

Appendix B

Introduction to Citation Form

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I. INTRODUCTION

In legal writing, a citation is used to identify the authority for a statement or the source of a quotation or paraphrase, and to tell the reader where to find that authority or source. For example, citations to articles identify the author, title, periodical in which the article is published, page numbers, and dates. Citations also provide other information, such as the kind of support that the cited source supplies for your statement. For example, a case citation tells you which court decided the case, and thus, whether the case is binding precedent or not. Legal citations are very stylized and accurate citation form can be important. If you join a journal at your law school or submit documents to a court you will find that accurate citation form may be crucial. You most likely will be learning legal citation in your first year of law school according to one of two citation systems, either *A Uniform System of Citation*, commonly known

as The Bluebook, or a newer source, the *ALWD Citation Manual*.¹ This Appendix will explain each one.

In your first year of law school you will mainly write legal memoranda and trial or appellate briefs. In these forms of writing, you cite authority within the text rather than in footnotes, and you put the citation right after the text that you are citing to. In other forms of writing, such as law review articles, you cite authority in footnotes. The information in this Appendix is about citing in text. Moreover, because most of the authorities you will use for first-year memoranda and briefs are cases, statutes, constitutions, law review pieces, and books, this Appendix includes only the rules for citing these authorities.

A citation can be in the form of either a sentence or a clause. A citation sentence comes after the sentence of text that it is the authority for and is punctuated as a separate sentence. You use a citation sentence if the authority you cite supports the entire sentence in your text. If the citation supports only part of your sentence of text, then use a citation clause following that part of the sentence it is an authority for. Set off the citation clause with commas.

Example: (A case name represents the citation):

Parents may be immune from a tort suit brought by their children. *Senior v. Junior*. However, parents are not immune from suits for intentional torts, *Red v. Green*, or from suits brought by emancipated children, *Fred v. Frank*.

In this example, *Senior v. Junior* is the case authority for the information in the sentence about parental immunity that precedes it. *Senior v. Junior* is written as a separate citation sentence. There are two citation clauses in the next sentence. Each citation provides authority for a part of the sentence. The writer has cited *Red v. Green* for its holding that there is no immunity from intentional torts, and cited *Fred v. Frank* for its holding that there is no immunity from suits brought by emancipated minors. Each citation clause is set off by commas.

II. CASE CITATIONS

A case citation identifies the case and gives the reader the information necessary to find the print version of that case.² The first time you cite a case, you must include the name of the case, the reporter in which it is published (or, if not yet in a reporter, its place of publication, which may be a looseleaf service or computer database), the page on which the case begins, the date the case was decided, and, if necessary, the court that decided the case. The date and the court information are enclosed in parentheses. The examples in these materials are for citations of cases from the United States published in case reporters or available on computer databases. This section uses an example of a case from a state court.

¹ Another source of citations is The University of Chicago Manual of Legal Citation (the Maroon Book).

² Often this information also enables you to find an electronic version.

Table T.1 in the Bluebook and Appendix 1 in the ALWD Manual list each jurisdiction in the United States. They tell you the names of the courts in each jurisdiction, the case reporters to which to cite, and the abbreviations for the jurisdiction, its courts, and the reporters. They also provide web site information. The ALWD Manual Appendix also tells you whether the jurisdiction's courts have local citation rules.

Below is an example and explanation of a typical citation of a state case. State cases are cited to the regional reporter, published by West, in this case the Pacific Reporter, Second Series, abbreviated P.2d. (The supernumerals are not part of the citation, but are keyed to explanations below.)

1 2 3 4 5 6
Adams v. Brown, 25 P.2d 100 (Okla. 1955).

1. Name of case, italicized, or achieved by underlining if typed or written. Use the last names of the parties, if the parties are individuals, and if there are more than one plaintiff or defendant use only the first named of each party. Use the complete name of a business entity, but abbreviate as permitted in the Bluebook Rule 10.2.2 and Tables T.6 and T.11, and ALWD Manual Appendix 3. For example, if "Brown" were the Brown & Smith Steel Company, Incorporated, write as *Brown & Smith Steel Co.*

Bluebook rule 10.2.1(h) instructs that abbreviations such as "Inc." or "Ltd." be omitted if a party's name contains words such as "R.R.," "Co.," "Bros.," or "Ass'n," which indicate that the party is a business firm. The ALWD Manual Rule 12.2 (e)(5) allows you to use Brown & Smith Steel Co., Inc. as an alternate.

