

ALWD Guide to Legal Citation

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ALWD Guide to Legal Citation

Eighth Edition

**Association of Legal
Writing Directors**

and

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Dedicated to Dr. Kirsten K. Davis and Dr. Susan Tanner for helping me reimagine how to teach citation. And to my mother, Jennifer Ronnow: Luckier than me you never can be, for I had a mother who read to me.

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Summary of Contents

Table of Contents xi
About the Authors xxvii
Preface xxix
Acknowledgments xxxv
Introduction xlvii

Part 1 Citation as Legal Language 1

Rule 1. The Function of Citation in Legal Language 2
Rule 2. Citation Placement and Use 8
Rule 3. The Function of Signals 15
Rule 4. Order of Cited Authorities 22
Rule 5. Explanatory Parentheticals, Commentary,
and Treatment 30
Rule 6. Including Quotations in Legal Documents 35
Rule 7. Indicating Omissions from and Altering
Quotations 46

Part 2 Citation Basics 59

Rule 8. Typeface for Citations 60
Rule 9. Abbreviations 66
Rule 10. Spelling and Capitalization 70
Rule 11. Numbers in General 76
Rule 12. Page Numbers 80
Rule 13. Sections and Paragraphs 88
Rule 14. Footnotes and Endnotes 93
Rule 15. Supplements 97
Rule 16. Graphical Material, Appendices, and Other
Subdivisions 99

- Rule 17.** Internal Cross-References 101
- Rule 18.** Full and Short Citation Formats 103

Part 3 Citing Traditional Legal Sources 113

- Rule 19.** Cases 114
- Rule 20.** Constitutions 170
- Rule 21.** Statutory Codes and Session Laws 174
- Rule 22.** Legislation and Other Legislative Materials 193
- Rule 23.** Court Rules, Judicial Administrative Orders,
Ethics Opinions, and Jury Instructions 236
- Rule 24.** Ordinances 244
- Rule 25.** Administrative and Executive Materials 248
- Rule 26.** Treaties and International Conventions
and Agreements 270
- Rule 27.** Books, Treaties, and Other Nonperiodic
Materials 278
- Rule 28.** Law Reviews and Other Periodicals 301
- Rule 29.** Dictionaries, Encyclopedias, and
American Law Reports 319
- Rule 30.** Restatements, Principles of the Law,
Model Codes, Uniform Laws, and Sentencing
Guidelines 334
- Rule 31.** Looseleaf Services 350
- Rule 32.** Court Documents, Transcripts, and Appellate
Records 356
- Rule 33.** Speeches, Addresses, and Other Oral
Presentations 373
- Rule 34.** Interviews, Letters, and Memoranda 378

Rule 35. Videos, Audio Recordings, and Artwork 389

Rule 36. Forthcoming, Unpublished, and Archived Works 412

Part 4 Online Sources and Technology 423

Rule 37. Online Sources in General 424

Rule 38. Internet Sites and Social Media 430

Rule 39. Commercial Databases 445

Rule 40. Interpersonal Communication Using Technology 448

Rule 41. Tangible Storage Devices and Cloud Storage Platforms 456

Rule 42. Generative Artificial Intelligence 465

Part 5 Appendices 477

Appendix 1. Primary Sources by Jurisdiction 479

Appendix 2. Local Court Citation Rules 543

Appendix 3. General Abbreviations 545

Appendix 4. Court Abbreviations 559

Appendix 5. Periodicals and Looseleaf Services 569

Appendix 6. Federal Taxation Materials 571

Appendix 7. Federal Administrative Agencies and Publications 581

Appendix 8. Cross-References for Law Reviews 585

Index 611

Table of Contents

About the Authors xxvii

Preface xxix

Acknowledgments xxxv

Introduction

xlvi

How to Use the *ALWD Guide* xlviii

1. Overall Organization xlix
2. Organization Within Each Part of the *ALWD Guide* xlix
3. Citations in Practice Documents and Scholarly Writing li
4. Examples Are for Demonstration Purposes Only lii
5. Automatic Formatting in Your Word-Processing Software liii
6. Finding What You Need (and Quickly) liii
7. Citing Sources Not Covered in the *ALWD Guide* liii
8. Nonconforming Citations liii
9. Sources for Additional Guidance liv
10. Citing the *ALWD Guide* liv

Part 1 Citation as Legal Language

1

1 The Function of Citation in Legal Language 2

- 1.1 Why Do Legal Writers Cite? 3
- 1.2 A Law-Trained Reader's Expectations 4
- 1.3 The Context in Which the Citation Appears 5
- 1.4 The Types of Rules in Citations 7

2 Citation Placement and Use 8

- 2.1 Placement Options 8
 - Sidebar 2.1: Use Embedded Citations Sparingly 10
 - Sidebar 2.2^{FN}: Using Your Word Processor to Format Footnotes 12
- 2.2 Frequency of Citation 12
- 2.3 Number of Sources to Cite 13
- 2.4 Guidelines for Determining Which Authorities to Cite in a Practice-Based Document 14

3	The Function of Signals	15
3.1	Function of Signals	15
3.2	Significance of <i>No Signal</i>	15
3.3	Categories of Signals	15
	Chart 3.1: Categories of Signals: Types and Degrees of Support	16
3.4	Formatting Signals	17
3.5	Pinpoint Pages	18
3.6	Signals for Multiple Authorities; Changing Signals	18
4	Order of Cited Authorities	22
4.1	Ordering Multiple Authorities	22
4.2	General Guidelines for Ordering Authorities	23
4.3	Order of Specific Sources	24
5	Explanatory Parentheticals, Commentary, and Treatment	30
5.1	Using Explanatory Parentheticals	30
5.2	Placement of Explanatory Parentheticals	30
	Sidebar 5.1: Order of Parentheticals	31
5.3	Constructing Explanatory Parentheticals	32
5.4	Commentary About Source or Treatment of Source	33
6	Including Quotations in Legal Documents	35
6.1	When to Quote	35
6.2	Quoting Accurately	35
6.3	Quotation Formats	35
6.4	Short Quotations	35
6.5	Long Quotations	40
6.6	Testimony	44
6.7	Epigraphs	44
7	Indicating Omissions from and Altering Quotations	46
7.1	Typeface for Brackets and Ellipses	46
7.2	Altering the Case of a Single Letter in a Word	46
7.3	Adding, Changing, or Omitting One or More Letters in a Word	46
7.4	Substituting or Adding Words to a Quotation	46
7.5	Altering Typeface in a Quotation	47
	Sidebar 7.1: “Cleaned Up” or “Citation Modified” Quotations	48

