and Lexis — are expensive and aimed at law firms. You do not need them. Everything in this guide can be done with free, official sources.

Good legal research answers four questions: what does the law say, where do I find it, is it still in force, and does it actually control my case? This guide walks each one using sources anyone can open in a browser — the Florida Bar rules portal, Online Sunshine for statutes, Justia and Google Scholar for cases, and the courts' own websites.

It also covers something brand new. As of **June 15, 2026**, every person who signs a court filing in Florida — lawyer or not — must certify that the legal authorities they cite **actually exist and are accurately cited**.¹ That makes careful verification not just good practice but a rule you can be sanctioned for breaking. AI tools can help you research, but they also invent fake cases, so this guide treats verification as the final, non-negotiable step.

PRACTICE POINTER · FREE DOES NOT MEAN SECOND-RATE

The free sources below contain the same primary law — the actual cases, statutes, and rules — that the paid services do. What you pay for with Westlaw or Lexis is mostly speed and automatic citators. You can replicate the citator work by hand, and this guide shows you how.

WATCH OUT · OLD GUIDES ARE DANGEROUS

Florida overhauled its civil rules effective January 1, 2025 and renumbered many provisions. A guide or form written before 2025 may cite a rule that has moved or changed. Always confirm the current text on an official source before you rely on it.

THE ROAD AHEAD

Research follows a repeatable, six-stage path

This guide walks each stage in order. The progress bar at the top of each stage shows where you are.



1 · Sources

Learn the free Florida research ecosystem — where the rules, statutes, constitution, and cases live online, and which site is authoritative for each.

2 · Case law

Find Florida decisions and cite them correctly — the Southern Reporter, the court structure, and proper Bluebook form.

3 · Authority

Tell binding authority from merely persuasive — and confirm a case is still good law without a paid citator.

4 · Statutes & rules

Research statutes and the rules of procedure — session laws vs. codified text, constitutionality, and the rulemaking line.

5 · Federal

Understand how federal law reaches a Florida state case — supremacy, which federal courts bind, and reverse-Erie.

6 · Verify

Use AI tools competently, satisfy the June 15, 2026 certification rule, and find free law libraries for what you cannot reach online.

WATCH OUT · ONE NEW RULE TOUCHES EVERYTHING

The June 15, 2026 certification rule applies to **every** citation in **every** filing. Whatever stage you are in, assume you will have to prove each authority is real and accurately quoted before you sign. Build that habit from the first case you read.



STAGE 1 · SOURCES

The free Florida research ecosystem

Five official, free sources cover almost everything. Learn what each one holds and which is authoritative, and you will rarely need anything else.

a Florida Bar rules portal

Current-text PDFs of every court-rule chapter, each stamped with its effective date — Civil Procedure, General Practice & Judicial Administration, Appellate, and more. floridabar.org/rules

b Online Sunshine — statutes

The official Florida Statutes, with a history note at the end of each section tracing every amendment. leg.state.fl.us/statutes

c Florida Constitution

All twelve articles, free, at flsenate.gov/laws/constitution.

d Justia — Florida cases

Free, searchable Supreme Court and District Court of Appeal opinions, browsable by year and court. law.justia.com/cases/florida

e Google Scholar case law

The closest free analog to a paid citator: its “How cited” tab lists later decisions that cite your case. scholar.google.com

PRACTICE POINTER · GO TO THE SOURCE

For the **current** text of a rule, use the Florida Bar portal; for a statute, use Online Sunshine. These are the official versions. Treat blogs, summaries, and even AI answers as signposts that point you to the real source — never as the authority itself.



STAGE 1 · SOURCES

Court sites, free forms, and practitioner commentary

Beyond the primary law, the courts and the Bar publish dockets, approved forms, and plain explanation — also free.

