



## CITING TO AUTHORITY

### *Supplemental Material for the Third Edition of*

# *The Guide to U.S. Legal Analysis and Writing*

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## *Citing to Authority*

(UPDATED VERSION OF CHAPTER 19 FROM THE 2<sup>nd</sup> EDITION\*)

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Entire books are written about proper U.S. legal citation form. Two commonly used citation style manuals are *ALWD Guide to Legal Citation*, 7th ed., (Carolyn Williams and ALWD, 2021) (aka, *ALWD Guide*) and *The Bluebook: A Uniform System of Citation* (21st ed. 2020) (aka, *The Bluebook*).<sup>1</sup> Because those books give extensive details, this chapter provides only a broad overview of correct citation form, consistent with the *ALWD Guide* and *The Bluebook*, to help you better understand its role in writing legal documents, including office memoranda and briefs filed with the court.

Note that each U.S. state may have its own official rules for proper citation form or may adopt a commercial rule book as its official source for proper citation form. As always, check the local rules of the court for guidance on proper citation form before submitting any court document.

### **A. Why Cite**

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\*Many thanks to research assistant Lexi Breitenstine for her critical assistance. KJL, DBM, CMA.

<sup>1</sup> Also, many books help explain the citation manuals. *See, e.g.*, MARIA L. CIAMPI, RIVKA WIDERMAN & VICKI LUTZ, *THE CITATION WORKBOOK: HOW TO BEAT THE CITATION BLUES* (2d ed. 1997); LARRY L. TEPLEY, *LEGAL WRITING CITATION* (2008); DIONNE ANTHON, *THE BLUEBOOK UNCOVERED: A PRACTICAL GUIDE TO MASTERING LEGAL CITATION (TWENTY-FIRST EDITION OF THE BLUEBOOK)* (2020).

The U.S. legal system's reliance on primary authority (constitutional and statutory provisions, case law, and administrative regulations) requires you to refer to the source of the information you include in a legal document. This is especially important when that information comes from a source that is binding on your case. Even when the source is not from your jurisdiction and, therefore, is not binding, you must cite any information that either originates in a persuasive primary source, such as a statute, case, or constitutional provision from outside the jurisdiction of your case, or any secondary source, such as a law review article written by a scholar in the field, a provision of the relevant Restatement of the Law, a book, or a treatise.

If you do not cite where required, you give the impression that your ideas or words form the basis for the information. This is a mistake for two reasons. First, relevant material that comes from a primary source of law offers the most persuasive and effective support for your argument. Second, conveying the incorrect impression that the ideas or words are yours and not the actual source's is plagiarism,<sup>3</sup> which can affect adversely your credibility and ultimately the strength of your client's case.

Citing to sources also allows your reader to access the information provided in your written document. Your reader can then (1) check the accuracy of your reference, (2) read further information found in the cited source, or (3) use that source to locate further sources. A law clerk working for the judge in your case, for example, will likely check your sources for accuracy. Your reader may want to read the entire case or statutory language to which you have cited. Your reader may want to look at more sections of a cited law review article. Finally, your reader may find your document during the research process and use your document as a resource for accessing further helpful authority to which you have cited.

The same guidelines apply when you are writing a scholarly article, such as a paper for a class or an article for a legal periodical or law review. While writing a scholarly article, you must carefully document where the information included in your paper originated; to do otherwise is to commit plagiarism. In addition, scholarly papers are particularly useful because authors provide extensive information on the legal resources available on the topic of the paper. This information is oftentimes found in the footnotes or endnotes of the paper.<sup>4</sup>

## **B. *When to Cite***

Determining when to cite can seem challenging at first. A general guideline to follow is that when in doubt provide a citation. Providing a citation when one is not needed is not wrong; omitting a citation where one is required, however, creates problems.

### **1. *Cite when quoting language originating in another source***

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<sup>3</sup> Chapter 5 addresses plagiarism in detail.

<sup>4</sup> Footnotes are found at the bottom of each page on which a source is mentioned; endnotes are found at the end of the document in a numbered series. This book includes footnotes rather than endnotes.

