Please ensure your drafts conform to the specifications found in the following style guidelines.¹ Some of these rules may conflict with rules you learned using different citation or style manuals. In many cases, the Bluebook specifies rules for legal writing and citation. Where the Bluebook does not specify, the editorial board has made a decision on acceptable format and style for the Wyoming Law Review. Please adhere to the Bluebook and these guidelines, even if you know a different rule.

These guidelines are not comprehensive and do not address everything you will need to know when writing your case note or comment, nor are these guidelines meant to replace the Bluebook. Rather, the guidelines are intended to serve as a starting point to familiarize you with the Bluebook and Wyoming Law Review style. Most importantly, if you have formatting or writing questions not addressed by these guidelines, please contact an editor. It is possible the editorial board has not made a decision regarding an issue where the Bluebook is either silent or unclear.

Please understand the editorial board will make every effort to offer consistent formatting guidelines, but the board is not immune from mistakes or miscommunication. If you get conflicting advice from editors or on different drafts, please let the editorial board know—it may be an issue where the guidelines need to be clarified.

Thank you in advance for your time and attention to these formatting and citation requirements. The cleaner your draft is with respect to these rules, the easier it will be for the editors to focus on the substantive strengths and weaknesses of your writing.

*Style Guidelines Contents*

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¹ These Style Guidelines were last updated June 5, 2011.

¹ Unless otherwise noted, all references to rules and tables are to the 19th edition of the Bluebook.
§ 1—FORMATTING GUIDELINES

- Write your case note or comment in Microsoft Word.
  - Font:
    - Times New Roman
    - 12 point for text
    - 10 point for footnotes
  - Double-space text and footnotes, except for block quotes.
  - Indent with tabs, not spaces.
  - Use only one space between each sentence.
  - Do not justify the text unless it is a block quote.
  - Use 1-inch margins all around.
  - Place page numbers at the bottom center of the page.

- Footnotes
  - Indent the first line of each footnote 0.5" from the left margin, just as you would with a paragraph in the main text.
  - Put only one space after the footnote number in the footnote section.
    - Example: \(^1\) Only one space goes between the footnote number and the footnote text in the footnote section.
    - Most versions of Word automatically insert a space after the footnote number.
  - When possible, footnotes should go at the end of the sentence following punctuation.
    - Examples:
      - End.”\(^1\)
      - End.\(^1\)
      - End?\(^1\)
  - Redbook 9.7(c) and Bluebook Rule 1.1 allow for occasional intra-sentence footnotes. Try to structure your sentences to avoid the need to invoke this rarity because such footnotes can make sentences seem choppy and more difficult to read. However, there may be times when intra-sentence footnotes are appropriate. For instance, when a sentence lists elements or parts of a definition from different sections of a statute.
    - Example:
      - Potentially Responsible Parties are defined as follows: (1) the current owners or operators of a contaminated site;\(^1\) (2) the past owners or operators of a contaminated site;\(^2\) (3) individuals or entities which “arranged for” the disposal or treatment of hazardous substances;\(^3\) and, (4) individuals or entities which accept hazardous substances for transportation to a contaminated site.\(^4\)

- Block quotes
  - Indent, justify, and single-space any quotes of 50 words or more. See Rule 5.1.
  - Do not use quotation marks around block quotes.
  - Block quotes should be indented an additional 0.5" on both the left and right.
  - This applies to block quotes in footnotes as well.
  - If you omit any part of a long or short quotation, see Rule 5.3.
• **Quotations and Apostrophes**
  
  o Use smart quotation marks and smart apostrophes (the curly kind used in this guide). Microsoft Word automatically converts them as you type, but it may miss quotes or apostrophes pasted from other documents.
  
  o Caveat: Use straight apostrophes or quotes to express measurements
    - Example: “Indent block quotes an additional 0.5" on the left and right sides.”
    - See Redbook 1.27.
  
  o Hint: Microsoft Word trick: press Ctrl+H to find and replace. Put a quotation mark in both fields (“Find what” and “Replace with”) and click the “Replace All” button. Word will automatically replace all straight quotes with smart quotes. Repeat with apostrophes.

