

Woman's name right and marital records in the US

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2024 年 02 月 10 日 03:00

```
"functions.R" in c:/data/NameRight/program/ reading...
```

```
Done.
```

(US 婚姻データの記述統計)

Seiro Ito

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Read marriage/divorce files

NBER marriage data

```
#### marriage
m2 <- qread(paste0(pathsave, "mar2.qs"))
```

```
setkey(m2, StateName, DateMarried)
m2[, .(StateName, DateMarried, race.g, agem.g, race.b, agem.b)]
```

	StateName	DateMarried	race.g	agem.g	race.b	agem.b
1:	Alabama	1968-01-01	1	23	1	22
2:	Alabama	1968-01-01	2	75	2	58
3:	Alabama	1968-01-01	1	32	1	21
4:	Alabama	1968-01-01	2	26	2	18
5:	Alabama	1968-01-01	1	31	1	29

12055871:	Wyoming	1990-12-31	1	18	1	18
12055872:	Wyoming	1990-12-31	1	41	1	30
12055873:	Wyoming	1990-12-31	1	29	1	30
12055874:	Wyoming	1990-12-31	1	33	1	36
12055875:	Wyoming	1990-12-31	1	36	1	36

```
m2[, YearMon := as.IDate(paste0(year, "-", month, "-01"),
  format = "%Y-%m-%d")]
m2ym <- m2[, .(
  Mar=.N,
  MedianAge.g = median(agem.g, na.rm = T),
  MedianAge.b = median(agem.b, na.rm = T), YM=YearMon[1]),
  by = .(StateName, year, month)]
```

Dunn v. Palermo of Tennessee (April 7, 1975) and neighbouring states

```
library(ggplot2)
ThisTheme <- theme(
  legend.position = "bottom",
  legend.direction = "horizontal",
  legend.text=element_text(size=6),
  legend.key.size=unit(.25, "cm"),
  legend.title = element_blank()
)
#### drop virginia "V.*a$" as it has a data problem
dunn <- m2ym[grepl("Ten|Ken|Missi|Ark|Alab|Geor|Nor.*C", StateName), ]
g <- ggplot(data = dunn, aes(x = YM, y = Mar, group = StateName,
  shape = StateName, colour = StateName)) +
  geom_point() +
  geom_line() +
  scale_y_log10() +
  scale_shape_manual(values = 0:10) +
  geom_vline(xintercept = as.IDate("1975-04-01", format = "%Y-%m-%d"),
    colour = "red") +
  scale_color_manual(values = c(
    "Alabama" = "lightblue", "Arkansas" = "lightblue", "Georgia" = "lightblue",
    "Kentucky" = "lightblue", "Mississippi" = "lightblue",
    "North Carolina" = "lightblue", "Tennessee" = "darkblue")) + ThisTheme +
  guides(colour=guide_legend(ncol=2, byrow=F))
pdf(
  paste0(pathsave, "NumberOfMarriagesDunnPalermo.pdf"),
  width = 14/2.54, height = 8/2.54)
print(g)
whatever <- dev.off()
```

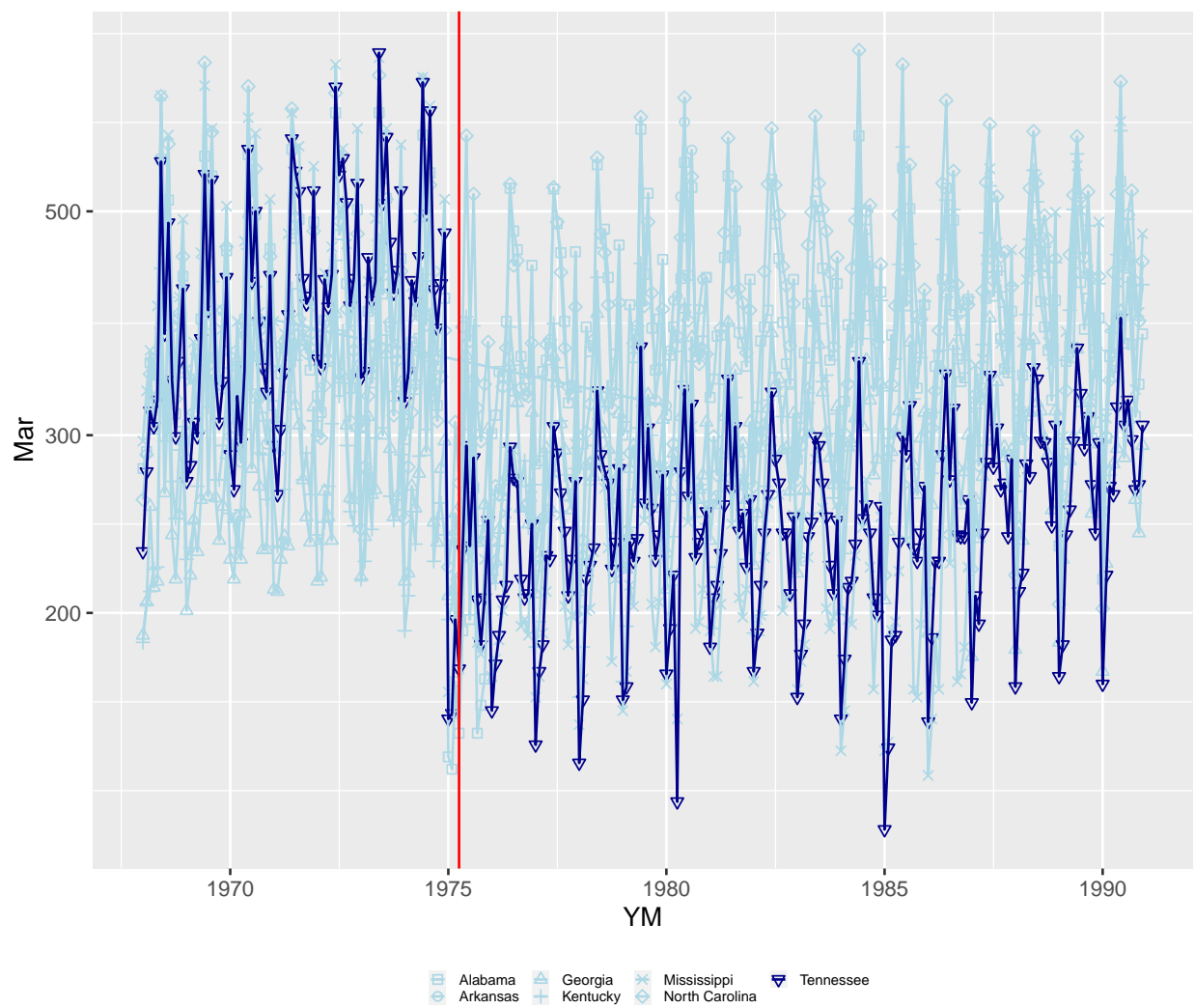


Figure 1: Number of marriages: Tennessee and contiguous states before and after Dunn v. Palermo

There is an obvious data problem with Tennessee in NBER data. The counts are almost halved after 1975. We cannot use it for analysis.

```
reshape(dunn[grepl("Tenn", StateName) & 1971 <= year & year <= 1976,
.(StateName, year, month, Mar)],
direction = "wide", idvar = c("StateName", "month"),
timevar = "year", v.names = "Mar")
```

	StateName	month	Mar.1971	Mar.1972	Mar.1973	Mar.1974	Mar.1975	Mar.1976
1:	Tennessee	1	293	357	342	324	157	160
2:	Tennessee	2	262	350	347	347	159	178
3:	Tennessee	3	304	428	450	427	197	190
4:	Tennessee	4	346	402	408	407	176	206
5:	Tennessee	5	395	433	426	451	231	213
6:	Tennessee	6	590	664	718	671	293	292
7:	Tennessee	7	548	543	509	497	233	272
8:	Tennessee	8	523	564	592	629	285	270
9:	Tennessee	9	429	510	466	418	206	216
10:	Tennessee	10	405	403	415	383	186	207
11:	Tennessee	11	412	429	437	424	207	209
12:	Tennessee	12	524	533	524	476	247	245

NCH marriage data

```
#### marriage
ms <- fread(paste0(pathsource, "CDC-NCHS/MarriageNCHS.prn"),
header = T)
m8 <- lapply(list.files(paste0(pathsource, "CDC-NCHS/ocr./"),
pattern = "8.c.*prn", full.names = T), fread, header = T)
m8 <- lapply(m8, function(x) x[, 1:6])
m8[[2]] <- m8[[2]][, -(2:3)]
m8 <- Reduce(function(...) merge(..., all = TRUE), m8)
m1 <- Reduce(function(...) merge(..., all = TRUE), list(ms, m8))
setnames(m1, grepout("^1", colnames(m1)),
paste0("v.", grepout("^1", colnames(m1))))
m1L <- reshape(m1, direction = "long", idvar = "StateName",
varying = grepout("^v", colnames(m1)))
setkey(m1L, time)
m1LW <- reshape(m1L, direction = "wide", idvar = "time",
timevar = "StateName", v.names = "v")
setnames(m1LW, grepout("^v", colnames(m1LW)),
gsub("^v.", "", grepout("^v", colnames(m1LW))))
#### divorce data, marriage rate data follow the same steps,
#### so omitted from markdown.
#### Tennessee: Halved in 1975? Check for NBER data integrity.
t(m1LW[1972 <= time & time <= 1978, .(time, Tennessee)])
```

	[,1]	[,2]	[,3]	[,4]	[,5]	[,6]	[,7]
time	1972	1973	1974	1975	1976	1977	1978
Tennessee	56164	56285	54606	51530	53270	55327	57529

This shows NBER data for Tennessee has a problem.

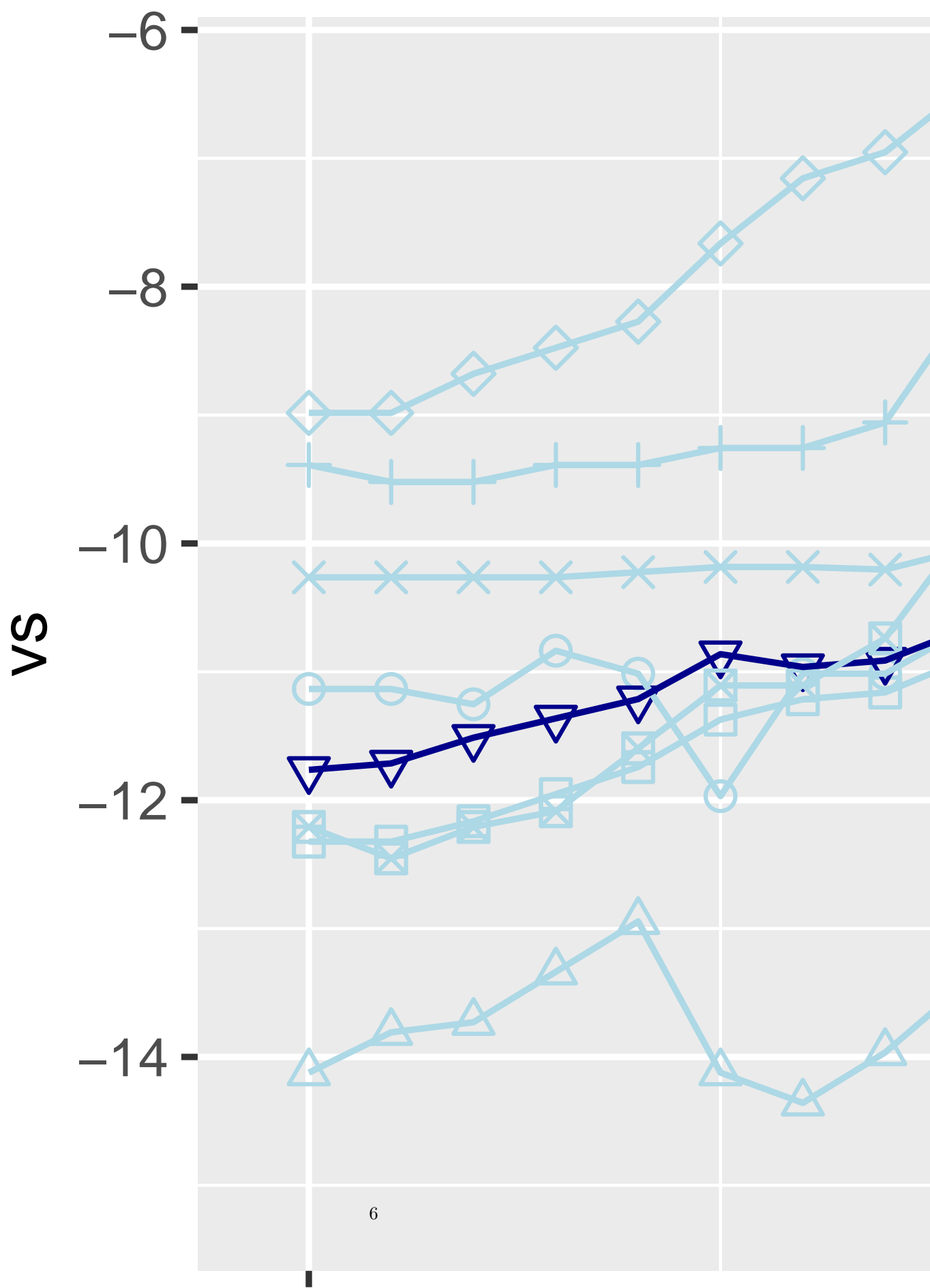
	StateName	time	v	vs LastNAYear	
1:	Illinois	1957	NA	NA	1957
2:	Indiana	1957	NA	NA	1957

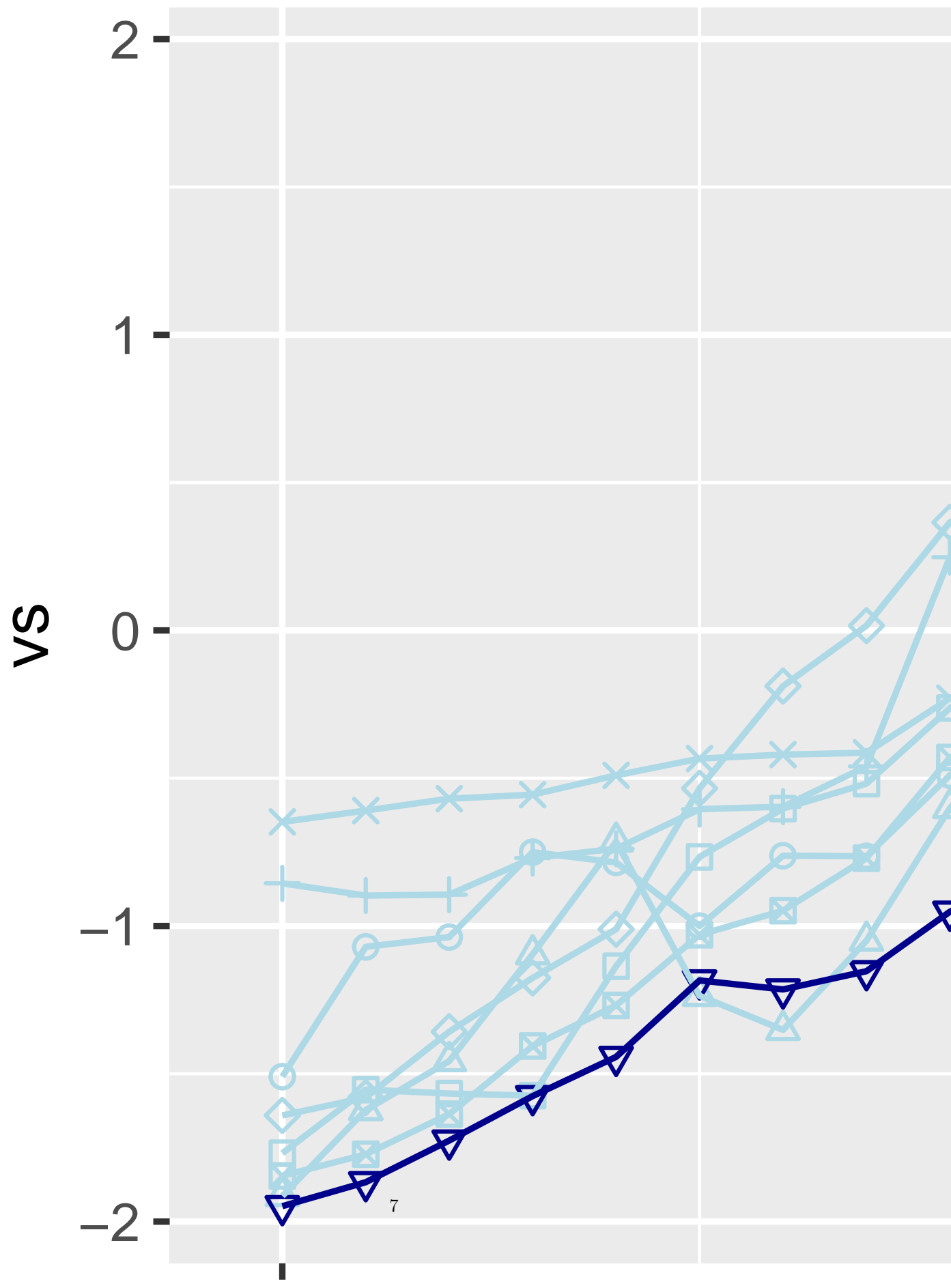
3:	Kentucky	1958	NA	NA	1958
4:	Louisiana	1958	NA	NA	1958
5:	Massachusetts	1956	NA	NA	1956
6:	New York	1957	NA	NA	1957
7:	North Carolina	1957	NA	NA	1957
8:	West Virginia	1957	NA	NA	1957

implied population

```
library(qs)
m1L <- qread(paste0(pathsave, "m1L.qs"))
m2L <- qread(paste0(pathsave, "m2L.qs"))
m12L <- merge(m2L, m1L, by = c("StateName", "time"), all = T)
m12L[, pop := round(v.y/(v.x/100), 0)]
m12L <- m12L[, .(StateName, time, pop)]

#### compute divorce rate
d2L <- qread(paste0(pathsave, "d2L.qs"))
d2L[, v := as.numeric(v)]
d12L <- merge(d2L, m12L, by = c("StateName", "time"))
setnames(d12L, "v", "case")
d12L[, v := round((case/pop)*100, 1)]
d12L[, vs := vs-vs[time==1974], by = .(StateName)]
d12L[, vs := v/var(v)^(.5), by = .(StateName)]
qsave(d12L, paste0(pathsave, "d12L.qs"))
```





Rate = marriages / 1000, where population is based on censuses (April 1 of 1960, 70, 80) and interpolated estimates of July 1 of each year.

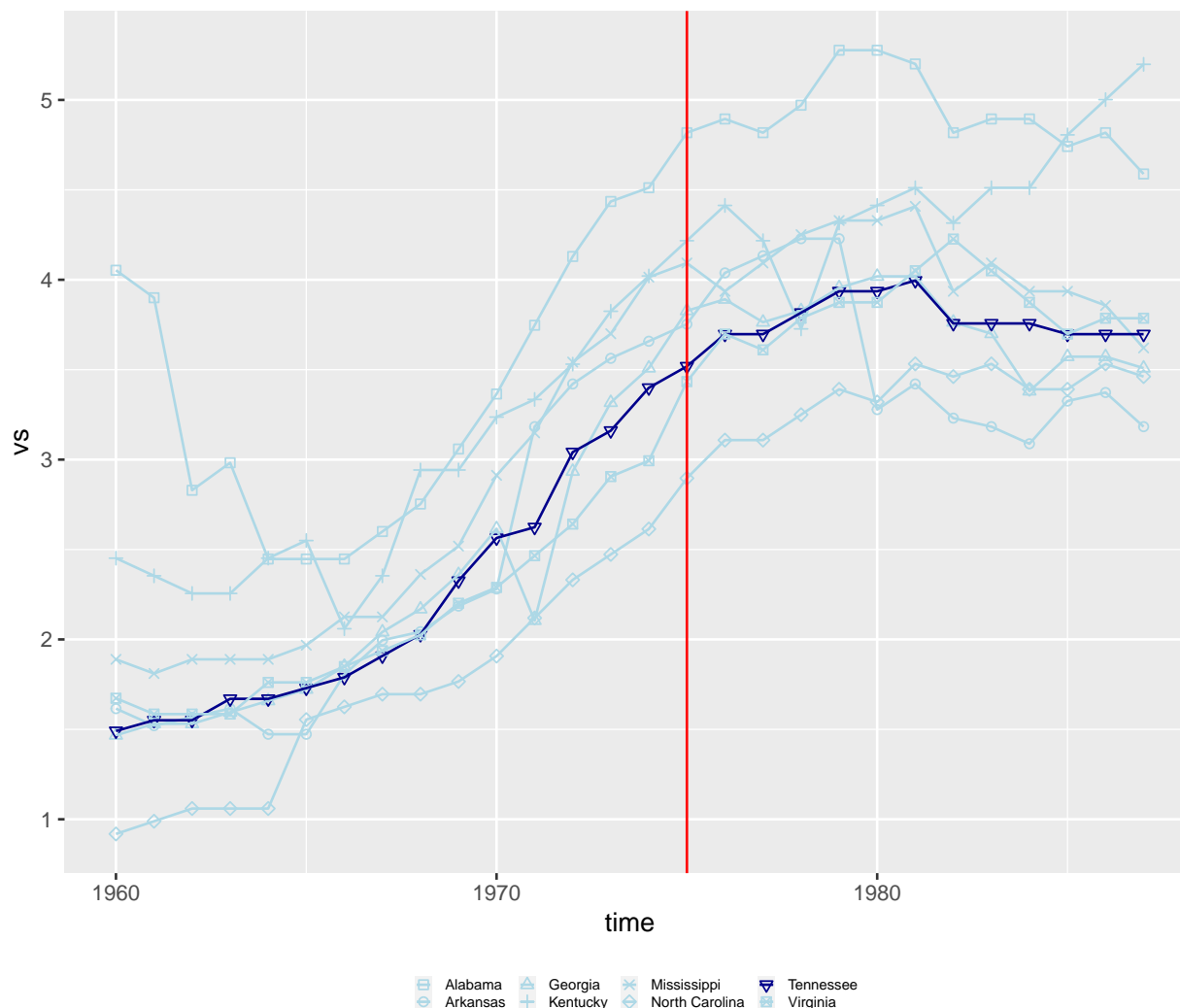


Figure 2: Divorce rates (standardized): Tennessee and contiguous states before and after *Dunn v. Palermo*

History of woman's name rights in the US

An overview

Most of the name right research starts with around 1900's, the period of no name right. Then proceeds to the 1970's when woman's name right was affirmed in various litigations.

There are many litigations that were negative on the right before the landmark *Stuart v. Board of Directors* (1972) and *Dunn v. Palermo* (1974) which gave affirmative decisions. In negating the right, many courts counted on *Chapman v Phoenix National Bank* (1881). As seen in below, however, *Chapman* is now regarded as an outlier that does not resonate well with historical legal precedents.^{*1} This follows from the research on common law in even earlier years of England.

^{*1}In *Davis and Roos* (1976), the court writes: It is our conclusion that history or precedent fails to support the "Chapman" enunciations.

In *Davis v. Roos* (1976), the court noted the earliest case in the common law right on woman's name: the common law of England on July 4, 1776, did not by operation of law engraft the husband's surname upon the wife.

Similarly, in *Malone v. Sullivan*, 124 Ariz. 469, 470 (Ariz. 1980), the English court in 1823 is quoted as:

It has been asserted in the argument, that a married woman cannot legally bear any other name than that which she has acquired in wedlock; but the fact is not so; a married woman may legally bear a different name from her husband, and very many living instances might be quoted in proof of the fact. [The King v. The Inhabitants of St. Faith's Newton, 3 Dowling Ryland Reports 348, 352.]

Malone v. Sullivan (1980)

It would appear that the custom of the wife's taking the name of the husband at the time of marriage remained just that, custom, and never became law. It was and is a question of choice and reputation.

We do not believe that *Chapman* is persuasive.

Another good historical summary is given by *Opinion No. 75-281* (1975), AG (Ops.Okla.Atty.Gen. Nov. 14, 1975). The oldest case being quoted in this opinion dates back to 1897: "Also, in *Rice v. State* (1897)*², the Court quoted the following language with approval."

It is said, the husband being the head of a family, the wife and children adopt his family name, — by custom, the wife is called by the husband's name; but whether marriage shall work any change of name at all is, after all, a mere question of choice, and either may take the other's name, or they may join their names together.