Cite anytime you quote directly the language of a source. For example, in Chapter 6 the court in *Mats Transport v. ABC Corporation* sets out a three-pronged test used to determine the reasonability of a covenant not to compete. If writing a document that referred to *Mats Transport* and the three-pronged test, using the same words found in the opinion, you would quote the test as follows:

To prove reasonability, “(1) the covenant must not be broader than necessary for the protection of the covenantee’s legitimate business interest; (2) the covenant cannot have an adverse effect on the covenantor; and (3) the covenant cannot adversely affect the public interest.” *Mats Transp. v. ABC Corp.*, 824 S.E.2d 1467, 1468 (E.C. Ct. App. 1992).

Once you have quoted and cited a source, however, you do not need to continue to quote that language when referring to it later in your document. In the quote above, for example, after you provide the direct quotation, should you later refer to a covenant that does not adversely affect the public interest, you do not need to include quotation marks around the legal phrase “adversely affect the public interest.”

## 2. Cite anytime you paraphrase information found in another source

Even when you paraphrase or summarize information found in another source, as discussed in Chapter 5, the idea still belongs to the original author of the source. Since the idea was not yours originally, you must provide a citation.



### ***Example of the original quoted language:***

In *Mats Transport*, the court wrote, “Whether a covenant [not to compete] is overly broad depends, in part, on the extent of the territory restricted.” *Mats Transp. v. ABC Corp.*, 824 S.E.2d 1467, 1468 (E.C. Ct. App. 1992).

The term “not to compete” appears in brackets in the above example. This indicates to the reader that the writer has added this language to the quoted language; this phrase is not part of the original quotation.



### ***Example of the writer’s paraphrase of the original language:***

In determining whether a covenant not to compete is too broad, courts will consider the geographic distance of the territory being restricted. *Mats Transp. v. ABC Corp.*, 824 S.E.2d 1467, 1468 (E.C. Ct. App. 1992).

Notice that in both examples above, the writer still cites to the location in the opinion where the reference is located, which is on page 1468.

## 3. Cite a source that refers to and cites a different source

In some instances, you may be reading one source that includes a reference and citation to a different source. For example, when referencing the three-pronged test above, the court in *Mats Transport* cited *Hanson v. Albright*, 539 S.E.2d 500, 501 (E.C. Ct. App. 1989). In deciding whether you cite only *Mats Transport* or also *Hanson*, consider the following choices.

- (a) You may choose to find and read *Hanson* and cite directly to *Hanson* for the reference, without any reference to *Mats Transport*; or
- (b) You may choose to cite both *Mats Transport* and *Hanson*, showing that *Hanson* was cited in *Mats Transport*.

If you choose the second approach, assuming that this is the first time you refer to both cases, you would cite to these sources in one of the two following ways.

➔ **Alternative 1:**

*Mats Transport v. ABC Corp.*, 824 S.E.2d 1467, 1468 (E.C. Ct. App. 1992)  
(citing *Hanson v. Albright*, 539 S.E.2d 500, 501 (E.C. Ct. App. 1989)).

➔ **Alternative 2:**

*Hanson v. Albright*, 539 S.E.2d 500, 501 (E.C. Ct. App. 1989), cited in *Mats Transport v. ABC Corp.*, 824 S.E.2d 1467, 1468 (E.C. Ct. App. 1992).

In determining whether to cite to the second source (the source contained in the main source to which you are referring), follow these guidelines.

- (a) If the source to which you are referring *directly quoted* the language from a second source, and you are also quoting the language, you *must* cite to the original source of the quoted language. You may do this in one of two ways:

➔ **Alternative 1:**

*Mats Transport v. ABC Corp.*, 824 S.E.2d 1467, 1468 (E.C. Ct. App. 1992)  
(quoting *Hanson v. Albright*, 539 S.E.2d 500, 501 (E.C. Ct. App. 1989)).