• **Never use bold or underline within the text of the document. Instead, use italics.**
  
  o Be careful not to overuse italics for emphasis. See Redbook 3.1, 3.2, and 3.11 for further explanation.
  
  o When you are emphasizing a word as part of a direct quote, make sure to note any emphasis that is not in the original quote. See Rule 5.2.
    - To note added emphasis, put “emphasis added” in a parenthetical in the citation.
      - If the emphasis is part of the original quote, do not indicate emphasis.

• **Dashes**
  
  o There are no spaces around em-dashes.
    - Example: “Two adult unmentionables—both of them male—bused themselves feasting upon the flesh of the household staff.” Jane Austen & Seth Grahame-Smith, PRIDE AND PREJUDICE AND ZOMBIES 80 (2009).
  
  o Use an en-dash (“—”), not its shorter cousin, the hyphen (“-”) to indicate ranges such as page numbers. Do not put spaces around the en-dash (e.g., “43–45” not “43 – 45” and not “43-45”). Rule 3.2 allows either an en-dash or a hyphen, but the local rules and our publisher require an en-dash. Many illustrations can be seen in Rule 4.1. Additional distinctions between the three types of dashes are explained in the Redbook from 1.49 to 1.61.
  
  o Hint: Microsoft Word trick: press Ctrl+Num+- for an en-dash or go to Insert > Symbol to add an en-dash manually or change the preset keyboard shortcut.
  
  o Use hyphens when citing statutes (e.g., “WYO. STAT. ANN. § 4-10-510”).

• **Tense:** Refer to court actions in the past tense not the present tense.

• **Found v. Held:** Use “found” for a court’s decision about facts and “held” for a court’s decision about the law.
§ 2—GRAMMAR & STYLE REMINDERS

Consider the following rules and tips related to grammar and style when writing your case note or comment. Although this list is not exhaustive, it includes some of the more common hang-ups writers encounter. Some books we recommend for reference are:

- *The Redbook: A Manual on Legal Style* by Bryan A. Garner. This short book is available in its 2nd edition and can be purchased in most book stores or online. It is regarded as one of the foremost authorities on legal citation and style.

- *The Elements of Style* by William Strunk, Jr. and E.B. White. This book is available in its 50th anniversary edition (an updated reprint of the 4th edition) and can be purchased in most book stores or online. It is regarded as one of the foremost authorities on how to write well.

- *On Writing Well* by William Zinsser. This book is currently in its 30th Anniversary Edition and is also widely available. The book is known as “the classic guide to writing non-fiction” and should be a part of any serious writer’s library.

- **Note:** Some rules outlined in books on writing and grammar may be modified or completely replaced by rules in the Bluebook. **Remember, the Bluebook and the editorial board are the final authority in legal citation.** However, many writing issues are not addressed by the Bluebook and you can confidently refer to other sources for guidance. During the drafting process, the editorial board will point out any further instances where the rules have been modified for law review purposes. For further information, consult your legal writing text and the Bluebook. The Bluebook is also online at www.legalbluebook.com.

- **Avoid splitting infinitives.**
  - Although in some rare instances a sentence may flow better if an adverb is inserted between “to” and the verb, it is a good idea to avoid the split infinitive entirely.
  - Example: The statute requires the court to analyze carefully the party’s claims.
  - Not: The statute requires the court to carefully analyze the party’s claims.

- **Do not overuse introductory phrases** such as “However,” “Also,” and “Additionally.”

- **Make sure verb tenses agree.**
  - Example: Skiing, running, and walking.
  - Not: Skiing, ran, and walked.

- **Make sure nouns and pronouns agree.**
  - Example: The acts passed by Congress to combat terrorism have been highly criticized for their impact on civil rights.
  - Not: The acts passed by Congress to combat terrorism have been highly criticized for its impact on civil rights.

