Citation Form in Transition: The ALWD Citation Manual

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BOOK REVIEW

CITATION FORM IN TRANSITION:
THE ALWD CITATION MANUAL

ALWD CITATION MANUAL: A PROFESSIONAL SYSTEM OF CITATION.
By Association of Legal Writing Directors and Darby Dickerson.

Reviewed by Vickie Rainwater†

The importance of citations in American jurisprudence can hardly
be overstated. Stability in the law depends on the principle of stare
decisis, which in turn relies on precedent. Virtually all legal argument,
therefore, rests on precedent. Legal writers must demonstrate that
the precedent on which they rely is sound and authoritative, and citations
are the shorthand they use to show readers the nature and source of that precedent.

For most of the last century, the conventions of legal citation form
have been dictated by The Bluebook.1 The fact that it is compiled by
students2 has not diminished its power as the ultimate arbiter of cita-
tion form.3 Indeed, The Bluebook is the official citation authority in

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School of Law; J.D. University of Texas School of Law, 1984. The author is grateful
to Professor Susan Phillips for her comments and assistance with citation form and to
Associate Dean Jim Hambleton for sharing his insights on neutral citation format.
Both Professor Phillips and Associate Dean Hambleton are faculty members and li-
brarians at Texas Wesleyan University School of Law.

1. All citations for this review are presented in both Bluebook form and ALWD
form to demonstrate the similarities and differences of the two.
Bluebook form: The Bluebook: A Uniform System of Citation (Columbia Law
Review Ass'n et al. eds., 17th ed. 2000) [hereinafter The Bluebook].
ALWD form: The Bluebook: A Uniform System of Citation (Columbia L. Rev. Assn.

2. Bluebook form: The Bluebook is “[c]ompiled by editors of the Columbia Law
Review, the Harvard Law Review, the University of Pennsylvania Law Review, and
The Yale Law Journal.” Id. at iii.
ALWD form: The Bluebook is “[c]ompiled by editors of the Columbia Law Review,
the Harvard Law Review, the University of Pennsylvania Law Review, and The Yale
Law Journal.” Id. at iii. (ALWD does not make clear whether to italicize the names
of these law reviews.)

3. Bluebook form: See generally A. Darby Dickerson, An Un-Uniform System of
Citation: Surviving with the New Bluebook (Including Compendia of State and Federal
Court Rules Concerning Citation Form), 26 Stetson L. Rev. 53 (1996) (describing the
history of The Bluebook). The Bluebook has, until now, had only one serious com-
petitor, “The Maroonbook,” also prepared by students. The UNIVERSITY OF CHICAGO
MANUAL OF LEGAL CITATION (The Univ. of Chi. Law Review & The Univ. of Chi.
Legal Forum eds., 1989).
ALWD form: See generally A. Darby Dickerson, An Un-Uniform System of Citation:
Surviving with the New Bluebook (Including Compendia of State and Federal Court
Rules Concerning Citation Form), 26 Stetson L. Rev. 53 (1996) (describing the history

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some jurisdictions and the de facto authority in many others. Many jurisdictions have citation rules of their own—to be followed in addition to *The Bluebook*—but generally these adapt basic *Bluebook* rules to the problems peculiar to that jurisdiction. And for many sources of authority, from treaties and tax materials to treatises and periodical articles, *The Bluebook* has been the only authoritative guide for citation form. So, through the good offices of countless students, American law has a citation system that is, for the most part, informative, stable, comprehensive, and unobtrusive.

Increasingly, however, *The Bluebook* has been subject to criticism. First, *The Bluebook* has perpetuated a double citation system, with significant differences for practitioners' documents and for law reviews. Begun as a manual for law-review editors, *The Bluebook* is still designed primarily for them, so practitioners must adapt law-review rules for their use. Second, the editors of *The Bluebook* have frustrated users by frequently making changes that serve no apparent need.


4. *Bluebook* form: ASS'N OF LEGAL WRITING DIRS. & DARBY DICKERSON, *ALWD CITATION MANUAL: A PROFESSIONAL SYSTEM OF CITATION* app. 2 (2000). Appendix 2 gives the citation rules required or preferred by each state—some states specifically require *Bluebook* style, others have more general guidelines, a few have their own style, and some use a combination of these. *Id.* at app. 2. Federal courts' citation rules are not included in this appendix, but they are available on the ALWD Web site. Ass'n of Legal WritingDirs., *Updates*, at http://www.alwd.org/cm/updates.htm (last modified Jan. 15, 2001). *The Bluebook* does not provide this information anywhere.