➔ **Alternative 2:**

*Hanson v. Albright*, 539 S.E.2d 500, 501 (E.C. Ct. App. 1989), quoted in *Mats Transport v. ABC Corp.*, 824 S.E.2d 1467, 1468 (E.C. Ct. App. 1992).

- (b) If the source to which you are referring did *not* directly quote language from a second source but only cited that source for the idea, you are not required to cite the second

source. However, you may choose to cite both sources if you have a substantive reason to do so, such as when the main source to which you are referring is a state intermediate appellate court decision and that court cites a decision by the same state's highest court. You could obtain the highest court's opinion and cite directly to that source, or you could cite both the intermediate appellate court decision and the highest court's decision. This is especially appropriate when the decisions are separated by many years. For example, if the highest court's decision was issued in 1975 and was then cited in an intermediate appellate court case decided six months prior to when you are researching, you would likely want to cite both cases, to show that the language cited was originally set down by the highest court in 1975 and was still being followed in the more recent intermediate appellate court case.

#### 4. *When is it not necessary to provide a citation?*

Another way to consider when to cite is to think about when it is *not* necessary to cite. Consider the following guidelines:

- (a) ***Substantive facts.*** You do not need to cite when providing the substantive facts, or story, from a court opinion, unless you are quoting directly from the facts found in that opinion. Quoting the facts is usually not necessary unless the court has included quoted testimony from the trial court case and that quotation is important to the legal issue you are addressing. For example, in a case involving a contract dispute, the testimony of the parties may be significant in deciding whether an enforceable contract existed. If the parties' testimony is quoted in the court opinion, you will likely want to provide the direct quote in your document as well. In this instance, you must provide quotation marks and a citation to where those facts are located in the court's opinion.
- (b) ***Procedural facts.*** You do not need to cite to the procedural facts from a court opinion. As discussed in Chapter 3, the procedural facts include the procedural history of the case or the actions taken by the courts below. The procedural facts include a statement of the cause of action (e.g., an action for breach of contract or negligence) and the judgment in the lower court case (e.g., jury verdict for plaintiff or summary judgment for the defendant, etc.).
- (c) You do not need to cite information that is considered common knowledge, as discussed in Chapter 5 on plagiarism. This determination is often difficult for those living both inside and outside the United States. The best solution to this dilemma is to follow the guideline given at the beginning of the chapter: When in doubt, provide a citation. Anytime you find information in another source and are not sure whether that information is considered common knowledge, provide a citation.

#### C. *How to Cite*

Legal citation rules ensure that readers receive the information they need to find in the original source. The rules also promote consistency of form so that readers know what to expect. Citation rules explain (1) what to include in a citation (the substance), and (2) how to structure the citation (the form). Both substance and form are addressed below.

## 1. Primary authority

Including the recommended information ensures that your reader can (1) understand the source of the information and (2) access that source. The information required in the citation varies depending on the source itself. Again, always refer to a legal citation manual, such as the *ALWD Guide* or *The Bluebook*, for the specific rules relevant to each source. The basic substance to include when citing to primary authority follows. In the examples below, the part of the citation being emphasized for learning purposes is shown in boldface type. In a regular citation, no bold typeface would be used.

### a. Constitutional provisions

When referring to a constitutional provision, provide the following basic information.<sup>5</sup>

- The source of the provision, that is, whether it is the U.S. Constitution or a state constitution.

➔ **Examples:**

**U.S. Const.** amend. IV.  
**N.Y. Const.** art. IV, § 7.

- The section, article, or clause.

➔ **Examples:**

U.S. Const. **amend. IV.**  
N.Y. Const. art. **IV**, § **7.**

### b. Statutory provisions

When referring to a statute, provide the following basic information.<sup>6</sup>

- The volume of the book where the statute is found.

<sup>5</sup> Specific rules on constitutions are found in Rule 13 of the *ALWD Guide* and Rule 11 of *The Bluebook*.

<sup>6</sup> Specific rules covering statutes are found in Rule 14 of the *ALWD Guide* and Rule 12 of *The Bluebook*.