2. Comma after the case name.

3. Volume number of the case reporter and name of the reporter, abbreviated. Leave a space between volume number and name of reporter.

Do not put a space between P. and 2d because there should be no space between adjacent single capitals, and the ordinal "2d" is considered a single capital. If the reporter were the South Eastern Reporter, Second Series, you would write as S.E.2d. If the reporter were the Southern Reporter, Second Series, however, under Bluebook rules you would write as So. 2d (leaving a space between So. and 2d) because the Bluebook abbreviates this reporter as "So.," which is not a single capital and thus requires a space before the numeral. The ALWD Manual abbreviates as S. or S.2d.

4. Page number at which the case begins.

5. No punctuation, but leave a space.

6. Parenthetical that identifies the jurisdiction and court, and the year the case was decided. Because the Pacific Reporter includes cases from many states, you must identify the jurisdiction of the case. Identification by the abbreviation of the state alone means that the case was decided by the highest court in that state. Thus, the abbreviation "Okla." means that the case was decided by the Oklahoma Supreme Court. If the case was not decided by the highest court, for example, the intermediate court of appeals, then identify the court if it is not otherwise identified by the name of the

reporter. For example, if a case was decided by the Minnesota Court of Appeals in 1978, cite as (Minn. Ct. App. 1978) for Bluebook citation and (Minn. App. 1978) for ALWD Manual citation. Bluebook Table T.1 and ALWD Manual Appendix 1 list the proper abbreviations for the courts in each jurisdiction.

If the reporter you cite publishes cases from only one jurisdiction, for example, the New York Supplement (N.Y.) do not include the jurisdiction in parenthesis.

Because the particular department, division or district of a court can be important to determine whether a case is binding precedent, the ALWD Manual Rule 12.6 (b)(2) includes this information for state citations inside the parentheses between the court information and the date.

You will cite most state court decisions according to the format in the *Adams v. Brown* example, subject to the following exceptions.

A. Parallel Citation to State Cases

Some states publish their court decisions in an officially published reporter. These cases are thus published in two case reporters: the state's official reporter and West's regional reporter.

Before 1991 (the publication date of the 15th edition of the Bluebook), rules of citation required citation to both reporters for all citations to all state cases for which the state publishes an official reporter. Citation to both reporters for the same case report is called a parallel citation.

The Bluebook in 1991 required parallel citations only for documents submitted to state courts for citations to cases decided by courts of that state if that state publishes an official reporter. However, you will still see parallel citations in other materials that were written according to the previous Bluebook rules.

The ALWD Manual and the 17th edition of the Bluebook require parallel citations only for documents submitted to a court whose rules require parallel cites.

For parallel citations, cite the official reporter first, followed by the cite to the regional reporter, as in the examples below.

Blue v. Green, 85 Wis. 2d 768, 270 N.W.2d 390 (1980).

This case is from the Wisconsin Supreme Court. The jurisdiction is identified in the cite to the state reporter and need not appear in the parenthetical at the end.

Black v. Gold, 85 Ill. App. 2d 768, 270 N.E.2d 390 (1980).

This case is from the Illinois Appellate Court, which is not the highest court in the state. However, the Illinois case reporter identifies the court so that it need not be identified in the parentheses.

B. Parallel Citation to California, New York, and Illinois Cases

West publishes additional reporters for California, New York, and Illinois cases, the California Reporter (Cal. Rptr.), the New York Supplement (N.Y.S.), and Illinois Decisions (Ill. Dec.). Older parallel citation often included the third reporter. You need not cite all three reporters under the new rules for parallel citations, however, because the court rules require cites to the official reporters only, not the West reporters.

A full three-reporter case cite looks like this.