*ALWD* form: ALWD & Darby Dickerson, *ALWD Citation Manual: A Professional System of Citation* 379, app. 2 (Aspen L. & Bus. 2000). Appendix 2 gives the citation rules required or preferred by each state—some states specifically require *Bluebook* style, others have more general guidelines, a few have their own style, and some use a combination of these. *Id.* at 379, app. 2. Federal courts' citation rules are not included in this appendix, but they are available on the ALWD Web site. ALWD, *Updates* <http://www.alwd.org/cm/updates.htm> (last modified Jan. 15, 2001). *The Bluebook* does not provide this information anywhere.

5. *Bluebook* form: *See*, e.g., TEXAS RULES OF FORM 1 (Tex. Law Review Ass'n ed., 9th ed. 2d prtg. 1997) (indicating that it is intended as a supplement to *The Bluebook*, *supra* note 1).

*ALWD* form: *See* e.g. *Texas Rules of Form* 1 (9th ed., 2d prtg., The U. of Tex. at Austin Sch. of L. Publications, Inc. 1997) (indicating that it is intended as a supplement to *The Bluebook*, *supra* n. 1).

6. *Bluebook* form: West and other publishers may use different citation forms, but they are never considered authoritative.

*ALWD* form: West and other publishers may use different citation forms, but they are never considered authoritative.

7. *Bluebook* form: *See* *The Bluebook*, *supra* note 1, R. P.1(a), at 11-12; *id.* R. 2.1(a), at 30-31. *See also* *id.* R. P.1(b), at 12; *id.* R. 15, at 107-17; *id.* R. 16, at 117-26.

*ALWD* form: *See* *The Bluebook*, *supra* n. 1, at 11-12 (R. P.1(a)); *id.* at 30-31 (R. 2.1(a)). *See also* *id.* at 12 (R. P.1(b)); *id.* at 107-17 (R. 15); *id.* at 117-26 (R. 16).


*ALWD* form: Dickerson, *supra* n. 3, at 57-58.
purpose. Most detrimental—especially to courts and practitioners—were the changes in the meaning of citation signals, which obscured the writer’s argument when the signals no longer carried their original meaning.9 Now in its 17th edition, each new edition of The Bluebook since the 7th has included changes in signals.10 In fact, a recent change in the meaning of the signal “see” was deemed so unnecessary and confusing that the American Association of Law Schools passed a plenary resolution against it.11 Third, The Bluebook has always been plagued with internal inconsistencies—some trivial, some not.12

Finally, and perhaps most important, The Bluebook’s presentation of the citation system is notoriously difficult to use. Even for experienced users, The Bluebook can be difficult, but for novices it is often daunting. Its difficulties have been the impetus for many commercial publications purporting to teach, explain, or simplify The Bluebook.13 Every legal writing text includes a chapter explaining Bluebook rules and citation usage, and legal writing teachers prepare handouts for their students to serve the same purpose. Learning the basics of The

ALWD form: Dickerson, supra n. 3, at 66 n. 81.
12. Bluebook form: For example, there are numerous inconsistent uses of abbreviations, such as “Bankr.” for “Bankruptcy Court,” The Bluebook, supra note 1, at 185 tbl.T.1, and “B.R.” for “Bankruptcy Reporter,” id.
ALWD form: For example, there are numerous inconsistent uses of abbreviations, such as “Bankr.” for “Bankruptcy Court,” The Bluebook, supra n. 1, at 185 tbl. T.1, and “B.R.” for “Bankruptcy Reporter,” id.
13. Bluebook form: See, e.g., Maria L. Ciampi et al., The Citation Workbook: How to Beat the Citation Blues (2d ed. 1997); Peter W. Martin, Introduction to Basic Legal Citation (2000-2001 ed.). http://www.law.cornell.edu/citation (last visited Jan. 27, 2001).
ALWD form: See e.g. Maria L. Ciampi et al., The Citation Workbook: How to Beat the Citation Blues (2d ed., Anderson Publg. Co. 1997); Peter W. Martin, Introduction to Basic Legal Citation (2000-2001 ed.) <http://www.law.cornell.edu/citation> (accessed Jan. 27, 2001).
Bluebook—never mind the intricacies—is a rite of passage for first-year law students akin to being called on in class the first time, taking the first exams, and making the first moot court argument. While the flaws in the citation system are troubling but relatively minor (except, perhaps, for the “see” problem), the flaws in The Bluebook’s presentation of the citation system are a deep source of frustration, especially for law professors and their students.

In 1997, the Association of Legal Writing Directors embarked on a project to write a new citation manual. The aim was to create a citation manual that, without making radical changes to the standard system, would simplify it and make it more consistent. The new manual would take the terror out of learning citation form—and, not incidentally, would take the terror out of teaching citation form—by presenting citation rules in an easily understood format. The ALWD Citation Manual: A Professional System of Citation is the happy result of that ambitious project. As indicated in the preface to the ALWD Manual: “The Association of Legal Writing Directors created the ALWD Citation Manual because lawyers, judges, law teachers, and law students need a citation manual that is easy to use, easy to teach from, and easy to learn from.” Darby Dickerson, the book’s primary author, and the ALWD Citation Manual Advisory Committee, which advised her on the project, have succeeded in creating a manual that meets all these goals.