7.6 ^{FN}	Adding a Footnote Within a Block Quotation	48
7.7	Indicating Mistakes in the Original	49
7.8	Indicating Omissions with Ellipsis	50
7.9	When to Use Ellipsis	51
7.10	When <i>Not</i> to Use Ellipsis	53
7.11	Altering Quotations of Handwritten or Typewritten Material	57

Part 2 **Citation Basics**

59

8 **Typeface for Citations** 60

8.1	Typeface Choices	60
8.2	When to Use Ordinary Type	60
8.3	When to Use <i>Italics</i> or <u>Underlining</u>	60
	Chart 8.1: Components to <i>Italicize</i> or <u>Underline</u>	61
	Chart 8.2: Latin Words and Abbreviations Ordinarily Not Italicized or Underlined	63
8.4	Typeface for Handwritten Materials	63
8.5	Spacing for Different Typeface	64
8.6 ^{FN}	When to Use LARGE AND SMALL CAPITAL LETTERS	64
	Sidebar 8.1: Using Your Word Processor to Format LARGE AND SMALL CAPITAL LETTERS	65
	Chart 8.3: Components Using LARGE AND SMALL CAPITAL LETTERS in Academic Footnotes	65

9 **Abbreviations** 66

9.1	Using Abbreviations	66
9.2	Spacing	66
9.3	Referring to Cases and Constitutions in Textual Sentences	68
	Chart 9.1: Words to Abbreviate in Textual Sentences and Embedded Citations	68

10 **Spelling and Capitalization** 70

10.1	Spelling in Titles and Text	70
10.2	Capitalization in Titles and Subtitles	70
	Sidebar 10.1: Common Prepositions	71
10.3	Capitalization in Text	72
10.4	Capitalizing Specific Words	73
	Chart 10.1: Capitalizing Specific Words	73

11 Numbers in General 76

- 11.1 Numbers in Citations 76
- 11.2 Numbers in Textual Sentences 76
- 11.3 Ordinal Numbers 78

12 Page Numbers 80

- 12.1 Initial Pages 80
- 12.2 Pinpoint Pages 80
 - Sidebar 12.1: Importance of Using Pinpoint References 81
- 12.3 Consecutive Pinpoint Pages 82
- 12.4 Nonconsecutive Pinpoint Pages 82
 - Sidebar 12.2: The Difference Between Hyphens and En Dashes 82
- 12.5 Star Pagination 83
- 12.6 Passim 87

13 Sections and Paragraphs 88

- 13.1 Sources Divided Solely by Sections or Paragraphs 88
- 13.2 Consecutive Sections or Paragraphs 90
- 13.3 Scattered Sections or Paragraphs 90
- 13.4 Unnumbered Paragraphs 91
- 13.5 Sources Divided Both by Pages and by Sections or Paragraphs 91
 - Sidebar 13.1: When Not to Cite to Both Pages and Sections or Paragraphs 92
- 13.6 Referring to Sections or Paragraphs in Text 92

14 Footnotes and Endnotes 93

- 14.1 Citing Footnotes or Endnotes Within a Source 93
- 14.2 Footnotes or Endnotes in Short Citations 96

15 Supplements 97

- 15.1 Sources Found Only in Supplements 97
 - Sidebar 15.1: Supplement v. Cumulative Supplement 97
- 15.2 Sources Found Only in Main Volume of a Supplemented Work 98
- 15.3 Sources Found in Both Main Volume and Supplement 98
- 15.4 Sources Found in Multiple Supplements 98

16 Graphical Material, Appendices, and Other Subdivisions 99

- 16.1 Graphical Material 99
- 16.2 Preventing Confusion in References to Graphical Material 99
- 16.3 Appendices 99
- 16.4 Other Subdivisions 100

17 Internal Cross-References 101

- 17.1 Definition of “Internal Cross-Reference” 101
- 17.2^{FN} Constructing an Internal Cross-Reference 101

18 Full and Short Citation Formats 103

- 18.1 Full Citation Format 103
- 18.2 Short Citations 103
- 18.3 *Id.* as a Short Citation 104
- 18.4 *Supra* in a Short Citation 107
- 18.5 Designating a Shortened Reference with [Hereinafter] 109

Part 3 Citing Traditional Legal Sources

113

19 Cases 114

- Fast Formats 114
- Snapshot: Cases 115

- 19.1 Full Citations to Cases 117
- 19.2 Case Names 117
 - Sidebar 19.1: Distinguishing Case Names from Party Names 118
 - Sidebar 19.2: Case Names and Abbreviations 121
 - Chart 19.1: Common Organization and Business Designations 124
 - Sidebar 19.3: Public Official Named as Party 130
- 19.3 Reporter Volume 134
- 19.4 Reporter Name 134
 - Chart 19.2: Abbreviations for Commonly Used Reporters 136
 - Sidebar 19.4: United States Supreme Court Nominative Reporters 138
 - Sidebar 19.5: Locating Parallel Citations 140
- 19.5 Page Numbers 140
- 19.6 Court Abbreviations 142

19.7	Date of Decision	145
19.8	Subsequent History	146
	Chart 19.3: Subsequent History Phrases	147
	Sidebar 19.6: Petition for Writ of Certiorari	148
	Chart 19.4: Prior History Phrases	152
19.9	Prior History	152
19.10	Parenthetical Information	152
	Chart 19.5: Abbreviations for Titles of Judges and Other Judicial Officials	154
19.11	Cases in the Public Domain	155
	Sidebar 19.7: Jurisdictions Using Public Domain Citations	156
19.12	Slip Opinions	156
19.13	Forthcoming Case Publications	157
	Sidebar 19.8: Docket Numbers	157
19.14	“Unpublished” (Nonprecedential) Cases	158
	Sidebar 19.9: Court Rules Prohibiting or Limiting Citation of Unreported Cases	159
19.15	Court Documents in Published or Pending Cases	161
19.16	Short Citations to Cases	165
20	Constitutions	170
	Fast Formats	170
20.1	Which Source to Cite	170
20.2	Full Citations to Constitutions Currently in Force	170
20.3	Full Citations to Historic Constitutions or Constitutional Provisions No Longer in Force	172
20.4	Short Citations to Constitutions	173
21	Statutory Codes and Session Laws	174
	Fast Formats	174
	Snapshot: United States Code	175
21.1	Sources of Statutory Law	177
	Sidebar 21.1: Publication Dates of Official and Unofficial Versions of the <i>United States Code</i>	177
21.2	Full Citations to Federal Statutes Currently in Force	178
21.3	Full Citations to Federal Statutes No Longer in Force	183
21.4	Full Citations to State Statutes	184
	Sidebar 21.2: Local Practices When Citing Statutes	184
	Chart 21.1: Analogous Rules for Statutory Components	185