The most important phrase in this quote is "either may take the other's name" part that indicates bloom and bride may take their own or other's name. It acknowledges the woman's name right to use her maiden name. The last part, "or they may join their names together", refers to double barrell, including the hyphenated name, to be used. Although affirmative to woman's name right, it is not evident if it also affirms a couple to use different surnames.

The opinion goes on: "In *State v. Green* (1961)*³, the Court, in determining the validity of candidacy for office of a married woman who sought to have her maiden name listed on the ballot, examined the English common law, stating:"

It is only by custom, in English speaking countries, that a woman, upon marriage, adopts the surname of her husband in place of her father. . . . In England, from which came our customs with respect to names, a woman is permitted to retain her maiden surname upon marriage if she so desires.

M. Turner-Samuels, in his book on 'The Law of Married Women' at page 345 (Turner-Samuels 1957, 345), states: "In England, custom has long since ordained that a married woman takes her husband's name. This practice is not invariable; not compellable by law. *A wife may continue to use her maiden, married, or any other name she wishes to be known by.*"

Lamber (1973, 781) notes on the practice in the England:

Men sometimes adopted their wives' surnames, and it was common for children of prominent or wealthy women to adopt their mother's surname.

No name right (-1960)

Spencer (1973, 677) writes that courts have consistently held that a woman automatically assumes husband's surname by operation of law, not merely as a matter of custom. For starters, Spencer (1973, p.667) cites

*²37 Tex. Cr. R. 36, 38 S.W. 801 (1897)

*³114 Ohio App. 497, 177 N.E.2d 616 (1961)

NY Court of Appeals *Chapman v Phoenix National Bank No.85 NY (1881)* as the first important American case of not allowing woman's name rights:

. . . a woman, upon marriage, takes her husband's surname. That becomes her legal name, and *she ceases to be known by her maiden name. ... (snip) ... Her maiden name is absolutely lost, and she ceases to be known thereby.*

In *People ex rel. Rago v Lipsky (1941)*, the court cites *Freeman and Chapman ()* that declares (Spencer 1973, p.671)

. . . it is well settled by common-law principles and immemorial custom that *a woman upon marriage abandons her maiden name and takes her husband's surname.*^{*4}

However, the relationship between the law and the custom, where traditionally the law demands a woman to change the surname and is also accepted as a custom, began to switch in some courts. In Ohio, *State ex rel. Bucher v Brower (1941)* and *State, ex rel. Krupa v. Green (1961)*, court holds that a woman takes her husband's surname as a matter of custom, rather than automatic operation of law.

In *Forbush v. Wallace (Sep 28, 1971)*, Alabama District Court concludes that it is not a constitutional right for a woman to use her maiden name in the driver's license ^{*5}, but it no longer refers it as an operation of law.

After 1971

After *Forbush v. Wallace (Sep 28, 1971)*, the courts started to lean towards affirmative to woman's name right by referencing the common law stating anyone can choose own name without a legal proceeding. This is under the pretext that the common law regarded the Christian name, with the sanction of baptism behind it, as all important (*Rice v. Department of Health & Rehabilitative Services, 386 So. 2d 844 (Fla. Dist. Ct. App. 1980)*).

Legal experts started to question the restrictions imposed by statutes despite the common law name rights, as in *Bysiewicz and MacDonnell (1972, 603)*:

The absence of name change requirement at the time of marriage should invalidate any other effort to compel adoption of the husband's surname. *If the state wishes the two parties to take husband's surname at marriage, it can so provide; the only one that has done so is Hawaii.*^{*6}

As stated in *Matter of Halligan (1974)*,

Under the common law a person may change his or her name at will so long as there is no fraud, misrepresentation or interference with the rights of others (*Smith v. United States Cas. Co., 197 N.Y. 420, 428-429; Matter of Wing, 4 Misc.2d 840*). ... *Under common law the change is accomplished by usage or habit.*

Spencer (1973) notes that a challenge by woman's name right arises from incidental and accidental category where convenience of administrative procedure, such as court notification using husband's surname, is at issue, and the direct attack on marital surname rule category where the legal surname of woman is at issue, such as voter registration under the woman's maiden name.

The opinion also notes the divide in the legal decisions^{*7}.

^{*4}This is not an exact quote: Under common law principles and immemorial custom, upon marriage, woman abandons her maiden name and takes husband's surname, with which is used her own given name.

^{*5}. . . "plaintiff's motion" (that the Alabama Department of Public Safety's regulation that requires a married woman to use her husband's surname in obtaining a driver's license in violation of the Fourteenth Amendment to the United States Constitution) " ... is hereby denied."

^{*6}Hawaii § 574-a: Every married woman shall adopt her husband's surname as a family name.

^{*7}"A few courts have enunciated a common law rule that a woman, upon her marriage, takes her husband's surname by operation of law [*Chapman v. Phoenix National Bank, 85 N.Y. 437 (1881)*; *People ex rel. Rago v. Lipsky, 327 Ill. App. 63, 63 N.E.2d 462 (1945)*, *Forbush v. Wallace, 341 F. Supp. 217 (N.D. Ala. 1971)*]. However, the most comprehensive examination of the common law rule regarding a woman's surname upon marriage is *Stuart v. Board of Supervisors of Elections (1972)* [266 Md. 440, 295 A.2d 223, 225 (1972)], wherein the Court stated: 'What constitutes the correct legal name of a married woman

The opinion on the trends in 1970's notes that the *Stuart* case in 1972 marks the turnaround. It writes: "Of the recent decisions regarding a married woman's surname, the *Stuart* case is the better reasoned one. In it, the Court:"

. . . Recognized the common law right of any person, absent a statute to the contrary, . . . if a married woman could lawfully adopt an assumed name without legal proceedings, the Maryland law manifestly permitted *a married woman to retain her birth given name* by the same procedure of consistent, nonfraudulent use following her marriage.

Stuart's court also notes that the law does not automatically establish majority choice of using husband's surname as a law^{*8}.

Finally, the opinion decides on the Oklahoma case:^{*9}

The name that a woman assumes by marriage not being governed by statutory provisions, and the allowance by the exclusionary section of the Change of Name Act (viz., 1637, supra) of a change of name by marriage without formal court proceedings, permit a married woman to retain her maiden surname, or to assume her husband's surname and retain all or as much of her maiden name as she chooses.

Opinions of judges are found in <https://law.justia.com/> or <https://casetext.com/case/>. Another great resource is <https://commonlaw.name/> where legal cases of name changes are collected for each state.

Creating event date file

```
LFlist <- lapply(list(
  paste0(pathsave, "Augustine1997Footnote18.tex"),
  , paste0(pathsave, "MacDougallFootnote9.prn")
  , paste0(pathsave, "FirstYearAppearingInMacDougallFootnote9.prn")
), fread)
names(LFlist) <- c("Augustine", "MacDougall", "MacDougallYear")
setnames(LFlist[[2]], "reference", "ref")
```

MacDougall (1985, footnote9) and Augustine-Adams (1997, footnote18) list the legal cases in each state that women's name right was acknowledged for the first time in the judicial system.

```
sy <- merge(LFlist[[1]][, .(state, year, case, ref)], LFlist[[2]][,
  .(state, year, case, ref)],
  by = c("state", "case"), all = T, suffixes = c(".A", ".M"))
setkey(sy, state, year.A, year.M)
```

Show code

In below, I add excerpts from various legal documents.

[Click here to see code](#)

under common law principles is a question which has occasioned a sharp split of authorities..."

^{*8}That a married woman's surname does not become that of her husband where . . . she evidences a clear intent to consistently and nonfraudulently use her birth given name subsequent to her marriage. Thus . . . the mere fact of the marriage does not, as a matter of law, operate to establish the custom and tradition of the majority as a rule of law binding upon all. (p. 227)

^{*9}"With regard to voluntary name change, prior to the effective date of the Change of Name Act, supra, Oklahoma followed the common law rule stated in Syllabus 1 by the Court in *Huff v. State Election Board (1934)* [168 Okl. 277, 32 P.2d 920, 93 A.L.R. 906 (1934)]. A person may, at common law, change his or her name in good faith and for an honest purpose, by adopting a new name and transacting his or her business and holding himself or herself out under the new name, with the acquiescence and recognition of his or her friends and acquaintances, and this right is not abrogated by the Constitution or any statute of this state. The name that a woman assumes by marriage not being governed by statutory provisions, and the allowance by the exclusionary section of the Change of Name Act (viz., 1637, supra) of a change of name by marriage without formal court proceedings, permit a married woman to retain her maiden surname, or to assume her husband's surname and retain all or as much of her maiden name as she chooses."

```

sy[grepl("Alab", state), ref.M := paste(ref.M, "[Seiro added:] (https://casetext.com/case/state-v-taylor
sy[grepl("Ari", state) & grepl("Laks", case), ref.M := paste(ref.M, "[Seiro added:] (https://casetext.com/case/ari-v-laks
sy[grepl("Ari", state) & grepl("Mal", case), ref.M := paste(ref.M, "[Seiro added:] (https://casetext.com/case/ari-v-mal
sy[grepl("Ark", state) & grepl("Apr", ref.M), ref.M :=
  paste(ref.M, "[Seiro added:] (https://law.justia.com/cases/federal/district-courts/FSupp/391/1395/149
sy[grepl("Ark", state) & grepl("Pamela", ref.M), ref.M :=
  paste(ref.M, "[Seiro added:] (https://law.justia.com/cases/federal/district-courts/FSupp/391/1395/149
sy[grepl("Ark", state) & grepl("Walk", case), ref.M :=
  paste(ref.M, "[Seiro added:] (https://law.justia.com/cases/federal/district-courts/FSupp/391/1395/149
sy[grepl("Cal", state), ref.M :=
  paste(ref.M, "[Seiro added: Judge noted, in a petition for a divorce, a woman has the right to use her
sy[grepl("Cal", state) & grepl("Wea", case), ref.M :=
  paste(ref.M, "[Seiro added:] (https://casetext.com/case/weathers-v-superior-court#:~:text=Accordingly
sy[grepl("Cal", state) & grepl("Wea", case), ref.A :=
  paste(ref.A, "[Seiro added:] (https://casetext.com/case/weathers-v-superior-court#:~:text=the%20issue
sy[grepl("Conn", state) & grepl("Custer", case), ref.M :=
  paste(ref.M, "[Seiro added:] (https://casetext.com/case/custer-v-bonadies) Since the plaintiff married
sy[grepl("Dist", state) & grepl("Brown", case), ref.M :=
  paste(ref.M, "[Seiro added:] (https://casetext.com/case/brown-v-brown-423#:~:text=The%20case%20is%20re
sy[grepl("Flor", state) & grepl("Mar", case), ref.M :=
  paste(ref.M, "[Seiro added:] (https://casetext.com/case/marshall-v-state-133) Appellant, a married woman
sy[grepl("Fl", state) & grepl("Dav", case), ref.M :=
  paste(ref.M, "[Seiro added:] (https://casetext.com/case/davis-v-roos#:~:text=The%20decision%20in%20For
sy[grepl("Flo", state) & grepl("Hoop", case), ref.M :=
  paste(ref.M, "[Seiro added:] (https://casetext.com/case/in-re-hooper-2#p403:~:text=The%20right%20of%20
sy[grepl("Ge", state) & grepl("Att", case), ref.M :=
  paste(ref.M, "[Seiro added:] (https://commonlaw.name/GA-AG-Opinion-75-49.pdf) it is my official opinion
sy[grepl("Ha", state) & grepl("Stat", case), ref.M :=
  paste(ref.M, "[Seiro added:] (https://law.justia.com/cases/federal/district-courts/FSupp/466/714/2360
sy[grepl("Ill", state) & grepl("695", ref.M), ref.M :=
  paste(ref.M, "[Seiro added:] (https://ag.state.il.us/opinions/1974/S-695.pdf) It should be noted that
sy[grepl("Ill", state) & grepl("711", ref.M), ref.M :=
  paste(ref.M, "[Seiro added:] (https://ag.state.il.us/opinions/1974/S-711.pdf) if a woman upon marriage
sy[grepl("Ind", state) & grepl("Hau", case), ref.M :=
  paste(ref.M, "[Seiro added:] (https://casetext.com/case/in-re-hauptly) A woman has a common law right
sy[grepl("Io", state) & grepl("1980", ref.M), ref.M :=
  paste(ref.M, "[Seiro added:] (https://www.legis.iowa.gov/docs/publications/AGO/1043259.pdf) This is al
sy[grepl("Jer", state) & grepl("Lawre", case), ref.M :=
  paste(ref.M, "[Seiro added:] () Plaintiff appeals from the denial of her application for a change of
sy[grepl("Mai", state) & grepl("Reben", case), ref.M :=
  paste(ref.M, "[Seiro added:] (https://law.justia.com/cases/maine/supreme-court/1975/342-a-2d-688-0.htm
sy[grepl("Mary", state) & grepl("Klein", case), ref.M :=
  paste(ref.M, "[Seiro added:] (https://casetext.com/case/klein-v-klein-114#:~:text=Q.%20144%20\(1958\).-
####sy <- rbind(sy, data.table(state = "Maryland", year.M = 1972, case = "Stuart v Board of Elections",
#### ref.M = "266 Md. 440, 295 A.2d 223 (Md. 1972) [[This case is added by Seiro:](https://casetext.com/case/stuart-v-board-of-elections
sy[grepl("Mary", state) & grepl("Stu.*Boa", case), ref.M :=
  paste(ref.M, "[Seiro added:] (https://casetext.com/case/stuart-v-board-of-elections#:~:text=a%20woman
sy[grepl("Mass", state) & grepl("Lowe", case), ref.M :=
  paste(ref.M, "[Seiro added:] (https://law.justia.com/cases/massachusetts/supreme-court/1977/373-mass-
sy[grepl("Michi", state) & grepl("Pio", case), ref.M :=
  paste(ref.M, "[Seiro added:] (https://casetext.com/case/piotrowski-v-piotrowski#:~:text=There%20is%20
sy[grepl("Miss", state) & grepl("Natale", case), ref.M :=
  paste(ref.M, "[Seiro added:] (https://law.justia.com/cases/missouri/court-of-appeals/1975/35880-0.htm

```

```

sy[grepl("Neb", state) & grepl("Simm", case), ref.M :=
  paste(ref.M, "[Seiro added:](https://law.justia.com/cases/nebraska/supreme-court/1978/41739-1.html) ]
sy[grepl("New Hamp", state) & grepl("Mosk", case), ref.M :=
  paste(ref.M, "[Seiro added:](https://casetext.com/case/moskowitz-v-moskowitz-12) The court affirms i
sy[grepl("New Yor", state) & grepl("Halli", case), ref.M :=
  paste(ref.M, "[Seiro added:](https://casetext.com/case/matter-of-halligan-3) [Supreme Court's requir
sy[grepl("N.*Car", state) & grepl("Moh", case), ref.M :=
  paste(ref.M, "[Seiro added:](https://casetext.com/case/in-re-mohlman-1) Court of Appeals denied the p
sy[grepl("N.?Ca", state) & grepl("Brie", case), ref.M :=
  paste(ref.M, "[Seiro added:](https://law.justia.com/cases/federal/district-courts/FSupp/523/494/2298)
sy[grepl("N.*Ca", state) & grepl("Brie", case), ref.M :=
  paste(ref.M, "[Seiro added:](https://casetext.com/case/obrien-v-tilson#:~:text=3.-,North%20Carolina%)
sy[grepl("Ok", state) & grepl("Op", case), ref.M :=
  paste(ref.M, "[Seiro added:](https://casetext.com/case/sneed-v-sneed-3?__cf_chl_tk=GALYvgWoulOU8HLvq)
sy[grepl("Ok", state) & grepl("Snee", case), ref.M :=
  paste(ref.M, "[Seiro added:](https://casetext.com/case/sneed-v-sneed-3?__cf_chl_tk=GALYvgWoulOU8HLvq)
sy[grepl("Oh", state) & grepl("Ball", case), ref.M :=
  paste(ref.M, "[Seiro added:](https://casetext.com/case/ball-v-brown) n Ball v. Brown, 450 F. Supp. 4
sy[grepl("Rh", state) & grepl("Tra", case), ref.M :=
  paste(ref.M, "[Seiro added:](https://casetext.com/case/traugott-v-petit) Woman appealed from a judgm
sy[grepl("^Vir", state) & grepl("Strik", case), ref.M :=
  paste(ref.M, "[Seiro added:](https://casetext.com/case/in-re-strikwerda-and-antell#:~:text=should%20)
sy[grepl("^Vir", state) & grepl("Mill", case), ref.M :=
  paste(ref.M, "[Seiro added:](https://casetext.com/case/in-re-change-of-name-of-miller#:~:text=and%20)
sy[grepl("Was", state) & grepl("Doe", case), ref.M :=
  paste(ref.M, "[Seiro added:](https://casetext.com/case/doe-v-dunning#:~:text=the%20court%20saw-,%22n
sy[grepl("Wis", state) & grepl("Kru", case), ref.M :=
  paste(ref.M, "[Seiro added:](https://casetext.com/case/in-re-petition-of-kruzel) the issue presented

```

adding cases

```

sy <- rbind(sy, data.table(state = "New York", year.M = 1974, case = "Matter of Halligan",
  ref.M = "266 Md. 440, 295 A.2d 223 (Md. 1972) [[This case is added by Seiro:](https://casetext.com/c
sy <- rbind(sy, data.table(state = "South Dakota", year.M = 1975, case = "Ogle v. Cir. Ct., Tenth (Now
  ref.M = "227 N.W.2d 621 (S.D. 1975) [[Seiro added:](https://casetext.com/case/ogle-v-cir-ct-tenth-now
  use.names = T, fill = T)
sy <- rbind(sy, data.table(state = "Texas", year.M = 1974, case = "Op. Att'y Gen. H-432 (October 25, 19
  ref.M = " [[Seiro added, page 4:](https://www.texasattorneygeneral.gov/sites/default/files/opinion-fi

```

```

setkey(sy, state, year.A, year.M)
sy <- sy[state != "" & (year.M >= 1972 | year.A >= 1972), .(state, case, year.A, year.M, ref.A, ref.M)]
library(kableExtra)
# all cases
kbt <- kbl(sy, align = "lcccll",
  caption = "States with their first years in legal decisions : MacDougall and Augustine-Adams",
  format = "html")
kbt <- kable_styling(kbt, fixed_thead = T, full_width = F, position = "left")
kbt <- row_spec(kbt, seq(1, nrow(sy), 2), background="lightgray")
kbt <- column_spec(kbt, column = grep("case", colnames(sy)), width = "1.2cm")
kbt <- column_spec(kbt, column = 1, width = "2cm")
kbt <- column_spec(kbt, column = grep("year.A", colnames(sy)), width = "1.0cm")
kbt <- column_spec(kbt, column = grep("year.M", colnames(sy)), width = "1.0cm")
kbt <- column_spec(kbt, column = grep("ref.A", colnames(sy)), width = "5.5cm")
column_spec(kbt, column = grep("ref.M", colnames(sy)), width = "5.5cm")

```

States with their first years in legal decisions : MacDougall and Augustine-Adams

state

case

year.A

year.M

ref.A

ref.M

Alabama

State v. Taylor

1982

1982

415 So. 2d 1043, 1047

415 So. 2d 1043 (Ala. 1982) [Seiro added: a married woman's right to register to vote in her maiden name. ...(snip)... The Board of Registrars filed an answer ...(snip)... the legal name of a married woman is her husband's surname. ...(snip)... The trial judge held a hearing ...(snip)... The order directed the board to register Taylor and Theriot in their maiden surnames. ...(snip)... The judgment of the trial court is due to be affirmed.]

Alaska

Op. Att'y. Gen.

NA

1976

NA

Alaska (May 5, 1976)

Arizona

Laks v. Laks

NA

1975

NA

25 Ariz. App. 58, 540 P.2d 1277 (1975) [Seiro added: Divorced mother's right to rename children as MotherMaidenName-FatherSurName was rejected by the court.] [Seiro added: Appellant ... had, without appellee's consent, changed the surname of the three minor children ... to that of 'Eliot-Laks', Eliot being her maiden name. ...(snip)... the trial court found it was not in the best interest of the children to effectuate the name change. Primrock v. Wilson, 55 Ariz. 192, 100 P.2d 180 (1940). Affirmed.]

Arizona

Malone v. Sullivan

1980

1980

605 P.2d 447

124 Ariz. 469, 605 P.2d 447 (1980) [Seiro added: Did the commissioner abuse his discretion in refusing to consider petitioner's petition for dissolution of marriage because the petition was filed in petitioner's maiden or paternal surname rather than in her husband's surname? ...(snip)... Respondent's refusal to grant petitioner's petition solely because it was filed under her maiden surname was error.]

Arkansas

Op. Att'y Gen.

NA

1974

NA

Ark. No. 74-123 (Oct. 8, 1974) [Seiro added: Under Arkansas law a married woman may retain her maiden name, and if Pamela Walker did not change her name when she married she was entitled to be registered under her maiden name. <https://law.justia.com/cases/federal/district-courts/FSupp/391/1395/1494569/>] [Seiro added:]

Arkansas

Op. Att'y Gen.

NA

1974

NA

Ark. No. 74-75 (April 19, 1974) [Seiro added: an opinion from the Attorney General of Arkansas, rendered in April, 1974, to the effect that 'there is no Arkansas law which automatically changes a woman's name to that of her husband upon marriage:']

Arkansas

Walker v. Jackson

NA

1975

NA

391 F. Supp. 1395 (E.D. Ark. 1975) [Seiro added: Amendment 51 to the Constitution of the State of Arkansas, which amendment sets up a system of permanent registration for Arkansas voters ...(snip)... in the case of a woman her name as it appears on the affidavit must be prefixed by the word 'Miss' or 'Mrs.' so as to reflect her current or past marital status. There is no comparable requirement for male registrants. Plaintiffs claim that the section, as written and applied, is violative of the Ninth, Fourteenth and Nineteenth Amendments to the Constitution of the United States. ...(snip)... We hold, therefore, that the prefix requirement violates the Equal Protection Clause of the Fourteenth Amendment; ...(snip)... 'The Court finds that plaintiffs are entitled under Arkansas law to use whatever name they care to use as long as the use is not for fraudulent purposes.' As has been seen, that is also the view of the Attorney General of Arkansas, and it is also the view of this full Court.]

California

Op. Atty Gen.

NA

1974

NA

Cal. (March 12, 1974) [Seiro added: Judge noted, in a petition for a divorce, a woman has the right to use her maiden name to file the case.]

California

Weathers v. Superior Court

1976

1976

126 Cal. Rptr. 547 Ct. App. [Seiro added: the right of a wife who during marriage used her maiden name to petition for a dissolution of marriage in that name rather than the surname of her husband. We conclude that the wife has the right so to file her petition. ...(snip)... Accordingly, when a woman marries, she may choose to be known by the surname of her husband or by her maiden surname. ...(snip)... Although married, she may maintain an action in court using the name by which she was known prior to marriage. (Cherrigan v. City etc. of San Francisco, 262 Cal.App.2d 643, 653, June 3, 1968)]

54 Cal. App. 3d 286, 126 Cal. Rptr. 547 (1976) [Seiro added: Judge noted, in a petition for a divorce, a woman has the right to use her maiden name to file the case.] [Seiro added: Accordingly, when a woman marries, she may choose to be known by the surname of her husband or by her maiden surname. ... (snip) ... The trial court thus exceeded its jurisdiction in refusing to entertain wife's petition for dissolution of marriage solely because the petition was filed in wife's maiden name.]

Connecticut

Op. Att'y Gen.

NA

1975

NA

Conn. (Jan. 23, 1975)

Connecticut

Custer v. Bonadies

1974

1974

318 A.2d 639 Conn. Super. Ct.

30 Conn. Supp. 385, 318 A.2d 639 (Super. Ct. 1974) [Seiro added: Since the plaintiff married women established a clear legal right to register to vote under their maiden names, which they consistently use, and since no other adequate remedy exists, they are entitled to relief by mandamus.]

Delaware

Op. Att'y Gen.

NA

1974

NA

Del. (Aug. 7, 1974)

District of Columbia

Op. Corp. Counsel D.C.

NA

1975

NA

1975

District of Columbia

Brown v. Brown

1977

1978

384 A.2d 632, 632

382 A.2d 1038 (D.C. 1978), vacating 384 A.2d 632 (D.C. 1977) [Seiro added:] In this appeal from a judgment of divorce, appellant claims that the trial court erred in denying her request that her maiden name be restored. We agree and remand to the trial court with directions that appellant's maiden name be restored.]