A Single Citation System That Is Stable and Consistent

Any citation written using ALWD form will be immediately understandable by readers accustomed to Bluebook form. Dickerson and the Advisory Committee decided that the new manual should, for the most part, simply restate the most commonly used rules of citation.

14. Bluebook form: The Association of Legal Writing Directors is an organization for professors who direct legal writing programs. Dickerson, supra note 4, at xxii. The author is a member of ALWD, but she did not work on the ALWD Citation Manual: A Professional System of Citation in any capacity.

ALWD form: The Association of Legal Writing Directors is an organization for professors who direct legal writing programs. ALWD & Dickerson, supra n. 4, at xxii. The author is a member of ALWD, but she did not work on the ALWD Citation Manual: A Professional System of Citation in any capacity.

15. Bluebook form: Jamar, supra note 4, at xxii.

ALWD form: Jamar, supra n. 11, at 67.

16. Bluebook form: Dickerson, supra note 4, at xxiii-xxiv.

ALWD form: ALWD & Dickerson, supra n. 4, at xxiii-xxiv.

17. Bluebook form: Id.

ALWD form: Id.


ALWD form: ALWD & Dickerson, supra n. 4.


ALWD form: Id. at xxiii.


ALWD form: Jamar, supra n. 11, at 65.
There was no attempt to make radical changes to the rules. But there are, of course, a few changes. Of these, only a very few could be considered significant, and no more than one or two could cause any confusion.

A very welcome change is the elimination of a double set of rules, so that a single form is used both for practitioners' documents and for law reviews. The Manual adopts the rules for signals that most lawyers are familiar with, which The Bluebook itself has readopted in the 17th edition, and further, makes the promise that "the rules in this book will not be changed arbitrarily." The use of small capitals is eliminated; ordinary type and italic type or underlining are the only typefaces used. The first word of an organization's name, state names, and "United States" may be abbreviated in case names. To show whether the case is binding authority in the jurisdiction, ALWD requires division and district information for state appellate courts.

21. Bluebook form: See id. In fact, some may find the approach too conservative. A couple of illustrations will suffice. Adopting postal abbreviations for states would not have caused any confusion, and would have helped pave the way for neutral citation format. And the continuing insistence on page numbers—rather than on only section or paragraph numbers—for pinpoint references is anachronistic when many researchers are using CD and online resources that do not incorporate book page references. Id.

ALWD form: See id. In fact, some may find the approach too conservative. A couple of illustrations will suffice. Adopting postal abbreviations for states would not have caused any confusion, and would have helped pave the way for neutral citation format. And the continuing insistence on page numbers—rather than on only section or paragraph numbers—for pinpoint references is anachronistic when many researchers are using CD and online resources that do not incorporate book page references. Id.

22. Bluebook form: For a chart showing major changes and comparing certain rules in ALWD and The Bluebook, see Darby Dickerson, Instructor's Guide to Accompany ALWD Citation Manual: A Professional System of Citation app. A (2000).

ALWD form: For a chart showing major changes and comparing certain rules in ALWD and The Bluebook, see Darby Dickerson, Instructor's Guide to Accompany ALWD Citation Manual: A Professional System of Citation 15, app. A (Aspen L. & Bus. 2000).


ALWD form: ALWD & Dickerson, supra n. 4, at 4.

24. Bluebook form: Id. R. 45.0, at 301-04.

ALWD form: Id. at 301-04 (R. 45.0).


ALWD form: The Bluebook, supra n. 1, at v.

26. Bluebook form: Dickerson, supra note 4, at 8.

ALWD form: ALWD & Dickerson, supra n. 4, at 8.

27. Bluebook form: Id. R. 1.1, at 15.

ALWD form: Id. at 15 (R. 1.1).

28. Bluebook form: Id. R. 12.2(e), (h)-(i), at 61-62. The Bluebook also made this change in the 17th edition with the exception of abbreviating "United States." The Bluebook, supra note 1, R. 10.2.1(c), at 59; id. R. 10.2.2, at 62.

ALWD form: Id. at 61-62 (R. 12.2(e), (h)-(i)). The Bluebook also made this change in the 17th edition with the exception of abbreviating "United States." The Bluebook, supra n. 1, at 59 (R. 10.2.1(c)); id. at 62 (R. 10.2.2).