- 21.5 Short Citations to Federal and State Statutes 186
- 21.6 Full Citations to Federal Session Laws Currently in Force 188
- 21.7 Full Citations to Historical Facts and Federal Session Laws No Longer in Force 190
- 21.8 Full Citations to State Session Laws 191
- 21.9 Short Citations to Federal and State Session Laws 191

22 Legislation and Other Legislative Materials 193

Fast Formats 193

- 22.1 Full Citations to Federal Unenacted Measures 194
 - Sidebar 22.1: Forms of Legislative Measures 196
- 22.2 Short Citations to Federal Unenacted Measures 199
- 22.3 Citations to Federal Enacted Bills or Joint Resolutions 200
- 22.4 Citations to Federal Enacted Simple or Concurrent Resolutions 201
- 22.5 Full Citations to Congressional Committee Hearings 202
- 22.6 Short Citations to Congressional Hearings 204
- 22.7 Full Citations to Numbered Congressional Reports and Documents 205
- 22.8 Short Citations to Numbered Congressional Reports and Documents 209
- 22.9 Citations to Unnumbered Reports, Documents, and Committee Prints 210
- 22.10 Citations to Congressional Debates 212
- 22.11 Citations to Congressional Journals 217
- 22.12 *The Declaration of Independence* 219
- 22.13 Full Citations to State Unenacted Measures 220
- 22.14 Short Citations to State Unenacted Measures 223
- 22.15 Citations to State Enacted Measures and Joint Resolutions 224
- 22.16 Citations to State Legislative Hearings 225
- 22.17 Full Citations to State Legislative Reports and Documents 226
- 22.18 Full Citations to State Legislative Debates 229
- 22.19 Short Citations to State Legislative Debates 232
- 22.20 Citations to State Legislative Journals 233

23 Court Rules, Judicial Administrative Orders, Ethics Opinions, and Jury Instructions 236

Fast Formats 236

- 23.1 Court Rules and Judicial Administrative Orders 236
- 23.2 Ethics Opinions 240
- 23.3 Jury Instructions 241

24 Ordinances 244

Fast Formats 244

- 24.1 Full Citations to Codified Ordinances 244
- 24.2 Full Citations to Uncodified Ordinances 245
- 24.3^{FN} Full Citations to Codified or Uncodified Ordinances in Academic Footnotes 246
- 24.4 Short Citations to Codified or Uncodified Ordinances 247

25 Administrative and Executive Materials 248

Fast Formats 248

Snapshot: Code of Federal Regulations 249

- 25.1 Full Citations to *Code of Federal Regulations* 251
 - Sidebar 25.1: Currency of C.F.R. Volumes 253
- 25.2 Short Citations to *Code of Federal Regulations* 254
- 25.3 Full Citations to *Federal Register* 254
- 25.4 Short Citations to *Federal Register* 257
- 25.5 Full Citations to Federal Agency Decisions 258
- 25.6 Short Citations to Federal Agency Decisions 260
 - Sidebar 25.2: Citing Federal Tax Materials 260
- 25.7 Full Citations to Advisory Opinions 261
- 25.8 Short Citations to Advisory Opinions 262
- 25.9 Full Citations to Executive Documents 263
- 25.10 Short Citations to Executive Documents 265
- 25.11 Executive Agreements 266
- 25.12 Citations to Patents 266
- 25.13 Citations to State Administrative Codes 267
- 25.14^{FN} Citations to State Administrative Codes in Academic Footnotes 267
- 25.15 Citations to State Administrative Registers 267
- 25.16 Citations to State Agency Decisions 268
- 25.17 Citations to State Advisory Opinions 268
- 25.18 Citations to State Executive Materials 269
- 25.19 Citations to Other Administrative and Executive Materials 269

26 Treaties and International Conventions and Agreements 270

Fast Formats 270

- 26.1 Full Citations to Treaties, International Conventions, or International Agreements Currently in Force 270

	Chart 26.1: Document Sources for Treaties, Conventions, and Agreements	275
26.2	Full Citations to Treaties, Conventions, or Agreements No Longer in Force	276
26.3 ^{FN}	Full Citations to Treaties, Conventions, or Agreements in Academic Footnotes	276
26.4	Short Citations to Treaties, Conventions, or Agreements	276
26.5	International and Foreign Legal Sources	277
27	Books, Treatises, and Other Nonperiodic Materials	278
	Fast Formats	278
27.1	Full Citations to Books, Treatises, and Other Nonperiodic Materials	279
27.2	Star Edition	287
27.3	Collected Works	288
27.4	Books, Treatises, and Other Nonperiodic Materials in Electronic Media	290
27.5	Unique Citation Formats for Noteworthy Nonperiodic Materials	292
27.6	Short Citations to Books, Treatises, and Other Nonperiodic Materials	295
28	Law Reviews and Other Periodicals	301
	Fast Formats	301
28.1	Consecutive and Nonconsecutive Pagination	302
28.2	Full Citations to Consecutively Paginated Periodicals	302
	Sidebar 28.1: Identifying Student Authors	304
28.3	Full Citations to Nonconsecutively Paginated Periodicals	309
28.4	Full Citations to Cartoons or Comic Strips	312
28.5	Full Citations to Periodicals in Electronic Media	312
28.6 ^{FN}	Full Citations to Periodicals in Academic Footnotes	315
28.7	Short Citations to Periodicals	315
29	Dictionaries, Encyclopedias, and American Law Reports	319
	Fast Formats	319
29.1	Full Citations to Dictionaries	320
29.2	Short Citations to Dictionaries	322
29.3	Full Citations to Multivolume Encyclopedias	324
	Chart 29.1: Representative Encyclopedia Abbreviations	325

29.4	Full Citations to Encyclopedias with Named Authors or Editors	327
29.5	Full Citations to Annotations in <i>American Law Reports</i>	329
	Chart 29.2: Abbreviations for A.L.R. Series	331
29.6	Short Citations to Annotations	332
30	Restatements, Principles of the Law, Model Codes, Uniform Laws, and Sentencing Guidelines	334
	Fast Formats	334
	Snapshot: Restatement of the Law	335
30.1	Full Citations to Restatements and Principles of the Law	337
	Chart 30.1: Subject Matters of Restatements and Principles of the Law	338
30.2	Short Citations to Restatements or Principles	340
30.3	Full Citations to Sentencing Guidelines, Model Codes, and Model Acts	341
30.4	Short Citations to Sentencing Guidelines, Model Codes, or Model Acts	343
30.5	A.B.A. Model Code or Rules of Professional Responsibility	344
30.6	Citations to Uniform Laws	347
31	Looseleaf Services	350
	Fast Formats	350
31.1	Full Citations to Case Materials in Looseleaf Services	350
	Chart 31.1: Abbreviations for Names of Looseleaf Publishers	353
	Sidebar 31.1: Understanding Paragraphs in Looseleaf Services	354
31.2	Full Citations to Non-Case Materials in Looseleaf Services	355
31.3	Short Citations to Non-Case Materials in Looseleaf Services	355
32	Court Documents, Transcripts, and Appellate Records	356
	Fast Formats	356
32.1	Scope of Rule	356
32.2	Full Citations to Court Documents in the Same Case	357
	Sidebar 32.1: PACER and ECF	358
	Sidebar 32.2: More on Document Names	359
32.3	Full Citations to Exhibits	361
	Sidebar 32.3: Bates Numbering	362
32.4	Full Citations to Transcripts or Recordings	362