➔ **Examples:**

23 U.S.C. § 1331 (2005).  
810 Ill. Comp. Stat. 5/2-314 (1) (2001).

- The abbreviation for the code or statute. Cite to the official code if possible. The official federal code is the United States Code, cited as “U.S.C.” Official state code or statute names vary from state to state; they are listed in Appendix 1 of the *ALWD Guide* and Table 1 of *The Bluebook*.

➔ **Examples:**

23 U.S.C. § 1331 (2005).  
810 Ill. Comp. Stat. 5/2-314 (2001).  
Mass. Gen. Laws ch. 140 § 155 (2010).

- The specific section that references the statute.

➔ **Examples:**

23 U.S.C. § **1331** (2005).  
810 Ill. Comp. Stat. **5/2-314** (2001).  
Mass. Gen. Laws **ch. 140 § 155** (2010).

- If citing an unofficial code (one that has not been adopted by a court), indicate within parentheses which company publishes it. The unofficial sources for federal statutes are the United States Code Annotated (U.S.C.A.), published by West Publishing Company, and the United States Code Service (U.S.C.S.), published by LexisNexis. The state unofficial sources vary by state and are listed in Appendix 1 of the *ALWD Guide* and Table 1 of *The Bluebook*.

➔ **Examples:**

23 U.S.C.A. § 1331 (**West** 2005).  
23 U.S.C.S. § 1331 (**Lexis** 2005).  
810 Ill. Comp. Stat. Ann. 5/2-314 (**West** 2001).  
Mass. Gen. Laws ch. 140 § 155 (**West** 2010).



- The year of the publication of the book in which the statute is located, placed in parentheses.

➔ **Examples:**

23 U.S.C. § 1331 (2005).  
 810 Ill. Comp. Stat. 5/2-314 (2001).  
 Mass. Gen. Laws ch. 140 § 155 (2010).

- Books including statutes also have supplements. Supplements are published periodically and added to the hard volumes, usually at the back of the book. The supplements contain new statutes and amendments to statutes that were enacted since the date of the publication of the book. If the reference in your text is found in the supplement, indicate that in parentheses.

➔ **Example:**

23 U.S.C. § 1331 (Supp. 2007).

- If the main volume contains a statute that is still valid, and the supplement contains an amendment to that statute, both are shown in the parenthetical.

➔ **Example:**

23 U.S.C. § 1331 (2005 & Supp. 2007).

If researching online, the updated information is automatically integrated with the previous provisions already online, so a reference to a supplement is not needed.

Individual statutory references may include additional information, such as the subject matter or topic of the statute or its title, for example. Check your citation manual for specific guidelines.

### c. *Court opinions*

When referring to a court opinion, provide the following basic information.

- Case names: Providing a proper case name requires checking multiple rules found in a citation manual. The basic rules for citing case names in legal memoranda or court documents are found in Rule 12.2 of the *ALWD Guide* and Rules 10.2 and B10.1.1 of the Bluepages of *The Bluebook*.<sup>7</sup> A general approach to providing proper case names is to assume nothing and check for a rule about everything.

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<sup>7</sup> General rules covering case citations are found in Rule 12 of the *ALWD Guide* and Rule 10 of *The Bluebook*.

Never assume, for example, that the citation found on the top of the court opinion is written in proper citation form. In fact, the reported case name usually contains more information than is necessary for a proper citation.

➔ **Examples:**

(federal) *Bush v. Gore*, 531 U.S. 98 (2000).  
(state) *Trossman v. Phillipsborn*, 869 N.E.2d 1147 (Ill. App. Ct. 2007).

- The volume of the reporter where the opinion is located. In a written text, the volume number is found on the spine of the book.

➔ **Examples:**

(federal) *Bush v. Gore*, **531** U.S. 98 (2000).  
(state) *Trossman v. Phillipsborn*, **869** N.E.2d 1147 (Ill. App. Ct. 2007).

- The abbreviated name of the reporter where the opinion is located.