29. Bluebook form: Dickerson, supra note 4, R. 12.6(b), at 74.
and a date for all court rule citations, even current rules.\textsuperscript{30} Two changes that were urged by librarians are the inclusion of a publisher's name in a book citation\textsuperscript{31} and an exact date in a Federal Register citation.\textsuperscript{32} The distinctions between consecutively and non-consecutively paginated journals are eliminated so that the volume and page number of non-consecutively paginated journals are treated as they are for consecutively paginated journals,\textsuperscript{33} although \textit{ALWD} requires a date for the cite.\textsuperscript{34} These changes are unlikely to cause any difficulty.

But, a few changes may cause difficulty. Abbreviations have been made more consistent throughout, which has resulted in a change in the abbreviation for the Southern Reporter, which is now "S.," rather than "So."\textsuperscript{35} This is a change that some will find unnecessary and confusing. The occasional abbreviation sacrifices precision for brevity; for example, the abbreviation for this journal is Tex. Wes. L. Rev., which might easily be mistaken for Texas Western Law Review.\textsuperscript{36} \textit{(The Bluebook spells out Wesleyan.)}\textsuperscript{37} And \textit{ALWD} introduces a redundancy into the citation form for administrative decisions, requiring that both the reporter and the agency name be included\textsuperscript{38}—as \textit{The Bluebook} indicates, this is usually unnecessary because the reporter name clearly indicates the agency.\textsuperscript{39}

Another change that may cause difficulty is in the rule for order of citations. The \textit{Bluebook} rule treats state and federal cases differently.\textsuperscript{40} State cases are ordered first alphabetically, and then in re-

\begin{itemize}
  \item \textit{ALWD} form: ALWD & Dickerson, supra note 4, at 74 (R. 12.6(b)).
  \item Bluebook form: \textit{Id.} R. 17.1(c), at 152.
  \item \textit{ALWD} form: \textit{Id.} at 152 (R. 17.1(c)).
  \item Bluebook form: \textit{Id.} R. 22.1, at 186; Posting of Sue Liemer, immediate past President of ALWD, sliemer@siu.edu, DIRCON97@chicagokent2.kentlaw.edu (Aug. 9, 2000) (copy on file with author).
  \item \textit{ALWD} form: \textit{Id.} at 186 (R. 22.1); E-mail from Sue Liemer, immediate past Pres., ALWD, to DIRCON listserv, \textit{New Citation Manual}, sliemer@siu.edu, DIRCON97@chicagokent2.kentlaw.edu (Aug. 9, 2000) (copy on file with author).
  \item Bluebook form: DICKERSON, supra note 4, R. 19.3(d), at 163; Liemer, supra note 31.
  \item \textit{ALWD} form: ALWD & Dickerson, supra note 4, at 163 (R. 19.3(d)); E-mail, supra n. 31.
  \item Bluebook form: DICKERSON, supra note 4, R. 23.1(c), (f), at 202-04.
  \item \textit{ALWD} form: ALWD & Dickerson, supra n. 4, at 202-04 (R. 23.1(c), (f)).
  \item Bluebook form: \textit{Id.} R. 23.1(f), at 204.
  \item \textit{ALWD} form: \textit{Id.} at 204 (R. 23.1(f)).
  \item Bluebook form: \textit{Id.} at 68 chart 12.1.
  \item \textit{ALWD} form: \textit{Id.} at 68 chart 12.1.
  \item Bluebook form: \textit{Id.} at app. 5 at 436.
  \item \textit{ALWD} form: \textit{Id.} at 419, app. 5, 436.
  \item Bluebook form: THE BLUEBOOK, supra note 1, at 337 tbl.T.14.
  \item \textit{ALWD} form: The Bluebook, supra n. 1, at 337 tbl. T.14.
  \item Bluebook form: DICKERSON, supra note 4, R. 19.5-6, at 164-65.
  \item \textit{ALWD} form: ALWD & Dickerson, supra n. 4, at 164-65 (R. 19.5-6).
  \item Bluebook form: THE BLUEBOOK, supra note 1, R. 14.3.3, at 100.
  \item \textit{ALWD} form: The Bluebook, supra n. 1, at 100 (R. 14.3.3).
  \item Bluebook form: \textit{Id.} R. 1.4(d), at 26.
\end{itemize}
verse chronological order for cases from the same court. In contrast, federal cases are ordered in three groups—Supreme Court, circuit courts, district courts—and within each group of courts, each case is treated as if all were from the same court, and the cases are ordered in reverse chronological order. ALWD changes the rules for federal cases—it orders those from the circuits first by circuit court number, then in reverse chronological order, and district court cases are ordered first by state in alphabetical order, then by district in alphabetical order, and then in reverse chronological order. The change does make for tidy lists, but in the long run it may be unhelpful—many readers will resent having to scour a long list of citations for the most recent cases.

A second edition of the ALWD Citation Manual is planned for 2003. Meanwhile, corrections, updates, and additions are posted on the Web site maintained by the Association of Legal Writing Directors. A recent visit disclosed a rather discouraging number of corrections to the first through the fourth printings of the book. Several of the appendices are available in expanded versions on the Web site, and there is an excellent list of frequently asked questions. Although the ALWD Citation Manual itself does not include rules for tax materials or international materials except treaties binding the United States, these materials will be available on the Web site, probably next summer. The Web site, already very helpful, is frequently updated and is likely to improve.

ALWD form: Id. at 26 (R. 1.4(d)).

1. Bluebook form: Id.

ALWD form: Id.

2. Bluebook form: Id.

ALWD form: Id.


ALWD form: ALWD & Dickerson, supra n. 4, at 307 (R. 46.3(f)).


ALWD form: Id. at FAQ (accessed Jan. 15, 2001).

8. Bluebook form: Dickerson, supra note 4, at 4, 172.

ALWD form: ALWD & Dickerson, supra n. 4, at 4, 172.


ALWD form: FAQ, supra n. 44.
A Citation System That Is Easy to Use, Easy to Teach From, Easy to Learn From

The *ALWD Manual*, taking its cue from scores of new reference manuals, is designed for ease of use. The book is a little larger than *The Bluebook*, but it is still small enough to carry around easily. The paper and binding will withstand hard use. It is printed in two colors to differentiate the examples from the text and to show headings in the appendices. There is plenty of white space, so it is easy on weary eyes. Both the table of contents and the index are thorough and admirably clean on the page. The organization of rules is simple and sensible. The rules themselves are broken down into many subparts, each with its own heading, so that it is simple to locate small details. “Fast Format” pages at the beginning of each chapter contain numerous examples of citations for each type of source. These provide far more examples than *The Bluebook* does on its inside covers.

In addition to the Fast Formats, several features will prove particularly helpful to students: charts, which list abbreviations for research sources; “Sidebars,” which contain information on items of interest; and a short sample memorandum illustrating how citations are used in text. The Sidebars deserve special note. Some Sidebars


51. *Bluebook* form: DICKERSON, supra note 4, at xxiii.

*ALWD* form: ALWD & Dickerson, supra n. 4, at xxiii.

52. *Bluebook* form: E.g., id. at 58.

*ALWD* form: E.g. id. at 58.

53. *Bluebook* form: Id. at v-xx.

*ALWD* form: Id. at v-xx.

54. *Bluebook* form: Id. at 447-70.

*ALWD* form: Id. at 447-70.

55. *Bluebook* form: Id. at v-xx.

*ALWD* form: Id. at v-xx.

56. *Bluebook* form: E.g., id. at 57.

*ALWD* form: E.g. id. at 57.


*ALWD* form: *The Bluebook*, supra n. 1.

58. *Bluebook* form: E.g., DICKERSON, supra note 4, at 68 chart 12.1.

*ALWD* form: E.g. ALWD & Dickerson, supra n. 4, at 68 chart 12.1.

59. *Bluebook* form: E.g., id. at 67.

*ALWD* form: E.g. id. at 67.

60. *Bluebook* form: Id. at app. 6.

*ALWD* form: Id. at app. 6.

61. *Bluebook* form: E.g., id. at 45 (delineating the different uses of the *supra* short citation format).

*ALWD* form: E.g. id. at 45 (delineating the different uses of the *supra* short citation format).
very helpfully explain matters that are always mysterious to first-year students, such as the importance of pinpoint citations;\textsuperscript{62} the meaning of \textit{in re, ex parte}, and \textit{ex rel};\textsuperscript{63} why the early United States Reports have names like "Dallas" and "Howard";\textsuperscript{64} the meaning of "paragraph" in a looseleaf service;\textsuperscript{65} and the meaning of a denial of certiorari.\textsuperscript{66} Other Sidebars are little "how-to's" on subjects such as using parentheticals effectively,\textsuperscript{67} referring to a statute in the text,\textsuperscript{68} locating parallel citations,\textsuperscript{69} and making the word processor print section and paragraph symbols.\textsuperscript{70} For students, especially first-year students, the Sidebars answer a good number of the maddening questions that frustrate them as they struggle with their first assignments. \textit{The Bluebook} has nothing comparable.