- **Do not use informal contractions such as can’t or don’t.**
• **Avoid the passive voice as much as possible.**
  o Example: The Court overruled the objection.
  o Not: The objection was overruled by the Court.

• **Separate words in a list or series with a comma.**
  o Example: Lions, tigers, and bears.
  o Not: Lions, tigers and bears.

• Spell out **numbers** zero (0) to ninety-nine (99) in text. Numerals may be used for numbers 100 and higher. However, any number beginning a sentence must be spelled out. With numbers of five digits or more, use commas. See Rule 6.2.
  o Examples:
    ▪ The case involved 7884 bottles of rum.
    ▪ Over 27,884 plaintiffs were represented in this class action.
    ▪ Two hundred thousand dollars may not seem like a lot of money to an international conglomerate, but for the plaintiffs it amounted to nearly all of their retirement.
    ▪ Over ten assignments of error were asserted on appeal.
    ▪ The first 200 people who filed suit were served with counterclaims for breach of contract.

• **Possessives of singular nouns.**
  o Generally, to show ownership follow the noun with ‘s, regardless of the final letter.
    ▪ Example: Montgomery A. Burns’s nuclear plant was the subject of 2000 lawsuits during the course of ten years, all of which involved Homer J. Simpson as co-defendant.

• **Proper use of colons.**
  o After a colon, put in one space. When an independent clause follows the colon, it may begin with a lowercase or capital letter.
    ▪ Example: The Court listed three factors: first/First . . .
  o A colon should never follow a verb (i.e., never use a colon to separate a verb and an object or a verb and a preposition).
    ▪ Example: The Supreme Court considered three factors: (1) whether the interest was compelling . . .
    ▪ Not: The Supreme Court considered: (1) whether the interest was compelling . . .
  o A colon can be used in the following cases:
    ▪ To introduce a long quotation (50 words or more).
    ▪ To introduce a list of particulars.
      ▪ Example: The defendant was found with three items: a knife, a ski mask, and a rubber chicken.
    ▪ To join two sentences if the second interprets or amplifies the first.
      ▪ Example: The Court held the statute was not narrowly tailored to meet the state’s objectives: it/It did not account for discrimination against women or children which resulted from the statute’s enforcement.
To introduce a quotation that supports or contributes to the preceding clause.

- Example: The Court was unimpressed that the government set up an independent review board: “We think the notion of ‘independent review’ is illusory at best.”

- Avoid clichés, figures of speech, slang, and colloquialisms.
  - Sometimes it is easy to use figures of speech or slang in your writing without even noticing. In our everyday conversations, these phrases are quite common. However, try to avoid the temptation. A case note or comment is an academic work and should reflect a level of sophistication. Limited use of figures of speech, clichés, slang, or colloquialisms may be acceptable in the proper context (e.g., in your title), but as a general rule avoid them.

- Omit needless words.
  - As Strunk and White put it:
    Vigorous writing is concise. A sentence should contain no unnecessary words, a paragraph no unnecessary sentences, for the same reason that a drawing should have no unnecessary lines and a machine no unnecessary parts. This requires not that the writer make all sentences short, or avoid all detail and treat subjects only in outline, but that every word tell.\(^2\)
  - Examples:
    - Bad: The court addressed the question as to whether . . .
    - Good: The court addressed whether . . .
    - Bad: The court addressed whether or not . . .
    - Good: The court addressed whether . . .
    - Bad: This is a subject that is highly controversial.
    - Good: This subject is highly controversial.
  - “The fact that” is often unnecessary in a sentence and should be avoided.
  - Also, avoid overusing “that” in a sentence. As a rule of thumb, if the sentence makes sense without “that” you can safely omit it.
    - Example: The reason the court cited was lack of evidence.
    - Not: The reason that the court cited was lack of evidence.

