Chapter 7: Introduction to Citation

**Citation** is the method that tells the reader of legal documents the source of the legal or factual statement that the citation follows. The reader, when given information to find the source on their own, can assess whether the source is (1) a primary or secondary authority; (2) a mandatory or persuasive authority; (3) credible to the reader; and (4) relevant to the issue being discussed.

You should use a consistent citation format with which the reader is familiar because it makes it easier for the reader to check the sources you cite. This, in turn, enhances your credibility as a writer because you are making it easier for the reader to follow what you are saying.

The Bluebook: A Uniform System of Citation, Columbia Law Review Ass'n et al. eds., (21st ed. 2020), is considered the standard for legal citation, and we will use this citation manual for this class. There are other citation manuals, and some states have even developed their own. Be sure to use the proper citation format for your particular jurisdiction.

**Parts of the Bluebook**

The Bluebook has five parts.

1. Quick References (inside front and back covers)
2. Practitioner’s Notes (blue pages)
3. Rules (white pages)
4. Tables and Abbreviations
5. Index

For this class, plan to use the Practitioner’s Notes, which we will refer to as the blue pages, as these are the rules for functional legal documents like memoranda and briefs. The Rules, or white pages, are for scholarly legal writing like law review articles. There will be times when you will have to look in the white pages for the full rule.

# Citation Forms

*Rules indicated are the start for creating your citations; this is not an exhaustive list.*

## Full citation

See Rules B10.1.1-3; R10-10.5. The complete citation to the source, including every component required by the appropriate Bluebook rule. Use the full citation the first time you cite any source.

## Short citation

See Rules B4, B10.2, R4, R10.9. The abbreviated citation. Use the short citation only after you have cited the source fully

## Pinpoint citation

See Rules B10.1.2, R3.2. A citation, either full or short, that indicates the specific page on which the reader can locate the proposition you state the source supports. Use a pinpoint citation, or pincite, whenever you quote or paraphrase from a source. Also use a pincite when you are referring to a specific part of a judicial opinion, such as a dissent or concurrence.

## Parallel citation

See Rules B10.1.3, R10.3.1. A citation that provides information on where to find the source in multiple resources. You will most often encounter this for case citations because cases are often published in multiple reporters; for instance, Georgia cases can be found in both the state reporter and also in the regional reporter. Whether to use parallel citations depends on your jurisdiction and court’s preference.

## String citation

See Rule R1.4. A citation that consists of citations to multiple authorities that are connected to each other in a certain way. You will most often encounter this when citing multiple cases that support the same proposition stated or when citing multiple cases to explain from where you synthesized a legal rule.