➔ **Examples:**

(federal) *Bush v. Gore*, 531 **U.S.** 98 (2000).  
(state) *Trossman v. Phillipsborn*, 869 **N.E.2d** 1147 (Ill. App. Ct. 2007).

In the two examples above, “U.S.” is the abbreviation for “United States Reports,” and “N.E.2d” is the abbreviation for “North Eastern Reporter, Second Series.” The North Eastern Reporter is one of West’s regional reporters, which are the official reporters in most U.S. states. Each regional reporter contains cases from multiple state courts, primarily appellate courts. The abbreviations for commonly used reporters are found in Chart 12.2 of the *ALWD Guide*. Also you may refer to Appendix 1 in the *ALWD Guide* or Table 1 in *The Bluebook*.

- The page of the reporter where the opinion begins.

➔ **Examples:**

(federal) *Bush v. Gore*, 531 U.S. **98** (2000).  
(state) *Trossman v. Phillipsborn*, 869 N.E.2d **1147** (Ill. App. Ct. 2007).

- The subsequent page where the relevant information in the case is found, if applicable. The reference to that page is called the pinpoint citation or “pincite.”

➔ **Examples:**

(federal) *Bush v. Gore*, 531 U.S. 98, **99** (2000).  
(state) *Trossman v. Phillipsborn*, 869 N.E.2d 1147, **1150** (Ill. App. Ct. 2007).

- The year when the case was decided (provided in parentheses).

➔ **Examples:**

(federal) *Bush v. Gore*, 531 U.S. 98 (**2000**).  
(state) *Trossman v. Phillipsborn*, 869 N.E.2d 1147 (Ill. App. Ct. **2007**).

- Any other necessary identifying information (see below).

**When citing to a federal decision:**

- If the U.S. Supreme Court decided the case, no other identifying information is necessary.
- If a federal circuit (intermediate appellate) court decided the case, include the specific circuit. In the next example, the court opinion originated in the Ninth Circuit of the United States Court of Appeals.

➔ **Example:**

*Smith v. Jones*, 232 F.3d 547 (**9th Cir.** 2004).

- If a federal district (trial) court decided the case, include a specific reference to the trial court. In the next example, the court opinion originated in the United States District Court for the Northern District of Ohio.

➔ **Example:**

*Brown v. White*, 450 F. Supp. 1250 (**N.D. Ohio** 1997).

**When citing to a state decision:**

- If the highest court of the state decided the case, and you are citing to a regional reporter, such as the Pacific Reporter, Second Series, listed in the citation below, include in parentheses a reference to the state along with the year the case was decided. A U.S. legal reader will know the case comes from the highest state

court when the citation includes only an abbreviation of the state and no other identifying court information.

 **Example:**

*Simmons v. Hershey*, 75 P.2d 698 (**Ariz.** 1978).

- If an intermediate appellate state court decided the case, and you are citing to a regional reporter, such as the North Eastern Reporter, Second Series, listed in the citation below, include a reference to the specific appellate court in parentheses. The reference to the appellate court is based on each state court's rules, so be sure to check the state-by-state references found in Appendix 1 of the *ALWD Guide* and Table 1 of *The Bluebook*. The reference below to the intermediate appellate court is indicated by "Ct. App."

 **Example:**

*Morrow v. Mills*, 666 N.E.2d 872 (**Ind. Ct. App.** 2004).

- Sometimes you will find that the state case is found in more than one reporter. This happens when both an official and one or more unofficial reporters publish the same court opinion. If it is necessary to cite to multiple reporters,<sup>8</sup> always cite to the official reporter first and to any unofficial reporter(s) thereafter. To determine where parallel citations are needed, reference Rule 12.4(c) in the *ALWD Guide* and Rule 10:3.1 in *The Bluebook*.

 **Example:**

*Simmons v. Hershey*, 645 Ariz. 1245, 75 P.2d 698 (1978).