Blue v. Green, 46 N.Y.2d 401, 186 N.E.2d 807, 413 N.Y.S.2d 895 (1978).

Black v. Gold, 50 Cal. 3d 247, 786 P.2d 375, 266 Cal. Rptr. 649 (1989).

C. Citation to Federal Court Cases

1. The Supreme Court of the United States.

Supreme Court cases are cited to the official reporter, United States Reports, abbreviated U.S., so that a citation to a case would be

Nathanson v. Victor, 300 U.S. 52 (1980).

If a case is not reported yet in United States Reports, you may cite to the West Publishing Company's Supreme Court Reporter (S. Ct.) or the Lawyer's Edition (L. Ed.), in that order. If the case is not yet reported in any reporter, cite to United States Law Week (U.S.L.W.) or to a computer database. Do not give parallel citations for Supreme Court cases.

2. United States District Courts and Courts of Appeal.

There are no official reporters for decisions from these courts. The cases are cited to West reporters: District court cases are cited to the Federal Supplement (F. Supp. or F. Supp. 2d), and courts of appeal cases are cited to Federal Reports (F., F.2d, or F.3d). Another reporter, Federal Rules Decisions (F.R.D.) reports cases concerning federal procedural issues.

Because the citation does not identify the court in which the cited case was decided, you must always identify the court, by district or by circuit, in the parentheses.

John v. Marshall, 400 F. Supp. 12 (W.D. Va. 1976).

This case is from the United States District Court for the Western District of Virginia.

John v. Marshall, 400 F. Supp. 12 (D.R.I. 1976).

This case is from the United States District Court for the District of Rhode Island. Rhode Island comprises one federal district.

John v. Marshall, 400 F.2d 12 (2d Cir. 1976).

This case is from the United States Court of Appeals for the Second Circuit.

John v. Marshall, 400 F.2d 12 (D.C. Cir. 1976).

This case is from the United States Court of Appeals for the District of Columbia Circuit.

D. Unreported Cases

To cite cases that are not reported or are reported only in slip opinions (individual court decisions published separately soon after they are rendered), cite by the case name, the case's docket number, the page preceded by "slip op.," the court, and the full date of the decision.

If the opinion is not separately paginated, cite the page on which the case begins and then the page on which the material is located.

Silver v. Gold, No. 92-95, slip op. 600, 602 (E.D. Mich. June 9, 1993).

If the opinion is separately paginated, cite as

Silver v. Gold, No. 92-28, slip op. at 602 (E.D. Mich. June 9, 1993).

To cite to cases available only on electronic databases, give enough information to allow the reader to find the case. Cite to LEXIS or Westlaw or other electronic database such as a looseleaf service, rather than to the Internet. When citing to LEXIS or Westlaw, for Bluebook cites, cite the case name, the docket number, the unique LEXIS or Westlaw identifier assigned to the case, the screen or page number (if assigned) preceded by an asterisk, and a parenthetical that includes the court abbreviation and full date. For ALWD Manual cites, omit the docket number.

A Bluebook citation would be

Bush v. Gore, No. 2000-150, 2000 WL 345789, at *5 (N.D. Fla. Dec. 5, 2000).

An ALWD Manual citation would be

Bush v. Gore, 2000 U.S. Dist. LEXIS 5740, at *5 (N.D. Fla. Dec. 5, 2000).

If the case is available only on the Internet use Bluebook Rule 18 or ALWD Manual Rule 12.15.

E. Case History

Because parties to litigation may appeal losing decisions, many cases build up a litigation "history." This history may include a decision on a motion or trial, one or more appeals, and one or more rehearings. Some or all of this prior or subsequent history of a case may be relevant authority for your analysis and should be cited.

Give the prior history (usually the trial court decision) only if significant to the point for which you cite the case.

On the other hand, the entire subsequent history (usually appellate decisions or denials of further review) should be included, unless the cite is for a denial of certiorari or discretionary appeal if the case is more than two years old, or for the case history on remand if it is not relevant to your analysis. Subsequent history includes a case that overrules the cited cases.