The difference in ease of use between \textit{The Bluebook} and \textit{ALWD} is seen most clearly by comparing a specific rule. Here is a typical example. The rule covering pinpoint cites appears in \textit{The Bluebook} in Rule 3.3, which is headed "Pages, Footnotes, Endnotes, and Graphical Materials."\textsuperscript{71} Rule 3.3(a), headed "Pages," includes six rules, none of them is captioned in any way—you must read the text to determine what the rule is about. The rule for pinpoint cites is effectively buried in the fourth rule (although the excellent index will lead you to the rule provided you know to look for "pinpoint citations").\textsuperscript{72} There is no definition of the term and no indication of the importance of a pinpoint citation. In fact, the rule itself does not use the term "pinpoint citation."\textsuperscript{73}
The ALWD rule for pinpoint citations appears in Chapter 5, which covers only Page Numbers.\(^7\) Rule 5.2 is headed “Pinpoint Pages,” and it defines a pinpoint page, explains that it is also called a “jump citation,” illustrates its use in several different situations, notes that pinpoints are almost always necessary, and includes a Sidebar explaining the importance of using pinpoint citations.\(^7\) The ALWD presentation is clearly the superior one.

The ALWD Citation Manual provides extra support for professors in the form of ready-made PowerPoint presentations, exercises, and Bluebook conversion charts.\(^6\) Features of this kind ensure that teaching and learning citation from ALWD will be much less painful than it has been with The Bluebook.

Practitioners will find the Appendices especially helpful. Appendix 1, the equivalent of The Bluebook’s Table 1, is easier to understand than The Bluebook version and includes a paradigm citation form for statutory and administrative laws.\(^7\) In particular, Appendix 2 will be helpful to practitioners who need information on local court citation rules or preferences.\(^8\) The Appendices do not attempt to be encyclopedic, as do The Bluebook’s Appendices,\(^9\) but the Web versions are more comprehensive than the print versions.\(^8\)

The Future for Citation Form

Although the ALWD Citation Manual does not make or advocate radical changes in standard citation practice, it does acknowledge the

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\(^7\) Bluebook form: Dickerson, supra note 4, R. 5.2, at 25-27.
ALWD form: ALWD & Dickerson, supra n. 4, at 25-27 (R. 5.2).
\(^7\) Bluebook form: Id. at 27.
ALWD form: Id. at 27.
\(^7\) Bluebook form: Dickerson, supra n. 22.
ALWD form: The Bluebook, supra n. 1, at 34-35 (R. 3.3). Apart from the index, the term “pinpoint citation” appears in The Bluebook only in the sections on electronic sources and public-domain sources. Id. at 64 (R. 10.3.3); id. at 137 (R. 18.2.1(g)); id. at 140 (R. 18.2.6(b)). These two sections have been recently added or updated. Id. at v-vi, but other sections have not been made internally consistent with them. This is a good illustration of The Bluebook’s internal inconsistencies.

\(^7\) Bluebook form: Id. at 25-27.
ALWD form: Id. at 25-27.
\(^7\) Bluebook form: Id. at 379, app. 2.
ALWD form: Id. at appps. 1-6.
\(^8\) Bluebook form: Ass’n of Legal Writing Dirs., Appendices to the ALWD Citation Manual, at http://www.alwd.org/cm/appendixndx.htm (last updated Oct. 10, 2000).
ALWD form: ALWD, Appendices to the ALWD Citation Manual <http://www.alwd.org/cm/appendixndx.htm> (last updated Oct. 10, 2000).
citation reform underway in various jurisdictions.\textsuperscript{81} Traditional citation systems support print sources. Because legal information is now widely and increasingly available in electronic sources, both The Bluebook and ALWD include rules for citing to electronic sources.\textsuperscript{82} But both The Bluebook and ALWD have a definite print bias—if a document is available in print (ALWD says "readily available"), a citation to the print version is required.\textsuperscript{83} Some critics consider this book-centered focus outmoded, if not quite obsolete.\textsuperscript{84} Both the American Bar Association and the American Association of Law Libraries have proposed "neutral citation formats" (The Bluebook calls them "public domain" formats\textsuperscript{85}) in which the data elements for the citation do not depend on the medium in which a document appears.\textsuperscript{86} In other words, the citation is used to find the content, not the source, and the citation is accurate and valid for all sources of the same content, whether in a book, on a CD-ROM, or on-line.\textsuperscript{87} For example, the ABA citation format consists of the case name, the year of the decision, a court abbreviation (postal code abbreviations are used for state names), a sequential opinion number (this is the unique identifier that

\begin{itemize}
\item \textsuperscript{81} Bluebook form: See Dickerson, supra note 4, R. 43.0, at 289-90; id. at apps. 1-2.
\item ALWD form: See ALWD & Dickerson, supra n. 4, at 289-90 (R. 43.0); id. at 379-405, apps. 1-2.
\item \textsuperscript{82} Bluebook form: Id. R. 38-42, at 271-88; The Bluebook, supra note 1, R. 18.1-3, at 130-42.
\item ALWD form: Id. at 271-88 (R. 38-42); The Bluebook, supra n. 1, at 130-42 (R. 18.1-3).
\item \textsuperscript{83} Bluebook form: Dickerson, supra note 4, R. 38.1, at 271; The Bluebook, supra note 1, R. 18.1, at 129.
\item ALWD form: ALWD & Dickerson, supra n. 4, at 271 (R. 38.1); The Bluebook, supra n. 1, at 129 (R. 18.1).
\item \textsuperscript{84} Bluebook form: For a thorough explanation of the controversy, see Coleen M. Barger, The Uncertain Status of Citation Reform: An Update for the Undecided, 1 J. App. Prac. & Process 59 (1999).
\item ALWD form: For a thorough explanation of the controversy, see Coleen M. Barger, The Uncertain Status of Citation Reform: An Update for the Undecided, 1 J. App. Prac. & Process 59 (1999).
\item \textsuperscript{85} Bluebook form: The Bluebook, supra note 1, R. 10.3.3, at 64.
\item ALWD form: The Bluebook, supra n. 1, at 64 (R. 10.3.3).
\item \textsuperscript{86} Bluebook form: Am. Ass'n of Law Libraries Comm. on Citation Formats, Universal Citation Guide ¶¶ 9-13, 16 (AALL 1999); ABA Special Comm. on Citation Issues, Report and Recommendations, available at http://www.abanet.org/ftp/pub/citation/report.txt (last visited Dec. 7, 2000). Neutral citation formats are both "vendor neutral," that is, not dependent on any particular publisher or vendor, and "medium neutral," that is, not dependent on any particular medium.
\item ALWD form: Am. Assn. of L. Libs. Comm. on Citation Formats, Universal Citation Guide ¶¶ 9-13, 16 (AALL 1999); ABA Spec. Comm. on Citation Issues, Report and Recommendations <http://www.abanet.org/ftp/pub/citation/report.txt> (accessed Dec. 7, 2000). Neutral citation formats are both "vendor neutral," that is, not dependent on any particular publisher or vendor, and "medium neutral," that is, not dependent on any particular medium.
\item \textsuperscript{87} Bluebook form: Constitutions are always cited this way. See Dickerson, supra note 4, R. 13.0, at 97-100; The Bluebook, supra note 1, R. 11, at 75.
\item ALWD form: Constitutions are always cited this way. See ALWD & Dickerson, supra n. 4, at 97-100 (R. 13.0); The Bluebook, supra n. 1, at 75 (R. 11).
\end{itemize}
has the function of a West Reporter page number), and a paragraph reference for a pinpoint citation.\textsuperscript{88} The ABA proposal recommends a parallel citation to a print source.\textsuperscript{89} The AALL proposal, which is very similar, does not recommend a parallel citation.\textsuperscript{90} Both The Bluebook and ALWD provide alternative neutral citation formats, neither of which is identical to the AALL or the ABA proposal.\textsuperscript{91} While any neutral citation format eliminates reliance on commercial print publishers for data elements, it requires the jurisdiction to sequentially number its opinions\textsuperscript{92} and number the paragraphs within each opinion.\textsuperscript{93} A few states have adopted neutral citation formats,\textsuperscript{94} as has one federal circuit.\textsuperscript{95} But the federal judiciary as a whole has resisted calls to adopt neutral formats,\textsuperscript{96} and some commentators ar-