The above example reveals that the highest court in Arizona decided the case (Ariz.) and that the case is found in both the Arizona Reports (the official reporter) and the Pacific Reporter, Second Series (the unofficial reporter). Unlike prior examples, there is no state abbreviation in the parentheses. This omission is because the state and level of court (the highest court in Arizona) is indicated in the official citation to the Arizona Reports.

## 2. Secondary sources

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<sup>8</sup> Court rules often require writers submitting documents to the court to include references to both the official and unofficial reporters, where available. Most states no longer have official reporters. However, states likely had official reporters in the past; if you are citing to a case when both official and unofficial reporters existed you must cite to both. As always, it's essential that when submitting a document to the court you check the appropriate court rules.

a. *Law review articles (periodicals)*

When referring to a law review article, provide the following basic information:

- The author of the article.<sup>9</sup>

➔ **Example:**

Nicholas Quinn Rosenkranz, *Federal Rules of Statutory Interpretation*, 115 HARV. L. REV. 2085 (2002).

- The title of the article *in italics*.

➔ **Example:**

Nicholas Quinn Rosenkranz, *Federal Rules of Statutory Interpretation*, 115 HARV. L. REV. 2085 (2002).

- The volume (if applicable) in which the article is located.

➔ **Example:**

Nicholas Quinn Rosenkranz, *Federal Rules of Statutory Interpretation*, **115** HARV. L. REV. 2085 (2002).

- The abbreviated name of the periodical where the article is located, IN SMALLCAPS. To find SMALLCAPS in Word, find the Font section in the Home tab and click on the small downward arrow. Under the Effects section, select the SMALLCAPS box. The law review below is the Harvard Law Review. The list of abbreviations for periodicals are found in Appendix 5 of the *ALWD Guide* and Table 13 of *The Bluebook*. Appendix 5 of the *ALWD Guide* is available online for free at <https://www.alwd.org/guide-features>.

➔ **Example:**

Nicholas Quinn Rosenkranz, *Federal Rules of Statutory Interpretation*, 115 **HARV. L. REV.** 2085 (2002).

- The first page on which the article begins.

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<sup>9</sup> Guidelines for citing to periodicals are found in Rule 21 of the *ALWD Guide* and Rule 16 of *The Bluebook*.

➔ **Example:**

Nicholas Quinn Rosenkranz, *Federal Rules of Statutory Interpretation*, 115 HARV. L. REV. **2085** (2002).

- Subsequent pages where the relevant material in the article is found, if applicable. This, again, is called a pinpoint citation or pincite.

➔ **Example:**

Nicholas Quinn Rosenkranz, *Federal Rules of Statutory Interpretation*, 115 HARV. L. REV. 2085, **2090** (2002).

- The year of the publication of the periodical in which the information is located (placed in parentheses).

➔ **Example:**

Nicholas Quinn Rosenkranz, *Federal Rules of Statutory Interpretation*, 115 HARV. L. REV. 2085 (**2002**).

Other information may be required. To ensure completeness, refer to your citation manual.

**b. Restatements of law**

The American Law Institute (ALI) brings together judges, professors, and legal scholars who document in the Restatements the relevant common law rules developed throughout the country in a particular area of law.<sup>10</sup> In addition, the Restatement authors provide commentary on those common law rules, helping to clarify how the rules have been interpreted and applied. The commentary may include criticism of the rules and any minority viewpoints regarding the relevant rules. When citing to a Restatement, include the following basic information.

- The name of the Restatement, IN SMALLCAPS.

➔ **Example:**

**RESTATEMENT (SECOND) OF TORTS § 402A (AM. L. INST. 1995).**

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<sup>10</sup> See e.g., Restatement of the Law (Second) of Contracts; Restatement of the Law (Second) of Judgments; Restatement of the Law (Second) of Torts. Guidelines for citing to Restatements are found in Rule 23.1 of the *ALWD Guide* and Rule 12.9.4 of *The Bluebook*.

- The relevant section of the Restatement.

➔ **Example:**

RESTATEMENT (SECOND) OF TORTS § **402A** (AM. L. INST. 1995).

