



- Lee Burgess: Welcome back to the Law School Toolbox podcast. Today, we're talking about the Bluebook.
- Alison Monahan: Woo-hoo!
- Lee Burgess: Woo-hoo! Your Law School Toolbox hosts are Alison Monahan and Lee Burgess, that's me. We're here to demystify the law school and early legal career experience so you'll be the best law student and lawyer you can be. We're the co-creators of the [Law School Toolbox](#), the [Bar Exam Toolbox](#), and the career-related website, [CareerDicta](#). Alison also runs [The Girl's Guide to Law School](#). If you enjoy the show, please leave a review or rating on your favorite listening app, and if you have any questions, don't hesitate to reach out to us. You can reach us via the [contact form](#) on LawSchoolToolbox.com, and we'd love to hear from you. With that, let's get started.
- Alison Monahan: Welcome back. Today, we're talking about the Bluebook. You might be wondering, can there actually be an entire episode on this podcast just about the Bluebook? Oh, yes, there can be.
- Lee Burgess: Woo-hoo, the Bluebook!
- Alison Monahan: Woo-hoo, yeah, everyone's favorite topic. If you've not started law school, you will soon learn to love the Bluebook, or not. So first off, Lee, what is the Bluebook?
- Lee Burgess: The Bluebook is a uniform system of citations used in legal writing, in law school and also in real life. You're going to typically use Bluebook citations to cite sources in your legal writing class, as well as any research papers you might complete in law school. Most of the time, you're going to do at least one or two large scale research papers in law school. If you work on a journal, like the law review or another journal at your school, checking citations is often one of the most important jobs for young staffers.
- Alison Monahan: Yes.
- Lee Burgess: And if you love, love, love checking citations, and shockingly enough, there are people and even members of our team who love the Bluebook, you can become the technical editor on your law review, and that's where you basically just do citations all the time.
- Alison Monahan: Yeah. And I mean, this is definitely something that people don't really love doing, but [it is important](#), because the whole idea is these citations really allow you to go and look up sources. We're lawyers, we provide evidence, so if the citations are not correct, you can't find the source, and that becomes a problem if you want to check, for example, a source that's cited in a law review article or



in a case. You really need to know where these are. So, it sounds tedious and it might be tedious, but it is actually important.

Lee Burgess: It is.

Alison Monahan: Random aside, Lee, do you know where the Bluebook comes from?

Lee Burgess: Oh my gosh, I do not.

Alison Monahan: Well, I happen to know this, because I was on the Columbia Law Review the year that we were editing the Bluebook.

Lee Burgess: Ooh.

Alison Monahan: So, it's actually written by students on various law reviews. Kind of a crazy factoid.

Lee Burgess: That is a crazy factoid. I did not know that.

Alison Monahan: Yeah, well, you didn't have to suffer through not only Bluebooking, but editing the Bluebook.

Lee Burgess: Yeah, that is kind of a special circle of torture.

Alison Monahan: Yeah, you want to talk about pedantic, wait until you have people arguing about what changes should be made to the Bluebook.

Lee Burgess: Yeah. If you've never seen a Bluebook, traditionally it is a blue book.

Alison Monahan: A book that is blue.

Lee Burgess: It is blue. I have one on my shelf here, and I'm looking at while I record this podcast. That students carry around, or attorneys have always had on their shelves, but today there's [an online version](#), which I was actually playing with. And yeah, I know, I was playing with the Bluebook. Sounds super exciting. But when I was doing this podcast preparation, and actually, I think the online version is quite good. So if you have an option, if I was a new law student, I would've just gone to the online version.

Alison Monahan: Yeah, I saw that if you get the paper one, they give you a free trial of the online one.

Lee Burgess: Yeah.



Alison Monahan: So if you want to have both, that could be a good option. I mean, I think there's probably value in having the paper copy, but you don't want to carry it around all the time. It's probably great to have the online one as well, or in lieu of.

Lee Burgess: Very true. If you're in law school, you may think as Alison, you were just mentioning, that it's important to be able to check someone's citations and find out where their evidence is coming from. When I was a new lawyer, one of my jobs was to respond to motions in limine, many of which were poorly written by plaintiff's counsel, because they were just churning through as many motions as they could file. I would take their citations and go dig into the cases and find mistakes.

Alison Monahan: Oh, yeah.

Lee Burgess: They had quoted things incorrectly. The case didn't actually say what they thought it said. And if they hadn't used the citations, I would not have been able to prove how wrong they were in my response brief.

Alison Monahan: Yeah, and this happens absolutely when you work for a judge. I worked for a federal district court judge, and I remember at least one case, one situation where someone had filed some sort of motion or brief, and obviously we check the citations for key points, and literally this person has edited out a "not" with an ellipse.

Lee Burgess: What?