Court and clerk websites

The Florida Courts site (flcourts.gov), the Supreme Court site, the Appellate Case Information System (acis.flcourts.gov), and your local circuit and county clerk sites publish dockets, administrative orders, and local procedures. Your judge's own web page often posts the procedures you must follow for hearings and orders.

Free forms and self-help

DIY Florida and Florida Courts Help (help.flcourts.gov) offer free, Supreme Court–approved forms and step-by-step interviews for common matters such as small claims, landlord–tenant, name change, and family law. Clerks can give *ministerial* help — explaining where to file — but by law cannot give legal advice.

Practitioner commentary

The *Florida Bar Journal* publishes free columns by practicing lawyers explaining current doctrine. These are **persuasive only** — useful for orientation and for the cases they cite, but always trace back to and rely on the primary authority itself.

WATCH OUT · COMMENTARY IS A MAP, NOT THE TERRITORY

A journal article or treatise can be wrong, dated, or oversimplified. Cite the case, statute, or rule it points to — not the article — and confirm that the primary source still says what the commentary claims.



STAGE 2 · CASE LAW

Where Florida decisions live: the Southern Reporter

Florida appellate opinions are published in one reporter set. Knowing how it is organized lets you read and cite any case.

Florida appellate decisions appear in the **Southern Reporter**, abbreviated So. (through 1941), So. 2d (1941–2008), and So. 3d (2008–present). Because the old *Florida Reports* stopped publishing in 1948, you cite only the Southern Reporter — no second “parallel” cite is needed.²

The court structure you are citing

As of June 2026 Florida has one Supreme Court, six District Courts of Appeal (the Sixth DCA, in Lakeland, has operated since January 1, 2023), twenty judicial circuits, and 67 county courts.³ The court that decided a case — and the year — go in the parenthetical at the end of the citation, and they tell you how much weight the decision carries (Stage 3).

PRACTICE POINTER · PINPOINT THE PAGE

When you quote or rely on a specific point, give the exact page it appears on — the “pinpoint” cite — not just the first page of the opinion. Judges check pinpoints, and the new certification rule expects your citation to be accurate down to the page.



STAGE 2 · CASE LAW

A quick-reference citation card

Courts expect citations in Bluebook form. Match these patterns exactly — the case name in italics, the volume and reporter, the first page, then the court and year.

- 1 Florida Supreme Court**
Smith v. Jones, 123 So. 3d 456 (Fla. 2020).
- 2 District Court of Appeal**
Smith v. Jones, 123 So. 3d 456 (Fla. 3d DCA 2020).
- 3 Sixth DCA (created 2023)**
Smith v. Jones, 350 So. 3d 100 (Fla. 6th DCA 2023).
- 4 Statute**
§ 95.11, Fla. Stat. (2025).
- 5 Session law**
Ch. 2023-15, § 9, Laws of Fla.
- 6 Rule of procedure**
Fla. R. Civ. P. 1.140.

WATCH OUT · NAME THE RIGHT COURT

“(Fla. 2020)” means the Florida Supreme Court; “(Fla. 3d DCA 2020)” means the Third District Court of Appeal. The difference decides whether the case binds your trial court or is only persuasive (Stage 3). Getting the court wrong in a citation is both a substance error and a certification problem.



STAGE 3 · AUTHORITY

Binding vs. persuasive authority

Not every case counts equally. Some *bind* your court — it must follow them; others are only *persuasive* — the judge may agree, but does not have to.

District Court of Appeal decisions bind statewide

A decision of any Florida District Court of Appeal binds **every** trial court in the state — not just the courts in its own district — as long as no other DCA has ruled the opposite way.⁴ So a Third DCA case binds a trial judge in Pensacola unless the First DCA (or another DCA) has held differently.

When the districts disagree

If two DCAs have ruled opposite ways on the same question, your trial court follows the DCA for the district it sits in. That kind of split is also what lets the Florida Supreme Court step in to settle the question for the whole state.⁵

PRACTICE POINTER · FIND A CASE FROM YOUR OWN DISTRICT FIRST

A decision from the DCA covering your county is the strongest authority you can hand a trial judge. Look there first; reach to other districts only if your own has not addressed the point.

