Legal Citation at a Crossroads

Carol Bast*, Susan W. Harrell**

INTRODUCTION

Legal citation, seemingly unchanged for years, has approached a crossroads. The year 2003 marked the publication of the second edition of the ALWD Citation Manual: A Professional System of Citation (hereinafter the ALWD Manual or the Manual).1 This new citation manual may soon be preferred over The Bluebook: A Uniform System of Citation (hereinafter the Bluebook) as the primary reference in legal writing classes at law schools.2 Another recent change is the move of several jurisdictions to vendor- and medium-neutral citation, facilitating citation to sources published in electronic form. In 1999 the American Association of Law Libraries published its Universal Citation Guide to encourage this trend.3

In many law schools, students are now learning how to cite according to the ALWD Manual rather than the Bluebook. As these students emerge from law schools and into the field, practitioners will become aware that there is an alternative to the Bluebook. There will be additional pressure for

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3COMMITTEE ON CITATION FORMATS, AMERICAN ASSOCIATION OF LAW LIBRARIES, UNIVERSAL CITATION GUIDE (1999).
change among practitioners as they become acquainted with neutral citation adopted in more and more jurisdictions. Because of its use and the momentum for change, law professors at all levels of education should have some knowledge of the *ALWD Manual* and the trend toward neutral citation so that their students, most of whom have been raised in the Internet era and are extensive online users, will also be able to understand the sources they see cited in their texts and eventually in the workforce. The purpose of this article is to provide that backdrop of knowledge.

The first section of this article explains what neutral citation is and discusses the American Association of Law Libraries’ publication of the *Universal Citation Guide*. The next section introduces the *ALWD Manual*, and the following section compares the *Manual* to the *Bluebook* and discusses criticisms of the *Manual*. The final section provides a discussion of the future of legal citations.

**Vendor- and Medium-Neutral Citation**

A number of jurisdictions have adopted vendor-neutral and medium-neutral citation. Until recently, citations have been inherently tied to the publication of a particular publisher and to the print version of the publication. For example, a citation to a case generally includes the volume in which the case is published and the first page of the case. In using this form of citation, the writer references to a particular page in a particular volume of a print set of books published by a particular publisher. This extensive use of the volume and page system of citation places a great deal of power in the hands of the publisher and, in fact, West Publishing Company claimed copyright protection for its page numbers.\(^4\)

Volume numbers and page numbers are less relevant in an electronic age with most of the legal sources available in online databases. Many courts have their own Web sites where they publish opinions of the courts. Soon, all legal sources will be first published online, with print publishing almost as an afterthought. Gradually, the print version of legal sources will cease to exist.

A vendor-neutral citation does not reference the publication of any particular vendor. A medium-neutral citation does not prefer print over

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\(^4\)See Carol M. Bast, *Citation Wars and the Erosion of Traditional Citation Forms*, 15 J. Paralegal Edu. & Prac. 19, 19–27 (1999).
electronic publication and can be used with both types of publication. For example, a court can consecutively number each of its opinions during the calendar year, and instead of numbering the pages in the opinion, can number the paragraphs within an opinion. Thus, the calendar year substitutes for the volume in a reporter and a paragraph number substitutes for a page number. An abbreviation in the citation indicates the court issuing the opinion. A number of courts have adopted vendor-neutral and medium-neutral citation.\(^5\)

In 1999 the American Association of Law Libraries (AALL) published its *Universal Citation Guide* to encourage this trend toward vendor-neutral and medium-neutral citation.\(^6\) The AALL coined the term “universal citation” to reference a vendor-neutral and medium-neutral citation.\(^7\) The *Universal Citation Guide* contains rules for citing to cases, statutes, constitutions, and administrative regulations. It allows citation to primary sources in those states that have adopted universal citation and provides sample citations to those states contemplating adopting universal citation.\(^8\)

*Universal Citation Guide*, Version 2.1 is available for public comment at the AALL Citation Formats Committee Web site.\(^9\) Version 2.1 incorporates the rules contained in the first edition and adds rules for citing law reviews and court rules. Version 2.1 reserves space for rules for citing administrative decisions, and a tentative draft of those rules is available at the Web site.