Subsequent history citations should be preceded by a word or phrase that explains the history, such as *aff'd*, which means that the higher court affirmed the decision below, or *rev'd*, which means that the higher court reversed. These explanatory words and phrases are quite stylized and are explained in the Bluebook Rule 10.7 and the ALWD Manual Rule 12.8(a). Note that the explanatory phrases are underlined or italicized and some are followed by a comma.

Blue v. Green, 100 F.2d 25 (7th Cir. 1999), *cert. denied*, 312 U.S. 420 (2000).

This citation means that the Supreme Court of the United States denied review of the case that had been submitted by a petition for a writ of certiorari. If the date of the two decisions were the same, both 1999, then for Bluebook cites omit the date in the citation to the earlier decision.

III. CONSTITUTIONAL AND STATUTORY CITATIONS

A. Constitutions

Cite constitutions by country or state and abbreviate constitution as “Const.” Do not include a date unless the constitution you are citing has been superseded.

U.S. Const. art. III, § 1, cl. 2.

N.M. Const. art. IV, § 7.

B. Statutes

1. Codes

Statutes are published in codes and are cited to the current official code volumes. The basic citation form includes the abbreviated name and volume of the code in which the statute appears, the section number (or whichever identification is used) of the statute, and the year the code was published. Statutes are also published by private publishing companies in codes that are annotated. Cite to the annotated code only if there is no official code cite; do not use parallel citations. When you cite to an annotated code, include the name of the publisher in the parenthetical. You will find the title of each jurisdiction’s codes as well as other compilations and their abbreviations in Table T.1 of the Bluebook and Appendix 1 of the ALWD Manual. The following cite is to the official version of the United States Code.

42 U.S.C. § 1985(3) (1994).

The cited statute is found in Title 42 of The United States Code at section 1985(3). The date is the year the code was published, not the year the statute was passed.

If the statute is published entirely in the supplement because it was enacted after the code was published in hardcover, then cite to the supplement:

42 U.S.C. §§ 2000f(a-b) (Supp. 1996).

If you are citing to an amended statute where the original version appears in the code and the amendment is in the supplement, cite to the code and the supplement:

42 U.S.C. §§ 2000e(k-m) (1994 & Supp. 1996).

2. Session laws

If a statute has not yet been published in the code, then cite it as an act in the session laws (laws enacted by a legislature during one of its annual sessions that are published yearly and bound in the order of their enactment). Give its name and public law number, the volume and name of the session laws (for state laws, begin with the name of the state) and page. The following is a Bluebook cite to *The Statutes at Large*, which is the compilation of United States sessions laws.

Public Debt Act, Pub. L. No. 86-74, §1, 73 Stat. 156 (1986).

The ALWD Manual does not include the name of the act. See Rule 14.6. Also cite to the act if you are using material that is not published in the code, such as the statement of legislative purpose.

Some statutes that have been codified are commonly still cited by the name and identification from their original passage as a public act, in addition to their current code citation. For example,

The Omnibus Crime Control and Safe Streets Act of 1968,
Title III, 18 U.S.C. §§ 2510-2515 (1988).

3. Electronic Database

If you have used an electronic database, then cite by adding a parenthetical that includes the name of the database and its currency rather than the year the code was published. See Bluebook Rule 18.1.2. For unofficial codes also include the publisher, editor, or compiler.

IV. PERIODICALS

Your most common citations to periodicals will be to law reviews. To cite law review material in your text, first give the author's full name as it appears in the publication. Include designations such as "Jr." and shorten a middle name (or names) to an initial, unless the author uses an initial for a first name. If so, use that initial and the full middle name.

Follow the author's name with the title of the material, underlined or italicized. Then give the volume number of the periodical, the abbreviated name of the periodical in roman type (not large and small capitals), the page on which the piece begins, and in parentheses the year of publication. See Bluebook Table T.14 for the abbreviations for periodicals, and Table T.11 for geographic abbreviations. For the ALWD Manual, see Appendix 5.

A. Lead Material

Lead articles, usually written by faculty and practicing attorneys, are cited by the author's full name and the material described above, as in this example.