\textsuperscript{88} Bluebook form: ABA Special Comm. on Citation Issues, \textit{supra} note 86, at 2, 9-10.  
\textit{ALWD} form: ABA Spec. Comm. on Citation Issues, \textit{supra} n. 86, at 2, 9-10.  
\textsuperscript{89} Bluebook form: \textit{Id.} at 11-12.  
\textit{ALWD} form: \textit{Id.} at 11-12.  
\textsuperscript{90} Bluebook form: Am. Ass'n of Law Libraries Comm. on Citation Formats, \textit{supra} note 86, at ¶ 40.  
\textit{ALWD} form: Am. Assn. of L. Libs. Comm. on Citation Formats, \textit{supra} n. 86, at ¶ 40.  
\textsuperscript{91} Bluebook form: Dickerson, \textit{supra} note 4, R. 43.0, at 289-90; The Bluebook, \textit{supra} note 1, R. 10.3.3, at 64. ALWD arguably missed a good opportunity to move closer to neutral rules. For example, in constructing court designators, it might have used postal abbreviations for states, as the ABA and AALL forms do. And the requirement of page numbers for pinpoints ignores the fact that some electronic formats do not show the print version's page numbers. That means a conscientious writer will have to find the paper version just to construct the citation. Generally a pinpoint to a paragraph or section is quite sufficient, and the rules should allow for that.  
\textit{ALWD} form: ALWD & Dickerson, \textit{supra} n. 4, at 289-90 (R. 43.0); The Bluebook, \textit{supra} n. 1, at 64 (R. 10.3.3). ALWD arguably missed a good opportunity to move closer to neutral rules. For example, in constructing court designators, it might have used postal abbreviations for states, as the ABA and AALL forms do. And the requirement of page numbers for pinpoints ignores the fact that some electronic formats do not show the print version's page numbers. That means a conscientious writer will have to find the paper version just to construct the citation. Generally a pinpoint to a paragraph or section is quite sufficient, and the rules should allow for that.  
\textsuperscript{92} Bluebook form: Some jurisdictions use docket numbers. Dickerson, \textit{supra} note 4, R. 12.18(a), at 89; The Bluebook, \textit{supra} note 1, R. 10.8, at 70-71.  
\textit{ALWD} form: Some jurisdictions use docket numbers. ALWD & Dickerson, \textit{supra} n. 4, at 89 (R. 12.18(a)); The Bluebook, \textit{supra} n. 1, at 70-71 (R. 10.8).  
\textsuperscript{93} Bluebook form: ABA Special Comm. on Citation Issues, \textit{supra} note 86.  
\textit{ALWD} form: ABA Spec. Comm. on Citation Issues, \textit{supra} n. 86.  
\textsuperscript{94} Bluebook form: Dickerson, \textit{supra} note 4, at app. 2 (listing states adopting neutral formats).  
\textit{ALWD} form: ALWD & Dickerson, \textit{supra} n. 4, at 379 app. 2 (listing states adopting neutral formats).  
\textsuperscript{95} Bluebook form: The Sixth Circuit Court of Appeals adopted a neutral format for cases after December 31, 1993. The Bluebook, \textit{supra} note 1, tbl.T1.  
\textsuperscript{96} Bluebook form: Barger, \textit{supra} note 84, at 80-82.  
\textit{ALWD} form: Barger, \textit{supra} n. 84, at 80-82.
gue that such changes would be costly, burdensome, and unnecessary.\textsuperscript{97} One study indicates that these fears are unfounded.\textsuperscript{98}

The burgeoning availability of law on the Web may provide the impetus to resolve this controversy. Every day more case law and statutes are available on the Web, essentially free. Lawyers who use that material might pay for "translations" to West volume and page numbers for a time, but not for long. As more law becomes available on the Web, it becomes increasingly likely that a neutral citation system will one day—perhaps soon—be the predominant one.

Both \textit{The Bluebook} and \textit{ALWD} acknowledge this reality, and both provide a neutral citation format to be used where possible, while requiring the state-adopted format where applicable.\textsuperscript{99} It appears that \textit{ALWD}, and perhaps \textit{The Bluebook} too, will support and complement the work of those adopting neutral formats.

\textbf{Conclusion}

The \textit{ALWD Citation Manual} is not just \textit{The Bluebook} dressed up in a slick presentation and marketed with PowerPoints. It is a vast improvement over \textit{The Bluebook} in the sensible, accessible presentation of rules, in the number and usefulness of examples, and in the extensive coverage of state citation rules. For novices, \textit{ALWD} is clearly a better choice than \textit{The Bluebook}. For experts, \textit{The Bluebook} is probably still the better choice, primarily because its coverage is more complete.

For the 2000-2001 academic year, 81 of the more than 150 ABA-accredited law schools adopted the \textit{ALWD Citation Manual}.\textsuperscript{100} Uncertainty about whether it will be well received by law reviews, judges, and practitioners has kept some schools from adopting it. But as more schools adopt it and their students move into the wider legal world, it will almost certainly become well known and widely accepted, particularly as a teaching manual. We are in a time of transition in the world of legal research—both sources and citation forms will continue to evolve. The \textit{ALWD Citation Manual} is a welcome resource in this time of transition.

\textsuperscript{97} \textit{Bluebook} form: \textit{Id.}
\textit{ALWD} form: \textit{Id.}
\textsuperscript{98} \textit{Bluebook} form: \textit{Id.}
\textit{ALWD} form: \textit{Id.}
\textsuperscript{99} \textit{Bluebook} form: \textit{ALWD} gives the complete text of the rules for the states that have adopted neutral formats, but \textit{The Bluebook} merely gives a sample citation in the appropriate form. \emph{Dickerson, supra} note 4, R. 43.0, at 289-90; \textit{The Bluebook, supra} note 1, R. 10.3.3, at 64.
\textit{ALWD} form: \textit{ALWD} gives the complete text of the rules for the states that have adopted neutral formats, but \textit{The Bluebook} merely gives a sample citation in the appropriate form. \textit{ALWD} \& \textit{Dickerson, supra} n. 4, at 289-90 (R. 43.0); \textit{The Bluebook, supra} n. 1, at 64 (R. 10.3.3).
\textsuperscript{100} \textit{Bluebook} form: \textit{Ass'n of Legal Writing Dirs., supra} note 45.
\textit{ALWD} form: \textit{ALWD, supra} n. 45.