Florida

1976 Op. Att'y Gen.

NA

1976

NA

Fla. 076-66 (March 24, 1976)

Florida

Davis v. Roos

NA

1976

NA

326 So. 2d 226 (Fla. Dist. Ct. App. 1976) [Seiro added: The decision in Forbush was squarely bottomed upon the court's observation that: 'Alabama has adopted the common law rule that upon marriage the wife by *operation of law* takes the husband's surname.' (Emphasis supplied.) Such may well be the common law as construed by the Alabama courts, however, after reviewing the extensive authorities on the subject, we conclude that the common law of England on July 4, 1776, did not by operation of law engraft the husband's surname upon the wife. In Florida there is not statute or judicial decision requiring a woman to take her husband's surname upon marriage. Although it is the general custom for a woman to change her name upon marriage to that of the husband, the law does not compel her to do so.]

Florida

In re Hooper

NA

1983

NA

436 So. 2d 401 (Fla. Dist. Ct. App. 1983) [Seiro added: The right of a woman to her birth-given name, notwithstanding marriage, is established under Florida law. See Marshall v. State, 301 So.2d 477 (Fla. 1st DCA 1974); Davis v. Roos, 326 So.2d 226 (Fla. 3d DCA 1976). See also Egner v. Egner, 133 N.J. Super. 403, 337 A.2d 46 (N.J. 1975).]

Florida

Pilch v. Pilch

NA

1984

NA

447 So. 2d 989 (Fla. Dist. Ct. App. 1984)

Florida

Marshall v. State

1974

1974

301 So. 2d 477 Fla. Dist. Ct. App.

301 So. 2d 477 (Fla. Dist. Ct. App. 1974) [Seiro added: Appellant, a married woman, filed a petition with the Leon County Circuit Court seeking to establish her maiden or birth name as her legal name even though she continued her marriage with her husband. There is nothing in Florida Statutes, § 62.031 which prohibits a married woman from establishing her birth name as her legal name even though her marriage relationship continues.]

Florida

FLA. ATr'y GEN. ANN. REP.

1976

NA

§076-66 at 120

NA

Georgia

Op. Att'y Gen.

NA

1975

NA

Ga. No. 75-49 (June 3, 1975) [Seiro added: it is my official opinion that a married woman's surname is that of her husband but that she may change her name for all legal purposes, including issuance of a driver's license, by judicial decree or by consistent usage of another name without resort to judicial proceedings.]

Georgia

Ga. Code Ann.

NA

1985

NA

§19-3-33.1 (Supp. 1985)

Hawaii

Hawaii Rev. Stat.

NA

1976

NA

§574-1 (1976) [Seiro added: Until 1975, it was required that every married woman shall adopt her husband's name as a 'family name.' H.R.S. § 574-1 (1968). This was changed in 1975 to allow a wife to retain her maiden name, or a husband to take his wife's surname, or either party to choose a hyphenated combination of both surnames, in either order. L.1975, ch. 114, § 1.]

Hawaii

Jech v. Burch

NA

1979

NA

466 F. Supp. 714 (D. Hawaii 1979)

Illinois

Op. Att'y Gen.

NA

1974

NA

Ill. No. S-711 (Feb. 25, 1974) [Seiro added: if a woman upon marriage does not assume her husband's surname but retains her maiden name, she is not required to notify the Secretary of State.]

Illinois

Op. Att'y Gen.

NA

1974

NA

Ill. S-695 (Feb. 13, 1974), both opinions indicating that Illinois does not follow *Rago v. Lipsky*, 327 Ill. App. 63, 63 N.E.2d 642 (1945) (country's sole case holding that a married woman takes her husband's surname as her "legal" name at common law) [Seiro added: It should be noted that in Illinois there is no statute which requires a woman to adopt assume, or change her own name to her husband's surname upon marriage.]

Indiana

In re Hauptly

1974

1974

312 N.E.2d 857

262 Ind. 150, 312 N.E.2d 857 (1974) [Seiro added: A woman has a common law right to do business in a name other than her married name. ... a person may change his name at will without any legal proceedings by merely adopting another name. The mere speculation by the State that the appellant's decision to change her name might cause embarrassment to her child was not sufficient to justify the trial court's denial of the appellant's petition for a name change.]

Iowa

Op. Att'y Gen.

NA

1980

NA

Iowa (March 25, 1980) [Seiro added: This is about hyphenated names which the Assistant Attorney General concurs to.]

Iowa

Iowa Code Ann.

NA

1981

NA

§595.5 (West 1981)

Kansas

Op. Att'y Gen.

NA

1973

NA

Kan. No. 73-47 (Feb. 1, 1973) following Gallop v. Shanahan No. 120, 456 (Dist. Ct. Shawnee County, Nov. 2, 1972), noted in Note, Constitutional Law-Equal Protection and Right of Suffrage Prohibits State From Cancelling Voter Registration of Newly Married Woman-Women Upon Marriage Do Not Necessarily Abandon Maiden Name, 21 U. Kan. L. Rev. 588 (1972-73)

Kentucky

Op. Att'y Gen.

NA

1974

NA

Ky. No. 74-902 (Dec. 26, 1974)

Kentucky

Op. Att'y Gen.

NA

1974

NA

Ky. No. 74-349 (May 14, 1974)

Kentucky

Op. Att'y Gen.

NA

1977

NA

Ky. No. 77-334 (May 23, 1977)

Kentucky

Op. Att’y Gen.

NA

1977

NA

Ky. No. 77-239 (April 13, 1977)

Kentucky

Memorandum Ky. Dept. Transportation

NA

1981

NA

(Oct. 30, 1981) (Kentucky Department of Transportation relinquishes position that a married woman must obtain driver’s license in her husband’s surname unless she has a court-ordered name “change”)

Louisiana

Boothe v. Papale

NA

1975

NA

No. 74-939 (E.D. La. Feb. 12, 1975) (Order granting plaintiffs Motion for Summary Judgment) [Seiro added: Affirms that, in Louisiana, it is customary for women to use the maiden name after marriage. (? , fn 54)]

Louisiana

Pugh v. Theall

NA

1977

NA

342 So. 2d 274 (La. Ct. App. 1977), cert. denied 344 So. 2d 1055 (La. 1977) [Seiro added: Affirms that, in Louisiana, it is customary for women to use the maiden name after marriage. <https://www.casemine.com/judgement/us/591494baadd7b049345c1e1e>]

Louisiana

La. Rev. Stat. Ann.

NA

1984

NA

§40:34.A.(1)(a)(iii) (West 1984) (statute relating to naming children at birth)

Maine

Op. Atty. Gen.

NA

1974

NA

Me. (April 12, 1974)

Maine

In re Reben

NA

1975

NA

342 A.2d 688 (Me. 1975) [Seiro added: the appellant first alleges that she has a right under the common law to choose any name she wishes, unless motivated by a fraudulent purpose, and that as the Judge of Probate found no fraudulent purpose, his denial of her petition was an abuse of discretion. ... (snip) ... We sustain her appeal. ... (snip) ... This opinion, also, will leave many questions unanswered, foremost, probably, the question whether a woman takes the surname of her husband at marriage by operation of law. Traditionally this has been the almost unanimous practice in this state, yet no statute has required it and no decision of this Court has ever affirmed it as being mandated by the common law.]

Maine

Op. Att'y Gen.

NA

1978

NA

Me. (April 4, 1978)

Maine

ME. Op. ATr'Y GEN.

1978

NA

WL 33940 Me.A.G.

NA

Maryland

Op. Att'y Gen.

NA

1972

NA

Md. (Nov. 30, 1972)

Maryland

Op. Att'y Gen.

NA

1974

NA

Md. (May 7, 1974)

Maryland

Op. Atty. Gen.

NA

1974

NA

Md.(March 30, 1974)

Maryland

Klein v. Klein

NA

1977

NA

36 Md. App. 177, 373 A.2d 86 (Ct. Spec. App. 1977) [Seiro added: That Maryland follows the common law with respect to a name change is no longer open to question. Hardy v. Hardy, 269 Md. 412, 306 A.2d 244 (1973); Stuart v. Board of Supervisors, 266 Md. 440, 295 A.2d 223 (1972); Romans v. State, 178 Md. 588, 16 A.2d 642 (1940); Hall v. Hall, supra. ...(snip)... We hold that it is an abuse of discretion to deny a woman who requests it at the time of divorce the restoration of her prenuptial name, absent illegal, fraudulent, or immoral purposes.]

Maryland

Goldin v. Goldin

NA

1981

NA

48 Md. App. 154, 426 A.2d 410 (Ct. Spec. App. 1981)

Maryland

Op. Att'y Gen.

NA

1983

NA

Md. (Jan. 20, 1983)

Maryland

Stuart v. Board of Supervisors

1972

1972

295 A.2d 223

266 Md. 440, 295 A.2d 223 (1972), noted in the right of a married woman to use her birth-given surname for voter registration, 32 Md. L. Rev. 409 (1973) [Seiro added: a woman may retain her birth name after marriage merely by consistently and nonfraudulently using it.]

Massachusetts

Mass. Ann.

NA

1983

NA

Laws ch. 46 §1D (Law. Co-op. Supp. 1983)

Massachusetts

MAss. Op. ATr'y GEN.

1974

NA

Number 5 at 48

NA

Massachusetts

Secretary of the Commonwealth v. City Clerk of Lowell

1977

1977

366 N.E.2d 717

373 Mass. 178, 366 N.E.2d 717 (1977) [Seiro added: In 1974 the Attorney General issued three opinions with respect to the recording and use of names. Rep. A.G., Pub. Doc. No. 12, at 105 (1974). Rep. A.G., Pub. Doc. No. 12, at 48 (1974). Rep. A.G., Pub. Doc. No. 12, at 72 (1974). Those opinions asserted and elaborated a common law principle that people may select or change their names freely if there is no fraudulent intent. The defendants, city and town clerks, refused to follow those opinions ...(snip)... We hold that the Attorney General is right and the city and town clerks are wrong, and order that the rights of the parties be declared accordingly. ...(snip)... A woman, regardless of her marital status, may change her name at will, without resorting to legal proceedings, provided it is done for an honest purpose. [187-189]]

Michigan

Op. Att'y Gen.

NA

1974

NA

Mich. No. 4834 (Oct. 2, 1974)

Michigan

Piotrowski v. Piotrowski

NA

1976

NA

71 Mich. App. 213, 247 N.W.2d 354 (1976) [Seiro added: There is no requirement that any person go through the courts to establish a legal change of name. ...(snip)... The circumstance that there is a minor child is not enough to support denial of the request. ...(znip)... Reversed and remanded for a decree to restore to plaintiff her maiden name.]

Michigan

Mich. Comp. Laws Ann.

NA

1980

NA

§333.2824(1) (West 1980) (statute relating to naming children at birth)

Michigan

Wood v. Detroit Edison

NA

1980

NA

409 Mich. 279, 294 N.W.2d 571 (1980)

Michigan

Jones v. Sanilac County Road Comm'n

NA

1983

NA

128 Mich. App. 569, 342 N.W.2d 532 (1983)

Minnesota

Minn. Stat. Ann.

NA

1985

NA

§517.08 (West Supp. 1985)

Missouri

In re Natale

NA

1975

NA

527 S.W.2d 402 (Mo. Ct. App. 1975) [Seiro added: On August 21, 1973, the court entered its order and judgment denying the Petition for Change of Name on the ground that 'Petitioner is lawfully married and resides with her legal spouse' and 'that under such circumstances the granting of said petition could be detrimental to others in the future.' The court's order did not specify who the 'others' were, but at the hearing, the court had commented, 'Where a married couple who do have and in the future are likely to have many obligations for which they are liable, I can see circumstances that would be detrimental . . . ?

It appears, therefore, that the trial court found that the fact of a woman's ongoing marriage is prima facie evidence of detriment to creditors sufficient to deny her petition for change of name. ...(snip)... Our research had disclosed no appellate decision in any state which affirmed the trial court's denial of a married woman's name change petition on the ground of an ongoing marriage. *Petition of Hauptly*, 312 N.E.2d 857 (Ind.1974); *Marshall v. State*, 301 So. 2d 477 (Fla.App.1974); *Application of Halligan*, 46 A.D.2d 170, 361 N.Y.S.2d 458 (1974); *Application of Lawrence*, 133 N.J.Super. 408, 337 A.2d 49 (Super.Ct.App. Div.1975). ...(snip)... The judgment is reversed and the trial court directed to issue its order changing petitioner's name as prayed.]

Missouri

Johnson v. Pacific Intermountain Expr. Co.

NA

1983

NA

662 S.W.2d 237 (Mo. 1983), cert denied 104 S. Ct. 2349 (1984)

Missouri

Miller v. Miller

NA

1984

NA

670 S.W.2d 591 (Mo. Ct. App. 1984)

Montana

Op. Att'y Gen.

NA

1974

NA

Mon. (May 1, 1974)

Montana

In re Natale

1975

NA

527 S.W.2d 402, 404-05 Mo. Ct. App.

NA

Nebraska

Neb. Rev. Stat.

NA

1984

NA

§71-640.01 (1984) (statute relating to naming children at birth)

Nebraska

Simmons v. O'Brien

1978

1978

272 N.W.2d 273

201 Neb. 778, 272 N.W.2d 273 (1978) [Seiro added: District Court denying a decree of dissolution. We reverse and remand with directions. The sole and only issue is whether the District Court erred in refusing to grant a decree of dissolution on the ground that it lacked jurisdiction because of the form of name used in the petition for dissolution. ...(snip)... At common law a married woman could legally bear a different name from her husband. *The King v. The Inhabitants of St. Faith's Newton* (1823), 3 Dowling & Ryland's Reports 348, *Kruzel v. Podell*, 67 Wis.2d 138, 226 N.W.2d 458.]

New Hampshire

Moskowitz v. Moskowitz

NA

1978

NA

118 N.H. 199, 385 A.2d 120 (1978) [Seiro added: The court affirms its prior decree wherein it found as a fact that it would not be in the best interest of the family unit to permit said change of name. The recommendation was approved by Perkins, J (of probate court, added by seiro). ...(snip)... We (NH Supreme Court, added by Seiro) do not suggest that every petition for a change of name be granted, but rather hold that some substantial reason must exist for denying such a petition. The mere fact that there are children is not sufficient ground. ...(snip)... Remanded.]

New Hampshire

N.H. Rev. Stat. Ann.

NA

1983

NA

§126.6-a (1983) (statute relating to naming children at birth) [Seiro added: Until 1975, it was required that every married woman shall adopt her husband's name as a 'family name.' H.R.S. § 574-1 (1968). This was changed in 1975 to allow a wife to retain her maiden name, or a husband to take his wife's surname, or either party to choose a hyphenated combination of both surnames, in either order. L.1975, ch. 114, § 1.]

New Jersey

Op. Att'y Gen.

NA

1975

NA

N.J. No. 20-1975 (Aug. 26, 1975)

New Jersey

In re Lawrence

1975

1975

337 A.2d 49, 51 N.J. Super. Ct. App. Div.

133 N.J. Super. 408, 337 A.2d 49 (1975) [Seiro added: Plaintiff appeals from the denial of her application for a change of name under N.J.S.A. 2A:52-1 from her married to her maiden name...(snip)... The trial judge, in an opinion published in 128 N.J. Super. 312 (Law Div. 1974), concluded: This court has great concern for the stability of the family and the marriage relationship. ...(snip)... an abuse of the trial judge's discretion. Reversed and remanded for entry of judgment in accordance herewith.]

New York

Matter of Halligan

NA

1974

NA

266 Md. 440, 295 A.2d 223 (Md. 1972) [This case is added by Seiro: Supreme Court's requirement that petitioner show 'a compelling reason' for the change, improperly imposed a burden of persuasion upon her beyond that required by the statute...No reasonable objection appearing, appellant is entitled to her requested order declaring that she shall be known by her maiden name of Ryan, and no other.]

New York

N.Y. Civ. Rights Law

NA

1985

NA

§§64, 65 (McKinney Supp. 1985)

New York

N.Y. Dom. Rel. Law

NA

1985

NA

§§14-a(1), 15(1), 240-a (McKinney Supp. 1985)

New York

In re Halligan

1974

1974

361 N.Y.S.2d 458 App. Div.

46 A.D.2d 170, 361 N.Y.S.2d 458 (App. Div. 1974) [Seiro added: Supreme Court's requirement that petitioner show 'a compelling reason' for the change, improperly imposed a burden of persuasion upon her beyond that required by the statute. ...(snip)... The order should be reversed and the petition granted.]

North Carolina

O'Brien v. Tilson

NA

1981

NA

523 F. Supp. 494 (E.D.N.C. 1981) [Seiro added: North Carolina General Statute § 130-50(e) be, and the same is hereby adjudged and declared void and of no force or effect insofar as it precludes plaintiffs from recording the surnames of their choice on the birth certificates of their children called for under N.C.G.S. § 130-50(e).]

North Carolina

N.C. Gen.

NA

1983

NA

Stat. §130-A-101(c) (Supp. 1983) (statute relating to naming children at birth)

North Carolina

In re Mohlman

1975

1975

216 S.E.2d 147 N.C. Ct. App.

26 N.C. App. 220, 216 S.E.2d 147 (1975) [Seiro added: Court of Appeals denied the petition of a married woman to use her maiden name. ..(snip)... To the extent that the court (of appeals), in denying relief and dismissing the petition, based its action upon its finding that the relief sought is unnecessary, it did so erroneously.]

North Dakota

Op. Att'y Gen.

NA

1974

NA

N.D. (March 20, 1974)

Ohio

Ball v. Brown

1977

1977

450 F. Supp. 4 N.D.

450 F. Supp. 4 (N.D. Ohio 1977) [Seiro added: n Ball v. Brown, 450 F. Supp. 4, 10 (N.D. Ohio 1977), an Ohio statute requiring automatic cancellation of a woman's registration form following a change in marital status was found to violate the federal voting rights statute, 42 U.S.C. § 1971.]

Oklahoma

Op. Att'y Gen.

NA

1975

NA

Okla. (Nov. 14, 1975) [Seiro added: *Opinion No. 75-281 (1975)*, AG (Ops.Okla.Atty.Gen. Nov. 14, 1975) ... permit a married woman to retain her maiden surname, or to assume her husband's surname and retain all or as much of her maiden name as she chooses.]

Oklahoma

Sneed v. Sneed

NA

1978

NA

585 P.2d 1363 (Okla. 1978) [Seiro added: the trial court refused to restore Mrs. Sneed's maiden name because she had a minor child ...(snip)... At common law a married woman was not compelled to adopt her husband's surname. ... (snip)... Reversed and remanded with directions.]

Oregon

Ore. Rev. Stat.

NA

1983

NA

§106.220 (1983)

Pennsylvania

Op. Att'y Gen.

NA

1973

NA

Pa. No. 72 (Oct. 25, 1973)

Pennsylvania

Op. Att'y Gen.

NA

1973

NA

Pa. No. 62 (Aug. 20, 1973)

Pennsylvania

Op. Att'y Gen.

NA

1974

NA

Pa. No. 8 (Jan. 31, 1974)

Rhode Island

Traugott v. Petit

1979

1979

404 A.2d 77

122 R.I. 60, 404 A.2d 77 (1979) [Seiro added: Woman appealed from a judgment of the Superior Court, Providence and Bristol County, Needham, J., which decreed, *inter alia*, that married women who wished to register a motor vehicle or apply for operator's license must use their Christian names followed by their husband's surnames. Appeal sustained; judgment reversed; case remanded.]

South Carolina

Op. Att'y Gen.

NA

1974

NA

S.C. (Dec. 12, 1974)

South Carolina

Op. Atty. Gen.

NA

1975

NA

S.C. (June 6, 1975)

South Dakota

Ogle v. Cir. Ct., Tenth (Now 6th) Jud. Cir

NA

1975

NA

227 N.W.2d 621 (S.D. 1975) [Seiro added: we conclude that the trial court abused its discretion in denying the petition without giving petitioner an opportunity to present further evidence.]

South Dakota

Op. Att'y Gen.

NA

1977

NA

S.D. No. 77-31 (April 15, 1977) (interpreting Ogle v. Circuit Court 89 S.D. 18, 227 N.W.2d 621 (1975))

Tennessee

Dunn v. Palermo

NA

1975

NA

522 S.W.2d 679 (Tenn. 1975)

Tennessee

Tenn. Code Ann.

NA

1983

NA

§68-3-305 (1983) (statute relating to naming children at birth)

Texas

Op. Att’y Gen.

NA

1974

NA

Tex. No. H-432 (Oct. 25, 1974)

Texas

Op. Att’y Gen. H-432 (October 25, 1974) Re: Whether a woman is required to assume her husband’s surname as her own

NA

1974

NA

[Seiro added, page 4: under this statute a woman retained her common law right to choose at marriage either to keep her name prior to marriage or to assume her husband’s surname.]

Texas

Op. Att’y Gen.

NA

1980

NA

Tex. No. MW-225 (Aug. 21, 1980) (says that a married woman may vote under a hyphenated last name, of her “maiden name” and her husband’s name)

Vermont

Op. Att’y Gen.

NA

1974

NA

Vt. No. 179 (Feb. 4, 1974)

Virginia

Op. Att’y Gen.

NA

1973

NA

Va. (June 6, 1973) (re voting)

Virginia

In re Strikwerda

1975

1975

220 S.E.2d 245

216 Va. 470, 220 S.E.2d 245 (1975) [Seiro added: Since husband supports wife's petition, there is little likelihood that name change would have disruptive effect on the family, and it was abuse of discretion to deny petition after finding that it was not filed for illegal, fraudulent or immoral purpose. ...(snip)... Reversed and remanded.]

Virginia

In re Miller

1978

1978

243 S.E.2d 464

218 Va. 939, 243 S.E.2d 464 (1978) [Seiro added: Married woman entitled to resume maiden name under common law as applied to petitions under Code Sec. 8-577.1 (now with changes Sec. 8.01-217).]

Washington

Doe v. Dunning

NA

1976

NA

87 Wash. 2d 50, 549 P.2d 1 (1976) [Seiro added: no legal impediment which would prevent married parents from giving the child the mother's surname.]

West Virginia

Op. Att'y Gen.

NA

1975

NA

W. Va. (April 30, 1975)

Wisconsin

Op. Att'y Gen.

NA

1977

NA

Wis. No. 7-77 (Jan. 31, 1977)

Wisconsin
 Op. Att’y Gen.
 NA
 1982
 NA
 Wis. (Sept. 21, 1982)
 Wisconsin
 Kruzel v. Podell
 1975
 1975
 226 N.W.2d 458,459

67 Wis. 2d 138, 226 N.W.2d 458 (1975) [Seiro added: the issue presented was ‘whether upon marriage a woman is required by law to assume the surname of her husband.’ ...(snip)... Since we conclude in this case that Kathleen Rose Harney was never compelled to change her name, nor did she ever in fact adopt the surname Kruzel by usage, her petition, although ostensibly brought under sec. 296.36, Stats. 1971, amounted only to a request for judicial recognition that she had been correct in using her maiden surname in the past.]

[Click here to see tables by match results](#)

```
# matching cases
sy1 <- sy[!is.na(year.M) & !is.na(year.A), .(state, year.M, case, ref.M)]
kbt <- kbl(sy1, align = "rc11",
  caption = "States with their first years in legal decisions : Matching in MacDougall and Augustine-Adams",
  format = "html")
kbt <- kable_styling(kbt, fixed_thead = T, full_width = F, position = "left")
kbt <- row_spec(kbt, seq(1, nrow(sy1), 2), background="lightgray")
kbt <- column_spec(kbt, column = 3, width = "2cm")
kbt <- column_spec(kbt, column = 1, width = "2cm")
column_spec(kbt, column = 4, width = "10cm")
```

States with their first years in legal decisions : Matching in MacDougall and Augustine-Adams

state
 year.M
 case
 ref.M
 Alabama
 1982
 State v. Taylor

415 So. 2d 1043 (Ala. 1982) [Seiro added: a married woman’s right to register to vote in her maiden name. ...(snip)... The Board of Registrars filed an answer ...(snip)... the legal name of a married woman is her husband’s surname. ...(snip)... The trial judge held a hearing ...(snip)... The order directed the board to register Taylor and Theriot in their maiden surnames. ...(snip)... The judgment of the trial court is due to be affirmed.]