Prior to the publication of the *Universal Citation Guide*, at least eight states had already adopted neutral citation form in some respect. The states that have adopted neutral citation form in some respect are Louisiana, Maine, Montana, New Mexico, North Dakota, Oklahoma, Wisconsin, and South Dakota.\(^10\) Two additional states adopted neutral citation form following the publication of the *Universal Citation Guide*. Utah and

\(^5\)See id. at 28–29, 31–34.

\(^6\)Committee on Citation Formats, *supra* note 3.

\(^7\)The *Bluebook* uses the term “public domain format.” *Bluebook*, *supra* note 2, R. 10.3.3, at 64. The *Manual* uses the term “neutral citation.” *ALWD Manual*, *supra* note 1, R. 12.16, at 95–96.

\(^8\)See http://www.aallnet.org/products/pub_universal.asp. According to the Web site, “[t]he Guide provides a roadmap for constructing actual citations for those jurisdictions that have adopted the Universal citation form. For those jurisdictions still debating the issue of citation reform, it serves as a model for adoption.” *Id*.

\(^9\)See http://www.aallnet.org/committee/citation/.

\(^10\)See Bast, *supra* note 4, at 28.
Wyoming adopted neutral citation form in 2000.\textsuperscript{11} Illinois and Tennessee are discussing adoption of the neutral citation format.\textsuperscript{12}

There have been other movements toward neutral citation. Since 1994, the United States Court of Appeals for the Sixth Circuit has given its cases an electronic citation, although use of the electronic citation is not mandated.\textsuperscript{13} By 1999, other states had taken smaller steps toward neutral citation. Mississippi allows attorneys to use neutral citation form as an alternative to traditional citation form. Arizona and Colorado number the paragraphs of cases and allow these paragraph numbers to be used for pinpoint citations. The Pennsylvania Superior Court has assigned a neutral citation to each of its cases, with the neutral citation to be used until a case is published in the Atlantic Reporter.\textsuperscript{14}

Citation manuals memorialize the conventions used in constructing legal citations and promote uniformity of citation form. Thus, citation manuals lend stability and predictability to citation form. Citation manuals may also serve as style manuals, containing standards for typeface, quotations, abbreviations, and capitalization. Courts require that citations in documents submitted to them conform to particular citation rules and manuals. Legal journals typically mandate that citations conform to a particular citation manual.

A plethora of citation manuals control legal citation forms across the country. Many states have adopted citation manuals for their states, and practicing attorneys are required to cite according to these manuals when submitting documents to the state courts.\textsuperscript{15} For example, the Florida Rules of Appellate Procedure mandate that attorneys cite according to Rule 9.800 in legal documents. The \textit{Bluebook} supplements Rule 9.800 for citations not included in Rule 9.800, which, in turn, is supplemented by the Florida Style

\begin{footnotes}
\item[12]ALWD MANUAL, supra note 1, at 383, 402.
\item[13]Bast & Harrell, supra note 11, at 24.
\item[14]Id.
\end{footnotes}
Manual. Some law reviews have citation manuals that authors must follow. Often, these manuals supplement the Bluebook for state-specific citations. For example, the submission guidelines for the Florida State University Law Review state that “[c]itations should conform to The Bluebook: A Uniform System of Citation (17th ed.). Citations to Florida sources should conform to the Florida State University Law Review Florida Style Manual (5th ed.), a copy of which may be obtained for $5 from the Law Review.”

THE ALWD MANUAL

The ALWD Manual was written by legal research and writing professionals and is published by Aspen Publishers. The substance of the Manual is more a restatement of Bluebook substance than a new creation; legal citations produced using the Manual do not differ markedly in substance from those produced using the Bluebook. However, the Manual is “much more user-friendly” and “teacher-friendly” than the Bluebook. For example, spaces in citations are indicated with green triangles. Part 1D explains how word processor format, with justification and default settings, affects citations.