- Avoid double-negatives.
  - Legal writing is notorious for double-negatives. However, in most cases sentences are better expressed in positive form.
  - Examples:
    - Bad: The court is not saying that her murder of her son is not a factor.
    - Good: The court said the murder of her son may be a factor.
    - Bad: The attorneys decided not to ask the court not to rule on whether or not she exerted undue influence.
    - Good: The attorneys decided to allow the court to rule on whether she exerted undue influence.

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• **Be consistent with your terminology.**
  o Do not interchange different terms for the same concept, statute, or law. If you are referring to the Clean Water Act, call it the Act or CWA, but do not interchange these terms arbitrarily. The best practice is to first refer to the particular item in its full name and parenthetically indicate the term you will use thereafter. However, be careful not to confuse the reader, especially if you are using two or more different acts, statutes, or laws. Make sure the short name you use is clear and distinguishable from others.
    ▪ Example: The Clean Water Act (Act) had several controversial provisions. Particularly, the Act made it illegal to . . .

• **Comma use.**
  o Consult a grammar handbook for rules governing the proper use of commas.
  o Keep in mind commas should not be overused and avoid excess comma splicing.
    ▪ Good: The court held that appropriate seat belt use saves lives.
    ▪ Bad: The court, in its holding, stated that seatbelts, when used properly, save lives.

• **“Court” versus “court.”**
  o When referring to the Wyoming Supreme Court, use the full name if possible.
  o Capitalize “Court” only when referring to the United States Supreme Court or when referring to the full name of any court (such as “United States District Court”).
  o When discussing a court of appeals decision, never write “the Court of Appeals said . . .” Instead, write “the court said,” or specify the appellate court: “The Court of Appeals for the Fifth Circuit said . . .”
  o See Rule 8 for use of “court.”
§3—BLUEBOOK REMINDERS

CASES

- **Five Footnote Rule:** Full cite a case if no full or short cite for the case (including *id.*) appears within the previous five footnotes. The same rule applies for any other source (law review, statute, etc.).

- **Short citations** to cases should conform to Rule 10.9. A short cite is appropriate if the case has been cited in any form (full, short, or *id.*) in either (a) the same footnote, or (b) one of the previous five footnotes. Otherwise you must use a full cite.
  
  - Example:
    2. *Id.*

  - **Note:** A short cite is appropriate in footnote 3 because a cite to *Slothrop* can readily be found in one of the previous five footnotes, but a full cite to *Slothrop* is required in footnote 9 because none of the previous five footnotes cite that case. However, *Swanlake* may be short-cited in footnote 9 because it was cited in footnote 4, which is within the previous five footnotes. For another example, see Rule 10.9.

- **Case names**
  
  - The case name that appears in the reporter should be modified to conform to Rule 10.2.1.
  
  - In the text, case names are generally not abbreviated. See Rule 10.2.1.
    - Example: Board of Education v. Earls.
  
  - In the citation, any word listed in Table 6 is abbreviated. See Rule 10.2.2.
  
  - Case names in the text are italicized.
    - Examples:
      - The United States Supreme Court upheld the right for schools to administer random drug tests to students in *Board of Education v. Earls*.
      - The Court’s holding in *Earls* was not unanimous.
  
  - Case names in full citations in the footnotes are not italicized, but case names in short cites are italicized.
    - Examples:
      - *Earls*, 536 U.S. at 836.
  
  - Treat textual sentences in a footnote like the text of the body (i.e., case names in the text of a footnote should be italicized and not abbreviated).
Do not use a common name as the short cite for you case.
   - Example: Bureau of Land Management v. Richardson, 49 F. Supp. 366 (1993), should be referred to as Richardson, not BLM. See Rule 10.9.

Don’t use parallel cites for Wyoming Supreme Court cases. Use the official West Reporter.

When citing U.S. Supreme Court cases, use the U.S. cite if available, otherwise cite to S. Ct.

The court name should be in the parenthetical, unless the case is a U.S. Supreme Court case or the reporter unambiguously conveys the jurisdiction and court. See Rule 10.4.
   - Examples:
       - This is a U.S. Supreme Court case and does not require a court name in the parenthetical.
       - This is a federal district court case; therefore, the court name (W.D. Okla.) must appear in the parenthetical.
       - This is a Connecticut appellate court which is clearly denoted in the reporter name and need not be repeated in the parenthetical.