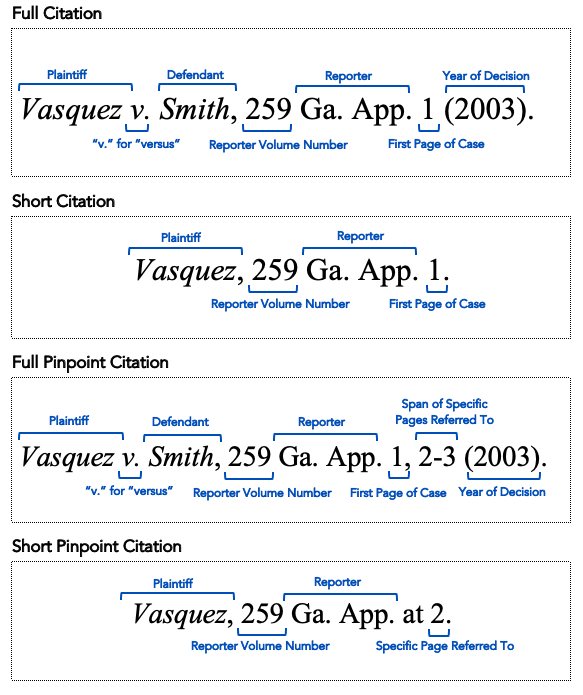
## Textual sentence/Citation Clause

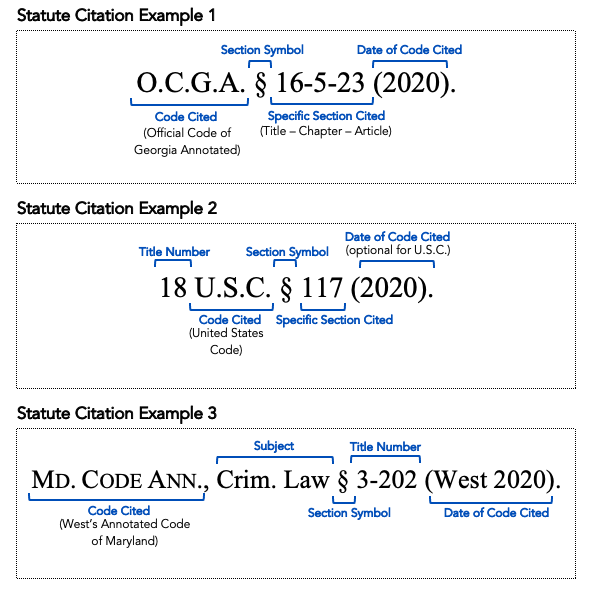
See Rules B.1, R1.1. When you insert the citation as a clause into part of a sentence. *For example, in Sweatt v. Painter, 339 U.S. 629 (1950)...*

## Citation Sentence

See Rules B.1, R1.1. When the citation comes after the sentence for which you need to provide support. *The Equal Protection Clause extends to admitting students to law schools. Sweatt v. Painter, 339 U.S. 629 (1950).*

# Citation Examples





# Common Citation Questions

## Italics or Underlining?

The Bluebook allows you to use either italics or underlining for case names. For this class, you will use underlining because, quite simply, it is easier for me to see whether you have formatted your citation correctly. Many firms and judges prefer italics. As with so much in legal writing, be sure to consult your local rules, standing orders, or style guides when deciding whether to use italics or underlining for documents you produce outside of this class. Also, be sure to stay consistent with your choice of italics or underlining.

## Which citation do I use?

The first time you cite a source, you must provide the full citation and you cannot break any of the pieces apart. Sometimes this results in awkward-looking sentences. *For instance, when considering Sweatt v. Painter, 339 U.S. 629 (1950),* …The next time you discuss the same case, however, you can rely on a short citation, either the shortened version of the full citation or id., depending on which one is appropriate.

## How do I cite to two cases that discuss the same thing?

The following are correct:

* In Smith and Jones, the court recognized XYZ. 123 Ga. App. at 457; 111 Ga. App. at 223.
* In Smith v. Beck, 123 Ga. App. 456, 457 (2019), and Jones v. Rutledge, 111 Ga. App. 222, 223 (2020), the court recognized XYZ.

Some writers believe that in-line citations should be avoided at all costs, and others believe that using split citations should be avoided at all costs. You will have to decide which format is better for you.

## How do I cite a sentence that requires two citations to two different parts of the sentence?

First, consider whether your sentence is likely too long and you should split the sentence into two smaller sentences. If division into smaller sentences does not work, the following are correct:

* [First part of sentence], [long cite to case 1], [second part of sentence], [long cite to case 2].
* [First part of sentence], [long cite], [second part of sentence], [short cite].
* [First part of sentence], [short cite], [second part of sentence], [long cite].
* [First part of sentence], [short cite], [second part of sentence], [short cite].

For example, "Courts have concluded that a battery has occurred when [fill in facts], [short/long cite to case 1], and also when [fill in facts] [short/long cite to case 2]." So, even though you normally place short citations as a separate citation sentence, you make an exception when you cite a sentence that requires two citations to two different parts of the sentence.

Further, if you need to cite a very large page range (e.g., the facts you use are on page 1 and the holding is on page 65), it would be helpful to your reader if you employed this technique. The rationale is that attribution trumps readability. Remember that if the information is not your original thought, you must let the reader know from whence the information came.

## "Can I use 'id.' in a string cite?"

If the first case in your string cite refers to the immediately preceding case, yes! But you may not use "id." after a string cite. So the following is correct:

* [Sentence] Brown, 456 Ga. App. at 320. [Sentence]. Id. at 321; Smith, 123 Ga. App. at 22; Jones v. Rutledge, 111 Ga. App. 222, 223 (2020).

However, the following is not correct.

* [Sentence]. Brown, 456 Ga. App. at 320; Smith, 123 Ga. App. at 22; Jones v. Rutledge, 111 Ga. App. 222, 223 (2020). [Sentence]. Id. at 321.

# Conclusion

This chapter is intended to serve as an overview to what a citation is and why it is necessary. For more in-depth treatment of the mechanics of putting together a citation, refer to The Bluebook and other resources.