WATCH OUT · YOU MUST DISCLOSE BAD AUTHORITY

Even authority that hurts you must be disclosed if it is controlling and the other side has not raised it. Hiding a binding case that goes against you is an ethics violation — and undermines the candor the court expects from every filer.



STAGE 3 · AUTHORITY

Panels, en banc, and the words that change a case

Reading later history correctly is half of research. A few key terms tell you whether a case still stands — or has been undercut.

Within a single DCA

A three-judge panel's decision binds later panels of the same court until the whole court, sitting *en banc*, recedes from it. En banc review is reserved for questions of exceptional importance or to keep the court's own decisions consistent.⁶

What the Florida Supreme Court did to a case

When you read subsequent history, the verb matters. The Supreme Court may **approve** a DCA decision (it stands), **quash** it (functionally wipes it out), or **disapprove** it.⁷ A panel can never overrule binding Supreme Court precedent — even if a later U.S. Supreme Court case seems to cast doubt on it.⁸

WATCH OUT · “QUASHED” MEANS GONE

If the Florida Supreme Court **quashed** the DCA opinion you found, that DCA opinion no longer controls — the Supreme Court's decision does. Always read the case's later history before relying on it; a great-sounding quote from a quashed opinion is worthless.



STAGE 3 · AUTHORITY

Is the case still good law? A no-cost workflow

Paid services flag this automatically. You can reach the same answer with six free steps — do all of them before you cite anything.

1 Read the history line

On Justia or Google Scholar, read the opinion's subsequent-history note at the top.

2 Run “How cited”

On Google Scholar, open the “How cited” tab and read the later decisions that cite your case.

3 Hunt for danger words

Look for “receded from,” “disapproved,” “overruled,” “quashed,” “abrogated,” or “superseded by statute.”

4 Check the issuing DCA

A DCA can recede from itself only en banc — scan its later opinions for that.

5 Check the Supreme Court

Look for any pending or completed Supreme Court review of the decision.

6 Re-check the statute

If the case interprets a statute, confirm on Online Sunshine that the statute has not since been amended.

PRACTICE POINTER · GOOGLE SCHOLAR HAS NO FLAGS

Unlike a paid citator, Google Scholar's “How cited” list does not label whether a later case treated yours kindly or harshly. You have to open and read each important citing opinion yourself — there is no shortcut, but it is reliable.



STAGE 4 · STATUTES & RULES

Researching statutes: codified text vs. session laws

Two different things both count as “the law” the Legislature passed. Knowing which to cite for what keeps your research clean.

The **Florida Statutes** are the organized, subject-by-subject compilation of permanent law — this is what you usually cite for a legal proposition, e.g. § 95.11, Fla. Stat. (2025). The **Laws of Florida** (session laws) are the chronological record of each bill as enacted, cited by chapter, e.g. Ch. 2023-15, Laws of Fla. Cite the session law for the *act itself*; cite the codified section for the *substantive rule* it created.

Tracking what changed

Each statute section ends with a history note listing every chapter law that amended it; the Legislature also publishes a Table Tracing Session Laws to Florida Statutes that maps a chapter into the codified text. Bill histories live at the Legislature's site.

PRACTICE POINTER · WORKED EXAMPLE: HB 837

The 2023 tort-reform act is session law Ch. 2023-15, Laws of Fla. Its effects live in codified sections — e.g. modified comparative negligence at § 768.81(6) and the shortened two-year negligence limitations period at § 95.11(4)(a). Cite the chapter law for the act; cite the section for the rule.



STAGE 4 · STATUTES & RULES

The Constitution and whether a statute is valid

A statute on the books is not always enforceable. Florida statutes are sometimes struck down, especially when they cross into the courts' own territory.

