

PREFACE

(2022 CUMULATIVE SUPPLEMENT)

This is a cumulative supplement to the 1971 permanent edition of the annotations to the Oregon Revised Statutes and Constitution of Oregon.

Annotations are intended solely for the purpose of directing the user to cases that may be of assistance in understanding statutory or constitutional language. The user should review and evaluate cases independently, rather than relying on descriptions contained in the annotations.

The supplements do not identify or describe amendments to statutes. Annotations may reflect statutory language that has been superseded by amendment. Annotations reflecting superseded language are subject to removal after an appropriate period on a nonsystematic basis. Annotations for vacated, reversed and overruled decisions are removed.

Cross-references (“**See**” and “**See also**”) are used in the supplements to direct the attention of the user to applicable or related annotations under another ORS section number, often in the permanent edition of the annotations. When an ORS section is renumbered, the applicable annotations in the previous issue of the supplement normally are relocated under the new section number and a cross-reference to the annotations under the new section number is added under the former section number.

If a statute has been repealed and replaced by a similar statute, entries for the repealed statute are relocated under the new statute number and labeled “**Under former similar statute.**” If a statute has been repealed and a similar statute did not replace it, entries for the repealed statute are removed from the supplement after an appropriate period. Material deleted due to repeal of a statute may include completed citations and other material relating to the permanent edition entry for the repealed statute.

Annotations occasionally cite ORS sections or chapters. If a section or chapter referred to in an annotation has been renumbered or repealed, the reference is directly preceded within the text by the notation “[former],” indicating that the

section or chapter number is no longer extant. The user should consult the current edition of ORS to determine the disposition of the section or chapter.

Annotations in the supplements are based on court decisions. Dissenting opinions are not annotated. If a case is duplicative of a point of law found in a preceding annotation, the case will be added to the pertinent annotation as a string citation.

“COMPLETED CITATIONS” provide the final citation for cases for which only temporary, advance sheet citations were available at the time of permanent edition publication.

“Sup Ct **review allowed**” indicates that, at the time of publication, the Oregon Supreme Court had granted review of a Court of Appeals decision but a Supreme Court opinion was not yet available.

OREGON RULES OF CIVIL PROCEDURE — Annotations to former statutes from which Oregon Rules of Civil Procedure were derived appear under the related rule and not the former statute. For the permanent edition, where annotations to former statutes have continued relevance, a cross-reference directs the user from the rule in the cumulative supplement to the former statute in the permanent edition. The Oregon Rules of Civil Procedure annotations appear following ORS chapter 10, as in the Oregon Revised Statutes.

OREGON EVIDENCE CODE — ORS chapter 40 is the Oregon Evidence Code.

FEDERAL CASES — Note that federal cases after 1985 do not show subsequent case history. Beginning with the 2000 cumulative supplement, only cases from the United States District Court for Oregon, the United States Bankruptcy Court for Oregon, the United States Court of Appeals for the Ninth Circuit and the United States Supreme Court are annotated. Beginning with the 2022 cumulative supplement, cases from the United States Bankruptcy Court for Oregon will no longer be annotated.