Phil J. Friday, Jr., *Just the Facts*, 50 J. Crim. L. & Criminology 78 (1980).

B. Student Material

For the Bluebook, cite signed student work by the author's full name in the same manner as other signed law review articles. Student work is signed if the author is credited with the piece anywhere in the issue in which it appears, for example at the end of the piece. If only the author's initials are provided, the piece is unsigned.

In order to indicate that a student wrote the material, for a Bluebook cite, cite the designation of the piece, for example, Comment or Note, before the title.

Moira Standish, Comment, *Will Thanksgiving Never Come?*, 50 Nw. U. L. Rev. 5 (1986).

For ALWD Manual citations to an identified student author, insert "Student Author," offset by commas, between the author's name and the title.

Moira Standish, Student Author, *Will Thanksgiving Never Come?*, 50 Nw. U. L. Rev. 5 (1986).

If the title is merely a long, digest-like heading, or a series of keywords, it should be omitted and the work cited solely by its designation. For example,

Richard Martin, Recent Case, 46 Nw. U. L. Rev. 357 (1982).

NOT: Richard Martin, Recent Case, *Constitutional Law—Right of Privacy—Abortion—Family Law—As Applied to Immature, Unemancipated and Dependent Minors, a State Statute Requiring a Physician to Notify a Pregnant Minor's Parents Prior to the Performing of an Abortion is Constitutional*, 46 Nw. U. L. Rev. 357 (1982).

If the piece is unsigned, for Bluebook cites, use the designation given by the periodical.

Comment, *Will Thanksgiving Never Come?*, 50 Nw. U. L. Rev. 5 (1986).

For ALWD Manual citation, if the student author is not identified, then just use Student Author in place of a name.

C. Abbreviations and Spacing

The general rule is to close up adjacent single capitals. However, for abbreviations of names of periodicals, do not close up single capitals if one or more refers to a geographic or institutional entity. In that case, set off with a space the capitals that refer to the entity from the adjacent single capital.

Moira Standish, Comment, *Will Thanksgiving Never Come?*,
50 Nw. U. L. Rev. 5 (1986).

This article is in the Northwestern University Law Review. Because the “U.” is an abbreviation of part of the name of the institution, it is set off from the “L.,” which is the abbreviation for “Law.”

V. BOOKS

Cite books with the author’s full name as it appears on the publication. Follow the rules about initials as stated under periodicals. Next, cite the title of the book (italicized or underlined) as it appears on the title page (for Bluebook cites include the subtitle only if particularly relevant; for ALWD Manual you may include the subtitle), the page, section or paragraph from which the material is taken, and, in parentheses, the year of publication and edition, if more than one edition. For ALWD cites, include the publisher in the parentheses. See ALWD Rule 22 and Bluebook Rule 15.

Benjamin N. Cardozo, *The Growth of the Law* 16 (1924).
[Bluebook cite]

Benjamin N. Cardozo, *The Growth of the Law* 16 (Greenwood Press
1924). [ALWD Manual cite]

If the book has an editor, give the editor’s full name in the parenthetical before the date. This is an example of a Bluebook citation for a multi-volume set with an editor.

2 Page on Wills, § 152 (Bowe M. Parker ed. 1991).

The “2” indicates the second volume of a multi-volume set. An ALWD Manual citation looks like this.

Page on Wills vol. 2, § 152 (Bowe M. Parker ed., W.H. Anderson Co.
1991).

If the book has two authors, include both names, using full names and an ampersand (&) to connect them. If the book has more than two authors, you have two options under either the Bluebook Rule 15 or ALWD Manual Rule 22 (1)(a). Either include the first author’s name followed by “et al.,” or include full names for each author. Use an ampersand between the last two names. The Bluebook suggests this last option only if all the names are particularly relevant.

Either of these examples is correct.

W. Page Keeton, Dan B. Dobbs, Robert E. Keeton & David G. Owen,
Prosser and Keeton on the Law of Torts § 10 (5th ed., West 1984).