Over two-thirds of the Manual contains rules, with the balance organized into appendices. The main portion of the Manual is divided into six parts:

However, we decline to adopt the Committee’s proposal to amend subdivision (n) (Other Citations) to allow practitioners to use the ALWD Citation Manual, in addition to The Bluebook, as a default reference. We conclude that uniformity in reporting is more important to the appellate courts, and ultimately to the public, than allowing practitioners the flexibility of using multiple citation manuals to reference sources. Although we appreciate that there may be reasons that individuals prefer one citation system over another, we conclude that those reasons do not justify amending the rule to allow alternative systems of citation. If at some point the Committee concludes that another citation system is superior we certainly would be willing to consider that proposal. However, we decline to adopt multiple systems of citation at this time.


19 ALWD Manual, supra note 1, at 5.

20 Id. at 8–10.
Appendixes are organized according to the rules. The Manual contains the following seven appendixes:

Appendix 1: Primary Sources by Jurisdiction
Appendix 2: Local Court Citation Rules
Appendix 3: General Abbreviations
Appendix 4: Court Abbreviations
Appendix 5: Abbreviations for Legal Periodicals
Appendix 6: Legal Memorandum Example
Appendix 7: Federal Taxation Materials

Although the citations produced with the Manual do not differ markedly from those produced with the Bluebook, there are several notable differences between the two citation manuals.

COMPARING THE MANUAL AND THE BLUEBOOK

One difference between the Bluebook and the Manual is the individuals responsible for producing them. The Bluebook is a product of law school students at a number of elite law schools, none of whom participate in writing more than one edition. With the seventeenth edition, the Bluebook acquired its Coordinating Editor, Mary Miles Prince, with the hope of increasing continuity in Bluebook production. By contrast, the Manual was written by the Association of Legal Writing Directors and Darby Dickerson, interim Dean of Stetson University College of Law. The Association of


22 Id. at vi.
Legal Writing Directors (ALWD) comprises the directors of legal research and writing programs at law schools.23

The Bluebook and the Manual are notably different in format. Bluebook print continues to be small and of one color. The Manual has a two-color, slightly larger print, which was designed to be “gentler on the eye.”24 The Manual contains numerous examples, with the features of the examples explained to the reader. “Sidebar” sections, containing additional useful explanations, are set off in boxes from the rest of the text. “Fast Formats” sections, preceding each rule, collect sample citations covered in the rule in chart form, making sample citations easily accessible to the reader. Useful information is contained in charts, making the information more digestible than if explained in text.

Both citation manuals have Web sites. The Bluebook Web site allows one to order the Bluebook online, read a summary of changes from the sixteenth edition to the seventeenth edition, and read the introduction to the Bluebook.25

The ALWD Manual Web site26 provides links to the publisher and to online bookstores, allowing the viewer to order the Manual online. The Web site contains much information useful to a user of the Manual, such as a frequently asked questions section, a list of reviews of the Manual, a section indicating errors in the first through the fifth printings of the first edition of the Manual, and a list of law schools, paralegal programs, courts, journals, and law reviews that have adopted the Manual. The Web site was created with the legal professor and instructor in mind and offers teaching resources such as PowerPoint presentations and citation exercises. One of the most valuable resources provided on the Web site is a detailed chart comparing the Manual to the seventeenth edition of the Bluebook. A copy of this chart can be found in Appendix A of this article.

The Manual differs from the Bluebook in some of its abbreviations. Two of the most notable abbreviations in the first edition of the Manual were the abbreviation for Southern Reporter and the abbreviation of

23 The ALWD Web site is located at http://alwd.org.

24 ALWD Manual, supra note 1, at xxiii.

25 The Web site is located at http://www.legalbluebook.com. Both the summary of changes in the latest edition of the Bluebook and the introduction are simply digital versions of the introduction and the major portion of the preface from the Bluebook.

26 See http://www.alwd.org/cm/.
United States, when used as a party to a case. The Manual’s abbreviation of Southern Reporter to “S.” instead of “So.” and the abbreviation of “United States” to “U.S.,” in the Manual’s first edition did receive some criticism.\(^{27}\) The abbreviation for “Southern Reporter” reverted to “So.” in the Manual; however, the abbreviation for “United States” remained “U.S.”\(^{28}\)

The Manual simplifies typeface rule requirements, reducing the three typefaces used in the Bluebook to two. The Manual dispenses with large and small capitals, retaining only two typefaces—roman and italics. In contrast to the Bluebook, there is one set of rules for both law review articles and practitioner’s documents. The Manual abandons the distinction in citation form between non-consecutively paginated journals, magazines, and newspapers, on one hand, and consecutively numbered journals, on the other hand. The Bluebook mandates that the writer retain only the last two digits of the second page number when indicating an inclusive page span. For example, pages 122 through 125 becomes 122–25. The Manual allows one to follow the lead of the Bluebook or to retain all digits of the second number in the page span.

The Manual answers common questions unanswered by the Bluebook. The Manual explains that one constructs a short form citation to a case, rather than to a specific page in the case, by omitting “at” from the short form citation.\(^{29}\) Thus, a short form citation to “State v. Inciarrano, 273 So. 2d 1272 (Fla. 1985)” is “Inciarrano, 273 So. 2d 1272.” An unanswered question in the Bluebook is how one constructs a pinpoint citation to multiple pages of a case solely available in an electronic database in which electronic pages are indicated by star pagination. The Manual explains that one should place one asterisk in front of the page number if referencing a single page and two asterisks in front of multiple pages.\(^{30}\) Thus, a pinpoint reference to one page would be “*10” and a pinpoint reference to multiple pages would be “**10–12.”

\(^{27}\)Hurt, supra note 18, at 1286–87.

\(^{28}\)Compare the second edition ALWD Manual, supra note 1, R. 12.2(g), at 70 with the first edition Association of Legal Writing Directors & Darby Dickerson, supra note 1, R. 12.2(g), at 70. Compare the second edition ALWD Manual, supra note 1, Chart 12.1, at 76 with the first edition Association of Legal Writing Directors & Darby Dickerson, supra note 1, Chart 12.1, at 76.

\(^{29}\)ALWD Manual, supra note 1, R. 12.22(b), at 99.

\(^{30}\)Id., R. 12.12(b), at 92–93.
REVIEWS AND CRITICISMS OF THE MANUAL

The ALWD Manual has been extensively reviewed, with most reviews positive.31 However, at least one reviewer has noted that many reviewers are not entirely disinterested. Most of the reviews are authored by members of ALWD or legal writing professors who are favorably disposed toward ALWD.32

One virtue of the Manual is that it does not require the legal professional to make a radical departure from the citation form to which it is accustomed. The fact that the Manual contains a restatement of the Bluebook rather than creating a new citation system makes the transition painless. One change that most legal writers embrace is that the same citation format is used for law review articles and other types of legal documents.33

Reviewers have reacted positively to the Manual’s format, perceiving the format to be more reader-friendly than Bluebook format34. Reviewers who teach legal writing have praised the Manual as a teaching tool.35 For example, one law school professor found that using the Manual meant that her students’ citations were more accurate, leaving more time for writing documents in legal writing class.36

However, a few reviewers have been less enthusiastic. Although one reviewer believes that the Manual has won the contest, he does not necessarily think that the Manual will supplant the Bluebook. He suggests that the success of the Manual may spur the Bluebook to become more user-friendly.37


33 NEALA Adopts New Citation Manual, NEALA Q., Fall 2000, at 24.

34 Wanda M. Temm, New Kid on the Block: The ALWD Citation Manual, 59 J. Mo. B. 16, 16 (2003); Vickie Rainwate, Citation Form in Transition: The ALWD Citation Manual, 7 Tex. Wesleyan L. Rev. 21, 33 (2000) (book review).


36 Temm, supra note 34, at 16, 18–19.

37 C. Edward Good, Will The ALWD Citation Manual He [sic] the Trial of the Century?, Trial, Sept. 2001, at 79. Id. In a prior article the same author criticizes the first edition of the Manual.
Another reviewer voiced doubts that the Manual would be successful, given the long history of use of the Bluebook by legal professionals. The editors of the Boston University Law Review produced one issue of the Law Review using the ALWD Manual, but then decided to switch back to the Bluebook because of their familiarity with the Bluebook.

Law school adoptions of the Manual have been brisk. One hundred sixty-five law schools are members of the Association of American Law Schools. Ninety-one law schools have adopted the ALWD Manual in whole or in part. Those law schools that have adopted the Manual in whole use it in all sections of their first-year legal research and writing program, while those law schools that have adopted the Manual in part use it in less than all of the first-year legal research and writing sections. Thus, over 55 percent of the law schools have adopted the Manual to some extent.

Adoptions by law reviews, professional journals, and courts have been slower. Sixteen law reviews and journals have adopted the Manual. A few courts have adopted the Manual.

“I consider the publication of the ALWD manual bad news because of the trouble I think it will cause in the legal profession. Yes, we have had and still have trouble with the Bluebook, but it is the nation’s uniform system.” Good, supra note 35, at 79. Good suggested that a more logical response would have been to “reform the Bluebook from within.” Id.


39Editorial Board, Editorial Note, Citation Manual, 81 B.U. L. Rev. 917, 917 (2001). However, the editors stated: “[w]e found the ALWD to be a clear and attractive alternative to The Bluebook.” Id. “We do not wish to imply, nor should anyone infer, that we are rendering a judgment regarding the better of the two guides. We are simply more familiar with The Bluebook.” Id. at 917–18.

40See http://www.aals.org/members.html.

41Fifteen of the journals and law reviews are listed at http://www.alwd.org/cm/. In addition, the authors were informed that the journal of Paralegal Education and Practice has adopted the Manual. The fifteen journals and law reviews that have adopted the Manual are: Animal Law (Lewis and Clark Northwestern School of Law); Appalachian Law Review; Brigham Young University Education and Law Journal; COMMENT (University of California at Hastings); Environmental Outlook (Albany Law School); Journal of Appellate Practice and Process; Journal of the Association of Legal Writing Directors; Legal Writing: Journal of the Legal Writing Institute; NAELA Quarterly (National Association of Elder Law Attorneys); North Carolina Journal of Law & Technology; Southern University Law Review; Stetson Law Review; Temple Political and Civil Rights Journal; University of Baltimore Journal of Environmental Law; Whittier Law Review. Id.

42Those courts are: United States Court of Appeals for the Eleventh Circuit; United States Bankruptcy Court, Montana; United States District Court for the District of Montana. Id.
THE FUTURE OF LEGAL CITATION

For almost seventy-five years, the *Bluebook* was the dominant legal citation manual. Given the rapidity with which the law schools have embraced the *Manual*, it seems that the *Manual* will be the dominant citation manual. “Network effects theory and common sense predict that the ALWD Manual should win the fight in a rapidly evolving citation network because . . . it is better suited to responding quickly and intelligently to the needs of the legal discourse community.” The vast majority of legal writing teachers in law schools are in favor of the *Manual*; thus, the majority of the next generation of attorneys will have learned to cite using the *Manual* rather than the *Bluebook*. Transition of law reviews and professional journals from the *Bluebook* to the *Manual* will be slower.

In the twentieth century, legal citation format experienced little change until almost the end of the century. Electronic publishing spurred the movement toward neutral citation format. Several prestigious legal organizations have encouraged this movement. AALL did much with the publication of its *Universal Citation Guide*. The American Bar Association (ABA) has encouraged the movement toward neutral citation form. In February 2003 the ABA passed a resolution “urg[ing] all American jurisdictions to participate in the creation of an American universal system of citation.”

43Hurt, supra note 18, at 1301.

44The ABA resolution provides:

RESOLVED,

That the American Bar Association will facilitate discussion with organizations currently developing legal citation formats towards development of a universal American citation standard that reflects both existing ABA recommended citation formats and other formats proposed and adopted in U.S. jurisdictions;

FURTHER RESOLVED,

That the American Bar Association urges cooperation amongst Federal, state, and territorial entities, law schools, research and writing organizations, and technology standards groups and others, to create a uniform citation standard that reflects the wide range of experience and research, as evidenced by the Association’s own citation resolution, and that can be implemented in legislatures, agencies, and courts.

FURTHER RESOLVED,

That the American Bar Association urges all American jurisdictions to participate in the creation of an American universal system of citation for case reports, statutes, administrative documents, and other resources upon which the legal profession relies.

Now, at the beginning of the twenty-first century, we are at a crossroads. Will the trend toward neutral citation continue? Will the dominant citation manual be the *Bluebook* or the *ALWD Manual*? A number of states have adopted neutral citation form and we predict that this trend will continue.

**CONCLUSION**

We see a clear trend toward more jurisdictions adopting neutral citation. The trend in citation manuals is to law schools, law reviews, and professional journals using the *ALWD Manual*. Editors of *The Journal of Legal Studies Education*, the *American Business Law Journal*, and the journals of the regional organizations are encouraged to study the differences between the *Bluebook* and the *ALWD Manual* to determine whether any of those journals should consider adoption of the *Manual*. The process of legal research has gradually, but slowly, adapted to take advantage of access to sources provided by new technology. Likewise, the availability of the *ALWD Manual* presents the opportunity for a positive change from the outmoded approach mandated by the *Bluebook* for generations.
## Appendix A
### Comparison of Selected ALWD 2d Edition and Bluebook 17th Edition Rules

<table>
<thead>
<tr>
<th>Rule</th>
<th>ALWD Citation</th>
<th>Bluebook Citation</th>
<th>Differences</th>
</tr>
</thead>
<tbody>
<tr>
<td>Typeface (Rule 1)</td>
<td>Ordinary type and <em>italics</em> (or underlining). No distinctions based on type of document (law review v. court document) or placement of citation within the paper.</td>
<td>Ordinary type, <em>italics</em> (or underlining), and small caps. Different fonts required depending on type of document and where source is cited within the paper.</td>
<td>ALWD has one set of conventions, not two. ALWD eliminates small caps as a typeface.</td>
</tr>
<tr>
<td>Abbreviations and Spacing (Rule 2)</td>
<td>F. Supp. F. 3d Corp. Govt. Intl.</td>
<td>F. Supp. F. 3d Corp. Govt. Intl'</td>
<td>No substantial differences on spacing. ALWD abbreviations end with periods; some Bluebook abbreviations include apostrophes.</td>
</tr>
<tr>
<td>Capitalization (Rule 3)</td>
<td><em>Federal Civil Procedure Before Trial</em></td>
<td><em>Federal Civil Procedure Before Trial</em></td>
<td>ALWD eliminates the “and prepositions of four or fewer letters” part of the Bluebook, which brings legal citation closer to non-legal style.</td>
</tr>
<tr>
<td>Numbers (Rule 4)</td>
<td>Use words for zero through ninety-nine in all text and notes. 1st, 2d, 3d, 4th</td>
<td>Use numerals for zero through ninety-nine in text and notes. 1st, 2d, 3d, 4th</td>
<td>ALWD does not distinguish between numerals and words depending on context. No substantial differences on ordinals.</td>
</tr>
</tbody>
</table>
### Appendix (Cont.)

<table>
<thead>
<tr>
<th>RULE</th>
<th>ALWD CITATION</th>
<th>BLUEBOOK CITATION</th>
<th>DIFFERENCES</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Page spans (Rule 5)</strong></td>
<td>125–126 or 125–26</td>
<td>125–26</td>
<td>ALWD gives a choice on how to present a page span; you may retain all digits or drop repetitive digits and retain two digits on the right-hand side of the span, as in Bluebook 3.3(d).</td>
</tr>
<tr>
<td><strong>Footnotes and endnotes</strong></td>
<td>n. 7</td>
<td>n. 7</td>
<td>ALWD requires a space after n. or nn. abbreviation.</td>
</tr>
<tr>
<td>(Rule 7)</td>
<td>nn. 12–13</td>
<td>nn. 12–13</td>
<td></td>
</tr>
<tr>
<td><strong>Supra and infra</strong> (Rule 10)</td>
<td><em>Supra</em> n. 45.</td>
<td><em>Supra</em> note 45.</td>
<td>Under ALWD, abbreviate note as “n.” and place a space after the period.</td>
</tr>
<tr>
<td><strong>Id.</strong> (Rule 11.3)</td>
<td><em>Id.</em> at 500.</td>
<td><em>Id.</em> at 500.</td>
<td>Basically similar rules. ALWD eliminates the “5 id. in a row” rule found in Bluebook 10.9.</td>
</tr>
<tr>
<td>RULE</td>
<td>ALWD CITATION</td>
<td>BLUEBOOK CITATION</td>
<td>DIFFERENCES</td>
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<tr>
<td>Rule 10</td>
<td>Rule 10 now allows abbreviation of the first word of a party’s name when the name appears in Table 6.</td>
<td>ALWD eliminates the “multiple date” rule found in Bluebook 10.5.</td>
<td>ALWD requires division and district information for state appellate courts. “Ct.” eliminated from most court abbreviations. For cases cited from Westlaw or LEXIS, ALWD does not require the docket number of the case. ALWD also requires two asterisks to identify multiple pages of a pinpoint cite.</td>
</tr>
<tr>
<td>RULE</td>
<td>ALWD CITATION</td>
<td>BLUEBOOK CITATION</td>
<td>DIFFERENCES</td>
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<tr>
<td>Legal Periodicals (Rule 23)</td>
<td>L. Ray Patterson, Legal Ethics and the Lawyer’s Duty of Loyalty, 29 Emory L.J. 909, 915 (1980).</td>
<td>L. Ray Patterson, Legal Ethics and the Lawyer’s Duty of Loyalty, 29 Emory L.J. 909, 915 (1980).</td>
<td>ALWD eliminates most distinctions between consecutively and non-consecutively paginated articles. Include longer date for non-consecutively paginated journals, but do so within the parenthetical. ALWD uses the term “Student Author” to replace Note, Comment, etc.</td>
</tr>
<tr>
<td>RULE</td>
<td>ALWD CITATION</td>
<td>BLUEBOOK CITATION</td>
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<tr>
<td>Signals (Rule 44)</td>
<td>Signals are <em>e.g.</em>, <em>accord</em>, <em>see</em>, <em>see also</em>, <em>cf.</em>, <em>contra</em>, <em>compare</em> . . . <em>with</em>, <em>but see</em>, <em>but cf.</em>, and <em>see generally</em>.</td>
<td>Signals are <em>e.g.</em>, <em>accord</em>, <em>see</em>, <em>see also</em>, <em>cf.</em>, <em>contra</em>, <em>compare</em> . . . <em>with</em>, <em>but see</em>, <em>but cf.</em>, and <em>see generally</em>.</td>
<td>Under ALWD, all signals may be separated with semicolons. ALWD does not use any punctuation after a signal. ALWD does not have a comma after <em>e.g.</em></td>
</tr>
<tr>
<td>Order of Citations (Rule 45)</td>
<td>ALWD lists federal and state court cases first by jurisdiction, then in reverse chronological order.</td>
<td>Federal and state court cases are ordered in reverse chronological order.</td>
<td></td>
</tr>
<tr>
<td>Quotations (Rule 47)</td>
<td>ALWD says to block indent passages if they contain at least fifty words OR if they exceed four lines of typed text.</td>
<td>The <em>Bluebook</em> says to block indent passages if they contain at least 50 words.</td>
<td>ALWD does not require you to count the exact number of words in long quotations.</td>
</tr>
</tbody>
</table>
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