

# Order

Michigan Supreme Court  
Lansing, Michigan

March 18, 2026

Megan K. Cavanagh,  
Chief Justice

ADM File No. 2022-31

Brian K. Zahra  
Richard H. Bernstein  
Elizabeth M. Welch  
Kyra H. Bolden  
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Noah P. Hood,  
Justices

Amendment of Rule  
2.106 of the Michigan  
Court Rules

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On order of the Court, notice of the proposed changes and an opportunity for comment in writing and at a public hearing having been provided, and consideration having been given to the comments received, the following amendment of Rule 2.106 of the Michigan Court Rules is adopted, effective May 1, 2026.

[Additions to the text are indicated in underlining and  
deleted text is shown by strikeover.]

Rule 2.106 Notice by Posting or Publication

(A)-(E) [Unchanged.]

(F) Newspaper Defined.

(1) The term “newspaper” as used in this rule means a print publication~~is limited to a newspaper~~ published in the English language for the dissemination of local news of a general character~~general news and information~~ or for the dissemination of legal news, to which all of the following apply:-

(a) There is~~The newspaper must have~~ a bona fide list of paying subscribers to the publication or the publication has~~or have been~~ published at least once a week in the same community without interruption for at least 2 years;

(b) The publication has~~and have been published~~ and of general circulation at not less than weekly intervals~~established, published, and circulated at least once a week~~ without interruption for at least 1 year in the county where publication is to occur. A newspaper shall not lose eligibility for interruption of continuous publication due to any of the following:

(i) An act of God.

- (ii) Labor disputes.
  - (iii) The COVID-19 pandemic, for the period beginning March 10, 2020 through the end of the COVID-19 pandemic.
  - (iv) Military service of the publisher for a period not to exceed 2 years and provided the publication is resumed within 6 months following the termination of such military service.
- (c) The publication annually averages at least 25% news and editorial content per issue.
  - (d) The publication must offer a print and website version. During the full publication period, any notice must appear in the publication's print and website versions and be placed on the website established and maintained by a state association of newspapers that represents a majority of newspapers in this state as a central repository for notices.

(2) [Unchanged.]

(G) [Unchanged.]

**Staff Comment (ADM File No. 2022-31):** The amendment of MCR 2.106 updates the definition of “newspaper” for notice by publication. See also MCL 691.1051.

The staff comment is not an authoritative construction by the Court. In addition, adoption of a new rule or amendment in no way reflects a substantive determination by this Court.



I, Elizabeth Kingston-Miller, Clerk of the Michigan Supreme Court, certify that the foregoing is a true and complete copy of the order entered at the direction of the Court.

March 18, 2026

*Elizabeth Kingston-Miller*  
Clerk