[ALWD cite]

... (5th ed. 1984) [Bluebook cite]

or

W. Page Keeton et al., *Prosser and Keeton on the Law of
Torts* § 10 (5th ed. 1984) [Bluebook cite]

... (5th ed., West 1984) [ALWD cite]

VI. GENERAL CITATION INFORMATION

A. Citation to a Particular Page

If you quote from a source or discuss material on a particular page or pages in the source, you must cite the page or pages on which the quotation or material can be found. If you are citing the source for the first time, put the page citation after you cite the page at which the source begins. This page citation is often called a jump cite or a pinpoint citation. For example,

Blue v. Gold, 200 N.W.2d 108, 110 (Mich. 1975).

In this example, the quotation from *Blue* is on page 110 of the Northwestern Reporter. The case begins at page 108. If this cite required a parallel cite, it would also have to include a parallel pinpoint cite to the official state reporter, hence:

Blue v. Green, 50 Mich. 100, 104, 200 N.W.2d 108, 110 (1975).

The parallel cite informs the court that the quotation can also be found on page 104 of the official state reporter.

B. Short Citation Form

Once you have cited an authority with a complete citation, for Bluebook citation, you may use a short citation form for subsequent citations if the short form does not confuse the reader as to what the cite is for, the full citation is in the same general discussion, and the reader can locate the full citation easily. The ALWD Manual allows you to use a short form citation anytime after you cite with a full citation, if you wish. See Rule 11.1.

1. *Id.*

Id. is a citation form that refers to the immediately preceding cited authority, and can be used to refer to any kind of authority with two exceptions in the ALWD Manual Rule 11.3 (2). If the second citation is to material on the same page as the preceding cite, use just *id.*

Citation one: *Green v. Blue*, 233 A.2d 562, 564 (Pa. 1967).

Citation two: *Id.*

If the citation is to a different page, use “*id. at*” the page number. For example:

Citation one: Benjamin N. Cardozo, *The Growth of the Law* 16 (1924).

Citation two: *Id. at* 25.

If the citation is to a case that requires a parallel citation, for Bluebook citation use “*id. at*” the page number for the first reporter cited and then short form of the parallel citation. See B(3) below for short form. See Bluebook Rule 10.9 (a) (i) and ALWD Rule 12.21.

Citation one: *Blue v. Green*, 426 Pa. 464, 233 A.2d 562 (1967).

Citation two: *Id. at* 473, 233 A.2d at 581.

For ALWD Manual citation, use short form for both cites.

Do not capitalize *id.* if you use it within a sentence as a citation clause. For example,

Because the thirteenth amendment does not require state action, *id. at* 104, the court should hold that a private conspiracy violates that amendment.

2. *Supra*

Supra is used as a short citation when the authority has been fully cited previously but is not the immediately preceding citation. Do not use *supra* to cite to cases, statutes, or constitutions. For these, use *id.* where appropriate or the form discussed below in (3). Use *supra* to cite to books and articles.

Cardozo, *supra*, at 10. [This refers to Cardozo’s previously cited book, cited for material at page 10.]

3. Short Form for Cases Where *id.* is Not Appropriate

The short form consists of the name of the case, and the volume and name of the case reporter and the page number (for each reporter if a parallel citation is required). You have a choice as to how much of the case name to include. You may omit the case name and cite to the reporter and page when it is perfectly clear which case you are referring to, as when the case name appears in the preceding sentence, or you may shorten the case name to the name of one party, for example, if the case name is not included in the text of the sentence, or you may provide the full case name. If in doubt, use at least one party’s name. Example:

Grey v. Pink, 270 N.W.2d at 390.

or

Grey, 270 N.W.2d at 390.

or

270 N.W.2d at 390.

Typically, if you use the name of one party, use the name of the first named party. However, if that party is a government or a very common name, or is the same name as a party in another case, use the last named party's name. So, for example, for *State v. Gray*, use *Gray*.

If this citation were to appear in a document submitted to a Wisconsin court, for example, the jump cite to the official state reporter would also be included.

Grey v. Pink, 85 Wis. 2d at 768, 270 N.W.2d at 390.

or

Grey, 85 Wis. 2d at 768, 270 N.W.2d at 390.

or

85 Wis. 2d at 768, 270 N.W.2d at 390.

When you discuss a case in text, as opposed to citing the case, you may always refer to the case by the name of a party if you have already cited the case. Again, do not identify a case only by the governmental party, such as "In *United States*. . . ."

To invalidate an agreement, one court has required actual fraud. *Bubble v South.*, 35 P. 220 (Okla. 1910). Later courts have limited *Bubble* to its specific facts, however.

or

Fraud under the FTC requires intentional conduct. *United States v. Mobilier*, 35 F. Supp. 12 (E.D.N.Y. 1960). Later courts have limited *Mobilier* to its facts.

4. Electronic Database

Use the unique database identifier for the case short form. See Bluebook Rule 18.7, ALWD Manual Rule 12.21(d).

Grey, 2000 WL 2000, at *1.

5. Short Form for Statutes Where *id.* is Not Appropriate

You may use a short form to cite a statute in the same general discussion in which you have cited the statute in full as long as the citation is clear to the reader. For example, if you are discussing the Civil Rights Act, 42 U.S.C. § 1983, you may cite it as § 1983 in that discussion, or as the Civil Rights Act § 1983, or as 42 U.S.C. § 1983. When you discuss a statute in text, as opposed to a citation, you may also use the short designation. Most people probably use the section designations. See Bluebook Rule 12.9. The ALWD Manual, Rule 14.5, requires the same information as the long form except omit the publisher and date. In text, however, the ALWD Manual requires you to spell out the citation if you use it.

6. Constitutions

Do not use a short form citation except *id.* where appropriate

7. Hereinafter

You may devise your own short form for particularly cumbersome citations to any kind of material. After you cite the material in full, follow with “hereinafter” and the form you will use. Enclose this information in brackets. See ALWD Manual Rule 11.4(d) for other information.

P. Bator et al., *Hart and Wechsler’s The Federal Courts and the Federal System* 300 (2d ed. 1973) [hereinafter Hart & Wechsler].

Do not use hereinafter for case names or for any statutes unless the name is extremely long.

C. String Citation

A list of citations to several authorities for a particular point is called a string citation. You will see string cites used in judicial opinions and in memoranda and briefs, but you should use long ones sparingly. Unless your purpose is to actually list every case or other authority on point, or to literally show overwhelming authority, a string cite is usually not necessary and is difficult to read. The reader will tend to avoid it.

A citation of just a few authorities, however, is fairly common. The authority or authorities that are considerably more helpful or important than the others should be cited first. The others should follow in the order listed in the Bluebook Rule 1.4 and ALWD Manual Rule 46.3—enacted law first (constitutions, statutes, and other enacted law), international agreements, case law, and others as listed in those Rules. If no authorities stand out, this ordering scheme governs the entire string cite. There is also a correct order within each type of authority. For case law, the order is federal cases, state cases, listed alphabetically by state, and foreign cases. Within each jurisdiction (all federal courts are one jurisdiction), cite cases from highest court to lowest court, and within each court level, most recent to least recent. Use the same order of jurisdictions to cite constitutions and statutes. Separate each citation with a semicolon.

Sosa v. Grace, 350 F. Supp. 80 (N.D. Ill. 1987); *Weiss v. Jones*, 400 S.E.2d 10 (Ga. 1986); *McGee v. McGuire*, 430 S.W.2d 85 (Mo. 1986); *Jeter v. O’Neill*, 500 N.E.2d 3 (N.Y. 1985); *Alou v. Biggio*, 150 S.W.2d 82 (Tex. 1979); *Olerud v. Martinez*, 200 P.2d 20 (Wash. 2000).

Remember that not all authorities are equal in weight. A string cite obscures the differences in the importance of the authorities listed. A case or statute from the jurisdiction of your assignment, for example, should be more important than those from other jurisdictions, and these citations should precede the others. Although you may cite controlling authority first in a string cite, you should also consider citing controlling authority alone, after the proposition it supports. Then, use an introductory

signal (see below) to cite supporting cases from other jurisdictions, as is done in this example from an Illinois problem:

A parent is not immune from suit brought by an emancipated minor. *Oscar v. Green*, 350 N.E.2d 10 (Ill. 1971). *See also Roosevelt v. Franklin*, 390 A.2d 50 (N.J. 1965); *Kit v. Carson*, 41 N.W.2d 200 (N.D. 1962); *Black v. Hills*, 460 N.W.2d 80 (S.D. 1964).