Arizona
 1980

Malone v. Sullivan

124 Ariz. 469, 605 P.2d 447 (1980) [Seiro added: Did the commissioner abuse his discretion in refusing to consider petitioner's petition for dissolution of marriage because the petition was filed in petitioner's maiden or paternal surname rather than in her husband's surname? ...(snip)... Respondent's refusal to grant petitioner's petition solely because it was filed under her maiden surname was error.]

California

1976

Weathers v. Superior Court

54 Cal. App. 3d 286, 126 Cal. Rptr. 547 (1976) [Seiro added: Judge noted, in a petition for a divorce, a woman has the right to use her maiden name to file the case.] [Seiro added: Accordingly, when a woman marries, she may choose to be known by the surname of her husband or by her maiden surname. ... (snip) ... The trial court thus exceeded its jurisdiction in refusing to entertain wife's petition for dissolution of marriage solely because the petition was filed in wife's maiden name.]

Connecticut

1974

Custer v. Bonadies

30 Conn. Supp. 385, 318 A.2d 639 (Super. Ct. 1974) [Seiro added: Since the plaintiff married women established a clear legal right to register to vote under their maiden names, which they consistently use, and since no other adequate remedy exists, they are entitled to relief by mandamus.]

District of Columbia

1978

Brown v. Brown

382 A.2d 1038 (D.C. 1978), vacating 384 A.2d 632 (D.C. 1977) [Seiro added:] In this appeal from a judgment of divorce, appellant claims that the trial court erred in denying her request that her maiden name be restored. We agree and remand to the trial court with directions that appellant's maiden name be restored.]

Florida

1974

Marshall v. State

301 So. 2d 477 (Fla. Dist. Ct. App. 1974) [Seiro added: Appellant, a married woman, filed a petition with the Leon County Circuit Court seeking to establish her maiden or birth name as her legal name even though she continued her marriage with her husband. There is nothing in Florida Statutes, § 62.031 which prohibits a married woman from establishing her birth name as her legal name even though her marriage relationship continues.]

Indiana

1974

In re Hauptly

262 Ind. 150, 312 N.E.2d 857 (1974) [Seiro added: A woman has a common law right to do business in a name other than her married name. ... a person may change his name at will without any legal proceedings by merely adopting another name. The mere speculation by the State that the appellant's decision to change her name might cause embarrassment to her child was not sufficient to justify the trial court's denial of the appellant's petition for a name change.]

Maryland

1972

Stuart v. Board of Supervisors

266 Md. 440, 295 A.2d 223 (1972), noted in the right of a married woman to use her birth-given surname for voter registration, 32 Md. L. Rev. 409 (1973) [Seiro added: a woman may retain her birth name after marriage merely by consistently and nonfraudulently using it.]

Massachusetts

1977

Secretary of the Commonwealth v. City Clerk of Lowell

373 Mass. 178, 366 N.E.2d 717 (1977) [Seiro added: In 1974 the Attorney General issued three opinions with respect to the recording and use of names. Rep. A.G., Pub. Doc. No. 12, at 105 (1974). Rep. A.G., Pub. Doc. No. 12, at 48 (1974). Rep. A.G., Pub. Doc. No. 12, at 72 (1974). Those opinions asserted and elaborated a common law principle that people may select or change their names freely if there is no fraudulent intent. The defendants, city and town clerks, refused to follow those opinions ...(snip)... We hold that the Attorney General is right and the city and town clerks are wrong, and order that the rights of the parties be declared accordingly. ...(snip)... A woman, regardless of her marital status, may change her name at will, without resorting to legal proceedings, provided it is done for an honest purpose. [187-189]]

Nebraska

1978

Simmons v. O'Brien

201 Neb. 778, 272 N.W.2d 273 (1978) [Seiro added: District Court denying a decree of dissolution. We reverse and remand with directions. The sole and only issue is whether the District Court erred in refusing to grant a decree of dissolution on the ground that it lacked jurisdiction because of the form of name used in the petition for dissolution. ...(snip)... At common law a married woman could legally bear a different name from her husband. The King v. The Inhabitants of St. Faith's Newton (1823), 3 Dowling & Ryland's Reports 348, Kruzel v. Podell, 67 Wis.2d 138, 226 N.W.2d 458.]

New Jersey

1975

In re Lawrence

133 N.J. Super. 408, 337 A.2d 49 (1975) [Seiro added: Plaintiff appeals from the denial of her application for a change of name under N.J.S.A. 2A:52-1 from her married to her maiden name...(snip)... The trial judge, in an opinion published in 128 N.J. Super. 312 (Law Div. 1974), concluded: This court has great concern for the stability of the family and the marriage relationship. ...(snip)... an abuse of the trial judge's discretion. Reversed and remanded for entry of judgment in accordance herewith.]

New York

1974

In re Halligan

46 A.D.2d 170, 361 N.Y.S.2d 458 (App. Div. 1974) [Seiro added: Supreme Court's requirement that petitioner show 'a compelling reason' for the change, improperly imposed a burden of persuasion upon her beyond that required by the statute. ...(snip)... The order should be reversed and the petition granted.]

North Carolina

1975

In re Mohlman

26 N.C. App. 220, 216 S.E.2d 147 (1975) [Seiro added: Court of Appeals denied the petition of a married woman to use her maiden name. ...(snip)... To the extent that the court (of appeals), in denying relief and dismissing the petition, based its action upon its finding that the relief sought is unnecessary, it did so erroneously.]

Ohio

1977

Ball v. Brown

450 F. Supp. 4 (N.D. Ohio 1977) [Seiro added: n Ball v. Brown, 450 F. Supp. 4, 10 (N.D. Ohio 1977), an Ohio statute requiring automatic cancellation of a woman's registration form following a change in marital status was found to violate the federal voting rights statute, 42 U.S.C. § 1971.]

Rhode Island

1979

Traugott v. Petit

122 R.I. 60, 404 A.2d 77 (1979) [Seiro added: Woman appealed from a judgment of the Superior Court, Providence and Bristol County, Needham, J., which decreed, *inter alia*, that married women who wished to register a motor vehicle or apply for operator's license must use their Christian names followed by their husband's surnames. Appeal sustained; judgment reversed; case remanded.]

Virginia

1975

In re Strikwerda

216 Va. 470, 220 S.E.2d 245 (1975) [Seiro added: Since husband supports wife's petition, there is little likelihood that name change would have disruptive effect on the family, and it was abuse of discretion to deny petition after finding that it was not filed for illegal, fraudulent or immoral purpose. ...(snip)... Reversed and remanded.]

Virginia

1978

In re Miller

218 Va. 939, 243 S.E.2d 464 (1978) [Seiro added: Married woman entitled to resume maiden name under common law as applied to petitions under Code Sec. 8-577.1 (now with changes Sec. 8.01-217).]

Wisconsin

1975

Kruzel v. Podell

67 Wis. 2d 138, 226 N.W.2d 458 (1975) [Seiro added: the issue presented was 'whether upon marriage a woman is required by law to assume the surname of her husband.' ...(snip)... Since we conclude in this case that Kathleen Rose Harney was never compelled to change her name, nor did she ever in fact adopt the surname Kruzel by usage, her petition, although ostensibly brought under sec. 296.36, Stats. 1971, amounted only to a request for judicial recognition that she had been correct in using her maiden surname in the past.]

only in MacDougall

```
sy2 <- sy[!is.na(year.M) & is.na(year.A), .(state, year.M, case, ref.M)]
```

```
kbt <- kbl(sy2, align = "rcll",
```

```
  caption = "States with their first years in legal decisions: Only in MacDougall",
```

```
  format = "html")
```

```
kbt <- kable_styling(kbt, fixed_thead = T, full_width = F, position = "left")
```

```
kbt <- row_spec(kbt, seq(1, nrow(sy2), 2), background="lightgray")
kbt <- column_spec(kbt, column = 3, width = "2cm")
kbt <- column_spec(kbt, column = 1, width = "2cm")
column_spec(kbt, column = 4, width = "10cm")
```

States with their first years in legal decisions: Only in MacDougall

state

year.M

case

ref.M

Alaska

1976

Op. Att'y. Gen.

Alaska (May 5, 1976)

Arizona

1975

Laks v. Laks

25 Ariz. App. 58, 540 P.2d 1277 (1975) [Seiro added: Divorced mother's right to rename children as MotherMaidenName-FatherSurName was rejected by the court.] [Seiro added: Appellant ... had, without appellee's consent, changed the surname of the three minor children ... to that of 'Eliot-Laks', Eliot being her maiden name. ...(snip)... the trial court found it was not in the best interest of the children to effectuate the name change. Primrock v. Wilson, 55 Ariz. 192, 100 P.2d 180 (1940). Affirmed.]

Arkansas

1974

Op. Att'y Gen.

Ark. No. 74-123 (Oct. 8, 1974) [Seiro added: Under Arkansas law a married woman may retain her maiden name, and if Pamela Walker did not change her name when she married she was entitled to be registered under her maiden name. <https://law.justia.com/cases/federal/district-courts/FSupp/391/1395/1494569/>] [Seiro added:]

Arkansas

1974

Op. Att'y Gen.

Ark. No. 74-75 (April 19, 1974) [Seiro added: an opinion from the Attorney General of Arkansas, rendered in April, 1974, to the effect that 'there is no Arkansas law which automatically changes a woman's name to that of her husband upon marriage.']

Arkansas

1975

Walker v. Jackson

391 F. Supp. 1395 (E.D. Ark. 1975) [Seiro added: Amendment 51 to the Constitution of the State of Arkansas, which amendment sets up a system of permanent registration for Arkansas voters ...(snip)... in the case of a woman her name as it appears on the affidavit must be prefixed by the word 'Miss' or 'Mrs.' so as to reflect her current or past marital status. There is no comparable requirement for male

registrants. Plaintiffs claim that the section, as written and applied, is violative of the Ninth, Fourteenth and Nineteenth Amendments to the Constitution of the United States. ...(snip)... We hold, therefore, that the prefix requirement violates the Equal Protection Clause of the Fourteenth Amendment; ...(snip)... ‘The Court finds that plaintiffs are entitled under Arkansas law to use whatever name they care to use as long as the use is not for fraudulent purposes.’ As has been seen, that is also the view of the Attorney General of Arkansas, and it is also the view of this full Court.]

California

1974

Op. Atty Gen.

Cal. (March 12, 1974) [Seiro added: Judge noted, in a petition for a divorce, a woman has the right to use her maiden name to file the case.]

Connecticut

1975

Op. Att’y Gen.

Conn. (Jan. 23, 1975)

Delaware

1974

Op. Att’y Gen.

Del. (Aug. 7, 1974)

District of Columbia

1975

Op. Corp. Counsel D.C.

1975

Florida

1976

1976 Op. Att’y Gen.

Fla. 076-66 (March 24, 1976)

Florida

1976

Davis v. Roos

326 So. 2d 226 (Fla. Dist. Ct. App. 1976) [Seiro added: The decision in Forbush was squarely bottomed upon the court’s observation that: ‘Alabama has adopted the common law rule that upon marriage the wife by *operation of law* takes the husband’s surname.’ (Emphasis supplied.) Such may well be the common law as construed by the Alabama courts, however, after reviewing the extensive authorities on the subject, we conclude that the common law of England on July 4, 1776, did not by operation of law engraft the husband’s surname upon the wife. In Florida there is not statute or judicial decision requiring a woman to take her husband’s surname upon marriage. Although it is the general custom for a woman to change her name upon marriage to that of the husband, the law does not compel her to do so.]

Florida

1983

In re Hooper

436 So. 2d 401 (Fla. Dist. Ct. App. 1983) [Seiro added: The right of a woman to her birth-given name, notwithstanding marriage, is established under Florida law. See *Marshall v. State*, 301 So.2d 477 (Fla. 1st DCA 1974); *Davis v. Roos*, 326 So.2d 226 (Fla. 3d DCA 1976). See also *Egner v. Egner*, 133 N.J. Super. 403, 337 A.2d 46 (N.J. 1975).]

Florida

1984

Pilch v. Pilch

447 So. 2d 989 (Fla. Dist. Ct. App. 1984)

Georgia

1975

Op. Att'y Gen.

Ga. No. 75-49 (June 3, 1975) [Seiro added: it is my official opinion that a married woman's surname is that of her husband but that she may change her name for all legal purposes, including issuance of a driver's license, by judicial decree or by consistent usage of another name without resort to judicial proceedings.]

Georgia

1985

Ga. Code Ann.

§19-3-33.1 (Supp. 1985)

Hawaii

1976

Hawaii Rev. Stat.

§574-1 (1976) [Seiro added: Until 1975, it was required that every married woman shall adopt her husband's name as a 'family name.' H.R.S. § 574-1 (1968). This was changed in 1975 to allow a wife to retain her maiden name, or a husband to take his wife's surname, or either party to choose a hyphenated combination of both surnames, in either order. L.1975, ch. 114, § 1.]

Hawaii

1979

Jech v. Burch

466 F. Supp. 714 (D. Hawaii 1979)

Illinois

1974

Op. Att'y Gen.

Ill. No. S-711 (Feb. 25, 1974) [Seiro added: if a woman upon marriage does not assume her husband's surname but retains her maiden name, she is not required to notify the Secretary of State.]

Illinois

1974

Op. Att'y Gen.

Ill. S-695 (Feb. 13, 1974), both opinions indicating that Illinois does not follow *Rago v. Lipsky*, 327 Ill. App. 63, 63 N.E.2d 642 (1945) (country's sole case holding that a married woman takes her husband's surname as her "legal" name at common law) [Seiro added: It should be noted that in Illinois there is no statute which requires a woman to adopt assume, or change her own name to her husband's surname upon marriage.]

Iowa

1980

Op. Att'y Gen.

Iowa (March 25, 1980) [Seiro added: This is about hyphenated names which the Assistant Attorney General concurs to.]

Iowa

1981

Iowa Code Ann.

§595.5 (West 1981)

Kansas

1973

Op. Att'y Gen.

Kan. No. 73-47 (Feb. 1, 1973) following *Gallop v. Shanahan* No. 120, 456 (Dist. Ct. Shawnee County, Nov. 2, 1972), noted in Note, Constitutional Law-Equal Protection and Right of Suffrage Prohibits State From Cancelling Voter Registration of Newly Married Woman-Women Upon Marriage Do Not Necessarily Abandon Maiden Name, 21 U. Kan. L. Rev. 588 (1972-73)

Kentucky

1974

Op. Att'y Gen.

Ky. No. 74-902 (Dec. 26, 1974)

Kentucky

1974

Op. Att'y Gen.

Ky. No. 74-349 (May 14, 1974)

Kentucky

1977

Op. Att'y Gen.

Ky. No. 77-334 (May 23, 1977)

Kentucky

1977

Op. Att'y Gen.

Ky. No. 77-239 (April 13, 1977)

Kentucky

1981

Memorandum Ky. Dept. Transportation

(Oct. 30, 1981) (Kentucky Department of Transportation relinquishes position that a married woman must obtain driver's license in her husband's surname unless she has a court-ordered name "change")

Louisiana

1975

Boothe v. Papale

No. 74-939 (E.D. La. Feb. 12, 1975) (Order granting plaintiffs Motion for Summary Judgment) [Seiro added: Affirms that, in Louisiana, it is customary for women to use the maiden name after marriage. (? , fn 54)]

Louisiana

1977

Pugh v. Theall

342 So. 2d 274 (La. Ct. App. 1977), cert. denied 344 So. 2d 1055 (La. 1977) [Seiro added: Affirms that, in Louisiana, it is customary for women to use the maiden name after marriage. <https://www.casemine.com/judgement/us/591494baadd7b049345c1e1e>]

Louisiana

1984

La. Rev. Stat. Ann.

§40:34.A.(1)(a)(iii) (West 1984) (statute relating to naming children at birth)

Maine

1974

Op. Atty. Gen.

Me. (April 12, 1974)

Maine

1975

In re Reben

342 A.2d 688 (Me. 1975) [Seiro added: the appellant first alleges that she has a right under the common law to choose any name she wishes, unless motivated by a fraudulent purpose, and that as the Judge of Probate found no fraudulent purpose, his denial of her petition was an abuse of discretion. ... (snip) ... We sustain her appeal. ... (snip) ... This opinion, also, will leave many questions unanswered, foremost, probably, the question whether a woman takes the surname of her husband at marriage by operation of law. Traditionally this has been the almost unanimous practice in this state, yet no statute has required it and no decision of this Court has ever affirmed it as being mandated by the common law.]

Maine

1978

Op. Att'y Gen.

Me. (April 4, 1978)

Maryland

1972

Op. Att'y Gen.

Md. (Nov. 30, 1972)

Maryland

1974

Op. Att’y Gen.

Md. (May 7, 1974)

Maryland

1974

Op. Atty. Gen.

Md.(March 30, 1974)

Maryland

1977

Klein v. Klein

36 Md. App. 177, 373 A.2d 86 (Ct. Spec. App. 1977) [Seiro added: That Maryland follows the common law with respect to a name change is no longer open to question. Hardy v. Hardy, 269 Md. 412, 306 A.2d 244 (1973); Stuart v. Board of Supervisors, 266 Md. 440, 295 A.2d 223 (1972); Romans v. State, 178 Md. 588, 16 A.2d 642 (1940); Hall v. Hall, supra. ...(snip)... We hold that it is an abuse of discretion to deny a woman who requests it at the time of divorce the restoration of her prenuptial name, absent illegal, fraudulent, or immoral purposes.]

Maryland

1981

Goldin v. Goldin

48 Md. App. 154, 426 A.2d 410 (Ct. Spec. App. 1981)

Maryland

1983

Op. Att’y Gen.

Md. (Jan. 20, 1983)

Massachusetts

1983

Mass. Ann.

Laws ch. 46 §1D (Law. Co-op. Supp. 1983)

Michigan

1974

Op. Att’y Gen.

Mich. No. 4834 (Oct. 2, 1974)

Michigan

1976

Piotrowski v. Piotrowski

71 Mich. App. 213, 247 N.W.2d 354 (1976) [Seiro added: There is no requirement that any person go through the courts to establish a legal change of name. ...(snip)... The circumstance that there is a minor child is not enough to support denial of the request. ...(znip)... Reversed and remanded for a decree to restore to plaintiff her maiden name.]

Michigan

1980

Mich. Comp. Laws Ann.

§333.2824(1) (West 1980) (statute relating to naming children at birth)

Michigan

1980

Wood v. Detroit Edison

409 Mich. 279, 294 N.W.2d 571 (1980)

Michigan

1983

Jones v. Sanilac County Road Comm'n

128 Mich. App. 569, 342 N.W.2d 532 (1983)

Minnesota

1985

Minn. Stat. Ann.

§517.08 (West Supp. 1985)

Missouri

1975

In re Natale

527 S.W.2d 402 (Mo. Ct. App. 1975) [Seiro added: On August 21, 1973, the court entered its order and judgment denying the Petition for Change of Name on the ground that 'Petitioner is lawfully married and resides with her legal spouse' and 'that under such circumstances the granting of said petition could be detrimental to others in the future.' The court's order did not specify who the 'others' were, but at the hearing, the court had commented, 'Where a married couple who do have and in the future are likely to have many obligations for which they are liable, I can see circumstances that would be detrimental . . .' It appears, therefore, that the trial court found that the fact of a woman's ongoing marriage is prima facie evidence of detriment to creditors sufficient to deny her petition for change of name. ...(snip)... Our research had disclosed no appellate decision in any state which affirmed the trial court's denial of a married woman's name change petition on the ground of an ongoing marriage. *Petition of Hauptly*, 312 N.E.2d 857 (Ind.1974); *Marshall v. State*, 301 So. 2d 477 (Fla.App.1974); *Application of Halligan*, 46 A.D.2d 170, 361 N.Y.S.2d 458 (1974); *Application of Lawrence*, 133 N.J.Super. 408, 337 A.2d 49 (Super.Ct.App. Div.1975). ...(snip)... The judgment is reversed and the trial court directed to issue its order changing petitioner's name as prayed.]

Missouri

1983

Johnson v. Pacific Intermountain Expr. Co.

662 S.W.2d 237 (Mo. 1983), cert denied 104 S. Ct. 2349 (1984)

Missouri

1984

Miller v. Miller

670 S.W.2d 591 (Mo. Ct. App. 1984)

Montana

1974

Op. Att’y Gen.

Mon. (May 1, 1974)

Nebraska

1984

Neb. Rev. Stat.

§71-640.01 (1984) (statute relating to naming children at birth)

New Hampshire

1978

Moskowitz v. Moskowitz

118 N.H. 199, 385 A.2d 120 (1978) [Seiro added: The court affirms its prior decree wherein it found as a fact that it would not be in the best interest of the family unit to permit said change of name. The recommendation was approved by Perkins, J (of probate court, added by seiro). ...(snip)... We (NH Supreme Court, added by Seiro) do not suggest that every petition for a change of name be granted, but rather hold that some substantial reason must exist for denying such a petition. The mere fact that there are children is not sufficient ground. ...(snip)... Remanded.]

New Hampshire

1983

N.H. Rev. Stat. Ann.

§126.6-a (1983) (statute relating to naming children at birth) [Seiro added: Until 1975, it was required that every married woman shall adopt her husband’s name as a ‘family name.’ H.R.S. § 574-1 (1968). This was changed in 1975 to allow a wife to retain her maiden name, or a husband to take his wife’s surname, or either party to choose a hyphenated combination of both surnames, in either order. L.1975, ch. 114, § 1.]

New Jersey

1975

Op. Att’y Gen.

N.J. No. 20-1975 (Aug. 26, 1975)

New York

1974

Matter of Halligan

266 Md. 440, 295 A.2d 223 (Md. 1972) [This case is added by Seiro: Supreme Court’s requirement that petitioner show ‘a compelling reason’ for the change, improperly imposed a burden of persuasion upon her beyond that required by the statute...No reasonable objection appearing, appellant is entitled to her requested order declaring that she shall be known by her maiden name of Ryan, and no other.]

New York

1985

N.Y. Civ. Rights Law

§§64, 65 (McKinney Supp. 1985)

New York

1985

N.Y. Dom. Rel. Law

§§14-a(1), 15(1), 240-a (McKinney Supp. 1985)

North Carolina

1981

O'Brien v. Tilson

523 F. Supp. 494 (E.D.N.C. 1981) [Seiro added: North Carolina General Statute § 130-50(e) be, and the same is hereby adjudged and declared void and of no force or effect insofar as it precludes plaintiffs from recording the surnames of their choice on the birth certificates of their children called for under N.C.G.S. § 130-50(e).]

North Carolina

1983

N.C. Gen.

Stat. §130-A-101(c) (Supp. 1983) (statute relating to naming children at birth)

North Dakota

1974

Op. Att'y Gen.

N.D. (March 20, 1974)

Oklahoma

1975

Op. Att'y Gen.

Okla. (Nov. 14, 1975) [Seiro added: *Opinion No. 75-281 (1975)*, AG (Ops.Okla.Att'y.Gen. Nov. 14, 1975) ... permit a married woman to retain her maiden surname, or to assume her husband's surname and retain all or as much of her maiden name as she chooses.]

Oklahoma

1978

Sneed v. Sneed

585 P.2d 1363 (Okla. 1978) [Seiro added: the trial court refused to restore Mrs. Sneed's maiden name because she had a minor child ...(snip)... At common law a married woman was not compelled to adopt her husband's surname. ... (snip)... Reversed and remanded with directions.]

Oregon

1983

Ore. Rev. Stat.

§106.220 (1983)

Pennsylvania

1973

Op. Att’y Gen.

Pa. No. 72 (Oct. 25, 1973)

Pennsylvania

1973

Op. Att’y Gen.

Pa. No. 62 (Aug. 20, 1973)

Pennsylvania

1974

Op. Att’y Gen.

Pa. No. 8 (Jan. 31, 1974)

South Carolina

1974

Op. Att’y Gen.

S.C. (Dec. 12, 1974)

South Carolina

1975

Op. Atty. Gen.

S.C. (June 6, 1975)

South Dakota

1975

Ogle v. Cir. Ct., Tenth (Now 6th) Jud. Cir

227 N.W.2d 621 (S.D. 1975) [Seiro added: we conclude that the trial court abused its discretion in denying the petition without giving petitioner an opportunity to present further evidence.]

South Dakota

1977

Op. Att’y Gen.