32.5	Full Citations in Motions for Summary Judgment and Accompanying Statements of Fact	364
	Chart 32.1: The Flow of Citations When Drafting Statements of Facts to Accompany a Motion for Summary Judgment	365
32.6	Short Citations to Court Documents or Transcripts	366
	Sidebar 32.4: How to Choose Where in the Record to Cite	367
32.7	Full Citations to Appellate Records	367
32.8	Short Citations to Appellate Records	368
32.9	Citations in Table of Authorities	368
	Sidebar 32.5: Using a Word Processor to Create a Table of Authority	369
	Sidebar 32.6: Court Rules on the Order of Sections of Authorities in the TOA	370
33	Speeches, Addresses, and Other Oral Presentations	373
	Fast Formats	373
33.1	Full Citations to Unpublished Speeches, Addresses, and Other Oral Presentations	373
	Sidebar 33.1: When to Use Rule 33 or Another Rule for Speeches, Addresses, or Other Oral Presentations	374
33.2	Presentation Transcript Published in Text	376
33.3	Short Citations to Speeches, Addresses, and Other Oral Presentations	377
34	Interviews, Letters, and Memoranda	378
	Fast Formats	378
34.1	Full Citations to Interviews Conducted by the Author	379
34.2	Full Citations to Interviews Conducted by Another Person	381
34.3	Recorded Interviews Posted Online	382
34.4 ^{FN}	Full Citations to Interviews in Academic Footnotes	382
34.5	Full Citations to Unpublished Letters and Memoranda	382
34.6	Full Citations to Published Letters or Memoranda	385
34.7 ^{FN}	Citations to Letters or Memoranda in Academic Footnotes	386
34.8	Short Citations to Interviews, Letters, or Memoranda	386
35	Videos, Audio Recordings, and Artwork	389
	Fast Formats	389
35.1	Full Citations to Movies and Other Nonepisodic Films	391
35.2	Full Citations to Episodic Programs	393
35.3	Full Citations to Livestreams and Videos Available Online	395

- 35.4 Full Citations to Radio Broadcasts and Series 399
- 35.5 Full Citations to Audio Recordings 400
- 35.6 Full Citation to Single Audio Recording in a Collection 403
- 35.7 Full Citations to Podcasts 404
- 35.8 Full Citations to Audio Recordings Available Online 405
- 35.9 Full Citation to Private Audio Messages 406
- 35.10 Full Citations to Photographs, Illustrations, Images, or Other Works of Art 408
- 35.11^{FN} Full Citations to Photographs, Illustrations, Images, or Other Works of Art in Academic Footnotes 410
- 35.12 Short Citations to Videos, Radio, Audio Recordings, Podcasts, and Artwork 410

36 Forthcoming, Unpublished, and Archived Works 412

Fast Formats 412

- 36.1 Full Citations to Forthcoming Works 413
- 36.2 Full Citations to Unpublished Manuscripts 414
- 36.3 Full Citations to Working Papers 416
- 36.4^{FN} Full Citations to Forthcoming Works, Unpublished Manuscripts, or Working Papers in Academic Footnotes 417
- 36.5 Short Citations to Forthcoming Works, Unpublished Manuscripts, or Working Papers 417
- 36.6^{FN} Short Citations to Forthcoming Works, Unpublished Manuscripts, or Working Papers in Academic Footnotes 417
- 36.7 Archived Sources 417
 - Sidebar 36.1: Organization of Archival Collections 421
- 36.8 Short Citations to Archived Sources 422
- 36.9^{FN} Short Citations to Archived Sources in Academic Footnotes 422

Part 4 Online Sources and Technology

423

37 Online Sources in General 424

- 37.1 General Information About Citations to Sources in Print and Online Versions 424
- 37.2 Citing Online Sources That Are Official, Authenticated, or Exact Reproductions 424
 - Sidebar 37.1: Types of Websites and Indicia of Reliability 425
- 37.3 Parallel Citing Other Online Sources 426
- 37.4 Other Online Source Rules 428
 - Chart 37.1: Rules for Online and Parallel Online Citations 429

38 Internet Sites and Social Media 430**Fast Formats 430**

- 38.1 Full Citations to Sources on the Internet 431
 - Chart 38.1: Time Zones of the United States 435
- 38.2 Full Citations to Social Media 439
- 38.3 Short Citations to Sources on the Internet and Social Media 443

39 Commercial Databases 445**Fast Formats 445**

- 39.1 When to Cite Commercial Databases 445
- 39.2 Full Citations When a Unique Identifier Is Available 446
- 39.3 Full Citations When a Unique Identifier Is Not Available 447
- 39.4 Short Citations to Commercial Databases 447

40 Interpersonal Communication Using Technology 448**Fast Formats 448**

- 40.1 Full Citations to Email 449
- 40.2 Full Citations to Listserv Postings 450
- 40.3 Full Citations to Other Short Electronic Messages 450
- 40.4 Full Citations to Audio and Video Conferencing 452
- 40.5^{FN} Full Citations to Emails, Listserv Posts, Short Messages, and Audio and Video Conferencing in Academic Footnotes 454
- 40.6 Short Citations to Emails, Listservs, Short Messages, and Audio and Video Conferencing 454
- 40.7^{FN} Short Citations to Emails, Listservs, Short Messages, and Audio and Video Conferencing in Academic Footnotes 455

41 Tangible Storage Devices and Cloud Storage Platforms 456**Fast Formats 456**

- 41.1 Full Citations to Tangible Storage Devices 457
- 41.2 Full Citations to Cloud Storage Platforms 458
- 41.3 Full Citations to Microforms 461
- 41.4 Short Citations to Tangible Storage Devices, Cloud Storage Platforms, and Microforms 462
- 41.5^{FN} Short Citations to Tangible Storage Devices, Cloud Storage Platforms, and Microforms in Academic Footnotes 463

