



EVERYTHING YOU WANTED TO KNOW THAT *THE BLUEBOOK* DOES NOT TELL YOU CLEARLY

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Legal citation differs from any other type in academic scholarship or writing. At times, *The Bluebook* can seem confusing, frustrating, time-consuming to use, and intimidating. However, legal citations tell your reader a great deal of information about the cited source. Careful adherence to *The Bluebook* can improve the clarity and conciseness of your writing and demonstrate your credibility as a legal writer. Consider these basic practitioner's tips to help conquer those Bluebook fears. The following rules are not only used most often but misused most often too!

Consult *The Bluebook* in conjunction with these tips; many subtleties that are not set out below may apply to each rule. These tips are based on the 22nd edition of *The Bluebook*.

1. Spacing (Rule 6.1) (B6)

In academic writing, close up all adjacent single capitals. Do not close up single capitals with longer abbreviations. Numbers, both ordinal and cardinal, are treated as single capitals.

Right	Wrong
W.D. Pa.	W.D.Pa.
F. Supp.	F.Supp.
S. Ct.	S.Ct.
F. 2d	F.2d
Cal. App. 3d	Cal.App.3d

In practitioner writing, such as briefs and other court documents, abbreviations in reporter names may now be closed up to conserve the number of words used. Thus, the reporter "S. Ct." may now be written as either "S. Ct." or "S.Ct." This change was introduced in the 21st edition, so it is likely some judges and practicing attorneys are not aware of the update. Always be sure to check with your supervising attorney as to their preferences on spacing.

* Original by Eumi Lee & Julie Teperow. Subsequent revisions by Richard Bernache, Halle Edwards, Karin Scherner-Kim, Andrea Battaglini, Martha Mora, Mindy Barry, and Eric Nitz. Additional revisions in 2025 by Kelsey Handschuh.

2. Capitalization (Rule 8) (B.7.3.1)

In headings, capitalize the initial word, any word that immediately follows a colon, and all other words except articles, conjunctions, and prepositions of four or fewer letters. However, in all text, capitalize nouns referring to people or groups only when they refer to specific persons, offices, or bodies. The same applies to words such as “act,” or “circuit,”: capitalize them only when they refer to a specific act, circuit, or when referring to a circuit by name or number.

Right

We adhere to the Second Circuit’s ruling, rather than follow other circuits’ ambiguous precedent.

With respect to the word “court,” capitalize when naming any court in full, or when referring to the U.S. Supreme Court. You should also capitalize “Court” in a court document when referring to the court that will be receiving that document.

Right

Defendant’s reliance on the District Court of Maryland’s holding concerning the lack of prior notice was misplaced because the state supreme court has held that prior notice is not required.

3. Order of Signals (Rule 1.3).

When you use more than one signal in a citation string, the signals should be listed in the order in which they appear in Rule 1.2, so that *see* would precede *see also*, etc. Additionally, signals of the same type (i.e., all signals indicating support, comparison or contrast, contradiction, or the provision of background information) should be strung together in a single citation sentence, using semicolons to separate them. However, different types of signals (i.e., contradictory authority cited after supporting authority) must be grouped in separate citation sentences. See the Writing Center Handout [*Bluebook Signals Explained*](#) for more information on how to use signals.

Right

See Smith v. California, 479 U.S. 121 (1990); cf. Jackson v. Herrick, 59 F. Supp. 853 (1978).
But see Rand v. Olympia, 588 U.S. 43 (1994).

Of course, every good rule has an exception: if the authorities you cite support only a part of your sentence and are, in accordance with Rule 1.1, cited in a citation clause following that part and set off by commas, the citation clause can contain signals of different groups without the need for separate sentences. Thus, citation clauses can contain both supporting and contradictory authority, separated only by a semicolon.

4. Order of Authorities Within Each Signal (Rule 1.4)

In the 22nd Edition, Rule 1.4 allows substantial flexibility in how to order authorities within each signal. Authorities should be ordered in a logical manner. For example, if a case is substantially more helpful to or authoritative on your premise, that case can be cited first even if it is older than other cases within the signal.

Previous editions of *The Bluebook* required authorities to be listed in a specific order by type, unless a particular authority was especially helpful. For example, constitutions were listed before statutes. Cases from the same court were listed in chronological order. Not all practitioners may be aware of the change, and some may wish to adhere to the previous rule. Check with your supervisor about whether your office follows a particular standard.

5. Page Ranges (Rules 3.2, 3.3)

When citing to sources that span more than one page, retain the last two digits, and drop the other repetitious digits. This rule does not apply when citing multiple sections of statutes or regulations. Separate the inclusive page numbers with an en dash (–) or hyphen (-); there are no spaces between the numerals and the en dash.

100 U.S. 101, 111–12 (1999).
100 U.S. 1090, 1099–101 (1999).
17 U.S.C. §§ 1924–1999.
Del. Code Ann. Tit. 9 §§ 817-819 (1989).

6. Short Citations for Cases (Rules 4, 10.9)

The following are appropriate short citations for Anzidei v. Pitts Inc., 5 F.2d 20, 24 (5th Cir. 1950):

Right

Anzidei, 5 F.2d at 24.
5 F.2d at 24. [when the name of the case is mentioned in the text]
Id. at 24. [when the immediately preceding cite is to Anzidei and it is not a string cite.]

Wrong

Anzidei, at 24.

See Rule 10.9 for when to use each of the appropriate short citations.

7. Parentheticals (Rule 1.5)

Parentheticals are a useful means of conveying the relevance of cited materials and are specifically required when the relevance of the cited material would otherwise be unclear to the reader. Explanatory parenthetical phrases should begin with a present participle. Note the space between the year and the parenthetical phrase. See examples in Rule 1.5.

See Wilsey v. Beyer Mut. Life Ins., 10 U.S. 200 (1921) (holding that the eyesight damage from law school was not recoverable under the Georgetown health plan).

8. General Format for Parenthetical Information (Rule 1.5).

You have probably been told repeatedly that it is important to include parenthetical information when you cite to cases or other authority to allow the reader to understand why and how the authority is relevant to the point you are making. And, of course, *The Bluebook* provides you with detailed rules about how to format your parentheticals.

The general rule is that parentheticals should start with a lower-case present participle such as “holding,” or “finding” and end without punctuation, such as: (holding that defendant should have been given Miranda warnings). This general rule, however, has two exceptions:

First, if your parenthetical directly quotes at least one full sentence, it should begin with a capital letter and contain the appropriate closing punctuation, i.e., in most cases, a period.

Second, you can use a shorter parenthetical where a complete phrase starting with a present participle is unnecessarily complex. This applies, for example, where you list a number of situations in which courts have addressed various permutations of the same point, as in the following example: See also Smith v. Doe, 999 F.3d 9999 (14th Cir. 2002) (direct review); Jones v. Doe, 888 F.3d 8888 (14th Cir. 2002) (collateral review).

When a single citation contains multiple parentheticals, place them in this order:

(date) [hereinafter short name] (en banc) (Lastname, J., concurring) (plurality opinion) (per curiam) (alteration in original) (emphasis added) (footnote omitted) (citations omitted) (quoting another source) (citing another source), <http://www.domainname.com> (last visited) (explanatory parenthetical), prior or subsequent history.

9. State Abbreviations

Geographical terms are listed in Table 10 of *The Bluebook*.

When citing to a decision published in a federal or regional reporter, the court that handed down that decision must be cited. Look at the case heading to figure out what court is “speaking.” Then consult **Table 10 and Table 7** to cite the case appropriately.

Right

Howard Fin. Grp. v. Roche, 233 A.2d 33 (Pa. Super. Ct. 1983). McCarthy v. Leeds Equip. Coop., 197 F. Supp. 297 (S.D.N.Y. 1994).

10. Lexis/Westlaw Citation (Rule 10.8.1)

When citing to an electronic database, provide the case name, docket number, database identifier, court name, and full date. Abbreviations for months are located in **Table 12**.

Right

Martin v. Brez Mach. Co., No. CIV.A.98-1234, 1998 WL 98765, at *2 (S.D.N.Y. Feb. 3, 1998).

Coulter v. Sontag, Inc., No. 96-6789, 1997 U.S. App. LEXIS 5864, at *7 n.4 (1st Cir. Mar. 1, 1997).

Coulter v. Sontag, Inc., No. 96-6789, 1997 LX 5864, at *7 n.4 (1st Cir. Mar. 1, 1997).

Screen pages are indicated by an asterisk. Pages from other reporters that have published the opinion usually also are marked. If you are citing to the pages from reporters that have published the opinion, do not place asterisks in the citation.

A case is **not published** if it is only available on-line. If the opinion is published, then it is preferable to cite to that version, rather than the one on Lexis or Westlaw.

Short Cites Examples for Westlaw/Lexis:

Martin, 1998 WL 98765, at *1.

Coulter, 1997 U.S. App. LEXIS 5864, at *6–7.

Coulter, 1997 LX 5864, at *6–7.