S.D. No. 77-31 (April 15, 1977) (interpreting Ogle v. Circuit Court 89 S.D. 18, 227 N.W.2d 621 (1975))

Tennessee

1975

Dunn v. Palermo

522 S.W.2d 679 (Tenn. 1975)

Tennessee

1983

Tenn. Code Ann.

§68-3-305 (1983) (statute relating to naming children at birth)

Texas

1974

Op. Att’y Gen.

Tex. No. H-432 (Oct. 25, 1974)

Texas

1974

Op. Att’y Gen. H-432 (October 25, 1974) Re: Whether a woman is required to assume her husband’s surname as her own

[Seiro added, page 4: under this statute a woman retained her common law right to choose at marriage either to keep her name prior to marriage or to assume her husband’s surname.]

Texas

1980

Op. Att’y Gen.

Tex. No. MW-225 (Aug. 21, 1980) (says that a married woman may vote under a hyphenated last name, of her “maiden name” and her husband’s name)

Vermont

1974

Op. Att’y Gen.

Vt. No. 179 (Feb. 4, 1974)

Virginia

1973

Op. Att’y Gen.

Va. (June 6, 1973) (re voting)

Washington

1976

Doe v. Dunning

87 Wash. 2d 50, 549 P.2d 1 (1976) [Seiro added: no legal impediment which would prevent married parents from giving the child the mother’s surname.]

West Virginia

1975

Op. Att’y Gen.

W. Va. (April 30, 1975)

Wisconsin

1977

Op. Att’y Gen.

Wis. No. 7-77 (Jan. 31, 1977)

Wisconsin

1982

Op. Att’y Gen.

Wis. (Sept. 21, 1982)

```
# only in Augustine
sy3 <- sy[is.na(year.M) & !is.na(year.A), .(state, year.A, case, ref.A)]
kbt <- kbl(sy3, align = "rcll",
  caption = "States with their first years in legal decisions: Only in Augustine-Adams",
  format = "html")
kbt <- kable_styling(kbt, fixed_thead = T, full_width = F, position = "left")
kbt <- row_spec(kbt, seq(1, nrow(sy3), 2), background="lightgray")
kbt <- column_spec(kbt, column = 3, width = "3cm")
kbt <- column_spec(kbt, column = 1, width = "2cm")
column_spec(kbt, column = 4, width = "10cm")
```

States with their first years in legal decisions: Only in Augustine-Adams

state

year.A

case

ref.A

Florida

1976

FLA. ATr’y GEN. ANN. REP.

§076-66 at 120

Maine

1978

ME. Op. ATr’Y GEN.

WL 33940 Me.A.G.

Massachusetts

1974

MAss. Op. ATr’y GEN.

Number 5 at 48

Montana

1975

In re Natale

527 S.W.2d 402, 404-05 Mo. Ct. App.

In Arkansas case, the opinion of district attorney indicated that

*It appears from the materials before us that the controversy arose in the late summer or early fall of 1974 ... and immediately *1399 involved the plaintiffs, Walker and Scholle, who are both lawyers.*

She (Scholle) married in April, 1974 and retained her maiden name; since she had not changed her name she did not undertake to have her registration changed to reflect her marriage.

In Californian case of *Weathers v Superior Court*, State Court of Appeals Judge notes the opinion:

It raises the issue of the right of a wife who during marriage used her maiden name to petition for a dissolution of marriage in that name rather than the surname of her husband. We conclude that the wife has the right so to file her petition.

It also states such right is not implemented universally. Pleading for a divorce in 1975, the acting judge said:

On July 21, the petition was heard by Commissioner Russell R. Hermann sitting as a temporary judge of the court. Wife appeared in propria persona while Francisco Grippa made no appearance. Commissioner Hermann called the case as "Weathers versus Grippa." He asked wife if she had married Francisco Grippa. When wife answered that she had, the commissioner replied "All of your pleadings say 'Weathers versus Grippa.'" Informed by wife that she had at no time assumed Grippa's name, the commissioner replied, "That doesn't matter whether you have assumed it or not." Amplifying when wife responded that she had never used the Grippa name, the commissioner said, "The marriage certificate makes you Mrs. Grippa." When wife protested, "No, it doesn't," Commissioner Hermann responded, "They must have an awful novel wedding certificate in Oklahoma if it doesn't." Informed by wife that the marriage certificate simply read "Janet Lynn Weathers and Francisco Grippa," the commissioner replied, "I have never divorced people with two different names; never have."

In Florida *Marshall v State* case, one judge, although concurring the decision, worries the destruction of family and leaves an opinion piece:

I think it important that we here note that we are not called upon to decide whether it is requisite that upon marriage a wife assume the surname of her husband. That issue is not before us.

In Indiana, *In re Hauptly* case, the judge's opinion reveals that the State Attorney General attacked the plaintiff who filed to use her maidenname as:

"Perhaps she is claiming the woman's privilege that in an argument she does not have to use reason." (Page 6)

"It can be reasonably inferred that she believes that fact that she is the breadwinner of the family should be publicized so that all will know her husband has been emasculated and that she is the head of the family." (Page 7)

"... indicating that perhaps Mrs. Hauptly's need was not for a change of name but for a competent psychiatrist." (Pages 9 and 10)

"Namely, a sick and confused woman, unhappy and unsatisfied with her marriage, unable to determine what she wants to do with her life." (Page 10)

"... because she was a kind of odd ball" (Page 10)

"[In filing a claim for hospitalization] the computer would probably fail to function and the company refuse to pay on the grounds that it was not liable for hospitalization of a mistress under the terms of a family policy." (Page 11)

In Illinois case, Attorney General's opinion on early case states:

I do not believe that this appellate decision should control. The other Illinois decisions and cases elsewhere establish that a woman may in fact retain her own name upon marriage with or without court proceedings. (Ill. Op. Att'y Gen., February 13, 1974).

Tabulate earliest year entries:

```

ey <- sy[,
  .(yr.A = min(year.A, na.rm = T), yr.M = min(year.M, na.rm = T)),
  by = state]
ey[, yr := min(c(yr.A, yr.M)), by = state]
ey[yr.A == Inf, yr.A := NA]
ey[yr.M == Inf, yr.M := NA]
eytable <- ey[, .(State = paste(state, collapse = ", ")), by = yr]
setkey(eytable, yr)

library(kableExtra)
kbt <- kbl(eytable, align = "cl",
  caption = "States with their first years in legal decisions",
  format = "html")
kbt <- kable_styling(kbt, fixed_thead = T, full_width = F, position = "left")
kbt <- row_spec(kbt, seq(1, nrow(eytable), 2), background="lightgray")
kbt <- column_spec(kbt, column = 2, width = "12cm")
column_spec(kbt, column = 1, width = "2cm")

```

States with their first years in legal decisions	
yr	State
1972	Maryland
1973	Kansas, Pennsylvania, Virginia
1974	Arkansas, California, Connecticut, Delaware, Florida, Illinois, Indiana, Kentucky, Maine, Massachusetts, Michigan, Montana, New York, North Dakota, South Carolina, Texas, Vermont
1975	Arizona, District of Columbia, Georgia, Louisiana, Missouri, New Jersey, North Carolina, Oklahoma, South Dakota, Tennessee, West Virginia, Wisconsin
1976	Alaska, Hawaii, Washington
1977	Ohio
1978	Nebraska, New Hampshire
1979	Rhode Island
1980	Iowa
1982	Alabama

1983

Oregon

1985

Minnesota

Kohout (1973) discusses the conditions up to 1973. She notes name rights of women are not universally guaranteed. Some states, like New York, may allow name changes of a married woman after filing for it, but the court has a certain degree of discretion to deny the petition. The paper also highlights the *Forbush* case in which Alabama court suggested that the procedure should be simple and inexpensive.

A federal case in *Allen v Lovejoy* 553 F2d 522 (6th Circuit Court 1977) decided that Title VII of Civil Rights Act of 1964 was violated when an employer suspended a female worker for her refusal to sign a form with post-marriage surname.

A common law interpretation of the matter, claimed by feminists, is the following:

- Each person has the right to use and to be known by the surname of his or her choice.
- Then, a woman to use husband's name just by using it, and similarly, to use her maiden name just by using it.

Despite the clarity of this argument, by misstating precedent and overemphasizing the frequency with which the change occurs, many courts and officials transformed womans's option of adopting her husband's surname into a legal requirement.

— Omi, 1997, p. 261

The *Forbush* court listed state interests that restrict women's name rights:

1. Custom^{*10}
2. Administrative convenience^{*11}
3. Prevention of fraud^{*12}
4. *De minimis* injury due to existence of statutory remedies^{*13}
5. Preservation of family unit^{*14}

In *State v Taylor*, the court acknowledged that *Forbush's* decision is inaccurately representing the common law of Alabama.

Daum (1974, 72–73) argues that while there is a move toward ensuring women's name rights, because there was no statute to deny or allow the women's name rights, the application of the right was inconsistent.

^{*10}Longevity cannot be a rationale.

^{*11}No administrative efficiency is gained by married women to change her surname upon marriage.

^{*12}Common law name changes do not increase frauds.

^{*13}It is not a minimal cost to change a surname.

^{*14}Not well understood empirically.

Estimation

Identification strategy

Consider an event-study design for a unit i that starts being treated at τ :

$$y_{i,t} = a_t + a_i + \sum_{s=-L}^G \gamma_j D_{i,t+s} + \mathbf{b}' \mathbf{x}_{i,t} + e_{i,t},$$

where $D_{i,t+s} = 0, 1$ is an indicator function equals to 1 if i is treated in $t + s$ with $s = -L, -L + 1, \dots, -1, 0, 1, 2, \dots, G - 1, G$. Given i starts getting treated at τ , $D_{i,t-s} = 0$ for $\tau < t - s$, $D_{i,t-a} = 1$ for $\tau \geq t - s$. The indicator t measures the calendar time, s measures the event time (time-since-event). So we know that time-since-event s is equal to $t - \tau$, or $s = t - \tau$ or $t = s + \tau$. \mathbf{x}_{it} is a vector of exogenous covariates.

Our data structure is the hybrid type based on the classification by Miller (2023):

- Treatment dates vary by units.
- There are never-treated units.

The key identifying assumptions are:

1. In the absence of treatments, all the units share the same time effects a_t (conditional on unit fixed effects a_i and covariates $\mathbf{x}_{i,t}$).
2. Selection of treatment timing, selection of treated or never-treated (by the end of our observation period) units are as good as random, given time and unit fixed effects and covariates.

The treatment effect parameters γ need to give differences relative to a specific benchmark. It is common that to choose the benchmark of the mean pre-treatment effect, or setting $\gamma_{-1} = 0$.

To avoid multicollinearity, we need to drop one period FE from a_t , and one unit FE from a_i .

The number of pre-treatment periods need to balance efficiency and bias tradeoff. Longer periods provide efficiency, but it risks the inclusion of irrelevant periods, such as under marital market disruption immediately after the world war II (1946 onwards). Number of states reporting marriages (*Marriage Reporting Area*) increased from 32 (1957) to 37 (1964). Non MRA states also report data by using central files or survey estimation. In 1960, 33 MRA states, 8 states and DC hold central files of marriage records to construct data. In 1961-63, 35 MRA states 10 states with central files. In 1964, 37 MRA states, 7 states^{*15} have central files.

46 states report number of marriages performed, 5 States and DC report the number of marriage licenses issued using central files. Texas only reports data for 10 counties.

To avoid the bias while not throwing away too much of efficiency, we choose 1961, 14 years before the landmark *Dunn v Palermo*, with 45 states in marriage data, as the starting year.

Miller (2023) recommends to base entire pre-period to be the reference period.

```
m2L <- qread(paste0(pathsave, "m2L.qs"))
d12L <- qread(paste0(pathsave, "d12L.qs"))
m2L <- m2L[!grepl("Cent|Mid|Mount|Eng|east|Pac|^South$|Atl?a|Unit|^West$", StateName), ]
d12L <- d12L[!grepl("Cent|Mid|Mount|Eng|east|Pac|^South$|Atl?a|Unit|^West$", StateName), ]
destat(m2L[, .(NumberOfStates=.N, NumberOfEntries=length(v[!is.na(v)])), by = time])
```

	min	25\\%	median	75\\%	max	mean	std	0s	NAs	n
time	1956	1964	1972	1980	1988	1972	9.7	0	0	33
NumberOfStates	51	51	51	51	51	51	0.0	0	0	33
NumberOfEntries	51	51	51	51	51	51	0.0	0	0	33

^{*15}Why decreased?

Miller (2023) recommends to base entire pre-period to be the reference period. In the paper's accompanying code, he uses `cnsmreg` of stata. This is to impose a linear restriction on the estimated parameters in OLS using minimization of the Lagrangian:

$$\mathcal{L} = SSE + \lambda[\bar{\gamma}_{pre}].$$

Stata's manual on `cnsmreg` states that it uses a linear formula which should be similar to Hansen (2022), 8.8.^{*16}

However, in the current case, constrained least squares is not necessary. One can impose a set of nonzero constraints on γ_s for $s < 0$. Setting and substituting $\bar{\gamma}_{pre} = 0$ changes the estimating equation:

$$\bar{\gamma}_{pre} = 0 \quad \Leftrightarrow \quad \gamma_{-L} = - \sum_{s=-(L-1)}^{-1} \gamma_s,$$

so

$$\begin{aligned} y_{i,t} &= a_t + a_i + \sum_{s=-L}^G \gamma_s D_{i,t+s} + \mathbf{b}'\mathbf{x}_{i,t} + e_{i,t}, \\ &= a_t + a_i - (\gamma_{-(L-1)} + \dots + \gamma_{-1}) D_{i,t-L} + \gamma_{-(L-1)} D_{i,t-(L-1)} + \dots + \gamma_{-1} D_{i,t-1} \\ &\quad + \gamma_0 D_{i,t} + \dots + \gamma_G D_{i,t+G} + \mathbf{b}'\mathbf{x}_{i,t} + e_{i,t}, \\ &= a_t + a_i + \gamma_{-(L-1)} (D_{i,t-(L-1)} - D_{i,t-L}) + \dots + \gamma_{-1} (D_{i,t-1} - D_{i,t-L}) \\ &\quad + \gamma_0 D_{i,t} + \dots + \gamma_G D_{i,t+G} + \mathbf{b}'\mathbf{x}_{i,t} + e_{i,t}, \\ &= a_t + a_i + \sum_{s=-(L-1)}^{-1} \gamma_s (D_{i,t+s} - D_{i,t-L}) + \sum_{s=0}^G \gamma_s D_{i,t+s} + \mathbf{b}'\mathbf{x}_{i,t} + e_{i,t}. \end{aligned}$$

Checking data problems

[Click here to see data problem checks.](#)

Anomalous entries.

```
d12L[abs(vs)> 3, ][order(StateName, time)]
```

	StateName	time	case	vs	pop	v
1:	Alabama	1959	14975	3.51769	323389	4.6
2:	Alabama	1960	17320	4.05299	325612	5.3
3:	Alabama	1961	17715	3.90005	344112	5.1
4:	Alabama	1969	14146	3.05886	354366	4.0
5:	Alabama	1970	15109	3.36475	345287	4.4

838:	Wyoming	1984	3705	4.63383	49007	7.6
839:	Wyoming	1985	3807	4.57286	50739	7.5
840:	Wyoming	1986	3536	4.14606	51675	6.8
841:	Wyoming	1987	3202	3.84120	51177	6.3
842:	Wyoming	1988	3316	3.96315	50811	6.5

```
m2L[abs(vs)> 3, ][order(time, StateName)]
```

	StateName	time	v	vs
1:	Alabama	1956	6.6	-14.01325
2:	Alaska	1956	8.5	-10.15001
3:	Arizona	1956	25.1	-3.44959
4:	Arkansas	1956	7.9	-12.56501

^{*16}Because this code is proprietary, one cannot see what it does.

```

5:      California 1956  6.4  -8.36534
---
1679:      Virginia 1988 11.5  -9.76000
1680:      Washington 1988  9.9 -12.36056
1681: West Virginia 1988  7.3 -10.10529
1682:      Wisconsin 1988  8.5  -7.43784
1683:      Wyoming 1988 10.6 -12.97132

```

Data in 1956-1958 are unreliable that they use estimates. Drop from data.

```

d3L <- d12L[time >= 1959, ]
m3L <- m2L[time >= 1959, ]
d3L[, vs := v/var(v)^(.5), by = .(StateName)]
d3L[, vs := vs-mean(vs[1961 <= time & time <= 1965]), by = .(StateName)]
m3L[, vs := v/var(v)^(.5), by = .(StateName)]
m3L[, vs := vs-mean(vs[1961 <= time & time <= 1965]), by = .(StateName)]
qsave(d3L, paste0(pathsave, "d3L.qs"))
qsave(m3L, paste0(pathsave, "m3L.qs"))

```

Anomalous entries.

```
d3L[abs(vs)> 3, ][order(StateName, time)]
```

	StateName	time	case	vs	pop	v
1:	Colorado	1977	20557	3.17652	268420	7.7
2:	District of Columbia	1979	4488	3.14189	65865	6.8
3:	District of Columbia	1980	4682	3.43942	63975	7.3
4:	Illinois	1959	22700	3.32992	423648	5.4
5:	Nevada	1959	9509	4.21927	14004	67.9

```
d3L[vs < -.5, ][order(StateName, time)]
```

	StateName	time	case	vs	pop	v
1:	Arizona	1960	4780	-1.566809	130167	3.7
2:	Hawaii	1966	897	-0.613358	71506	1.3
3:	Indiana	1959	8228	-0.964599	452607	1.8
4:	Nevada	1970	9138	-0.742205	48876	18.7
5:	Nevada	1971	9474	-0.742205	50708	18.7
6:	Nevada	1973	9975	-0.792626	54792	18.2
7:	Nevada	1974	10045	-0.863216	57286	17.5
8:	Nevada	1975	10542	-0.832964	59184	17.8
9:	Nevada	1976	10298	-1.024565	64689	15.9
10:	Nevada	1977	10280	-1.095156	67782	15.2
11:	Nevada	1978	11213	-1.054818	71878	15.6
12:	Nevada	1979	11787	-1.074987	76525	15.4
13:	Nevada	1980	13842	-0.883385	80065	17.3
14:	Nevada	1981	14925	-0.853132	84600	17.6
15:	Nevada	1982	13092	-1.125408	87598	14.9
16:	Nevada	1983	13438	-1.115324	89726	15.0
17:	Nevada	1984	13822	-0.984228	84600	16.3
18:	Nevada	1985	13318	-1.095156	87598	15.2
19:	Nevada	1986	13470	-1.115324	89726	15.0
20:	Nevada	1987	13936	-1.085071	91078	15.3
21:	Nevada	1988	13922	-1.125408	93674	14.9
22:	New Mexico	1967	1545	-0.827416	100402	1.5
23:	Utah	1959	1336	-1.035568	87455	1.5

```

      StateName time case      vs      pop      v
m3L[abs(vs)> 3, ][order(time, StateName)]

```

```

      StateName time      v      vs
1: Rhode Island 1959  8.8  3.20044
2:  New Mexico 1968  7.6 -3.48848
3:   Nebraska 1970 10.6  3.06216
4:   Arizona 1973 12.7  3.12131
5: Pennsylvania 1973  8.5  3.09598
6:   Virginia 1973 12.1  3.02976
7:   Arizona 1974 12.6  3.06128
8:   Wyoming 1974 16.8  3.14669
9:   Delaware 1983  9.2  3.05812
10:  Arkansas 1988 14.6  3.39000
11:  Kentucky 1988 13.3  3.24121

```

Stationarity tests.

```

library(tseries)
d3L[, outcome := "divorce"]
m3L[, outcome := "marriage"]
dm3L <- rbind(d3L, m3L, use.names = T, fill = T)
  if (nrow(dm3L[is.na(v), ]) > 0)
    dm3L2 <- dm3L[!is.na(v), ] else
    dm3L2 <- dm3L
stt <- dm3L2[, .(
  kpss = kpss.test(v, null = "Trend")$p.value,
  adf = adf.test(v, alternative = "stationary", k = 5)$p.value),
  by = .(outcome, StateName)][kpss < .1 & adf < .1, ]
print(
  sttW <- reshape(stt, direction = "wide", idvar = "StateName",
    timevar = "outcome", v.names = grepout("k|adf", colnames(stt)))
)

```

```

      StateName kpss.divorce adf.divorce kpss.marriage adf.marriage
1:  North Dakota  0.0445779      0.01              NA              NA
2: North Carolina      NA      NA      0.0331327      0.021744

```

Drop:

- North Dakota from divorce rate estimation.
- North Carolina from marriage rate estimation.

```

d3L <- qread(paste0(pathsave, "d3L.qs"))
m3L <- qread(paste0(pathsave, "m3L.qs"))
dvdrops <- sttW[!is.na(kpss.divorce), StateName]
mrdrops <- sttW[!is.na(kpss.marriage), StateName]
d4L <- d3L[!(StateName %in% dvdrops), ]
m4L <- m3L[!(StateName %in% mrdrops), ]
qsave(d4L, paste0(pathsave, "d4L.qs"))
qsave(m4L, paste0(pathsave, "m4L.qs"))

```

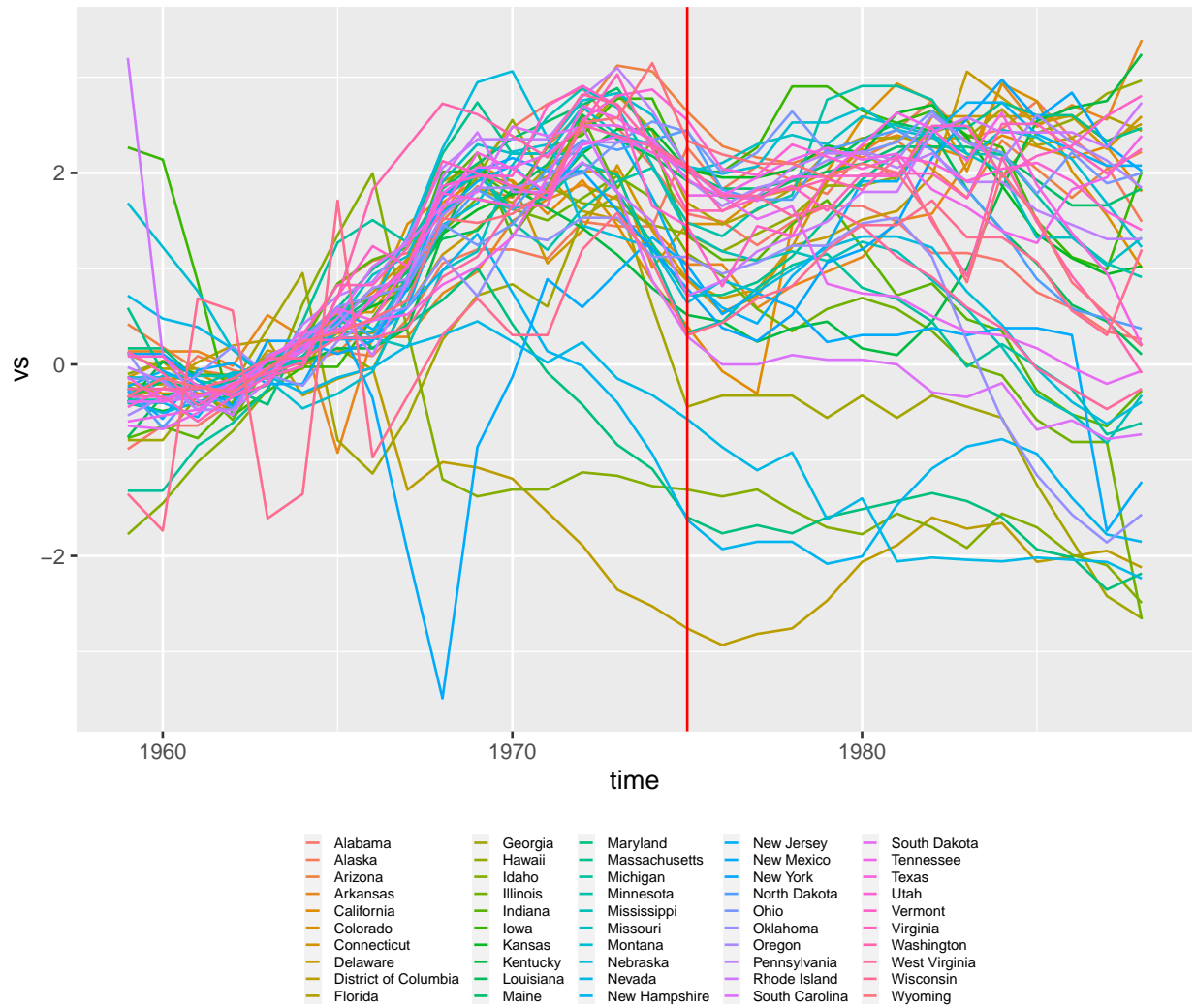



Figure 3: Marriage rates (standardized with overall std and means of 1961-1965)