42	Generative Artificial Intelligence	465
	Fast Formats	465
42.1	Citation v. Acknowledgment	466
42.2	Considerations Affecting AI Citation or Acknowledgment	466
	Sidebar 42.1: Evolving Standards	468
42.3	Acknowledgment of AI Use	468
	Sidebar 42.2: The Pros and Cons of Acknowledgment	469
42.4	Full Citations to the Substance of AI-generated Material	470
	Sidebar 42.3: Generative AI Is Not an Authoritative Source	470
	Sidebar 42.4: What a Chat Summary Is Not	472
42.5 ^{FN}	Full Citations to the Substance of AI-generated Material in Academic Footnotes	473
	Sidebar 2.5: Cautious Documentation of AI Use	474
42.6	Short Citations to the Substance of AI-generated Material	474

Part 5 **Appendices**

477

Appendix 1: Primary Sources by Jurisdiction	479
A. Federal Primary Sources	480
B. States' and District of Columbia's Primary Sources	483
C. Territories' Primary Sources	539
Appendix 2: Local Court Citation Rules	543
Appendix 3: General Abbreviations	545
A. Calendar Divisions	545
B. United States and World Geography	545
C. Subdivisions	549
D. Publishing Terms	550
E. Names of Cases, Institutional Authors, and Periodical Titles	550
F. Legislative Terms	554
G. Court Documents	555
Appendix 4: Court Abbreviations	559
A. Federal Court Abbreviations	559
B. State Court Abbreviations	562
C. Other Abbreviations in Court Names	566
Appendix 5: Periodicals and Looseleaf Services	569
Appendix 6: Federal Taxation Materials	571
A. Statutory Compilations	571
Sidebar A6.1: Versions of the Internal Revenue Code	572

B.	Tax Courts and Reporters	572
	Sidebar A6.2: Case Names in Older Tax Authorities	575
C.	Administrative Materials	576
D. ^{FN}	Citations to Federal Taxation Materials in Academic Footnotes	580
Appendix 7:	Federal Administrative Agencies and Publications	581
A.	Selected Official Federal Administrative and Executive Reporters and Publications	581
B.	Selected Federal Agency Abbreviations and Acronyms	582
Appendix 8:	Cross-References for Law Reviews	585
<i>Index</i>		611



About the Authors

The Association of Legal Writing Directors is a nonprofit organization with more than 400 members serving at most law schools. It was founded in 1996 to ensure law schools provide excellent legal research and writing instruction, to enhance the leadership of legal writing professors, and to support legal writing scholarship.

Carolyn V. Williams is an Associate Professor of Law at the University of North Dakota (UND) School of Law, where she teaches legal writing, research, advocacy, and generative artificial intelligence courses. She has authored the *ALWD Guide* since its seventh edition. She co-facilitates the Legal Writing and Generative AI Convo Group, which now includes more than 500 law professors nationwide who meet monthly to explore issues surrounding AI in legal education. She also founded the Generative AI and Legal Citation Brain Trust to encourage dialogue between law professors, law librarians, and practitioners regarding the purpose and parameters of legal citation and acknowledgment when researching, writing, and brainstorming with AI. The UND School of Law awarded her the 2023–24 Randy H. Lee Faculty Teaching Award and the 2025 Association of American Law Schools Teacher of the Year for UND.

In law school, Carolyn was editor-in-chief (EIC) of the *Arizona State Law Journal* and a teaching assistant for legal writing courses. As a professor, she became the faculty advisor for the *Journal* and mentored subsequent EICs. She is now an article editor of the *Journal of Appellate Practice and Process*, a faculty-edited law review that has used *ALWD Guide* citation format since 2000. Carolyn is also a sought-after consultant who frequently teaches continuing legal education courses for those in the larger legal community. She holds positions in each of the national legal writing organizations, including ALWD, the Legal Writing Institute, and the Legal Writing, Reasoning, and Research Section of the Association of American Law Schools.

Before joining academia, Carolyn spent eight years in big firm practice where she litigated a range of complex commercial and land use matters, including cases involving condemnation, data breach class actions, complex judgment collections, and shareholder disputes at the state and federal levels. Super Lawyers named her a Rising Star in 2016, an honor bestowed on no more than 2.5 percent of the lawyers in Arizona.



Preface

Legal citations serve multiple purposes. Naturally, they record the sources selected by writers to support their statements concerning the law. They provide readers with the information they'll need to access those sources. They give credit to the original authors of text and ideas. But they also underscore the weight, the relevance, and the influence that a particular source possesses. And they even tell us something about the legal writers who drafted them — including how current, how extensive, and how careful their research was — and consequently, the degree to which the writers' work will be perceived as trustworthy, complete, accurate, and ethical.

The *ALWD Guide to Legal Citation* exists to assist legal writers in building citations to serve those purposes. From its inaugural publication in 2000 (under the title *The ALWD Citation Manual*), this book has prioritized the forms of citations used by the overwhelming majority of today's legal writers. In the twenty-six ensuing years, the *ALWD Guide* has found ways to improve its content and structure, while continuing to serve its users and their legal writing needs.

Goals and Features

The *ALWD Guide to Legal Citation* has the following goals:

- To explain to beginners the purpose of citation, the audience's expectations, and the context in which attorneys craft legal citations;
- To help beginners learn the conventions of legal citation, both for constructing their own citations and for understanding citations written by others;
- To explain the functions of the specific components for citations to various types of legal sources;
- To give its users a text that makes sense and that provides a step-by-step guide to constructing accurate citations;
- To offer legal writing and research professors a text that is easy to use, well organized, and self-contained;
- To arrange its contents so that legal professionals can easily find what they need to construct the citations used in practice-based documents; and
- To identify and make easy to find the small changes needed to modify citations for the constraints of scholarly writing in academic journals.

The *ALWD Guide* places its greatest focus on the primary and secondary sources most often cited in practice-based and academic writing. Each primary or secondary source rule begins with a **Fast Formats** page that previews and refreshes understanding of essential components for both full and

short citations. Rules for case law, statutes, and restatements feature **Snapshots** of actual pages, illustrating where to find essential components. The *ALWD Guide* features abundant **Charts** with abbreviations and other essentials *within* the rules they relate to. **Sidebars** help students understand the “why” of legal citations and steer them away from common errors or misconceptions. At the beginning of each source’s rule, templates diagram the order and relationship of essential components. Each primary and secondary source rule features component-by-component explanations and illustrations, including the use of **red triangles ▲** to illustrate required spacing of components within the citation.

As was the case in the seventh edition, the eighth edition takes pains to ensure that writers do not confuse the citation formats of academic writing with those used by lawyers in practice. Each academic formatting rule number ends with the suffix ^{FN}. The academic rule and its examples are further marked with unmistakable visual cues; they are set off by a vertical red line and accompanied by a warning icon.