Check for constitutional problems

To see whether a statute has been challenged, search its section number on Google Scholar and Justia for cases addressing its constitutionality. Florida statutes are **frequently invalidated** when they intrude on the Supreme Court's exclusive power to make rules of "practice and procedure."⁹

The rulemaking line

Under the Florida Constitution, the Supreme Court controls procedure in all courts, while the Legislature makes substantive law.¹⁰ Where a purely procedural statute conflicts with a court rule, the **rule** wins; where a rule trespasses on substantive law, the rule is invalid.¹¹ The line between "procedural" and "substantive" is genuinely contested — especially for evidence statutes — so read recent cases before assuming which controls.

WATCH OUT · "IT'S IN THE STATUTES" IS NOT THE END

Finding your point in a statute is not proof it is enforceable. A court may have held the statute unconstitutional or a conflicting rule may override it. Always search for cases on the section before you build an argument on it.



STAGE 4 · STATUTES & RULES

Finding and citing the rules of procedure

The rules are where most courtroom procedure actually lives. They are free, current, and change often — so always read the live text.

The Florida Bar rules portal hosts the current text of every chapter, each stamped with its effective date. Cite rules in Bluebook form: Fla. R. Civ. P. 1.140 (civil procedure), Fla. R. Gen. Prac. & Jud. Admin. 2.515 (general practice and judicial administration), Fla. R. App. P. 9.130 (appellate).

Watch for renumbering

The 2025 overhaul moved several provisions — for example, many discovery rules were consolidated into Rule 1.280. An older case may cite a former subdivision number that no longer matches the current text. Pending amendments are tracked on the Supreme Court's rules-cases page.

PRACTICE POINTER · MATCH THE YEAR TO THE TEXT

When you cite a rule, you are citing the version in force now. If a case quotes an older subdivision, find the equivalent current provision on the Bar portal and cite that — noting the renumbering if it helps the judge follow your point.



STAGE 5 · FEDERAL

When federal law reaches a Florida state case

State courts handle federal claims all the time. A little federal-law literacy keeps you from missing — or overstating — a federal point.

Concurrent jurisdiction

Under the Supremacy Clause, federal law is the supreme law of the land, and state courts have **concurrent jurisdiction** over most federal claims unless Congress says otherwise.¹² Florida courts routinely hear claims under federal statutes — for example civil-rights, fair-debt-collection, credit-reporting, truth-in-lending, and wage-and-hour laws.

Preemption

Federal law can **preempt** (displace) state law expressly, by occupying a field, or by direct conflict. Florida courts apply the same preemption framework the federal courts use.¹³ If your opponent argues a state-law claim is preempted, that is the analysis to research.

PRACTICE POINTER · SPOT THE FEDERAL QUESTION EARLY

If your dispute involves a federal statute or a preemption argument, identify it at the outset. It changes which authorities bind the court (next page) and can change where the case can be heard.



STAGE 5 · FEDERAL

Which federal courts bind — and reverse-Erie

Not all federal decisions carry the same weight in a Florida court. Get this right and you will not over-rely on a case that is merely persuasive.

The U.S. Supreme Court binds; lower federal courts do not

On questions of federal law, the U.S. Supreme Court binds Florida courts.¹⁴ But decisions of the lower federal courts — including the Eleventh Circuit and the federal district courts in Florida — are only **persuasive**. A Florida court *may* follow them, but is not required to.¹⁵

Reverse-Erie

When a Florida state court hears a federal claim, it applies federal *substantive* law (because federal law is supreme) but generally its own state *procedure* — unless a state procedural rule would place an unnecessary burden on the federal right.¹⁶ This mirror image of the familiar federal-court *Erie* rule is sometimes called “reverse-Erie.”