Make sure to get the full name of the court. Some states have more than one type of appellate court (ex. N.J. Super. Ct. Law. Div., N.M. Ct. App.). See Table 1 for a breakdown of the jurisdictions and their courts.

See Table 7 for appropriate abbreviations for court names.
   - Examples:
     - Circuit Court (state) - Cir. Ct.
     - District Court (federal) - D.
     - Western District (federal) - W.D.
     - Court of Appeals (federal) - Cir.
     - Court of Appeals (state) - Ct. App.

Spacing:
   - As a general rule, when the abbreviation of the court name or reporter is all single letters or single letters followed by a number, do not use spaces (ex. N.W., S.D.N.Y., F.3d, A.L.R.3d).
   - If the abbreviation of a word in the court name or reporter is more than a single letter, put in spaces after the periods (ex. D. Mass., S. Ct., F. Supp. 2d, So. 2d). See Rule 6.1(a).
   - Exception: Law review abbreviations do not always follow this pattern. See Table 13 for abbreviations when citing a law review.

For circuit courts, the “th” and “nd” should never be superscript. Many versions of Word automatically convert the “th” and “nd” to superscript. You may have to disable this feature or manually correct the changes.
   - Use: 9th Cir.
   - Not: 9th Cir.

Page Numbers. See Rule 3.2(a).
   - Use: 134–45, 9–12, 24–26
Not: 134–5, 24–6, 134–145
If you are citing to information that does not appear on consecutive pages (ex. information on page 626 and 629) your cite should look like this:

**Citing a footnote.** See Rule 3.2(b).
  - Do not spell out “note.” There is a period and no space between “n” and the footnote number.
- If you are citing multiple footnotes, indicate such by using nn. See Rule 3.2(b).

**Concurring and Dissenting Opinions.** See Rule 10.6.1.
- Generally, when citing a case for a proposition that is not the holding of the majority, indicate that fact in a parenthetical.
  - Example:
    - See Rule 10.9(b)(i) for information on how to correctly use *id.* when citing dissenting opinions and majority opinions.

**Subsequent Case History.** See Rule 10.7.1.
- Cases that have been reversed, affirmed, granted cert., vacated, etc., should have such information indicated in italics after the case cite.
- Example:
- Abbreviations for explanatory phrases are in Table 8.

**Parenthetical information** usually begins with a present participle (verb + ing), is not capitalized, and does not end with a period within the parenthetical unless the entire parenthetical is a quote. See Rule 1.5.
- Examples:
  - Bd. of Educ. v. Earls, 536 U.S. 822, 828 (2002) (“We must therefore review the School District’s Policy for ‘reasonableness,’ which is the touchstone of the constitutionality of a governmental search.”).
  - See also *Vernonia*, 515 U.S. at 655 (commenting that the close supervision and discipline of students “permits a degree of supervision and control that could not be exercised over free adults”).
  - Hazelwood Sch. Dist. v. Kuhlmeier, 484 U.S. 260, 263, 266 (1988) (upholding the right of the school principal to remove two articles that dealt with teenage pregnancy and divorce from the school sponsored newspaper).
Guidance regarding the order of parentheticals within a citation can be found in Rule 1.5(b).

- **String Cites.** See Rule 1.4.
  - Do not use “and” between cases in a string cite; instead, use semi-colons.
  - The order of cases in a string cite should be in accordance with Rule 1.4.

- **Lexis/Westlaw Cites.** See Rule 18.3.1.
  - When citing a case that is unpublished or only available on Westlaw or Lexis, cite the case name, the case number, the Lexis or Westlaw number, the name of the court, and the FULL DATE.
  - If available, screen or page numbers should be preceded by an asterisk (*).
  - Example:
  - Note: During the course of writing, you may come across recent cases which are not yet published but may be published by the time you turn in a final draft. You should check these cases to see if reporter cites have become available and if so, replace the Lexis/Westlaw cite with the reporter cite.