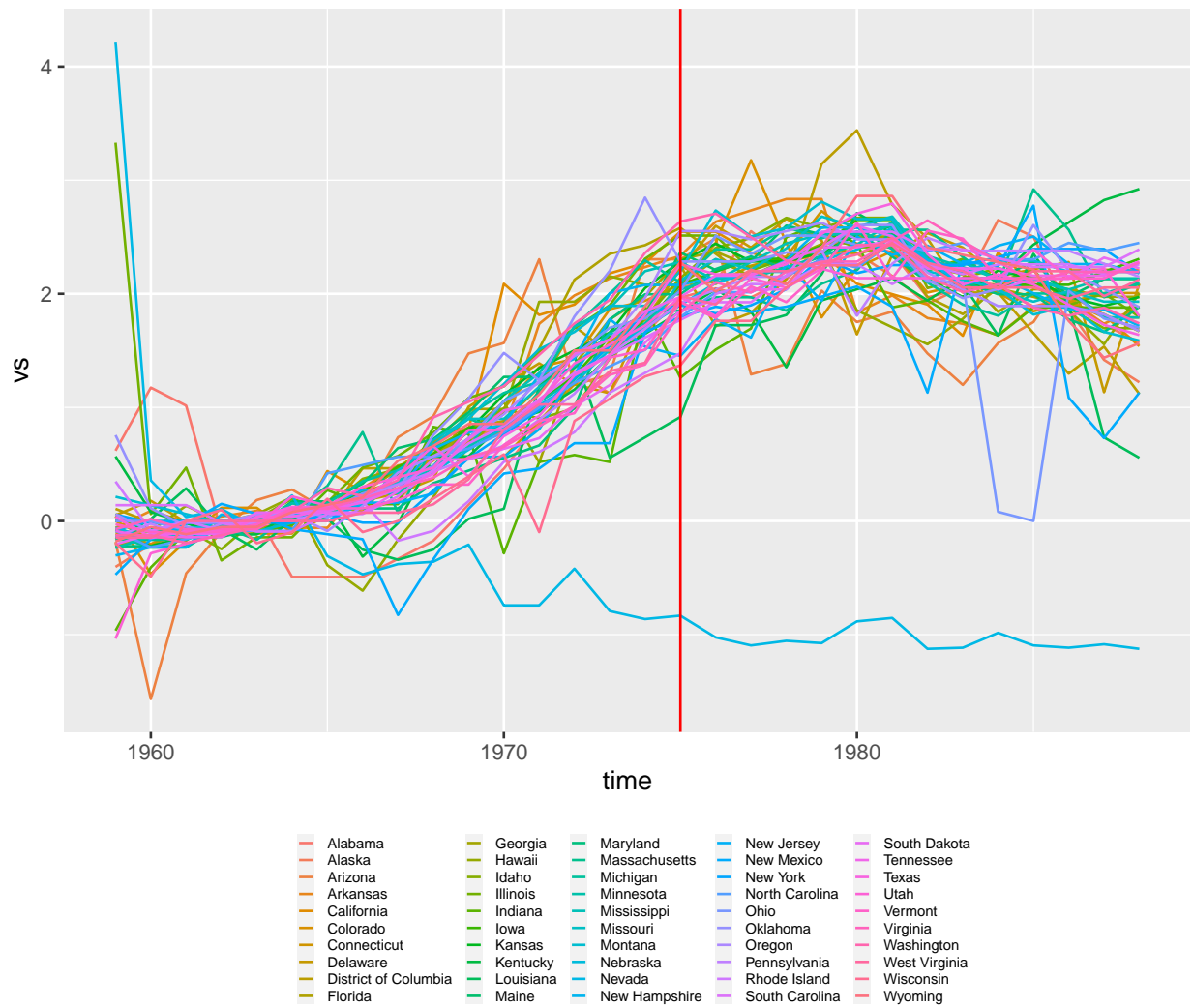


Figure 4: Divorce rates (standardized with overall std and means of 1961-1965)

Marriage rates and divorce rates

Event dates

```
fy <- fread(paste0(pathsource, "FirstYearCompiledBySeiro.prn"))
d4L <- qread(paste0(pathsave, "d4L.qs"))
m4L <- qread(paste0(pathsave, "m4L.qs"))
setnames(fy, "state", "StateName")
fy2 <- fy[, .(StateName, year, month)]
mr <- merge(m4L, fy2, by = "StateName", all = T)
dv <- merge(d4L, fy2, by = "StateName", all = T)
```

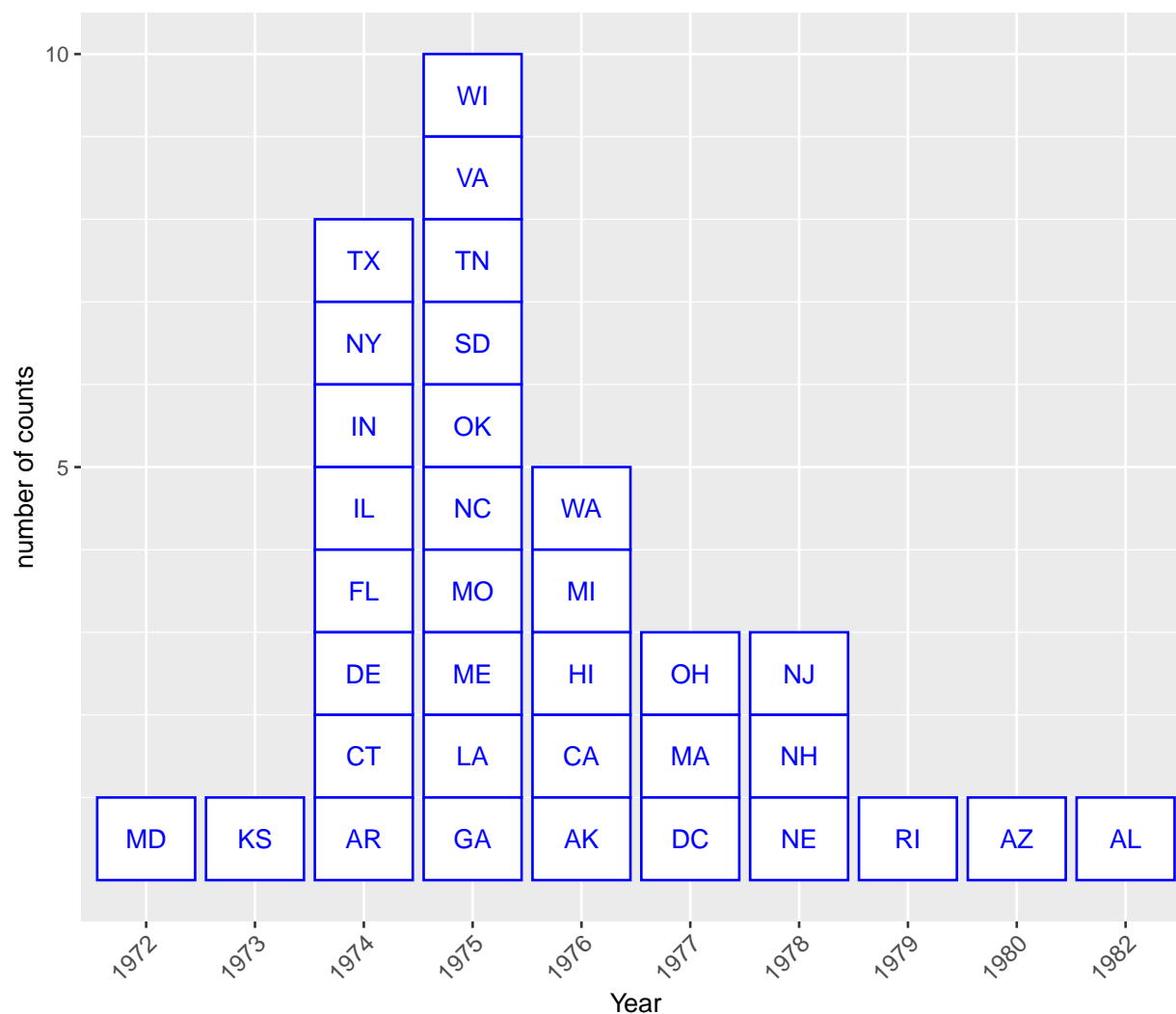


Figure 5: Event year distribution

```
for (ob in c("mr", "dv")) {
  obj = copy(get(ob))
  obj <- obj[!is.na(year), ]
  obj[, year := as.numeric(as.character(year))]
  obj[, time := as.numeric(as.character(time))]
```

```

obj[, trend := time - min(time)+1, by = StateName]
obj[, trend2 := trend^(2)]
obj[, trend3 := trend^(3)]
#### Normalization: At t-1, zero effect
#### year is the year of first case in each state
obj[, start := (year == time-1)]
obj[, et := 1:.N, by = StateName]
obj[, et := et-et[start], by = StateName]
obj[, ptrend := trend]
obj[, ptrend0 := trend[et==0], by = StateName]
obj[et >= 0, ptrend := ptrend0]
obj[, ptrend2 := trend2]
obj[, ptrend20 := trend2[et==0], by = StateName]
obj[et >= 0, ptrend2 := ptrend20]
obj[, ptrend3 := trend3]
obj[, ptrend30 := trend3[et==0], by = StateName]
obj[et >= 0, ptrend3 := ptrend30]
obj[, c("ptrend0", "ptrend20", "ptrend30") := NULL]
qsave(obj, paste0(pathsave, ob, ".qs"))
#### Normalization: mean of trend at event time < -1 is zero
#### For this operation, keep dummy data matrix separately as etdum.
etdum <- makeDummyFromFactor(factor(obj[, et]), nameprefix = "et")
#### change to easier-to-handle names
setnames(etdum, grepout("-", colnames(etdum)),
  gsub("-", "N", grepout("-", colnames(etdum))))
#### Subtract t-L, L=10 period to impose  $\bar{\gamma}_{s<0} = 0$ 
negtime <- grepout("N", colnames(etdum))
etdum[, (negtime) := lapply(.SD, function(x) x-etN10), .SDcols = negtime]
etdum[, etN10 := NULL]
#### Forcing manually a specific order in factor levels.
#### lm drops the first factor level as a reference.
#### (can also be done using library(forcats), but not necessary)
obj[, et := factor(et, levels = c(-1, unique(et)[!(unique(et) %in% -1)]))]
obj[, time := factor(time,
  levels = c(1988, unique(time)[!(unique(time) %in% c(1988, 1987))], 1987))]
obj[, StateName := factor(StateName,
  levels = c("Hawaii",
    unique(StateName)[!(unique(StateName) %in% c("Hawaii", "Florida"))], "Florida"))]
assign(ob, obj)
assign(paste0(ob, "et"), etdum)
}

```

Estimated results

Choice of reference normalization

In regression with no intercept, `lm` keeps all levels if we use it as the first factor variable in the formula, drops 1st levels in the second factor variable in the formula, drops 1st and last levels in the third factor variable in the formula, and so on.

If we use `et` variable as the first regressor, it overparameterises and gives rise to multicollinearity. In such case, we need to drop one more event time manually.

[Click here](#) to see how reference period choice affects estimated results.

```

obj = copy(dv)
#### In regression with no intercept,
#### lm keeps all levels in the 1st factor variable in the formula.
#### lm drops 1st levels in the 2nd factor variable in the formula.
#### lm drops 1st and last levels in the 3rd factor variable in the formula.
r10a <- lm(v ~ -1+et+StateName+time, data = obj)
r10b <- lm(v ~ -1+StateName+et+time, data = obj)
r10c <- lm(v ~ -1+StateName+time+et, data = obj)
obj[, time := factor(time,
  levels = c(1988, levels(time)[!(levels(time) %in% c(1988, 1959:1961))], 1961:1959))]
r22a <- lm(v ~ -1+et+trend+trend2+trend3+StateName+time, data = obj)
r22b <- lm(v ~ -1+trend+trend2+trend3+StateName+et+time, data = obj)
r22c <- lm(v ~ -1+trend+trend2+trend3+StateName+time+et, data = obj)
etdumpre <- makeDummyFromFactor(factor(obj[, et]), nameprefix = "et")
setnames(etdumpre, grepout("-", colnames(etdumpre)),
  gsub("-", "N", grepout("-", colnames(etdumpre))))
#### Subtract t-L, L=10 period to impose \bar{\gamma}_{s<0} = 0
negtime <- grepout("N", colnames(etdumpre))
etdumpre[, (negtime) := lapply(.SD, function(x) x-etN10), .SDcols = negtime]
etdumpre[, etN10 := NULL]
ettermspre <- paste(colnames(etdumpre), collapse = "+")
#obj[, StateName := factor(StateName, exclude=c('Hawaii', 'Florida', 'District Of Columbia'))]
obj3 <- data.table(obj, etdumpre)
form1 <- paste0("v ~ -1+StateName+time+", ettermspre)
form2 <- paste0("v ~ -1+trend+StateName+time+", ettermspre)
form3 <- paste0("v ~ -1+trend+trend2+trend3+StateName+", ettermspre)
r31 <- lm(as.formula(form1), data = obj3)
r32 <- lm(as.formula(form2), data = obj3)
r33 <- lm(as.formula(form3), data = obj3)

```

Compare r10a, r10b, r10c, r22a, r22b, r22c, r31, r32, r33.

```

form0 <- c(
  "et+StateName+time", "StateName+et+time", "StateName+time+et",
  "et+trend+trend2+trend3+StateName+time",
  "trend+trend2+trend3+StateName+et+time",
  "trend+trend2+trend3+StateName+time+et",
  "StateName+time+eterms",
  "trend+StateName+time+eterms",
  "trend+trend2+trend3+StateName+time+eterms")
forder <- c(paste(rep(c("TWFE", "TWFE trend"), each = 3),
  c("et is 1/3", "et is 2/3", "et is 3/3")),
  "TWFE premean = 0", "TWFE trend premean = 0",
  "TWFE trend3 premean = 0")
normalization <- c(rep(c("TWFE", "TWFE trend"), each = 3),
  rep("TWFE trend premean = 0", 3))
nums <- c(rep(c(10, 22), each = 3), 31:33)
Ci <- NULL
for (i in 1:9) {
  if (i < 7)
    rr <- get(paste0("r", nums[i], rep(letters[1:3], 2)[i])) else
    rr <- get(c("r31", "r32", "r33")[i-6])
  clus <- data.table(rr$model)[, StateName]
  rrc <- clx(rr, cluster = clus, returnV = T)
}

```

```

  clxci <- data.table(cbind(Coef = rownames(rrc$ci), rrc$est, rrc$ci))
  clxci <- rbind(clxci, t(c(-1, 0, rep(NA, 5))), use.names = F)
  clxci[, FormulaOrder := forder[i]]
  clxci[, normalisation := normalization[i]]
  Ci <- rbind(Ci, clxci)
}
Ci[, period := gsub("et", "", Coef)]
Ci <- Ci[grepl("^\\.?\\d", period), ]
Ci[, period := gsub("N", "-", period)]
Ci[, period := as.numeric(period)]
setcolorder(Ci,
  c("Coef", "Estimate", "Std. Error", "t value", "Pr(>|t|)", "2.5 %", "97.5 %", "period"))
setnames(Ci, c("Estimate", "2.5 %", "97.5 %"), c("beta", "CI_L", "CI_U"))
numcols <- c("beta", "CI_L", "CI_U", "period")
Ci[, (numcols) := lapply(.SD, as.numeric), .SDcols = numcols]
strcols <- colnames(Ci)[!(colnames(Ci) %in% numcols)]
Ci[, (strcols) := lapply(.SD, factor), .SDcols = strcols]

```

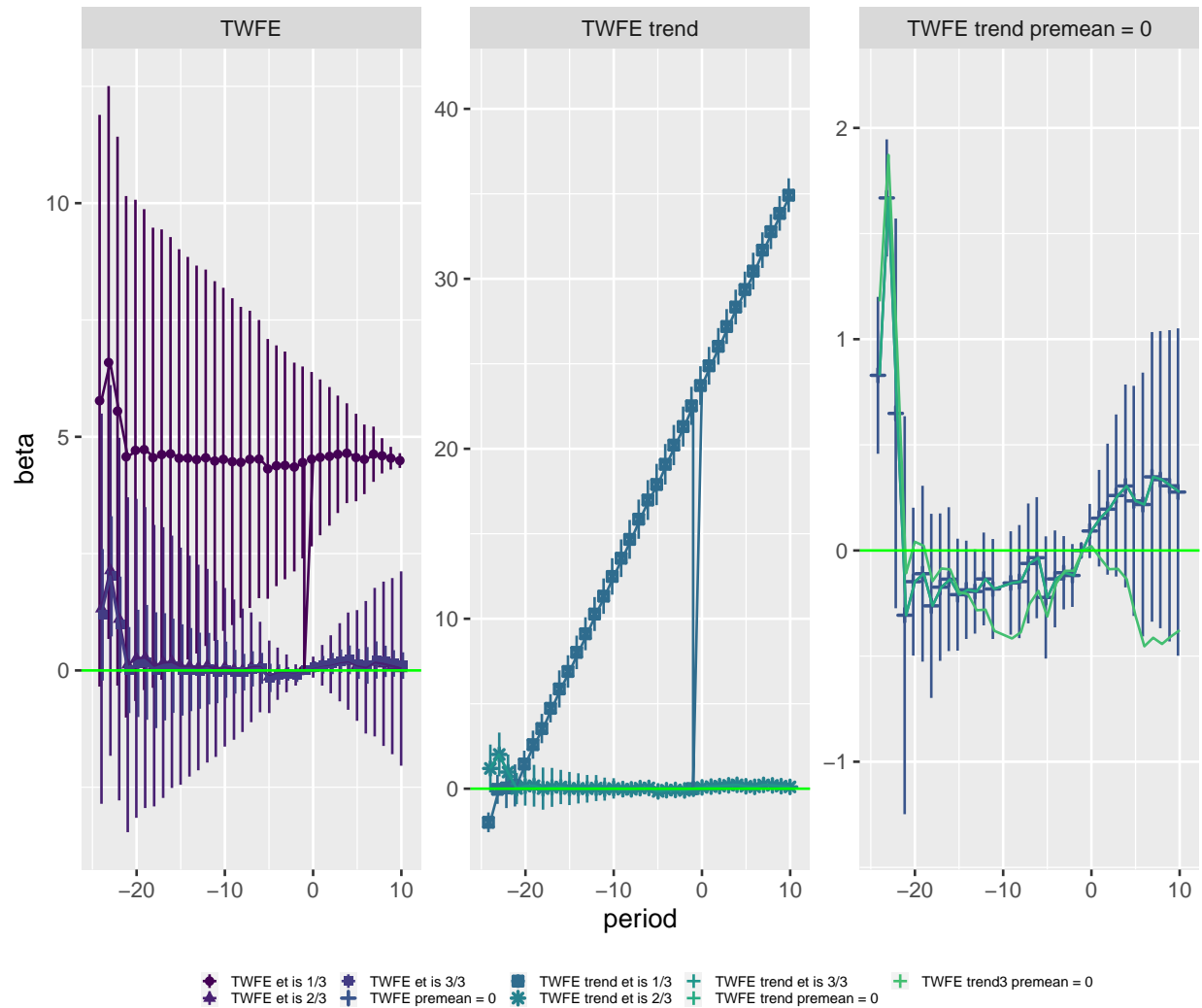


Figure 6: Impacts on divorce rates: Baseline with different normalization

Compare r10a, r10b, r10c, r22a, r22b, r22c.

- r10a: One sees that keeping all levels adds a value equivalent to the intercept to all estimates. This gives a problem when we force a normalisation $\gamma_{-1} = 0$ as the estimates jump around it. Another noticeable characteristic is that standard errors decrease as event time progresses. We also note that estimates on time dummies are of too large magnitude which may be due to the use of higher order trending terms. We may need to use only a linear trend.
- r10b: When the first ($s = -1$) level is dropped, the level of estimates are relative to it and the estimates are scattered around 0. Yet, there still is add an noticeable effect on estimated standard errors that they show reduction and increase before and after $s = -1$.
- r10c: When the first and the last ($s = 15$) levels are dropped, the standard errors get more sensible with no noticeable pattern. Point estimates show no pre or post trends.

The same pattern arises with trend t included, and as we include t, t^2, t^3 , we need to drop 3 time dummies in addition of default 1988 dummy from covariates.

- r22a: Even dropping 1988, 1959:1961 from time dummies, if we use `et` as the first in regressors, event time variables are kept for all values and gives estimates that hovers around the intercept value.
- r22b: -1 is dropped from `et` and γ_s are closer to zero.
- r22c: -1 and 15 are dropped from `et` and γ_s are closer to zero, and the same as r22b.

So the general idea for normalisation is:

- Manually drop -1 from `et` if normalization $\gamma_{-1} = 0$ is used.
- Manually drop $-L$ from `et` if normalization $\bar{\gamma}_{s<0} = 0$ is used and use $-L$ as the period to be substituted, after setting $et_{t<0} = et_{t<0} - et_{-L}$.
- Manually drop 2 periods (start and last periods of data) from `time` to incorporate time FE and a linear trend.
- Manually drop 1 state ("Hawaii") from `StateName` to incorporate state FE with a restriction $\bar{a} = 0$, after setting $a_i = a_i - a_{Hawaii}$.