Alison Monahan: You want to talk about sinking your case right then and there? The judge was just like, "Are you joking?"

Lee Burgess: I feel like that's practically malpractice.

Alison Monahan: Yeah, it was like, "Did you think nobody was going to notice this case literally stands for the opposite of what you are citing it for, and you edited out the not?"

Lee Burgess: Oh my gosh.

Alison Monahan: Don't do that.

Lee Burgess: Yeah, don't do that. That's terrible.

Alison Monahan: Because people will find out from your citations.

Lee Burgess: Yeah, and I remember being shocked at what some people would reference without going back and checking the case. I don't know if a lot of times in



practice, people are pulling quotes from secondary sources or something like that where they don't go back to the original case, but it looks so sloppy if in your brief, you can be like, "Well, plaintiff's counsel cites to this, but that's not actually what it says." They misquoted, or they didn't pay attention to the next paragraph-

Alison Monahan: Yeah, they edited out a "not."

Lee Burgess: ... or they left words out. So it is really important, and I think one of the things that working on citations can do, and you and I were just talking about this right before we jumped in the podcast, is when you do a lot of them, they get a lot easier-

Alison Monahan: Yes.

Lee Burgess: ... because you do end up memorizing the most common ones. But they also really help your attention to detail. One of the things that you have to be very good at when you're in law school, when you're working, if you're clerking, is to have a high attention to detail. Practicing citations and editing your own work and making sure everything is very clean and on point is very important, and something that you want to have as part of your legal practice.

Alison Monahan: Right, well, [it sends a signal](#). I remember clerking, you could sometimes tell ... I mean, we're not really going to get into this level of detail, but often times, there are multiple different reporters you could cite to on a federal case or a state case. There might be different ones, and one of them is the one you're supposed to cite to, but for whatever reason, some of the online sources cite to different ones, and you have to change them. It's really obvious if you don't change them, because we all know you know you should be citing to the federal reporter or whatever it is, and if you're not, then we know that you just copied and pasted this and didn't look at it.

Lee Burgess: Right.

Alison Monahan: So, that sends a signal that maybe we need to be more careful about the rest of what you're saying.

Lee Burgess: Yeah. It doesn't look good. And you don't want that reputation going around either, that when a judge sees your work, that they think it's sloppy.

Alison Monahan: Yeah. If they think it's sloppy, they think the citations are sloppy or poorly done, then they're going to definitely inspect everything else more carefully.

Lee Burgess: Yeah. All right, well, now that we have hopefully convinced everyone that this is important, let's talk about the first time you're probably going to be asked to



use the Bluebook, which is in your legal writing class. Some people listening might be wondering why you have to worry about citations on your legal writing assignments, because it's just an academic assignment.

Alison Monahan: Right, and people think, "Oh, well, it should matter more what I say than these tedious details."

Lee Burgess: Right, exactly. Exactly.

Alison Monahan: But the reality is, these are what you're being graded on, and this is obviously a part of your grade in legal writing. It's just such an easy place to give points away, and you just don't need to do that. If you allocate the time and some energy to getting this right, that can be enough easily to bump your grade up even a full letter grade.

Lee Burgess: Right. Yeah, I mean, I've seen this really influence people's outcomes. And also the other thing to think about in a legal writing class is often times, your sections aren't very big, and they still have to curve the class. So one year, one semester, my good friend and I, our papers had a difference of a point out of hundreds and hundreds of points, and you could only give one A+ in the class, and I got it by a point. You know? My friend didn't care that much, but I got the high score award in that class, the CALI award in that class, and she didn't, over a point.

Alison Monahan: Yeah.

Lee Burgess: So, talk about getting down to the details. You don't want to leave points on the table, because you don't know exactly how this is going to play into the curve. Because when you do have that forced curve, a point or two can be the difference between an A and a B.

Alison Monahan: Yeah, there's just no reason to lose points on this. I mean, it really just comes down ... I think honestly for most people, it just comes down to procrastination; they don't leave enough time to get this right, and then they kind of dial it in. They're like, "Well, I don't really know exactly what I'm doing. I'll just kind of make my best guess," and then you get this assignment back that you may have worked many, many hours on, and really thought carefully about, and you see your grade, and it's like, "Well, what happened?" And what happened is, you did a terrible job on your citations.

Lee Burgess: Yeah. Don't leave points on the table. I always say, "Make your professor's job hard." It's very easy to deduct points for mistakes, like citations and formatting.

Alison Monahan: Yeah, they'll be like, "Oh, awesome. I just got my curve."