**STATUTES, CONSTITUTIONS, RULES** (Rule 12)

- **Name of the Authority**
  - Usually cite the name of the authority in small caps.
    - Example: **FED. R. CRIM. P. 11, MODEL RULES OF PROF’L CONDUCT, U.S. CONST.**
    - Hint: In Word XP, go to “Format” and select “Font.” Check “Small Caps.” For a faster way to switch between small caps and regular typeface, create a shortcut key (like F7) to activate small caps. Consult the “help” section in Word for directions on creating a shortcut.
  - Always cite the official U.S. code, the U.S.C., not the U.S.C.A. or U.S.C.S. The U.S.C. was last published in 2006. The date on all statutes cited in to the code should be 2006. See Rule 12.3.2. If you are citing to a more recent statute (a session law), cite to the U.S.C.A., or to the Statutes at Large in accordance with Rule 12.4 (example: Sarbanes-Oxley Act of 2002, Pub. L. No. 107-204, 165 Stat. 245.).
  - State Statutory Cites
    - See Table 1.
    - You must use proper abbreviations and publisher names (and dates) found in Table 1 for every state statutory cite.

- Spell out the words “section” in the text, except when referring to a provision in the U.S. Code (see Rule 12.10). In a citation, use the symbols followed by a space. See Rule 6.2.

- **Statutory Short Cites**
  - Use the table in Rule 12.10.
  - This table also tells you how to refer to a statute section in a textual sentence.
    - Example: Title 28, section 1701 of the Delaware Code.
- Never use “at” before the § symbol.
- CFR is governed by Rule 14.2
- When citing the Federal Register, make sure you include the name of the proposal, the volume of the FR, the page number in the FR, and the specific date it appeared in the FR. See Rule 14.2.
- Id. and Statutes
  - When citing a different section of a statute used as the citation in the previous footnote, use “Id.” or “id.” for the name of the statute, then the section number. See Rule 4.1.
    - Example: First citation: ALASKA STAT. § 11.56.835.
    - Second Citation: Id. § 12.55.125.

LAW REVIEWS AND PERIODICALS
- Cite the full name of the author in regular text. See Rule 16. If there are two authors, use an “&” to separate. If there are more than two authors, use the first author followed by “et al.”
  - Examples:
    - Akhil Amar
    - W. Homer Drake & Jeffrey W. Morris
    - James Weinberg et al.
- Cite the name of the article in italics. See Rule 16.2.
- The name of the law review or periodical should be in small caps and properly abbreviated according to Table 13.
  - Example: Journal of Law and Economics = J.L. & ECON.
- Short cites should be in accordance with Rule 4.2.
  - Example: Weinberg, supra note 18, at 5.
  - To short cite an article you must have a pinpoint cite, otherwise use the full cite.
  - If more than one work by the same author is cited in the case note or comment, you must use a short cite that properly designates to which article you are referring. The first time you cite the article, use “hereinafter __________” to designate the article. See Rule 4.2(b).
  - Only use “hereinafter” to reference books, articles, and similar sources

OTHER COMMON CITATIONS
- Internet Cites
  - See Rule 18. The Bluebook has been substantially updated regarding internet citation and gives much more guidance than did previous editions.
- Newspaper Cites
  - See Rule 16.6.

- **Interview**
  - See Rule 17.2.5.

- **Special Citation Forms**
  - See Rule 15.8.
  - This covers citations to certain works such as Black’s Law Dictionary, the Bible, the Federalist Papers, Shakespeare, and the Bluebook, among others.

- **Case Notes or Comments**
  - Case names used in the name of a law review or periodical article, comment, or note should not be italicized. See Rule 16.3.