The *ALWD Guide* also aims to demystify certain features of legal citation. For example, it addresses curious features, such as star pagination; confounding features, such as whether, when, and why to provide a parallel citation or a public domain citation; confusing features, such as the geographic coverage of a regional reporter; challenging features, such as determining whether to append subsequent history to a case citation, and if so, in what manner; and overlooked features, such as how to cite to interviews conducted on a video-conferencing platform.

Changes to the Eighth Edition

The most obvious change in the eighth edition is the reorganization of the rules. To orient users, we have provided a chapter-mapping document online that compares the new rules to where they were in the seventh edition. This reorganization was necessary for a few reasons. First, time and again professors told us that they started teaching citation from the back of the book using former Parts 4 and 5, which explain citation placement and use, the use of signals for support, how to construct parentheticals, when to quote, and how to alter quotations properly. So, it made sense to move the rules that formerly comprised Parts 4 and 5 to the beginning of the book.

Second, as Carolyn grew into a seasoned professor, enjoyed the national dialogue on citation scholarship, and had enlightening conversations with colleagues, she realized that what was most essential about legal citation — that it conveys important information to the reader — was being lost by an overemphasis on perfect mechanics and format. This led to a new **Rule 1** that discusses the functional place of citation in law, explains the needs and expectations of various legal readers, and describes the many contexts in which legal citation appears (or not). Most importantly, it emphasizes the choices that legal writers

make when it comes to citation by reframing legal citation as a series of rhetorical decisions by the legal writer, instead of rigid, severe rules imposed on them. **Rule 1** serves as an ideal introduction to the rules moved to the front of the book, which highlight the writer's choices about quotations, placement, and parentheticals. New sidebars and revised language in other rules focus students' attention on the choices they have when citing and what factors will influence their decisions. In this way, students can better understand that it is alright to adapt citations for a new source or odd problem not addressed in the *ALWD Guide* and feel confident with the way in which they choose to address those situations. Understanding the place of citation in the legal world is much more important to learn than whether a comma is italicized or not.

Third, the organization of some rules did not make sense anymore. In the past twenty-plus years since the *ALWD Guide's* first edition, the way in which we access and store information has radically and rapidly changed. Each new edition of the *ALWD Guide* has added more sources (e.g., video conferencing, texts, cloud storage, social media) while at the same time other sources were becoming practically obsolete (e.g., CD-ROMs, live radio). Looking at the current state of information, it became clear that many sources were not where a user of the *ALWD Guide* would expect and that a reorganization of where sources appeared in the rules would help the end user and enhance consistency. Moving the sources that change the most rapidly (i.e., technology) to rules in the last part of the book provides an added bonus: In future editions, as more sources appear or disappear, fewer rules' numbering will be affected as the sections in **Part 4** expand and contract.

Beyond the reorganization, **Appendix 8**, Cross-References for Law Reviews, has been updated to correspond to the new edition of *The Bluebook: A Uniform System of Citation*. **Parts 1–4** and **Appendix 6**, Federal Taxation Materials, have callouts that cross-reference the information in the text of the *ALWD Guide* to the corresponding rule in the twenty-second edition of *The Bluebook*. Consequently, law review students can confidently use the *ALWD Guide* no matter the law review's stated preference of citation manual.

Appendix 5, Periodicals and Looseleaf Services, which lists full abbreviations for periodical titles, is still available online for free. One of the more difficult tasks of law review staff is to understand and apply the myriad rules surrounding how to craft lengthy periodical abbreviations. That makes **Appendix 5** a time saver for stressed law students. Allowing all interested individuals access to it for free is our way of giving back. See **Appendix 5** on the CasebookConnect Resource page for the *ALWD Guide to Legal Citation*, Eighth Edition, or on the book's product page under Student Resources and Professor Resources at www.AspenPublishing.com.

Appendix 2, Local Court Citation Rules, is also still online for free as a thank you for the support we received while updating it. Once again, we asked practitioners, judges, and professors from each of the fifty states to weigh in on the local rules of practice for their jurisdiction that are contained in **Appendix 2**. We made significant updates to those local rules as a result. As part of our civic

duty, we wanted the collective knowledge of local practices to benefit everyone. It also helps us to update this rapidly changing information in a timely fashion. See **Appendix 2** on the CasebookConnect Resource page for the *ALWD Guide to Legal Citation*, Eighth Edition, or on the book's product page under Student Resources and Professor Resources at www.AspenPublishing.com.

Rule 32, Court Documents, Transcripts, and Appellate Records (citing court documents in your own case), has two significant updates. First, we added a section regarding the separate statement of facts for a motion for summary judgment. We explained how exhibits, separate statements of facts, and motions for summary judgment work together. We gave specific instructions on how to cite exhibits within the separate statement of facts and then how to cite to the separate statement of facts within the motion for summary judgment. Second, we also added a section on how to create tables of authorities and cite within them.

Rule 36, Forthcoming, Unpublished, and Archived Works, now has rules on citing to material in archives.

We continued to reevaluate the nature of the sources relied on by today's legal writers. We extensively revised a number of rules by visualizing the multitude of ways that people access information now, crafting several new examples and illustrations to account for those, and adding detailed explanations of how to construct legal citations for each new source. For example, **Rule 35**, Videos, Audio Recordings, and Artwork, was completely overhauled to account for the many places videos appear in modern life. Prior Rule 33 (email, listservs, shared drives, and other short electronic messages) was split into **Rule 40**, Interpersonal Communication Using Technology, which captures people's interpersonal communication through technology, and **Rule 41**, Tangible Storage Devices and Cloud Storage Platforms, which gathers sources from a number of rules that have to do with physical media storage (e.g., CD-ROMs, DVDs) and cloud storage (e.g., Dropbox, Microsoft Teams).

Finally, **Rule 42**, Generative Artificial Intelligence, is a new rule that discusses the difference between citation and acknowledgment and when and how to do both when using generative AI. To craft this rule, Carolyn formed the Generative AI and Citation Brain Trust, which was comprised of forty legal writing professors, law librarians, and practitioners. (See the **Acknowledgments to the Eighth Edition** for a list of members.) These experts on legal citation and AI met with her over summer 2025 to discuss the current advice from citation manuals on citing to AI, the problems with the existing advice, and the content and structure of what would become **Rule 42**. Although the final decision as to what to include in the *ALWD Guide* remained with Carolyn, the Brain Trust's advice and guidance was essential.

The Role of Generative AI

We want to recognize the role generative AI played in shaping the eighth edition of the *ALWD Guide*. At various points in the revision process, we used

ChatGPT, Notebook LM, Otter.ai, CoPilot, Lex, and Lexis+ Protégé to get ideas, locate examples of sources, and refine ideas. Human effort was applied in each of those instances and included prompting, iterating, reading, revising, and editing. To be clear, Carolyn always drafted the first draft of new rules and wrote the revisions for old rules on her own before asking AI for feedback.