- A comment reference (“cmt.”), if applicable.

➔ **Example:**

RESTATEMENT (SECOND) OF TORTS § 402A **cmt. i** (AM. L. INST. 1995).

- The author and year of publication of the Restatement (placed in parentheses).

➔ **Example:**

RESTATEMENT (SECOND) OF TORTS § 402A (**AM. L. INST. 1995**).

### c. *Books*

When citing to books, provide the following basic information.<sup>11</sup>

- The name of the author of the book, IN SMALL CAPS.

➔ **Example:**

**WILLIAM N. ESKRIDGE JR.**, DYNAMIC STATUTORY INTERPRETATION 323  
(1994).

- The title of the book, IN SMALL CAPS.

➔ **Example:**

WILLIAM N. ESKRIDGE JR., **DYNAMIC STATUTORY INTERPRETATION** 323  
(1994).

- The page in the book where the information to which you are referring is located.

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<sup>11</sup> Rules addressing citations to books are found in Rule 20 of the *ALWD Guide* and Rule 15 of *The Bluebook*.

➔ **Example:**

WILLIAM N. ESKRIDGE JR., DYNAMIC STATUTORY INTERPRETATION 323 (1994).

- The year of publication of the book (provided in parentheses).

➔ **Example:**

WILLIAM N. ESKRIDGE JR., DYNAMIC STATUTORY INTERPRETATION 323 (1994).

Rules also exist for additional information that may be necessary when citing to secondary authority. Always check your citation manual.

**d. Internet sources**

Articles, blogs, webpages, and social media posts are increasingly cited in legal writings. There are a number of different Internet sources that can be cited, so always check your citation guide. Specific rules for citing Internet sources can be found in Rule 30 in the *ALWD Guide* and Rule 18 in *The Bluebook*. Include the following basic information when citing to an Internet source.

- The author of the Internet source. If the name of the author is unavailable, use the institutional owner of the domain if it is clear. Otherwise, omit author information.

➔ **Example:**

Jennifer Romig, *Listening and legal tech*, LISTEN LIKE A LAWYER (May 9, 2016), <https://listenlikealawyer.com/category/legal-technology/>.

- The title of the Internet source, *in italics*.

➔ **Example:**

Jennifer Romig, *Listening and legal tech*, LISTEN LIKE A LAWYER (May 9, 2016), <https://listenlikealawyer.com/category/legal-technology/>.

- The institutional owner of the domain, IN SMALL CAPS.

➔ **Example:**



Jennifer Romig, *Listening and legal tech*, LISTEN LIKE A LAWYER (May 9, 2016), <https://listenlikealawyer.com/category/legal-technology/>.

- The date and time that the Internet source was posted (placed in parentheses). If no date is available, provide the “last updated” or “last modified” date after the URL.



**Example:**

Jennifer Romig, *Listening and legal tech*, LISTEN LIKE A LAWYER (May 9, 2016), <https://listenlikealawyer.com/category/legal-technology/>.

- The URL that directs the reader directly to the source cited.



**Example:**

Jennifer Romig, *Listening and legal tech*, LISTEN LIKE A LAWYER (May 9, 2016), <https://listenlikealawyer.com/category/legal-technology/>.

Additional information is required for non-Internet electronic sources. Check your citation manual for source-specific citation rules.

#### **e. International materials**

To determine the proper citation for international and foreign law sources, consult Rules 20 and 21 of *The Bluebook* and the *Guide to Foreign and International Legal Citations* (2d ed. 2009). Also, a helpful online source for citing international materials is *Citing International Law Sources*, in Part IV of OXFORD UNIVERSITY STANDARD FOR CITATION OF LEGAL AUTHORITIES (Donal Nolan & Sandra Meredith eds., 4th ed. 2006), [https://www.law.ox.ac.uk/sites/files/oxlaw/oscola\\_2006\\_citing\\_international\\_law.pdf](https://www.law.ox.ac.uk/sites/files/oxlaw/oscola_2006_citing_international_law.pdf).

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