WATCH OUT · AN ELEVENTH CIRCUIT CASE DOES NOT CONTROL

It is a common mistake to treat a federal appeals-court or district-court decision as binding on a Florida state judge. It is not. Cite it as persuasive support — and find a Florida or U.S. Supreme Court case if you need something the judge must follow.



STAGE 6 · VERIFY

Using AI tools — helpful, but never trusted blindly

Generative-AI assistants like Claude, ChatGPT, and Gemini can speed up research enormously — and can also confidently invent law that does not exist.

Used well, an AI tool can explain doctrine in plain English, suggest search terms, outline an argument, and surface counter-arguments you had not considered. What it **cannot** be trusted to do is supply citations. AI models routinely **hallucinate** — they fabricate case names, misstate holdings, and invent rule numbers, all in a fluent, authoritative voice.

This is not hypothetical. Courts have sanctioned filers — in Florida and elsewhere — for submitting briefs full of AI-invented cases that did not exist. The lesson is simple: an AI tool can help you find where to look, but every authority it gives you must be opened and confirmed on a real, official source.

WATCH OUT · NEVER PASTE CONFIDENTIAL INFORMATION

Do not paste privileged, confidential, or personally identifying information into a public AI tool. Once it leaves your hands you cannot control where it goes — a serious risk to your case and your privacy.

PRACTICE POINTER · TREAT AI LIKE A BRIGHT BUT UNRELIABLE INTERN

An AI draft is a starting point, not a finished product. Verify every case, quote, and rule number it produces — then verify again if AI touched any part of the filing. You, the signer, are responsible for every word.



STAGE 6 · VERIFY

The June 15, 2026 certification rule NEW 2026

A statewide rule now puts the duty to verify in writing — and attaches real consequences to getting it wrong.

Effective **June 15, 2026**, Florida Rule of General Practice and Judicial Administration 2.515(d)(2) provides that every person who signs a filing — **attorney or self-represented** — represents that “the legal authorities identified exist and are accurately cited.”¹ The rule grew directly out of cases where AI tools invented fake citations.

The consequences are not theoretical. Sanctions for a violation can include reprimand, contempt, striking the filing, dismissal, and orders to pay costs and attorney's fees.¹⁷ The statewide rule also preempts the patchwork of local AI-disclosure orders some circuits had adopted — though some circuits may still require an explicit AI-use disclosure on the face of a filing.

WATCH OUT · THE RULE APPLIES TO YOU EVEN WITHOUT AI

The certification is not limited to AI users. Whenever you sign a filing, you are vouching that every authority in it is real and accurately cited — whether you found it by hand, in a book, or with a machine. There is no “I didn't know” exception.

TEMPLATE

A pre-filing citation verification routine

Run this routine on every authority before you sign anything. It is how you satisfy the new certification rule in practice.

TEMPLATE · VERIFY BEFORE YOU SIGN

Fill in the highlighted fields — do not file as-is

1. **Open the full opinion** on Justia, Google Scholar, or the court's official archive — not a snippet.
2. **Confirm the basics:** party names, volume and page, court, and year all match your citation.
3. **Confirm the holding supports your point** — not dicta, and not the losing side's argument.
4. **Verify any direct quotation** character-for-character against the opinion.
5. **Run a “How cited” check** for later cases that undercut it (Stage 3).
6. **Pull the current statute** from Online Sunshine and the current rule from the Bar portal.
7. **Classify any federal authority:** U.S. Supreme Court (binding) or lower federal (persuasive only).
8. **If AI touched any part of the filing**, repeat steps 1-7 — and never paste confidential information into a public tool.

PRACTICE POINTER · KEEP A VERIFICATION LOG

Jot the URL and date you confirmed each authority. If a citation is ever questioned, that short log is your evidence that you did the diligence the rule requires.



STAGE 6 · VERIFY

Free law libraries: when you need more than the web

Some treatises and tools are not free online. Florida's law libraries fill the gap — several are open to the public, sometimes with free Westlaw or Lexis terminals.

Law-school libraries open to the public

Public-access policies vary, so call ahead, but several Florida law-school libraries welcome the public for research — for example Florida A&M (which also serves as the Orange County Public Law Library), Florida International University, Stetson, Nova Southeastern, and the University of Florida's legal-information center. Some offer limited free access to Westlaw or Lexis on-site. A few are restricted to their own community or to bar members, so confirm before you go.

Federal depository libraries

Libraries designated as federal depositories must provide public access to government documents by law — a useful route to federal materials even where general access is limited.

PRACTICE POINTER · CALL FIRST, THEN GO WITH A PLAN

Public hours and database access change. Phone ahead, confirm you can use the terminals, and arrive with a short list of exactly what you need to pull — many libraries cap public computer time to an hour or two.



STAGE 6 · VERIFY

County law libraries and courthouse self-help

County and public law libraries are broadly open and free — and the courthouse itself often has a self-help center.

County law libraries

Most Florida counties operate a public law library, often inside or beside the courthouse, with free on-site access to research databases and sometimes volunteer-lawyer clinics. In Miami-Dade, the county law library operates at the justice center downtown and offers on-site Westlaw and Lexis plus a weekly volunteer-lawyer clinic; Broward, Hillsborough, and Palm Beach counties run comparable facilities.

Courthouse self-help

Florida Courts Help (help.flcourts.gov) and the Florida Courts HELP app provide free forms, plain-language instructions, and a clerk/self-help locator. Self-help staff and clerks can give procedural — not legal — help.

WATCH OUT · MINISTERIAL HELP HAS LIMITS

Clerks and self-help staff can show you where and how to file, but cannot tell you what to argue or whether you will win — that would be legal advice they are not permitted to give. For strategy, consult a licensed attorney.

PUTTING IT TOGETHER

The research mistakes that sink filings

A handful of errors account for most research failures. Watch for all of them before you sign.

Citing a case that is no longer good law

Always run the six-step “still good law” check — a quashed or receded-from case can lose your motion.

Treating persuasive authority as binding

Lower-federal-court and out-of-district DCA cases may only be persuasive. Know which is which before you lean on one.

Citing a renumbered rule by its old number

The 2025 overhaul moved many provisions. Confirm the current rule text and number on the Bar portal.

Trusting an AI citation without checking

AI tools hallucinate cases. Open and confirm every authority on an official source — the rule requires it.

Relying on a statute a court has struck down

Search the section for constitutionality challenges and conflicting rules before you build on it.

PRACTICE POINTER · VERIFICATION IS THE LAST WORD

However you found an authority, the final step is always the same: confirm it is real, current, and accurately cited. That single discipline protects your case and satisfies the June 15, 2026 rule.

BEFORE YOU FILE

A quick research checklist

- Every cited case is opened in full on an official source — not a snippet.
- Each citation's party names, page, court, and year match the opinion.
- I ran a “still good law” check and found no quash, overrule, or recede.
- I confirmed each authority is binding (not merely persuasive) where I rely on it.
- Statutes pulled fresh from Online Sunshine; rules pulled fresh from the Bar portal.
- Federal authority is classified: U.S. Supreme Court binding vs. lower federal persuasive.
- If AI assisted any part, I re-verified every citation independently.

Where to find Florida law — for free

- Court rules — floridabar.org/rules
- Statutes — leg.state.fl.us/statutes
- Constitution — flsenate.gov/laws/constitution
- Cases — law.justia.com/cases/florida
- Citorator-style search — scholar.google.com
- Forms & self-help — help.flcourts.gov

PRACTICE POINTER · ALWAYS VERIFY LOCALLY

Rules and procedures change, and every circuit and judge has local requirements. Before each filing, confirm the current rule, your circuit's administrative orders, and the judge's procedures. For more OLSI guides, visit www.openlawservices.org.

SOURCES & AUTHORITIES

Endnotes

Every legal proposition in this guide is grounded in the authorities below, cited in Bluebook form and verified against official Florida sources as of June 2026.

- 1 Fla. R. Gen. Prac. & Jud. Admin. 2.515(d)(2), eff. June 15, 2026 (every signer represents that the legal authorities identified exist and are accurately cited).
- 2 Bluebook T1.3; *see* Southern Reporter coverage (no parallel cite required after the Florida Reports ceased in 1948).
- 3 *In re Redefinition of Appellate Districts*, 331 So. 3d 703 (Fla. 2021) (Sixth DCA, operative Jan. 1, 2023); § 34.01(1)(c)3., Fla. Stat. (county-court jurisdictional cap raised to \$50,000).
- 4 *Pardo v. State*, 596 So. 2d 665, 666 (Fla. 1992); *State v. Hayes*, 333 So. 2d 51, 53 (Fla. 4th DCA 1976).
- 5 Art. V, § 3(b)(3), Fla. Const.; Fla. R. App. P. 9.030(a)(2)(A)(iv) (discretionary review on inter-district conflict).
- 6 Fla. R. App. P. 9.331 (en banc review for exceptional importance or uniformity); *In re Rule 9.331*, 416 So. 2d 1127 (Fla. 1982).
- 7 *See, e.g., D.M.T. v. T.M.H.*, 129 So. 3d 320 (Fla. 2013); *Valiant Ins. Co. v. Webster*, 567 So. 2d 408, 411 (Fla. 1990) (Supreme Court review terminology).
- 8 *State v. Lott*, 286 So. 2d 565, 566 (Fla. 1973); *Hoffman v. Jones*, 280 So. 2d 431 (Fla. 1973).
- 9 *See, e.g., DeLisle v. Crane Co.*, 258 So. 3d 1219 (Fla. 2018), abrogated by *In re Amendments to the Fla. Evidence Code*, 278 So. 3d 551 (Fla. 2019).
- 10 Art. V, § 2(a), Fla. Const. (Supreme Court rulemaking authority); Art. II, § 3, Fla. Const. (separation of powers).
- 11 *Massey v. David*, 979 So. 2d 931, 936–37 (Fla. 2008); *Allen v. Butterworth*, 756 So. 2d 52, 59 (Fla. 2000).

SOURCES & AUTHORITIES

Endnotes

- 1 U.S. Const. art. VI, cl. 2; *Tafflin v. Levitt*, 493 U.S. 455, 458 (1990); *Yellow Freight Sys., Inc. v. Donnelly*, 494 U.S. 820, 823 (1990).
- 2 *English v. Gen. Elec. Co.*, 496 U.S. 72, 78–79 (1990); *Crosby v. Nat'l Foreign Trade Council*, 530 U.S. 363, 372–73 (2000); *Phantom of Brevard, Inc. v. Brevard County*, 3 So. 3d 309, 314–15 (Fla. 2008).
- 3 U.S. Const. art. VI, cl. 2; *Cooper v. Aaron*, 358 U.S. 1, 18 (1958); *Carnival Corp. v. Carlisle*, 953 So. 2d 461, 465 (Fla. 2007).
- 4 *Carnival Corp. v. Carlisle*, 953 So. 2d 461, 465 (Fla. 2007); accord *State v. Dwyer*, 332 So. 2d 333, 335 (Fla. 1976) (lower federal decisions persuasive only).
- 5 *Brown v. W. Ry. of Ala.*, 338 U.S. 294, 298–99 (1949); *Felder v. Casey*, 487 U.S. 131, 138, 151 (1988); *Zorick v. Tynes*, 372 So. 2d 133, 137 (Fla. 1st DCA 1979).
- 6 Sanctions under Rule 2.515 / In re Representations by Signers of Filings, No. AOSC26-12 (Fla. May 28, 2026) (reprimand, contempt, striking, dismissal, costs, and fees).