Here are a few ways in which we used AI. Sometimes, we needed to understand what various parts of the country called certain attorney practices; for example, what were all the terms that attorneys used to describe the numbers a court assigned to each document filed in a specific case? Attorneys in one part of the country might call those numbers “docket numbers” — distinct from the docket numbers assigned to each case filed — whereas some might call them “ECF numbers,” and still others call them “file numbers.” Having AI suggest terms that fit the definition given to it in the prompt gave us a starting point for research that we might never have considered with a practice limited to a specific area of the country. At other times, AI was used to suggest titles and subtitles for rules that better captured the categories of sources contained in them. It suggested various ways to organize new subrules within existing rules. It helped brainstorm new sources of information that might need to be included in the *ALWD Guide*. Again, those suggestions were never adopted wholesale, and human discernment played a key role in the final decisions as to what made it into the eighth edition. Because AI is excellent at grammar, it helped with the mechanics of writing: to rephrase an awkward sentence, to give feedback on the flow of a new rule, and to suggest ways to tighten up a newly drafted section that seemed long or repetitive.

One of the most helpful AI contributions was assistance in locating source material for examples. For instance, we needed an example of when a lower-case *l* was used in a statute. Before AI, we would need to comb through pages of statutes looking for one that had a subsection *l*, with no guarantee we would locate one. With prompting, AI suggested an example, and we looked it up, but it did not exist. After further iteration, it made more suggestions. On researching the statutes, one of those suggestions not only had a subsection *l*, but subsection *l* had a sub-subsection number 1, which was the perfect example to demonstrate the contrast between *l* and 1 in a citation. The entire process took ten minutes — hours less than it would have taken the human author before AI.

We also used AI to facilitate the human author’s creation of plausible examples of sources that were difficult to physically explore. The vast majority of sources in the examples in the *ALWD Guide* are real sources, but to be clear, there are a handful of times when a source in an example might not exist, but its inclusion as an example is not accidental or a “hallucination.” Archival sources, for example, by nature, are not easily physically accessible. Online archives are searchable from across the world, but archived sources kept in boxes in libraries (or in private underground vaults like in the salt mines below Hutchinson, Kansas) are less so. AI helped to locate archives and the types of sources contained in them. Then we verified through reliable sources (not AI)

the existence of the archive and the types of sources in the archive. Then, we would craft a citation to a source that *could* exist in the archive without traversing back and forth across the country to verify it *did* exist. In other words, after learning from AI that a particular law clerk worked with a particular Justice at the same time the Justice worked on a particular case, we could verify that information with a reliable source, and then we could craft a citation to a memo that this law clerk *could* have written to that Justice about that case that *could* be stored in a particular archive housing the Justice's papers. Because the purpose of examples in the *ALWD Guide* is to model where certain components belong in a citation, and there are a multitude of real sources in the *ALWD Guide* to which most readers would never have access to check the citation, we felt this use of AI justified.

The *ALWD Guide* reflects Carolyn's knowledge and engagement, and she takes full responsibility for its content. We hope that our use sparks thoughtful discussion of the role AI can play when used wisely by experts in their respective fields.

We are confident that the *ALWD Guide to Legal Citation* will meet your needs for a legal citation reference work. Should you find any errors or omissions, or if you have suggestions for our next edition, please send them to the Association of Legal Writing Directors, alwd@alwd.org, or to Carolyn Williams, carolyn.williams.2@und.edu.

CVW and ALWD

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Creating a resource like the *ALWD Guide to Legal Citation* is a collaborative endeavor. It reflects the expertise, generosity, and encouragement of many people, more than I can adequately thank in these pages. I remain indebted to all who contributed to earlier editions, and I am especially thankful for the individuals listed below, whose efforts and insight strengthened the eighth edition:

The officers, directors, and membership of the Association of Legal Writing Directors (ALWD) for entrusting me with a second edition of my beloved *ALWD Guide*, for which I am touched and honored. In particular, thank you to the ALWD presidents I have worked with during the past five years: Laura Graham, Rebekah Hanley, Rachel Croskery-Roberts, David Cleveland, and Tenielle Fordyce-Ruff. I am also grateful for the support of the *ALWD Guide* Task Force for their work in spreading the word about the *Guide*.

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As Darby said, all errors are mine. If you see any, please let me know.

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University North Dakota School of Law
Grand Forks, North Dakota
February 2026

I am also grateful to the following copyright holders for permission to reprint material in the eighth edition:

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- *United States Code: 2012 Edition, Volume 3, Title 7*. Screenshot. U.S. Government Publishing Office, 2012.

Acknowledgments to the Seventh Edition

In law school, I learned legal citation using the *ALWD Citation Manual* (what is now the *ALWD Guide to Legal Citation*). I remember it as the easiest textbook to understand during my first year. As a student, I was grateful. As a professor, I have witnessed this same relief in my students who used prior editions of the *Guide*. Again, I was grateful to the authors—Darby Dickerson for taking on the monumental task of creating a simple, clear citation manual and to Coleen Barger for carrying that concept forward. Over the past year, my respect and admiration for these remarkable women grew as I revised the *Guide*. I am grateful beyond words for their work, and I hope I made them proud.

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As Darby said, all errors are mine. If you see any, please let me know.

Carolyn V. Williams
April 2021

Acknowledgments to the Sixth Edition

In my experience, writing the new edition to an established text is not an easy job. It isn't just a matter of adding (or subtracting) some abbreviations or correcting errors and omissions (although these tasks were certainly necessary). I've listened to and learned from complaints about the inherent nature of books about citation—from my students, from my legal writing comrades across the country, and from those directed to another publication. The complaints (let's relabel them as "concerns") range from "It's too long/bulky/detailed/heavy" to "It doesn't adequately explain X" and "I wish it covered Y." Reconciling these competing concerns has been an adventure. I've been making notes for months, and I've collected and implemented a host of helpful suggestions.

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I welcome your suggestions, and I encourage you to contact me if you have any questions, spot any problems, or just want to connect with another citation geek.

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April 2017

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Please let me know your suggestions, and without question, let me know if you find problems. My email address is below.

Coleen M. Barger
University of Arkansas Little Rock
February 2014

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Darby Dickerson
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Darby Dickerson
Stetson University College of Law
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Introduction
How to Use the
ALWD Guide



How to Use the *ALWD Guide*

The eighth edition of the *ALWD Guide to Legal Citation* assists writers in developing citations to sources used in their legal writing. The *ALWD Guide* codifies the rules of legal citation most commonly followed. While no citation system can anticipate every source a writer might need or choose to cite, the *ALWD Guide* gives rules and examples for frequently cited materials and guidelines for citing new or less familiar materials.