**INTERNAL CROSS REFERENCES**

- **Supra/Infra:** When you want to refer to a previous or subsequent portion of your case note or comment, do not refer to it by page number. Refer to the appropriate text by referring to footnotes contained in it. See Rule 3.5 for examples.
  - The editorial board prefers you use “See supra/infra notes xx–xx and accompanying text” when referring to the text of your case note or comment. If referring only to a footnote, use “See supra/infra note ____.”
  - “Id.” may not be used with supra/infra as an internal cross reference. See Rule 4.1.

- **Supra** can also be used as a version of short form citation. See Rule 4.2.
  - Use supra only to refer to legislative hearings, books, pamphlets, unpublished materials, periodicals, services, treaties and international agreements, regulations, directives, and decisions of intergovernmental organizations or your own textual discussion of the case.
    - DO NOT use supra to refer to cases, statutes, constitutions, or regulations. If you are referring to a case, statute, constitution, or regulation which has previously appeared in your case note or comment, use the full case cite or, if the case is cited within 5 previous footnotes, the short cite.
  - “Id.” may be used with supra as a short form of citation. See Rule 4.1.

**USE OF SIGNALS**

- **Using “See”**
  - See Rule 1.2.
  - When cited authority clearly supports the proposition but does not directly state it, use “See” before the cite.
  - Do not use any signal when the cite clearly states the proposition or when citing a quote.
Other possible signals include *E.g.*, *Accord, See also, Compare, Contra, But see, See generally.*
- Some signals may require parenthetical explanation. See Rule 1.2.
- Always *italicize* introductory signals.
- However, when using *E.g.*, or *See, e.g.*, note that the periods are italicized but the FINAL comma is NOT italicized.

**USE OF ID.**
- See Rule 4.1.
- You can use “*id*” to refer to an authority in a preceding footnote if it is the ONLY authority in the preceding footnote, or for preceding authority in the SAME footnote.
- “[Id.]” is always *italicized*. This includes the period following “*id.*”

**QUOTATIONS**
- **Alterations**
  - See Rule 5.2.
  - When altering the original text, use brackets [ ] to indicate the change.
    - Examples:
      - Changed text: “[Plaintiffs] claimed . . .”
      - Original text: “We hold the standard of conduct is that of a reasonable person.”
      - Changed text: The Court stated, “[T]he standard of conduct is that of a reasonable person.”
- **Ellipses (. . . to mark omitted parts of quoted text)**
  - See Rule 5.3.
  - Omissions at the beginning of a sentence should never be indicated with an ellipsis. Capitalize the first letter and put it in brackets to indicate an alteration.
    - Example:
      - Original text: “The Court held the plaintiffs had a claim under the common law theory of partnership by estoppel.”
      - Use: “[P]laintiffs had a claim under the common law theory of partnership by estoppel.”
      - Not: “. . . plaintiffs had a claim under the common law theory of partnership by estoppel.”
  - Use an ellipsis where language from the middle of a quoted sentence is omitted. Use three dots separated by a space between each dot (. . .)
    - Example: “The very integrity of the judicial system . . . depends on full disclosure.”
    - Note: Some computers may auto-format ellipsis marks to omit the spaces between the dots. You may have to manually correct this.
  - If the end of a sentence is omitted, use four dots (. . .).
    - Example: “To ensure that justice is done, it is imperative to the function of courts that compulsory process be available . . .”
    - Note: There is a space between the last word and the first dot.
If you are quoting only a fragment of a text, you do not need to insert ellipsis points.

- Example: “The court called the verdict ‘a miscarriage of justice.’”

However, if the fragment you are quoting includes omitted text, you must indicate as such with ellipses.

- Example: “The court called the verdict ‘a perfect example . . . of why the justice system works.’”

- If you italicize to draw attention to a word or phrase, at the end of your cite use “(emphasis added).” See Format reminder in this packet and Rule 5.2.
  - NEVER write “(emphasis in original).”

- If the court has relied on another authority for the proposition you are citing, or is quoting from another source, either indicate that fact in a parenthetical or let the reader know you have omitted that information.
  - Examples: