



BLUEBOOK SIGNALS EXPLAINED*

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Given the many intricacies of legal citation, introductory signals are often overlooked. Even the Bluebook itself devotes precious little space to explaining them; a mere five of its 560 pages explain signals, leading to substantial confusion as to what signals do and when to use them.

Despite their cursory treatment in the Bluebook, signals are important tools of legal writing. Unlike many pieces of legal citation that are purely technical, an effective use of signals can add meaning to your writing, indicating quickly to your reader how a certain source supports your proposition. This handout, used in conjunction with Bluebook Rule 1.2, will help you to get the most out of signals in your writing. It provides a brief overview of signals in general, then explains each signal in detail, using examples to illustrate how each signal works in context.¹ Finally, this handout looks at some of the unique mechanics that come into play when using multiple signals within a single citation and when using signals in footnotes.

What is an introductory signal?

Introductory signals are placed before every citation to indicate how the citations relate to the preceding sentence or clause. You can think of them as a shorthand way of telling the reader why you are including the citation at all. Signals can tell the reader that the material you cited directly supports your proposition, indirectly supports it, or even refutes it.

What does each signal mean?

The Bluebook lists four different “families” of introductory signals: (1) signals that indicate support, (2) signals that indicate comparison, (3) signals that indicate contradiction, and (4) signals that indicate background material.

1. *Signals that indicate support*

These signals are the most common in legal writing; they are used to show that the source cited supports your proposition in some way.

* Handout created by Ryan Miller

¹ Each of the examples revolves around the constitutional right of prisoners to receive medical care. In *Estelle v. Gamble*, 429 U.S. 97, 106 (1976), the Supreme Court held that denying medical care to prisoners may violate their Eighth Amendment right against cruel and unusual punishment. However, this is the case only if prison officials show “deliberate indifference to [the prisoner’s] serious medical needs.” *Id.*

[No signal] Though it may seem odd to list “no signal” as a signal, the lack of a signal still provides the reader with useful information about a source. When you do not include any signal before a citation, you are indicating to the reader that the source *directly* supports your proposition. This may be because your proposition is actually a quote from the source you cited, or because you have paraphrased the source. In addition, if your proposition includes statistics or other numerical data from a certain source, you can use [no signal] to indicate that the numbers you are using come directly from that source. Finally, [no signal] can be used when you referred to an authority in your proposition and your citation merely identifies the authority.

Example: The Eighth Amendment forbids prison officers from being deliberately indifferent to a prisoner’s serious medical needs. *Estelle v. Gamble*, 429 U.S. 97, 104 (1976).

Explanation: The proposition merely paraphrases part of the Court’s holding, so the source directly supports the proposition.

See *See* indicates that the source clearly, though indirectly, supports a proposition. That is, the source does not directly state your proposition, but if a reader checked the source, it would be immediately clear to her that it supports your proposition. In addition, when writing a memo or brief for a client, *see* is used when citing to a case to support a proposition referring to the client or the client’s case.

Example 1: It is important to provide prisoners with proper medical care. *See Estelle v. Gamble*, 429 U.S. 97, 104 (1976).

Explanation: The Court does not explicitly say anything about whether medical care is important. However, if a reader saw that failure to provide appropriate medical care was a constitutional violation, she could easily infer that the Court thought such care was important.

Example 2: Because our client has a serious medical need, he is entitled to treatment. *See Estelle v. Gamble*, 429 U.S. 97, 104 (1976).

Explanation: A reader could quickly reason that *Estelle’s* holding, which states that prisoners are entitled to treatment for serious medical needs, supports this proposition. However, *Estelle* itself does not say anything about our client, so *see* is needed to indicate that the reader must make a small inference that the rule of *Estelle* should also apply to our client.

E.g., *E.g.*, indicates two things. First, the source or sources that follow it directly support the proposition. In this regard, *e.g.*, functions just like [no signal].

Second, *e.g.*, indicates that the sources you chose are only one or a few of multiple sources that support this proposition. Rather than citing every source that supports your proposition, you can use *e.g.*, to signal to the reader that you have chosen the most relevant or illustrative source[s] and that there are others out there that, while supportive, are not necessary to include in your citation. Note that *e.g.*, can be combined with other signals to indicate that there are multiple sources that have the same relationship to the proposition but that the writer has chosen the most relevant one(s) to cite. For example, *see, e.g.*, denotes that numerous sources indirectly support the proposition. Note that when combining *e.g.*, with other signals, it should be preceded by an *italicized comma* and followed by a non-italicized comma.

Example: The Eighth Amendment is a broad protection that goes beyond prohibiting only direct, physical punishments. *E.g.*, *Estelle v. Gamble*, 429 U.S. 97, 104 (1976).

Explanation: *Estelle* directly supports the proposition, as it provides an example of an Eighth Amendment protection that goes beyond bans on physical punishments. However, *e.g.*, is used because it is far from the only example; the writer could have cited a number of cases. Rather than cite them all, the writer chose the most illustrative case and used *e.g.*, to indicate that there are other cases that support the proposition.

Accord

Accord is a tricky and rarely used signal. It indicates that two or more sources state or support the proposition, but the text either quotes or refers to only one of them. It is most often used to indicate that the law of one jurisdiction is in line with that of another. When using *accord*, you will first introduce the source that the proposition quotes or refers to, generally using [no signal], and then use *accord* to introduce the source that was not directly referred to.

Example: The Second Circuit has held that a dental cavity may qualify as a “serious medical need.” *Harrison v. Barkley*, 219 F.3d 132, 137 (2d Cir. 2000); *accord Formica v. Aylor*, 739 F. App’x 745, 756 (4th Cir. 2018).

Explanation: The proposition refers directly to a decision by the Second Circuit that a cavity may qualify as a “serious medical need” under *Estelle*. *Accord* is used here to show that the law of another jurisdiction, in this case the Fourth Circuit, is in line with the law of the first jurisdiction.

See also

See also essentially serves as a “step down” from *see*. It indicates that the cited authority supports the proposition, albeit a bit less directly or a bit less forcefully than a *see* cite. Perhaps the *see also* source speaks in more general terms, or perhaps it is a type of authority that is considerably less binding but still supportive of your proposition. *See also* is rarely used alone; it often

follows citations using [no signal] or *see* that support the proposition a bit more strongly. Given the lower weight given to citations following *see also* signals, it is generally best to include a parenthetical explaining why the source is relevant.

Example: By embracing a broad understanding of Eighth Amendment protections, the Supreme Court has emphasized that these protections guard not only prisoners' physical safety, but also their dignity. *Estelle v. Gamble*, 429 U.S. 97, 104 (1976); *see also* Jonathan Simon, *From Health to Humanity: Re-Reading Estelle v. Gamble after Brown v. Plata*, 25 Fed. Sent'g Rep. 276, 277 (2013) (tracing the development of the Court's recognition of dignity in the context of the Eighth Amendment).

Explanation: Because the article cited speaks more generally about the Court's jurisprudence, and because it is a secondary source and thus has less authoritative force, it is less on point than *Estelle* is. However, it is still a useful, relevant source, so it is introduced with *see also* and given a parenthetical to briefly explain to the reader why it also supports the proposition. Note, however, that cases may also be introduced with a *see also* signal.

Cf. *Cf.* is used to introduce a source that supports a proposition that is *different* from the one it follows, but that is analogous enough to the proposition that it still indirectly supports your proposition. As with *see also*, *cf.* generally requires an explanatory parenthetical to be effective, in this case because you will have to explain to the reader why the comparison is relevant.

Example: A broken leg qualifies as a serious medical need. *Cf. Burgos v. Philadelphia Prison System*, 760 F. Supp. 2d 502, 508 (E.D. Pa. 2011) (holding that a broken arm qualifies as a serious medical need).

Explanation: The source here does not itself support the proposition, though it supports an analogous proposition—that a broken arm constitutes a serious medical need under *Estelle*. From this proposition, the reader could draw the conclusion that if a broken arm qualifies as a serious medical need, a broken leg most likely would as well. Note the larger logical leap here than that of a *see* cite; for a *cf.* citation to be effective, the analogy must be compelling enough for the reader to believe that the source's proposition is comparable to the main proposition.

2. Signals that indicate comparison

Though the Bluebook recognizes this as a separate category of signals, there is in fact only one way to indicate comparison through the use of signals: *compare . . . with*. These signals

are unique in that they are always used together; you should never use the *compare* signal without *with* or vice-versa.

Compare ... This signal lets you set up a comparison that illustrates or supports your proposition. It frequently is useful for showing differences in the law between different jurisdictions. Either “side” of the comparison can include multiple sources linked by “*and*.” For the comparison to be helpful for the reader, it is best to explain each source through parentheticals. Note that the Bluebook requires commas before “*with*” and “*and*,” as illustrated in the example.

With ...

Example: The circuits are split as to what test should be used to determine whether a condition constitutes a serious medical need. *Compare Mahan v. Plymouth Cty. House of Corrections*, 64 F.3d 14, 18 (1st Cir. 1995) (considering serious any medical need that has been diagnosed by a physician as needing treatment or that is so obvious that even a lay person would recognize the need for treatment), *and Sheldon v. Pezley*, 49 F.3d 1312, 1316 (8th Cir. 1995) (same), *with Colwell v. Bannister*, 763 F.3d 1060, 1066 (9th Cir. 2014) (considering serious any medical need that could result in further significant injury or the unnecessary infliction of pain if it is not treated).

Explanation: The citation here illustrates the disagreement among the circuits, with the First Circuit and Eighth Circuit using one test and the Ninth Circuit using another. Note the use of parentheticals to show the reader where each circuit stands on the issue.

3. Signals that indicate contradiction

These signals are fairly rare, as they draw the reader’s attention to sources that contradict your proposition in some way. While it may seem odd to ever cite to sources that cut against your propositions, doing so can at times be an effective way to acknowledge weaknesses in your argument and improve your credibility. Usually, however, you would not merely cite contradictory authority in practice-based documents. Rather, you would engage with that adverse authority and explain why it is not controlling in your case. These signals are more often used in academic writing.

Contra Think of *contra* as the “anti-[no signal].” It indicates that the source that follows directly contradicts your proposition.

Example: Only physical injuries and illnesses can constitute serious medical needs. *Contra Comstock v. McCrary*, 273 F.3d 693, 702–03 (6th Cir. 2001) (“[A] prisoner’s psychological needs may constitute serious medical needs.”).

Explanation: Here *Comstock* directly contradicts the proposition. While the proposition claims that only physical maladies can constitute serious needs,

Comstock directly supports the opposite proposition, noting that psychological disorders can also constitute serious medical needs.

But see Just as *contra* is the anti-[no signal], *but see* is the anti-*see*. *But see* indicates that the source that follows clearly, though indirectly, supports a proposition that is contrary to your proposition.

Example: Estelle provides a meaningful protection for prisoners' rights. *See* 429 U.S. 97, 104 (1976). *But see* Joel H. Thompson, *Today's Deliberate Indifference: Providing Attention without Providing Treatment to Prisoners with Serious Medical Needs*, 45 HARV. C.R.-C.L. L. REV. 635 (2010) (arguing that in practice *Estelle* does little to protect prisoners' rights).

Explanation: But see is used to indicate that the article suggests, without directly stating, that *Estelle* protection is not actually meaningful. Though the article does not directly state that *Estelle* is not meaningful, it notes that few prisoners can actually benefit under *Estelle* due to a variety of factors. From this the reader can readily infer that *Estelle* may not be a meaningful protection.

But c.f. The last “anti” signal is *but c.f.*, which serves as the inverse of *c.f.* Just as *c.f.* precedes a source that supports a proposition different from the original one but analogous to it, *but c.f.* is used before a source that supports a proposition that is different from the *contrary* proposition but analogous to that *contrary* proposition.

Example: Arachnophobia, a crippling, irrational fear of spiders, cannot qualify as a serious medical need. *But cf. Talbert v. Correctional Dental Assocs.*, 731 F. App'x 145, 150 (3d Cir. 2018) (noting that a crippling fear of needles may qualify as a serious medical need).

Explanation: The main proposition is that arachnophobia cannot be a serious medical need. A *contrary proposition* is that arachnophobia *can be* a serious medical need. *But cf.* introduces a source that supports a proposition that is analogous to this *contrary proposition*—that another phobia, in this case a fear of needles, can be a serious medical need. From this, the reader may infer that arachnophobia can also constitute a serious medical need, because if one irrational fear can be a serious need, it would make sense for another irrational fear to qualify under this standard.

4. Signals that indicate background material

The last category of signals includes just one: *see generally*, which is used to refer broadly to background material related to your proposition.

See generally This signal is used to provide readers with sources that they may refer to in order to better understand the background of your proposition. *See generally* is rarely used with cases, and instead often introduces journal articles, treatises, or other secondary sources. As with some of the other signals, *see generally* is usually accompanied by an explanatory parenthetical that tells the reader why the sources that follow it are relevant.

Example: The recognition that the Constitution protected prisoners from indifference to their medical needs signaled a change in the Court’s Eighth Amendment jurisprudence. *See generally* Philip M. Genty, *Confusing Punishment with Custodial Care: The Troublesome Legacy of Estelle v. Gamble*, 21 VT. L. REV. 379 (1996) (discussing the Court’s shift from applying the Eighth Amendment only in cases of capital punishment to more broadly applying it to conditions of detention).

Explanation: *See generally* is used here to indicate that this article provides useful background that the reader can refer to if he or she wants more information on this topic.

Can I use multiple signals within a single citation sentence or clause?

Yes! As you may have noticed in the examples, a single citation can include a number of different signals. However, Bluebook rule 1.3 has some rules about how to use different signals within a single citation. There are two main rules to keep in mind: *first*, signals should be used in the order they appear in rule 1.2, and *second*, in a citation sentence, signals of the same family are separated by semicolons, while signals of different families are separated by periods. However, in a citation clause, all signals are separated by semicolons regardless of whether or not they are in the same family. Below is a template of a citation sentence that uses every signal, with the different families of signals illustrated by different colors.

Proposition. Source A; *see.*, Source B; *accord* Source C; *see* Source D; *see also* Source E; *cf.* Source F. *Compare* Source G, *and* Source H, *with* Source I, *and* Source J. *Contra* Source K; *see* Source L; *cf.* Source M. *See generally* Source N; Source O.

While it is highly unlikely that you will ever use *every* signal in a single citation, it is useful to see how each of the signals fit together. Looking at this template, you may notice a few unique quirks that arise when signals are used together. First, note that when *but see* or *but cf.* follows another negative signal, in this case *contra*, the “*but*” is omitted. In addition, note that if you have multiple sources that use the same signal, you do not repeat the signal; instead, just separate each source within a given signal with a semi-colon. This is illustrated above with sources N and O in *see generally*.

How are signals used in footnotes?

Signals can be used in footnotes in two ways. First, they can be used just like in above the line citations; that is, they simply precede a citation. Alternatively, signals can be used as the verb of a sentence in a footnote. This can be done to integrate information into the main text of a footnote that would usually be relegated to an explanatory parenthetical. Note that when signals are used as verbs, they are not italicized.

Example – using a signal to introduce a citation: The recognition that the Constitution protected prisoners from indifference to their medical needs signaled a change in the Court’s Eighth Amendment jurisprudence.^{EX1}

Explanation: This example is almost identical to the *see generally* example from above, except instead of the signal and citation following in a citation sentence, they are instead placed in the footnote.

Example - using a signal as a verb: The recognition that the Constitution protected prisoners from indifference to their medical needs signaled a change in the Court’s Eighth Amendment jurisprudence.^{EX2}

Explanation: The footnote serves the exact same purpose as the *see generally* example from above, but now the information that would be included in the parenthetical is integrated into the main sentence.

^{EX1} *See generally* Philip M. Genty, *Confusing Punishment with Custodial Care: The Troublesome Legacy of Estelle v. Gamble*, 21 VT. L. REV. 379 (1996) (discussing the Court’s shift from applying the Eighth Amendment only in cases of capital punishment to more broadly applying it to conditions of detention)

^{EX2} For a discussion of the Court’s shift from applying the Eighth Amendment only in cases of capital punishment to more broadly applying it to conditions of detention, see generally Philip M. Genty, *Confusing Punishment with Custodial Care: The Troublesome Legacy of Estelle v. Gamble*, 21 VT. L. REV. 379 (1996).