The *ALWD Guide* focuses on United States law, both federal and state. It does not address international or foreign sources, except for treaties binding on the United States. To cite a legal source from another country or an international law source, consult the *Guide to Foreign and International Legal Citations* (2d ed. 2009), prepared by the editors of New York University School of Law's *Journal of International Law and Politics*, or Part IV of the Oxford University Standard for Citation of Legal Authorities (OSCOLA), http://www.law.ox.ac.uk/sites/files/oxlaw/oscola_2006_citing_international_law.pdf.

In the same vein, the *ALWD Guide* does not address tribal law sources. There are 574 federally recognized American Indian tribes and Alaska Native Villages in the United States. Each tribe is a sovereign nation, and the authority to determine how its laws are cited properly rests with each sovereign. Some of the tribal nations have established and published citation formats for their own legal sources. For example, the Tohono O'odham Nation has citation direction on its website at <https://tojc-nsn.gov/wp-content/uploads/2025/03/Citations-for-Tohono-Oodham-Nation-codes-rules-caselaw.pdf>. The first step when citing tribal sources should always be searching for the tribal nation's own guidance and following it. Even where a tribal nation has spoken clearly on citation format, though, the sheer number of sovereign nations makes it impossible for the *ALWD Guide* to reproduce those standards within its pages.

Some tribal nations have chosen not to publish a standard citation format for their legal sources. To facilitate accurate and respectful legal scholarship and practice, legal writers must acknowledge each tribal nation's choice in this matter. So, when the tribal nation does not have a published citation format, look to citation norms within the tribal nation's sources (i.e., look at how tribal courts cite sources in their opinions) or call the clerk of the specific tribal court to discuss preferred practices.

The *ALWD Guide* does not prescribe a citation format for tribal law when a tribal nation has not provided its own guidance. Offering a uniform format from outside the tribal nation's own people risks substituting external conventions for a tribal nation's own values — which, given the United State's history of oppression and erasure of tribal nations' cultures, the *ALWD Guide* seeks to avoid. In addition, providing such a rule could discourage researchers — especially students — from consulting the tribal nation's official publications or websites for its preferred citation practices. Respect for tribal sovereignty and for sound research practice both require looking first and only to the tribal nation itself for guidance.

1 Overall Organization

The *ALWD Guide* is organized into five parts:

- **Part 1**, “Citation as Legal Language,” discusses the function of citation in legal documents, explaining the legal reader’s expectations and the contexts in which citation is used. It also illustrates the placement of citations in text, including citation sentences, citation clauses, embedded citations, and citations in academic footnotes. It provides guidance for choosing which authorities to cite and for organizing citations to multiple authorities. It also addresses the functions of signals and parentheticals. Finally, it covers the essentials for incorporating quotations into legal documents, including correct punctuation and formatting. It also demonstrates how to make alterations to or indicate omissions from a quoted text.
- **Part 2**, “Citation Basics,” addresses key concepts applicable to a variety of citations, including typeface, abbreviations, numbers, pinpoint references, and full or short citations.
- **Part 3**, “Citing Traditional Legal Sources,” diagrams and explains citations to the primary and secondary authorities most often used in legal writing, whether in print or online.
- **Part 4**, “Online Sources and Technology,” addresses sources *not covered* in **Part 3**, including those available on the internet, on commercial databases, and on other electronic media such as cloud storage platforms, email, listserv postings, and social media.
- **Part 5**, “Appendices,” collects essential information for constructing legal citations, including general and specialized abbreviations for official and unofficial reporters, statutes, and administrative publications, as well as complete abbreviations for legal periodicals. Where federal or state courts have adopted local rules affecting citation of primary sources, the *ALWD Guide* gathers references to both online and print sources of those local rules. This part also has the cross-references to the twenty-second edition of the *Bluebook*.

2 Organization Within Each Part of the *ALWD Guide*

Parts 1 through **4** condense legal citation into forty-two rules, divided into subsections. Each rule gives detailed explanations for citing a particular source or applying a particular concept. Examples illustrate key points and exceptions to the general rules.

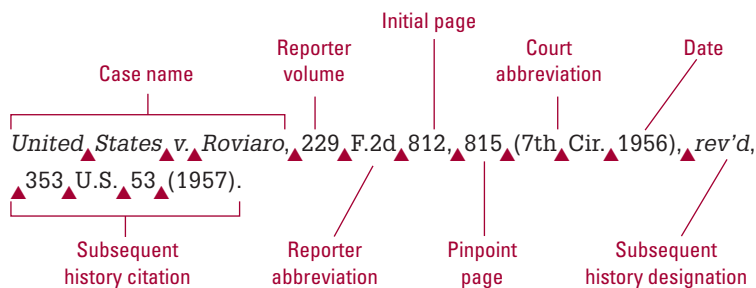
Rules for citing a particular source begin with a diagram of required components and an example that represents the components used in a full citation. The diagrams are highlighted in gray for easy identification. They use a vertical line

(1) to separate components of a full citation; the line does not, however, indicate the placement of spaces in a citation. Instead, the *ALWD Guide* uses red triangles (▲) in the component examples below the diagrams to designate required spaces. Using ordinary type, *italics*, or LARGE AND SMALL CAPITALS, the diagrams show components that must be rendered in those typefaces. The diagrams show the placement of necessary punctuation such as commas or parentheses. All punctuation and any words that will always appear exactly as they appear in the diagram are in black font. The text in red font indicates that the component is variable—the words it represents change with each source’s citation. For example, in the diagram below, “Case name” would be replaced with the actual, italicized name of a case. Red brackets indicate components that may not always be a part of the citation, depending on the circumstances. Think of brackets as indicating inclusion of this component (and any of its punctuation) only if it is available, exists, or is applicable. For example, in the component diagram below, the brackets around “[, Subsequent history designation,]” indicate that you may include the applicable designation, set off by commas, only if a case has subsequent history, and if so, the designation would be italicized. Do not include the red brackets, red triangles, or red text in the final citation.

This component diagram and accompanying example is from **Rule 19** (Cases):

Case name, | Reporter volume | Reporter abbreviation | Initial page, | Pinpoint reference | (Court abbreviation | Date) | [, *Subsequent history designation*,] | [*Subsequent history citation*].

Example



Following the diagram, the rule explains each component of the full citation and provides additional examples.

Rules 19 through **36** and **Rules 38** through **42** offer special features to help you construct accurate citations. These rules are preceded by “Fast Formats,” tables containing representative citations to commonly cited materials. Consult a rule’s Fast Formats to quickly preview basic citation components or refresh your memory. “Snapshots” of sources show you where to look to