Click here to see dropping N1 and 15.

```
obj = copy(dv)
etdum <- makeDummyFromFactor(factor(obj[, et]), nameprefix = "et")
#### change to easier-to-handle names
setnames(etdum, grepout("-", colnames(etdum)),
  gsub("-", "N", grepout("-", colnames(etdum))))
#### Subtract t-L, L=10 period to impose \bar{\gamma}_{s<0} = 0
negtime <- grepout("N", colnames(etdum))
etdumpre <- etdum
etdumpre[, (negtime) := lapply(.SD, function(x) x-etN10), .SDcols = negtime]
etdumpre[, etN10 := NULL]
etterms <- paste(colnames(etdum), collapse = "+")
#### Drop -1 and 15 from et
etterms <- gsub("\\+etN1\\+", "+", etterms)
ettermspre <- gsub("\\+et15", "", etterms)
#obj[, StateName := factor(StateName, exclude=c('Hawaii', 'Florida', 'District Of Columbia'))]
obj2 <- data.table(obj, etdum)
obj3 <- data.table(obj, etdumpre)
form1 <- paste0("v ~ -1+StateName+time+", etterms)
```

```

form2 <- paste0("v ~ -1+trend+StateName+time+", etterms)
form3 <- paste0("v ~ -1+trend+StateName+time+", ettermspre)
r11 <- lm(form1, data = obj2)
r21 <- lm(form2, data = obj2)
r31 <- lm(form3, data = obj3)
normalization <- c("TWFE", "TWFE trend", "TWFE trend pre-mean=0")
Ci <- NULL
for (i in 1:3) {
  rr <- get(paste0("r", i, 1))
  clus <- data.table(rr$model)[, StateName]
  rrc <- clx(rr, cluster = clus, returnV = T)
  clxci <- data.table(cbind(Coef = rownames(rrc$ci), rrc$est, rrc$ci))
  clxci <- rbind(clxci, t(c(-1, 0, rep(NA, 5))), use.names = F)
  clxci[, normalisation := normalization[i]]
  Ci <- rbind(Ci, clxci)
}
Ci[, period := gsub("et", "", Coef)]
Ci <- Ci[grepl("^\\.?\\d", period), ]
Ci[, period := gsub("N", "-", period)]
Ci[, period := as.numeric(period)]
setcolorder(Ci,
  c("Coef", "Estimate", "Std. Error", "t value", "Pr(>|t|)", "2.5 %", "97.5 %", "period"))
setnames(Ci, c("Estimate", "2.5 %", "97.5 %"), c("beta", "CI_L", "CI_U"))
numcols <- c("beta", "CI_L", "CI_U", "period", "Std. Error", "t value", "Pr(>|t|)")
Ci[, (numcols) := lapply(.SD, as.numeric), .SDcols = numcols]
strcols <- colnames(Ci)[!(colnames(Ci) %in% numcols)]
Ci[, (strcols) := lapply(.SD, factor), .SDcols = strcols]
Ci[grepl("mea", normalisation) & period < 0, mean(beta)]

[1] 0.00562091

```

Verifying the code with simulated data

Using Bacon data

```

#### https://lost-stats.github.io/Model\_Estimation/Research\_Design/event\_study.html#r
#### Load and prepare data
#### dat = fread("https://raw.githubusercontent.com/LOST-STATS/
##### LOST-STATS.github.io/master/Model_Estimation/Data/Event_Study_DiD/
##### bacon_example.csv")
dat <- fread(paste0(pathsource, "bacon_example.csv"))
#### Let's create a more user-friendly indicator of which states received treatment
dat[, treat := ifelse(is.na(`_nfd`), 0, 1)]
#### Create a "time_to_treatment" variable for each state, so that treatment is
#### relative for all treated units. For the never-treated (i.e. control) units,
#### we'll arbitrarily set the "time_to_treatment" value at 0. This value
#### doesn't really matter, since it will be canceled by the treat==0 interaction
#### anyway. But we do want to make sure they aren't NA, otherwise feols would drop
#### these never-treated observations at estimation time and our results will be
#### off.
dat[, time_to_treat := ifelse(treat==1, year - `_nfd`, 0)]
library(fixest)
twfel = feols(asmrs ~ i(time_to_treat, treat, ref = -1) |
  #### Our key interaction: time × treatment status

```

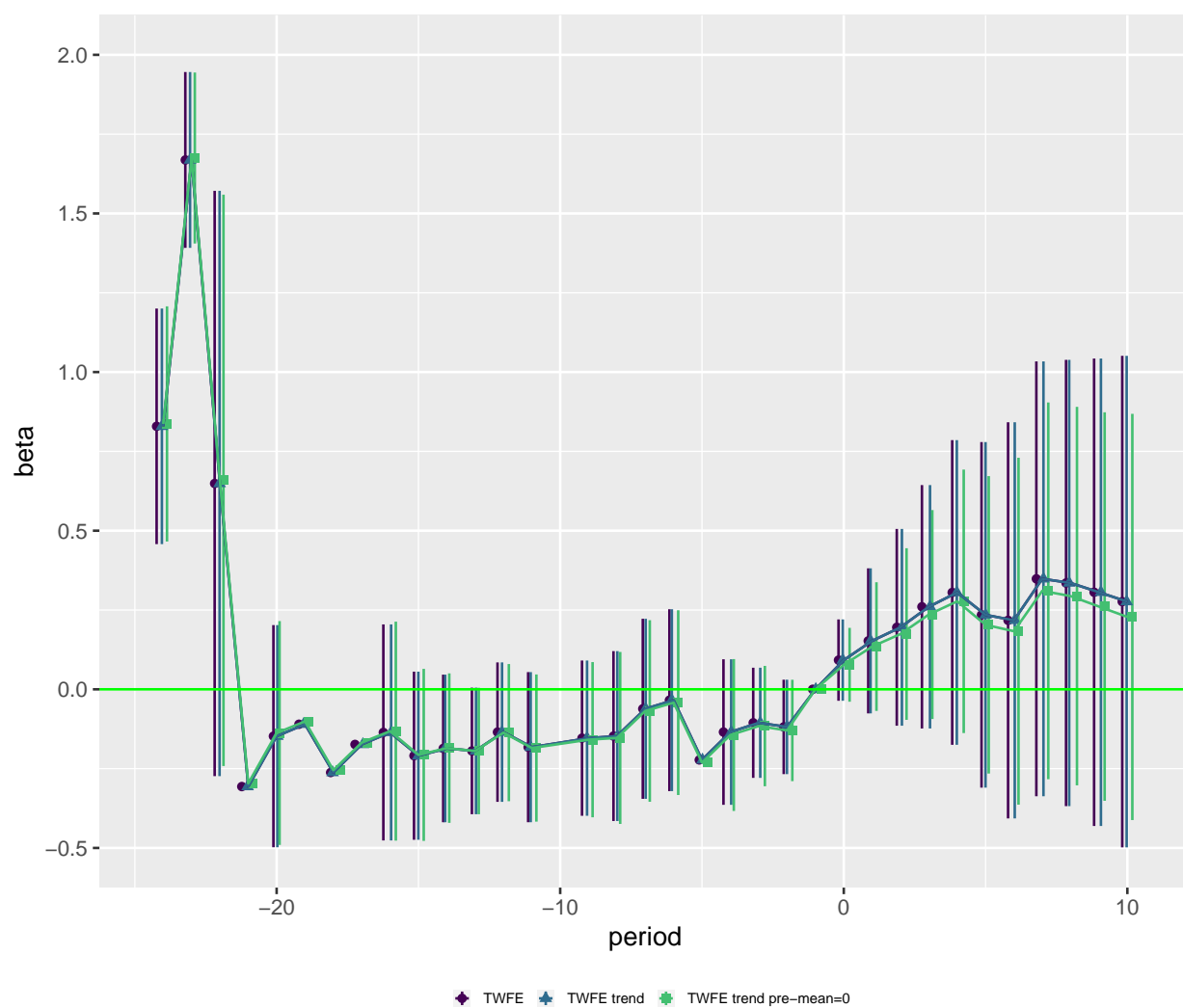



Figure 7: Impacts on divorce rates: Baseline with different normalisation

```

    stfips + year,      #### FEs
    cluster = ~stfips, #### Clustered SEs
    data = dat)
tt dum <- makeDummyFromFactor(factor(dat[, time_to_treat]),
    nameprefix = "tt", reference = NULL)
setnames(ttdum, colnames(ttdum), gsub("-", "N", colnames(ttdum)))
ttterms <- paste(colnames(ttdum), collapse = "+")
ttterms2 <- gsub("\\+ttN1\\+", "+", ttterms)
ttterms3 <- gsub("ttN21\\+", "", ttterms)
dat[, time := factor(year)]
dat[, id := factor(stfips)]
dt <- data.table(dat, ttdum)
#### 2: no intercept, drop et=-1
#### 3: with intercept, none dropped (so N21 gets to drop)
#### 4: with intercept, drop et=-1
twfe2 <- lm(as.formula(paste0("asmrs ~ -1+id+time+", ttterms2)), data = dt)
twfe3 <- lm(as.formula(paste0("asmrs ~ id+time+", ttterms3)), data = dt)
twfe4 <- lm(as.formula(paste0("asmrs ~ id+time+", ttterms2)), data = dt)
tc1 <- twfe1$coeff
names(tc1) <- gsub("ti.*:", "tt", names(tc1))
names(tc1) <- gsub(":treat", "", names(tc1))
names(tc1) <- gsub("-", "N", names(tc1))
for (i in 1:4) {
  if (i > 1) {
    tw <- get(paste0("twfe", i))
    tc <- tw$coeff
  } else tc <- tc1
  tc <- tc[grep("tt", names(tc))]
  tc <- data.table(spec = c("fixest", "no int, -1", "int, -21", "int, -1")[i],
    coef = names(tc), val = tc)
  assign(paste0("tcf", i), tc)
}
tcf <- rbindlist(list(tcf1, tcf2, tcf3, tcf4))
tcf[, et := gsub("tt", "", coef)]
tcf[, et := gsub("N", "-", et)]
tcf[, et := as.numeric(et)]
tcf[et == -21, ]

```

	spec	coef	val	et
1:	fixest	ttN21	-22.8576	-21
2:	no int, -1	ttN21	-22.8576	-21
3:	int, -1	ttN21	-22.8576	-21

```
tcf[et == -1, ]
```

	spec	coef	val	et
1:	int, -21	ttN1	22.8576	-1

We see that `fixest`, “with intercept, drop $t=-1$ ” are equivalent, “with intercept, drop $t=-21$ ” gives the same estimates but without $t = -21$ coefficient γ_{-21} , and “no intercept, drop $t=-1$ ” is parallel shift to the above.

Using Bacon data with trend

Let us see how trend alters the above equivalence result.

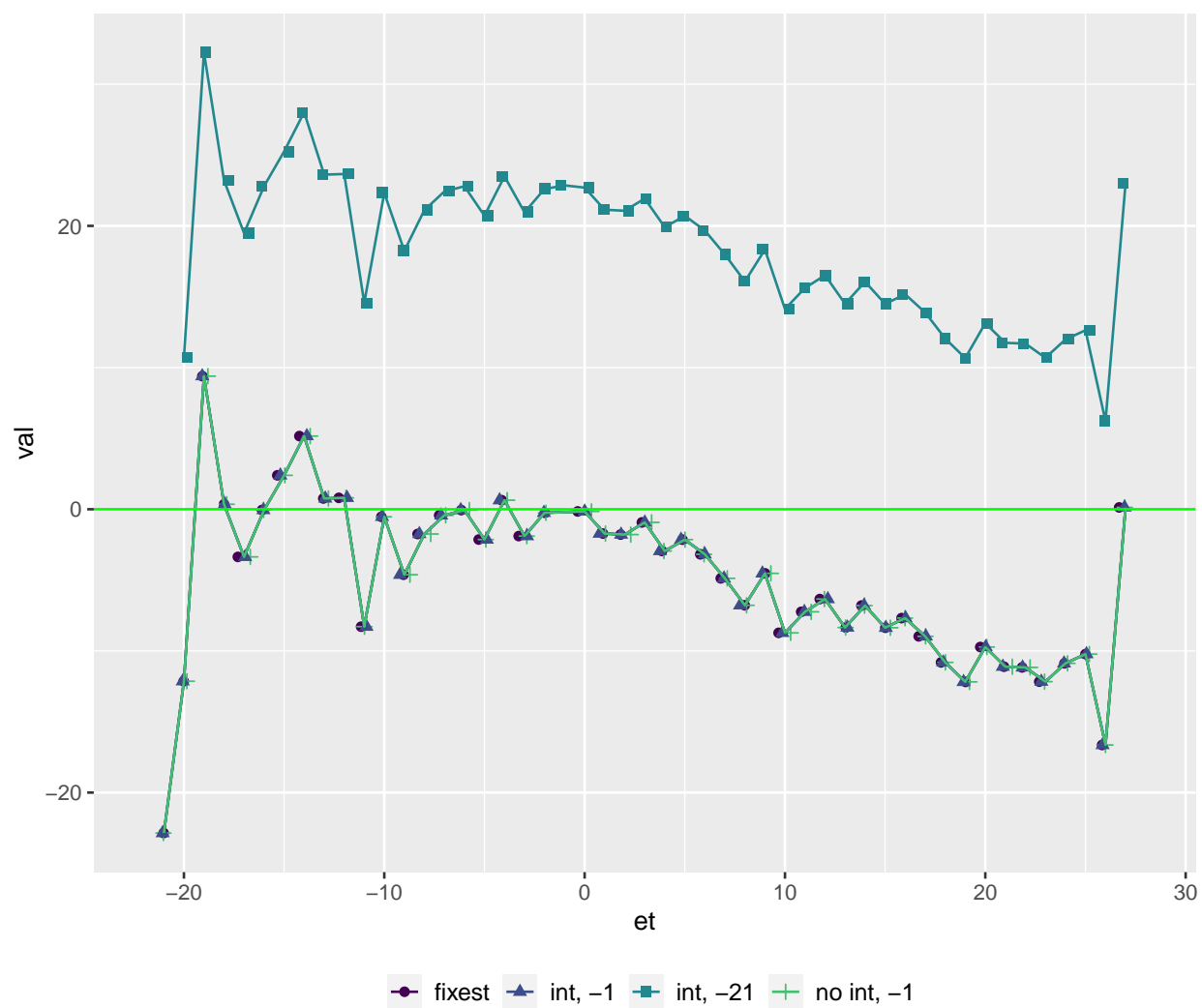


Figure 8: Parameter estimates: ‘fixest’ and other specifications

```

dat[, trend := 1:N, by = stfips]
twfet1 = feols(asrms ~ i(time_to_treat, treat, ref = -1) +
  i(year, ref = 1996) + trend | stfips, ##### FEs
  cluster = ~stfips, data = dat)
tdum <- makeDummyFromFactor(factor(dat[, year]), nameprefix = "y")
setnames(tdum, colnames(tdum), gsub("19", "", colnames(tdum)))
tterms <- paste(colnames(tdum), collapse = "+")
tdum[, y96 := NULL]
tterms2 <- paste(colnames(tdum), collapse = "+")
tterms3 <- gsub("\\+y95", "", tterms2)
tt dum <- makeDummyFromFactor(factor(dat[, time_to_treat]),
  nameprefix = "tt", reference = NULL)
setnames(ttdum, colnames(ttdum), gsub("-", "N", colnames(ttdum)))
ttterms <- paste(colnames(ttdum), collapse = "+")
ttterms2 <- gsub("\\+ttN1\\+", "+", ttterms)
ttterms3 <- gsub("ttN21\\+", "", ttterms)
dt <- data.table(dat, tdum, ttdum)
##### 2: no intercept, drop et=-1 (ttterms2), y96
##### 3: with intercept, drop et=21 (ttterms3), y95, y96 (tterms3)
##### 4: with intercept, drop et=-1 (ttterms2), y95, y96 (tterms3)
twfet2 <- lm(as.formula(paste0("asrms ~ -1+id+trend+", ttterms2, "+", tterms2)), data = dt)
twfet3 <- lm(as.formula(paste0("asrms ~ id+trend+", ttterms3, "+", tterms3)), data = dt)
twfet4 <- lm(as.formula(paste0("asrms ~ id+trend+", ttterms2, "+", tterms3)), data = dt)
tc1 <- twfet1$coeff
names(tc1) <- gsub("ti.*:", "tt", names(tc1))
names(tc1) <- gsub(":treat", "", names(tc1))
names(tc1) <- gsub("-", "N", names(tc1))
for (i in 1:4) {
  if (i > 1) {
    tw <- get(paste0("twfet", i))
    tc <- tw$coeff
  } else tc <- tc1
  tc <- tc[grepl("tt", names(tc))]
  tc <- data.table(spec = c("fixest", "no int, -1", "int, -21", "int, -1")[i],
    coef = names(tc), val = tc)
  assign(paste0("tcf", i), tc)
}
tcf <- rbindlist(list(tcf1, tcf2, tcf3, tcf4))
tcf[, et := gsub("tt", "", coef)]
tcf[, et := gsub("N", "-", et)]
tcf[, et := as.numeric(et)]
tcf[et == -21, ]

```

	spec	coef	val	et
1:	fixest	ttN21	-22.8576	-21
2:	no int, -1	ttN21	-22.8576	-21
3:	int, -1	ttN21	-22.8624	-21

```
tcf[et == -1, ]
```

	spec	coef	val	et
1:	int, -21	ttN1	22.8624	-1

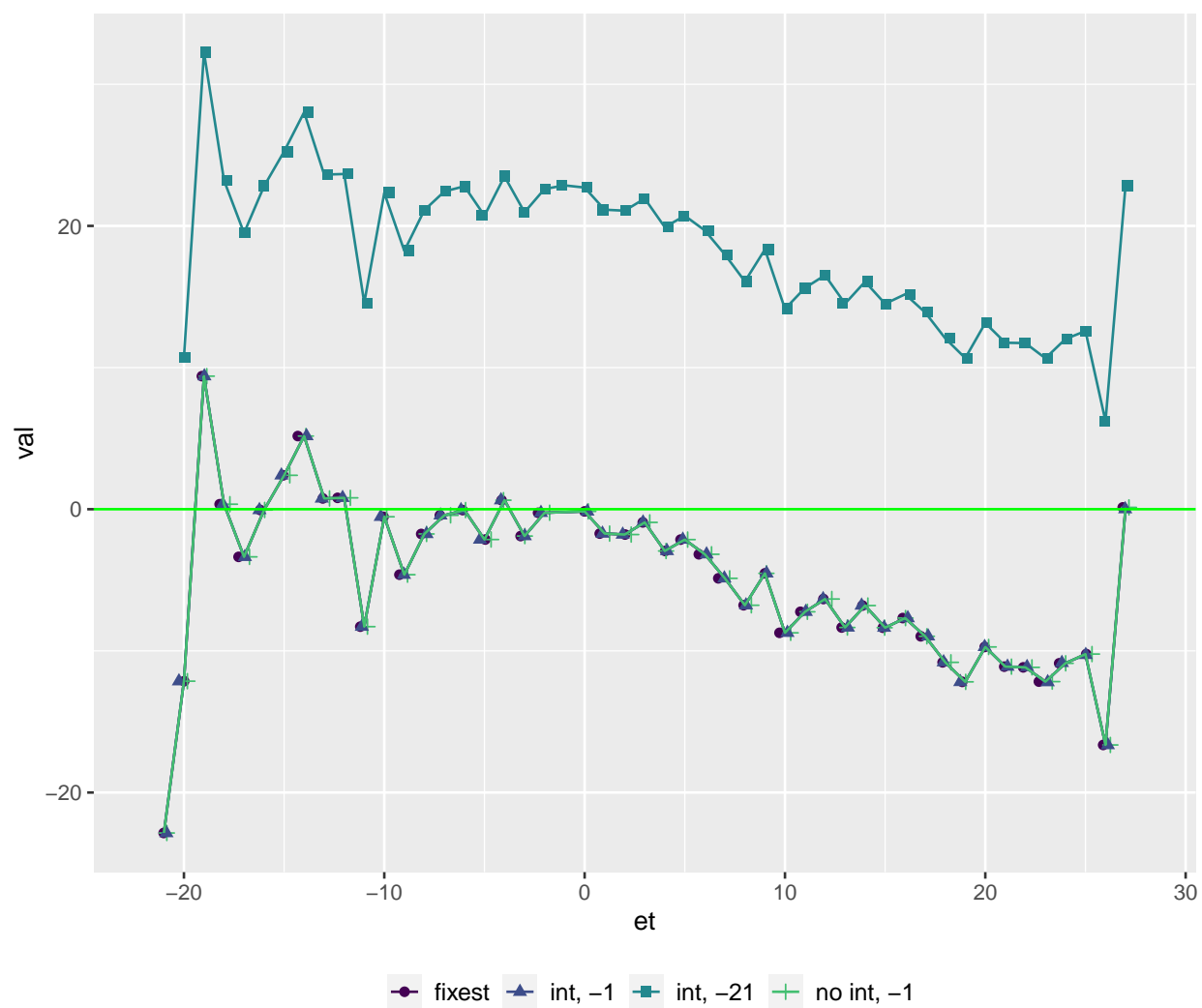


Figure 9: Parameter estimates with trend: 'fixest' and other specifications

Using Miller data

```
#### Set seed for reproducibility
set.seed(10103)
#### Function to generate data (Miller)
gendata <- function(ctrl, trends)
{
  #### trends: Set of treatment timing. Format: "10 11" (treated at 10, 11)
  #### ctrl: Existence of never-treated units, 0 or 1
  #### Number of observations
  numobs <- 48
  #### Number of treated unit types
  treatedunittypes <- length(unlist(strsplit(trends, " ")))
  #### Determine the number of treated and untreated observations
  numtreatedobs <- round(numobs / (1 + ctrl))
  numuntreatedobs <- numobs - numtreatedobs
  #### Calculate the number of observations per treated unit type
  obspertype <- floor(numtreatedobs / treatedunittypes)
  #### Extract event dates from the trends argument
  eventdates <- as.numeric(strsplit(trends, " ")[[1]])
  #### Create data.table
  dt <- data.table(id = 1:numobs)
  #### Create treated indicator
  dt[, treated := id > numuntreatedobs]
  #### Initialize Ei
  dt[, Ei := as.numeric(NA)]
  #### Fill in Ei values based on treated unit types
  for (ii in 1:treatedunittypes) {
    start <- (ii - 1) * obspertype + numuntreatedobs + 1
    stop <- ii * obspertype + numuntreatedobs
    dt[start <= id & id <= stop, Ei := eventdates[ii]]
  }
  #### Fill in Ei value for the last treated unit type
  if (max(dt[, id]) > stop) dt[id > stop, Ei := eventdates[treatedunittypes]]
  #### Expand time periods
  dt <- dt[, .(treated, Ei, t = 1:20), by = id]
  #### Set key for sorting
  setkey(dt, id, t)
  #### Make variables that determine the DGP
  dt[, etime := t - Ei] #### Event time
  dt[, TE := ifelse(etime >= 0, etime + 1, 0)] #### Endless ramp function for treatment effect
  dt[is.na(Ei), TE := 0]
  dt[, Y0_pure := 0] #### Simplest counterfactual
  #### Other counterfactuals (commented out)
  #### dt[, Y0_pure := 4 * treated + 0.3 * treated * t] #### Treated have a pre-trend...
  #### dt[, Y0_pure := 4 * treated + 0.1 * treated * (t - 10) * (Ei - 9)] #### Pre-trend based on Ei..
  dt[, eps := sqrt(0.2) * rnorm(n = .N)]
  dt[, actual := Y0_pure + TE * treated]
  dt[, y := actual + eps] ####s Observed Y
  return(dt)
}
gendata2 <- function(ctrl, trends) #### Edited
{
  #### trends: number of groups with same treatment timing
```

```

#### ctrl: number of never treated units
#### Number of observations
numobs <- 48
#### Number of treated unit types
treatedunittypes <- length(trends)
#### Determine the number of treated and untreated observations
numtreatedobs <- round(numobs * (1 - ctrl/numobs))
numuntreatedobs <- numobs - numtreatedobs
#### Calculate the number of observations per treated unit type
obsptype <- floor(numtreatedobs / treatedunittypes)
#### Extract event dates from the trends argument
eventdates <- as.numeric(trends[[1]])
#### Create data.table
dt <- data.table(id = 1:numobs)
#### Create treated indicator
dt[, treated := id > numuntreatedobs]
#### Initialize Ei
dt[, Ei := 0L]
#### Fill in Ei values based on treated unit types
for (ii in 1:treatedunittypes) {
  start <- (ii - 1) * obsptype + numuntreatedobs + 1
  stop <- ii * obsptype + numuntreatedobs
  dt[start <= id & id <= stop, Ei := eventdates[ii]]
}
#### Fill in Ei value for the last treated unit type
if (max(dt[, id]) > stop) dt[id > stop, Ei := eventdates[treatedunittypes]]
#### Expand time periods
dt <- dt[, .(treated, Ei, t = 1:20), by = id]
#### Set key for sorting
setkey(dt, id, t)
#### Make variables that determine the DGP
dt[, etime := t - Ei] #### Event time

#### Step function treatment effect
#### dt[, TE := 1 * (etime >= 0)] #### Commented out in Stata
dt[, TE := (etime >= 0) * (etime + 1)] #### Endless ramp function for treatment effect
dt[is.na(Ei), TE := 0]
#### dt[, TE := ifelse(etime >= 0, etime + 1, 0)]
dt[, Y0_pure := 0] #### Simplest counterfactual
#### Other counterfactuals (commented out)
#### dt[, Y0_pure := 4 * treated + 0.3 * treated * t] #### Treated have a pre-trend...
#### dt[, Y0_pure := 4 * treated + 0.1 * treated * (t - 10) * (Ei - 9)] #### Pre-trend based on Ei..
#### Error term
dt[, eps := sqrt(0.2) * rnorm(.N)]
#### Actual and observed outcome
dt[, actual := Y0_pure + TE * treated]
dt[, y := actual + eps]
return(dt)
}

#### Run the gendata function
dt <- gendata2(ctrl=1, trends=10:11)
#### Create event time dummies and drop if all entries are zero
for (ii in 0:10) {

```

```

dt[, paste("D_p", ii, sep = "") := as.integer(etime == ii)]
dt[, paste("D_m", ii, sep = "") := as.integer(etime == -ii)]
dropme <- mean(dt[, eval(parse(text=paste0("D_p", ii)))], na.rm = T) == 0
if (dropme) {
  cat(paste0("D_p", ii), "dropped due to all zero among treated.\n")
  dt[, (paste("D_p", ii, sep = "")) := NULL]
}
dropme <- mean(dt[, eval(parse(text=paste0("D_m", ii)))], na.rm = T) == 0
if (dropme) {
  cat(paste0("D_m", ii), "dropped due to all zero among treated.\n")
  dt[, (paste("D_m", ii, sep = "")) := NULL]
}
}

```

D_m10 dropped due to all zero among treated.

```

dt[, D_m0 := NULL] # Drop D_m0
dt[, group2 := Ei == 11]
dt[, trend_group2 := t * group2]
destat(dt, signif = 2) # Display summary statistics

```

	min	25\\%	median	75\\%	max	mean	std	Os	NAs	n
id	1.0	12.75	24.50	36.25	48.00	24.50	13.86	0	0	960
treated	0.0	1.00	1.00	1.00	1.00	0.98	0.14	20	0	960
Ei	0.0	10.00	10.00	10.00	10.00	9.58	2.00	20	480	960
t	1.0	5.75	10.50	15.25	20.00	10.50	5.77	0	0	960
etime	-9.0	-4.00	1.00	6.00	20.00	0.92	6.11	23	480	960
TE	0.0	0.00	0.00	2.00	21.00	1.82	3.50	687	0	960
Y0_pure	0.0	0.00	0.00	0.00	0.00	0.00	0.00	960	0	960
eps	-1.4	-0.28	0.01	0.30	1.56	0.01	0.44	0	0	960
actual	0.0	0.00	0.00	1.00	11.00	1.58	3.10	707	0	960
y	-1.4	-0.19	0.17	1.29	11.95	1.59	3.16	0	0	960
D_p0	0.0	0.00	0.00	0.00	1.00	0.05	0.21	457	480	960
D_p1	0.0	0.00	0.00	0.00	1.00	0.05	0.22	456	480	960
D_m1	0.0	0.00	0.00	0.00	1.00	0.05	0.21	457	480	960
D_p2	0.0	0.00	0.00	0.00	1.00	0.05	0.22	456	480	960
D_m2	0.0	0.00	0.00	0.00	1.00	0.05	0.21	457	480	960
D_p3	0.0	0.00	0.00	0.00	1.00	0.05	0.22	456	480	960
D_m3	0.0	0.00	0.00	0.00	1.00	0.05	0.21	457	480	960
D_p4	0.0	0.00	0.00	0.00	1.00	0.05	0.22	456	480	960
D_m4	0.0	0.00	0.00	0.00	1.00	0.05	0.21	457	480	960
D_p5	0.0	0.00	0.00	0.00	1.00	0.05	0.22	456	480	960
D_m5	0.0	0.00	0.00	0.00	1.00	0.05	0.21	457	480	960
D_p6	0.0	0.00	0.00	0.00	1.00	0.05	0.22	456	480	960
D_m6	0.0	0.00	0.00	0.00	1.00	0.05	0.21	457	480	960
D_p7	0.0	0.00	0.00	0.00	1.00	0.05	0.22	456	480	960
D_m7	0.0	0.00	0.00	0.00	1.00	0.05	0.21	457	480	960
D_p8	0.0	0.00	0.00	0.00	1.00	0.05	0.22	456	480	960
D_m8	0.0	0.00	0.00	0.00	1.00	0.05	0.21	457	480	960
D_p9	0.0	0.00	0.00	0.00	1.00	0.05	0.22	456	480	960
D_m9	0.0	0.00	0.00	0.00	1.00	0.05	0.21	457	480	960
D_p10	0.0	0.00	0.00	0.00	1.00	0.05	0.22	456	480	960
group2	0.0	0.00	0.00	0.00	0.00	0.00	0.00	480	480	960
trend_group2	0.0	0.00	0.00	0.00	0.00	0.00	0.00	480	480	960


```

# Normalize event time -1 to be zero
dt[D_m1 == 1, D_m1 := 0L]
dat = copy(dt)

#### Need to work on how Miller generated data, error: asmrs is missing

dat[, trend := 1:N, by = id]
library(fixest)
twfet1 = feols(y ~ i(etime, treated, ref = -1) +
  i(t, ref = c(1, 20)) + trend | id, ##### FEs
  cluster = ~id, data = dat)
if (length(twfet1$collin.var) > 0) twfet1$collin.var
tdum <- makeDummyFromFactor(factor(dat[, t]),
  reference = NULL, nameprefix = "y")
tterms <- paste(colnames(tdum), collapse = "+")
tterms2 <- gsub("y1\\+", "", tterms2)
tterms3 <- gsub("\\+y20", "", tterms2)
dt <- data.table(dat, tdum, ttdum)
#### 2: no intercept, drop et=-1 (tterms2), y1 (tterms2)
#### 3: with intercept, drop et=21 (tterms3), y1, y20 (tterms3)
#### 4: with intercept, drop et=-1 (tterms2), y1, y20 (tterms3)
twfet2 <- lm(as.formula(paste0("asmrs ~ -1+id+trend+", tterms2, "+", tterms2)), data = dt)
twfet3 <- lm(as.formula(paste0("asmrs ~ id+trend+", tterms3, "+", tterms3)), data = dt)
twfet4 <- lm(as.formula(paste0("asmrs ~ id+trend+", tterms2, "+", tterms3)), data = dt)
tc1 <- twfet1$coeff
names(tc1) <- gsub("ti.*:", "tt", names(tc1))
names(tc1) <- gsub(":treat", "", names(tc1))
names(tc1) <- gsub("-", "N", names(tc1))
for (i in 1:4) {
  if (i > 1) {
    tw <- get(paste0("twfet", i))
    tc <- tw$coeff
  } else tc <- tc1
  tc <- tc[grep("tt", names(tc))]
  tc <- data.table(spec = c("fixest", "no int, -1", "int, -21", "int, -1")[i],
    coef = names(tc), val = tc)
  assign(paste0("tcf", i), tc)
}
tcf <- rbindlist(list(tcf1, tcf2, tcf3, tcf4))
tcf[, et := gsub("tt", "", coef)]
tcf[, et := gsub("N", "-", et)]
tcf[, et := as.numeric(et)]
tcf[et == -21, ]
tcf[et == -1, ]

```

Data preparation and estimation

We need to manually drop -1 (for baseline) or $-L = -10$ (for zero mean pre-period effects) from event time variables, Hawaii from State dummy variables (for linear independence), 1960, 1988 from time dummy variables (for accommodating a linear trend). In below, this is done by creating a dummy matrix from a factor variable and dropping the chosen reference. In using restrictions $\bar{\gamma}_{s<0} = 0$ or $\bar{a}_i = 0$, we will subtract the chosen reference from each columns of a dummy matrix.

```

for (ob in c("mr", "dv")) {
  obj <- qread(paste0(pathsave, ob, ".qs"))
  obj <- obj[, time2 := as.numeric(time)]
  obj <- obj[time2 >= 1960 & time2 <= 1988, ]
  ##### State dummies
  stdum <- makeDummyFromFactor(factor(obj[, StateName]), nameprefix = "")
  ##### Subtract Hawaii to impose  $\bar{\alpha}_i = 0$ 
  stnames <- colnames(stdum)
  setnames(stdum, stnames, gsub(" ", "", stnames))
  stdum[, (stnames) := lapply(.SD, function(x) x-Hawaii), .SDcols = stnames]
  stdum[, Hawaii := NULL]
  stterms <- paste(colnames(stdum), collapse = "+")
  ##### Time dummies
  tdum <- makeDummyFromFactor(factor(obj[, time]), nameprefix = "y")
  ##### Drop 1961, 1987 for accommodating trend and keep linear independence
  setnames(tdum, colnames(tdum), gsub("19", "", colnames(tdum)))
  tnames <- colnames(tdum)
  tdum[, paste0("y", c(61, 87)) := NULL]
  tterms <- paste(colnames(tdum), collapse = "+")
  etdum <- makeDummyFromFactor(factor(obj[, et]), nameprefix = "et")
  ##### Event time dummies
  ##### change to easier-to-handle names
  setnames(etdum, grepout("-", colnames(etdum)),
    gsub("-", "N", grepout("-", colnames(etdum))))
  etdumpre = copy(etdum)
  etprepost = copy(etdum)
  ##### Subtract  $t=-L$ ,  $L=10$  period to impose  $\bar{\gamma}_{s<0} = 0$ 
  negtime <- grepout("N", colnames(etdum))
  etdumpre[, (negtime) := lapply(.SD, function(x) x-etN10), .SDcols = negtime]
  etdumpre[, etN10 := NULL]
  ##### Subtract  $t=-1$  period to impose
  #####  $\bar{\gamma}_0 = 0$ ,  $\gamma_{s \neq 0} = \gamma_s - \gamma_0$ 
  preposttime <- colnames(etdum)
  etprepost[, (preposttime) := lapply(.SD, function(x) x-etN1),
    .SDcols = preposttime]
  etterms <- paste(colnames(etdum), collapse = "+")
  ##### Drop -1 and -10 from et
  etterms1 <- gsub("\\+etN1\\+", "+", etterms)
  etterms2 <- gsub("\\+etN10", "", etterms)
  obj1 <- data.table(obj, stdum, tdum, etdum)
  obj1a <- data.table(obj, stdum, tdum, etprepost)
  obj2 <- data.table(obj, stdum, tdum, etdumpre)
  ##### A: TWFE, B: TWFE+trend
  formA. <- paste0("v ~ -1+", stterms, " + ", tterms)
  formB. <- paste0("v ~ -1 + trend +", stterms, " + ", tterms)
  formC. <- paste0("v ~ -1 + trend + I(trend^(2)) + I(trend^(3))+",
    stterms, " + ", tterms)
  formA1 <- paste(formA., "+", etterms1)
  formB1 <- paste(formB., "+", etterms1)
  formC1 <- paste(formC., "+", etterms1)
  formA2 <- paste(formA., "+", etterms2)
  formB2 <- paste(formB., "+", etterms2)
  formC2 <- paste(formC., "+", etterms2)

```

```

obj1[, id := 1:N]
obj2[, id := 1:N]
rA0 <- lm(as.formula(formA.), data = obj1)
rB0 <- lm(as.formula(formB.), data = obj1)
rC0 <- lm(as.formula(formC.), data = obj1)
rA1 <- lm(as.formula(formA1), data = obj1)
rB1 <- lm(as.formula(formB1), data = obj1)
rC1 <- lm(as.formula(formC1), data = obj1)
rA2 <- lm(as.formula(formA2), data = obj2)
rB2 <- lm(as.formula(formB2), data = obj2)
rC2 <- lm(as.formula(formC2), data = obj2)
#### All coefficients are relative to t=-1 (which is set to zero)
rA0a <- lm(as.formula(formA.), data = obj1a)
rB0a <- lm(as.formula(formB.), data = obj1a)
rC0a <- lm(as.formula(formC.), data = obj1a)
rA1a <- lm(as.formula(formA1), data = obj1a)
rB1a <- lm(as.formula(formB1), data = obj1a)
rC1a <- lm(as.formula(formC1), data = obj1a)
assign(paste0(ob, "reg"), list(
  "TWFE"=rA0, "TWFE+t"=rB0, "TWFE+t3"=rC0,
  "TWFE+et"=rA1, "TWFE+t+et"=rB1, "TWFE+t3+et"=rC1,
  "TWFEa"=rA0a, "TWFEa+t"=rB0a, "TWFEa+t3"=rC0a,
  "TWFEa+et"=rA1a, "TWFEa+t+et"=rB1a, "TWFEa+t3+et"=rC1a,
  "TWFE+et, pre-period"=rA2, "TWFE+t+et, pre-period"=rB2,
  "TWFE+t3+et, pre-period"=rC2
))
#### CI
normalizationABC <- c("TWFE", "TWFE trend", "TWFE trend3")
normalization123 <- c("no et", "-1", "pre-mean=0")
Ci <- NULL
for (ch in 1:3) {
  for (i in 0:2) {
    for (j in c("", "a")) {
      if (i==2 & j == "a") next
      rr <- get(paste0("r", LETTERS[ch], i, j))
      id <- as.numeric(names(rr$resid))
      clus <- obj1[id, StateName]
      #clus <- data.table(rr$model)[, StateName]
      rrc <- clx(rr, cluster = clus, returnV = T)
      clxci <- data.table(cbind(Coef = rownames(rrc$ci), rrc$est, rrc$ci))
      clxci[, normalABC := gsub("FE", paste0("FE", j), normalizationABC[ch])]
      clxci[, normal123 := normalization123[i+1]]
      Ci <- rbind(Ci, clxci)
    }
  }
}
Ci[, period := gsub("et", "", Coef)]
Ci <- Ci[grepl("^\\.?\d", period), ]
Ci[, period := gsub("N", "-", period)]
Ci[, period := as.numeric(period)]
setcolorder(Ci, c("Coef", "Estimate", "Std. Error", "t value", "Pr(>|t|)",
  "2.5 %", "97.5 %", "period"))
setnames(Ci, c("Estimate", "2.5 %", "97.5 %"), c("beta", "CI_L", "CI_U"))

```

Table 1: Trend terms in two-way FEs of event study estimates

	Divorce rates					
	TWFE+t+et	TWFE+t3+et	TWFEa+t	TWFEa+t3	TWFEa+t+et	TWFEa+t3+et
Linear trend $\$t\$$	0.220*** (0.007)	0.619* (0.253)	0.177*** (0.004)	1.892*** (0.157)	0.233*** (0.004)	0.625** (0.224)
Squared trend $\$t^{\{2\}}\$$		-0.121 (0.078)		-0.403*** (0.063)		-0.120 (0.073)
Cubic trend $\$t^{\{3\}}\$$		0.004 (0.002)		0.012*** (0.002)		0.004 (0.002)
Num.Obs.	986	986	986	986	986	986
R2	0.989	0.989	0.976	0.988	0.989	0.989

+ p < 0.1, * p < 0.05, ** p < 0.01, *** p < 0.001

```
numcols <- c("beta", "CI_L", "CI_U", "period", "Std. Error", "t value", "Pr(>|t|)")
Ci[, (numcols) := lapply(.SD, as.numeric), .SDcols = numcols]
strcols <- colnames(Ci)[!(colnames(Ci) %in% numcols)]
Ci[, (strcols) := lapply(.SD, factor), .SDcols = strcols]
Ci[grepl("mea", normal123) & period < 0, mean(beta), by = normalABC]
qsave(Ci, paste0(pathsave, ob, "ci.qs"))
}
```

Trend terms:

```
library(modelsummary)
Results <- list("Divorce rates"=dvreg, "Marriage rates"=mrreg)
ii <- as.vector(which(unlist(lapply(dvreg,
  function(x) any(grepl("tre", names(coef(x))))))))
ii <- ii[ii > 3]
res <- c(Results[[1]][ii], Results[[2]][ii])
ms <- modelsummary(res,
  ####output = "gt",
  output = "kableExtra",
  stars = TRUE,
  title = "Trend terms in two-way FEs of event study estimates",
  ####coef_omit = "Sta|time|^et.?[123][1-9]|[23]0",
  #### Need single quotes, double quotes give an error
  coef_map = c('trend' = 'Linear trend $t$', 'I(trend^(2))' = 'Squared trend $t^{\{2\}}$',
    'I(trend^(3))' = 'Cubic trend $t^{\{3\}}$'),
  gof_omit = 'IC|Adj|F|RMSE|Log')
#### column labels
###library(gt)
###ms <- tab_spanner(data = ms, label = 'Divorce rates', columns = 2:6)
###ms <- tab_spanner(data = ms, label = 'Marriage rates', columns = 7:11)
library(kableExtra)
ms <- add_header_above(ms, c(" " = 1, "Divorce rates" = 8, "Marriage rates" = 8))
kable_styling(ms, bootstrap_options = "striped", full_width = F, position = "left")
```

When trending terms (and their cubic terms) are included (and their interactions with state dummies in the richest specifications), event study estimates also tend to have trends similar to gross trends, declining in marriage rates. In the case of divorce rates, use of trend terms breaks down estimation and event study

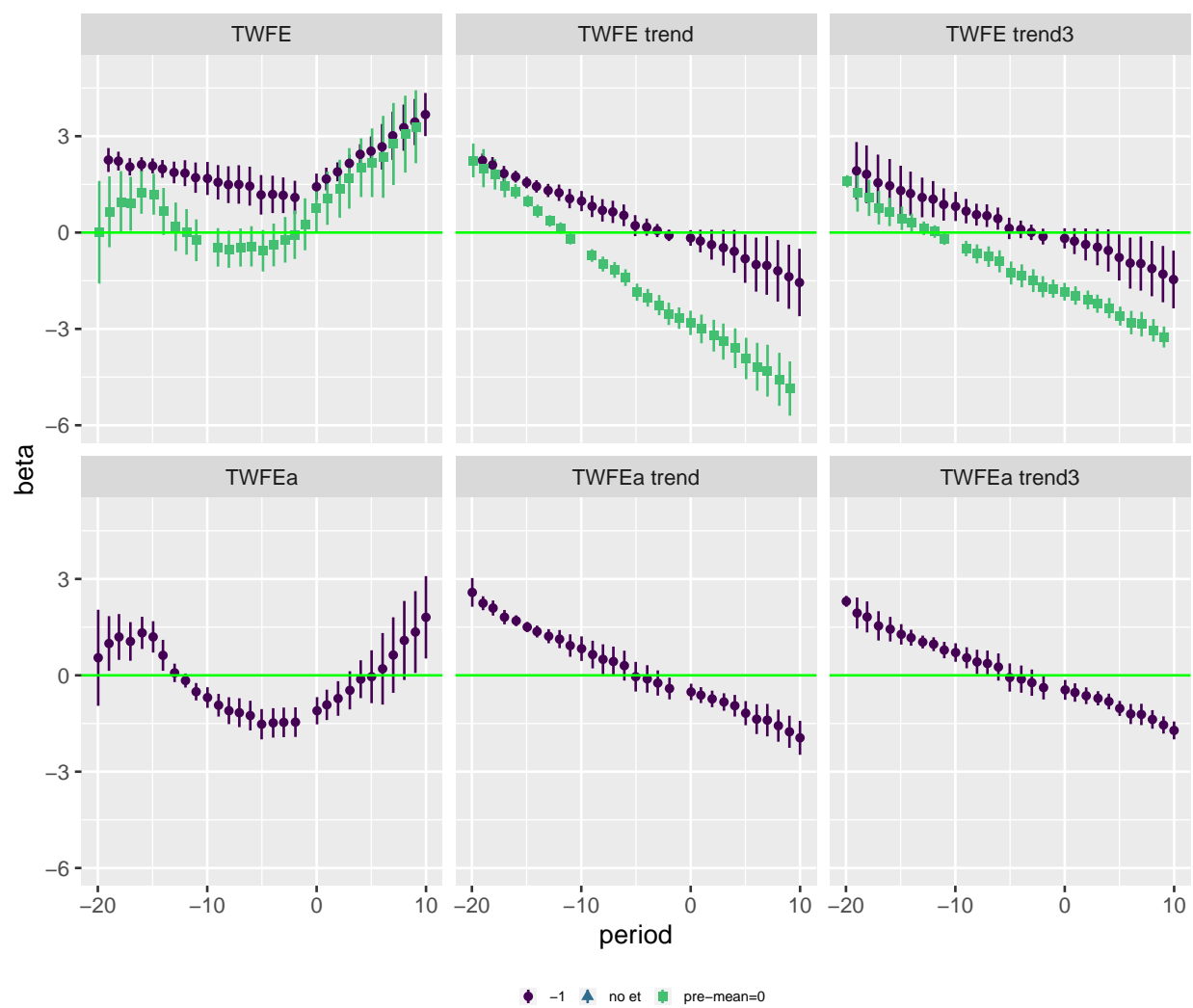


Figure 10: Impacts on divorce rates

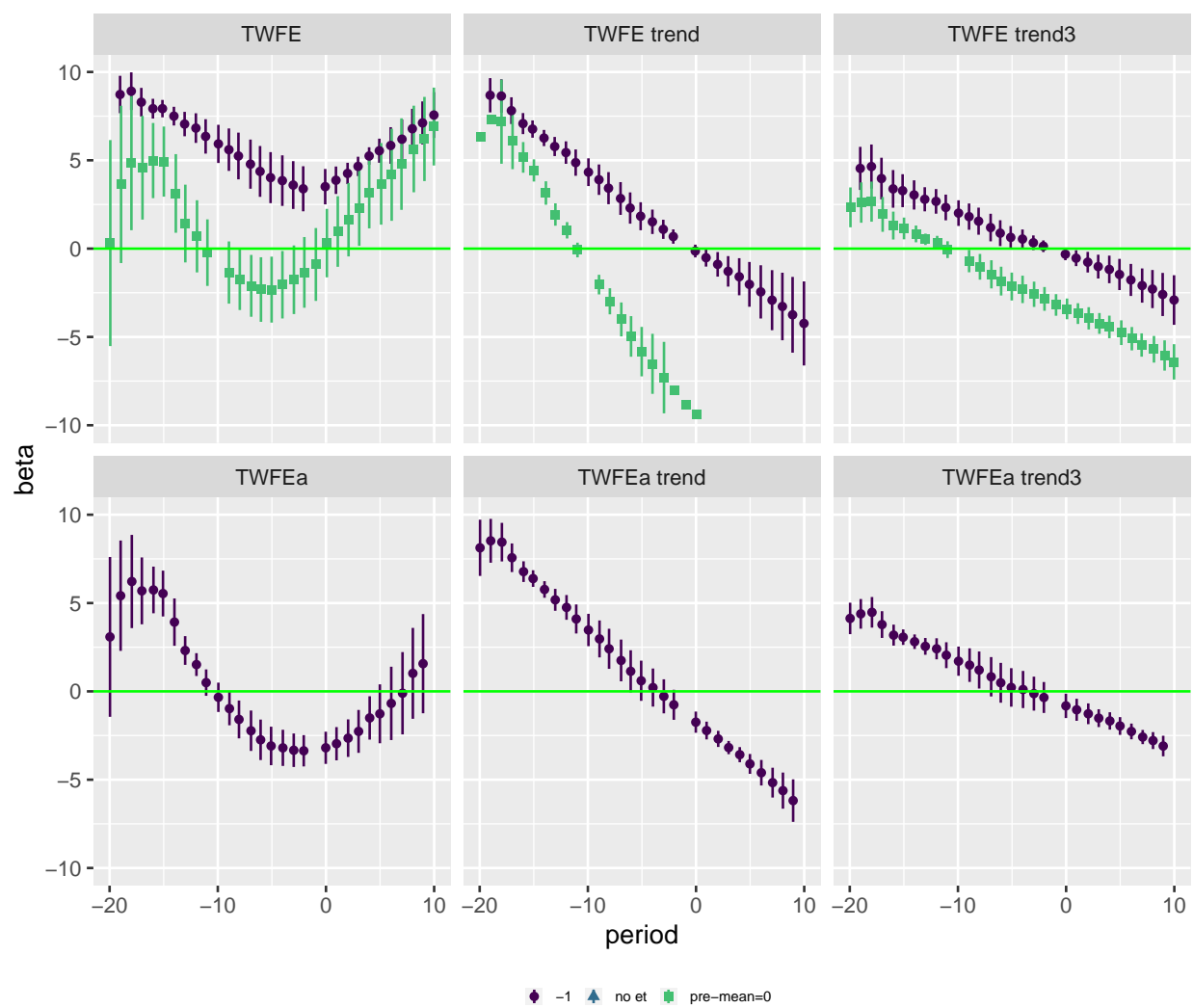


Figure 11: Impacts on marriage rates

estimates have the magnitude of thousands. This suggests possible collinearity between linear trend and the time-to-event variable. In below, I will use TWFE and + only squared linear trend.

Placeholder (you should not see this)

I can win an argument on any topic, against any opponent. People know this, and steer clear of me at parties. Often, as a sign of their great respect, they don't even invite me.

— Dave Barry

Marriage Registration Area was established in January, 1957. In 1959, 32 States and 4 other areas participated. Alabama, Alaska, California, Connecticut, Delaware, Florida, Georgia, Idaho, Iowa, Kansas, Kentucky, Louisiana, Maine, Maryland, Michigan, Mississippi, Montana, Nebraska, New Hampshire, New Jersey, New York (excluding New York City), Ohio, Oregon, Pennsylvania, Rhode Island, South Dakota, Tennessee, Utah, Vermont, Virginia, Wisconsin, Wyoming, Hawaii, Puerto Rico, Virgin Islands, and the independent registration area of New Orleans.

Divorce Registration Area was established in January, 1958.

In 1959, the DRA included 17 States and 2 other areas: Alabama, Alaska, Georgia, Idaho, Iowa, Kansas, Maryland, Montana, Nebraska, Oregon, Pennsylvania, South Dakota, Tennessee, Utah, Virginia, Wisconsin, Wyoming, Hawaii, and the Virgin Islands. See page 24 of **Vital Statistics of the United States, 1959, Volume 1**

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