D. Introductory Signals

Introductory signals are the italicized or underlined words that often precede citations to authority. Signals are used to show what type of support the citation supplies for the author's statement. The meanings of the most used signals are described below.

1. Direct citation without a signal: Use no signal before a citation if the authority

- a. is the source of a quotation or paraphrase, or
- b. identifies an authority referred to in the text, or
- c. is direct support for the proposition.

2. Introductory signals

a. *See* is the signal most often used. It means that the cited authority is a basic source material for the proposition in the text. *See* is used if the proposition is not directly stated in the cited authority (use no signal if it is) but follows directly from it, or, according to the ALWD Manual, the cited authority contains dicta that supports the cited proposition.

See also is used to give additional support, especially after other supporting authorities have been cited and discussed. (*See also* is not included in the ALWD Manual).

Because Jones did not act intentionally or recklessly, she is not guilty of criminal contempt. *See Yellow v. Orange*, 100 F. Supp. 58 (S.D.N.Y. 1951).³

Because Jones did not act intentionally or recklessly, she is not guilty of criminal contempt under the rule of *Yellow v. Orange*. *See also William v. Jefferson*, 394 F.2d 42 (D.C. Cir. 1971); *Silver v. Copper*, 285 F.2d 512 (D.C. Cir. 1968).

b. *E.g.* means "for example." Use it to give one or more examples of support for the proposition in the text. *E.g.* may be combined with other signals, such as in *See, e.g.* *E.g.* is followed by a comma in Bluebook citation.

³ *See* is used instead of no signal because *Yellow v. Orange* does not say anything about Jones.

Most state statutes require that the defendant act intentionally or recklessly. *See, e.g.*, N.Y. Penal Law § 50 (McKinney 1980); Or. Rev. Stat. § 32 (1985); Utah Code Ann. § 12 (1981). A defendant, therefore, should not be guilty if he acted negligently. *See, e.g., Blue v. Green*, 400 F.2d 12 (7th Cir. 1972) (defendant “just careless”); *Gold v. Brass*, 394 F.2d 42 (D.C. Cir. 1971) (defendant “merely inadvertent”); *Yellow v. Orange*, 100 F. Supp. 58 (S.D.N.Y. 1951) (defendant’s “mere oversight”).

c. *Cf.* means that the proposition in the cited authority is different from, but analogous to, the proposition in the text. *Cf.* can show comparisons, as can the signal “*Compare.*”

d. Show authority in contradiction to your proposition with “*Contra,*” for direct contrary authority, or with a signal introduced by “*but,*” such as “*but see,*” and “*but cf.*”

Either intentional or reckless disregard of a court order constitutes criminal contempt. *Gold v. Brass*, 394 F.2d 42 (D.C. Cir. 1971). *But see Lead v. Pipe*, 512 F.2d 65 (10th Cir. 1980) (requiring intentional conduct for criminal contempt).

A signal may be used with an explanatory parenthetical as in the examples above. The Bluebook and the ALWD Manual and most readers encourage parenthetical information to be added to the basic citation in order to explain the relevance of the authority cited with an introductory signal. The parenthetical information should relate to the material discussed in your text. Generally, a parenthetical should be a phrase, not a sentence, and should begin with a present participle (example 2(d)). However, if you do not need a complete participial phrase, use a shorter parenthetical (example 2(b)).

Do not use parentheticals for an important point, however. The facts of important cases should be discussed in your text, not relegated to parentheticals.

Another use of parentheticals is to supply other information, such as information that explains the weight of the cited authority, as in these examples.

Lawless v. Justice, 394 F.2d 42 (D.C. Cir. 1971) (Bork, J., dissenting).

Lead v. Pipe, 512 U.S. 65 (1980) (per curiam).