- Lee Burgess: Right. You know? And I think one of the reasons why they do allocate so many points to those is because that's how they get their curve; people are sloppy.
- Alison Monahan: Yeah. I mean, they know people are not going to take this seriously, and they're going to leave it till the last minute, and they're like, "Okay, well, you're going to be punished for that."
- Lee Burgess: Yeah. Okay, so we've already talked about how important these are for your grades. I also think that it's important to start realizing that this is the beginning of your professional career and your professional ... I don't know, what's the ... Reputation, I guess, is the best word to say, but looking careless is a bad thing. You don't want to look like you don't know what you're doing, and some of these writing assignments may also be writing samples for future jobs, so you definitely don't want those to be sloppy, because that's how people are going to evaluate your work. But you don't want your reputation around school with your professors to be like, "Oh, this person doesn't check their work," because you might need a letter of recommendation for one of these professors. You don't want that to be part of your letter of recommendation.
- Alison Monahan: Right. Also, I think it just sends a signal about ... like, it seems like you don't care, basically. No one likes that. It seems like you're not taking the class seriously; you just dial it in, you don't care. Again, just like a judge, your legal writing professor is probably going to look more carefully at the rest of your work in a negative light if they think that you just dialed it in on the citations and didn't really try.
- Lee Burgess: Yeah. You know, when I was working ... Not to toot my own horn. There's no way to tell the story without sounding like you're complimenting yourself, but when I would get feedback ... I worked for one senior associate quite a bit on a lot of his motions, because we were in a big trial, and one of the things he did send to me as feedback was, "I really like the fact that I don't have to go through your work with a fine tooth comb, because you have cleaned it up already." I think that if you've never been a supervisor of someone else's work, you don't appreciate how much that means to you. I mean, you and I now supervise an entire team, and you and I both supervise people in various other roles that we've had in our careers. But if somebody gives you sloppy work as your subordinate and makes more work for you, that never looks good.
- Alison Monahan: No, that's not favorable. The thing about-
- Lee Burgess: But it makes you really happy when it's clean work.
- Alison Monahan: Yeah, and the crazy thing about citations is you never know when you're going to need this. I remember when we were filing motions at trial and I was the one writing the brief, and literally the partner on the case was the one doing the



citation check because she was the one who actually had time to do it. So this isn't something ... You know, when you're in an all hands on deck situation, being good at this actually has a lot of value.

Lee Burgess: Yeah. Okay, so I think we've convinced people that it's serious.

Alison Monahan: Hopefully.

Lee Burgess: Hopefully. If you haven't turned off the podcast because you don't want to listen to us talk about the Bluebook anymore. But let's actually [walk through a citation](#), so if you've never done any Bluebooking, you can get an idea of how to search or how to cite.

Alison Monahan: All right.

Lee Burgess: This is the exciting stuff, guys.

Alison Monahan: Woo-hoo!

Lee Burgess: Dust off your Bluebook.

Alison Monahan: Get out your Bluebooks.

Lee Burgess: You can follow along on your online Bluebook or your paper Bluebook. Let's say that we wanted to cite to a United States Supreme Court case such as *Citizens United v. the Federal Election Commission*, because it's an election year and if we haven't talked about the election enough, I feel like I have to pull it into even a citation podcast.

Alison Monahan: Go vote.

Lee Burgess: Yeah, exactly. Go vote. The decision is from 2010. If you are going to cite this in a legal writing paper, you would want to open up your Bluebook to the section where it discusses how to cite to the United States Supreme Court, and case citations are discussed in rule 10, which is page 94 of the paper book. Alison, is the Bluebook full of quote unquote "these rules"?

Alison Monahan: Well, I mean, there are all kinds of things in here. You've got rules, you've got tables. I mean, I feel like the goal of it really is to cover any type of thing you could possibly want to cite, which makes it pretty involved.

Lee Burgess: Right. Yeah. I mean, if you haven't seen one of these books, they're pretty thick.

Alison Monahan: Yeah. One of the first things, and you'll probably talk about this briefly later, but if you're just being introduced to the Bluebook, one of the first things you want



to do is flip through it and just get a sense of where things are, because they're not necessarily organized in the most logical-

Lee Burgess: That's true.

Alison Monahan: ... highly used, first order. And then you want to get out some tabs and really tab those tables and things that you're going to use a lot, because that's just going to save you a ton of time when you're going to need to look up all this stuff.

Lee Burgess: This is where you'd know that you've reached a level of law school nerdiness, is when you are really excited about tabbing your Bluebook. I remember tabbing my Bluebook, and it was kind of exciting.

Alison Monahan: Yeah, because it really does make it easier if you're like, "Oh, I need to look up abbreviations," I just flip to the green tab.

Lee Burgess: Yeah.

Alison Monahan: That's probably easier than sitting there and looking at the table of contents and thinking, blah, blah, blah. It might depend on what you're working on, what's most critical. But you do want to think through and maybe have a list or tabs or bookmarks or whatever it is if it's in a browser, for the things you're going to use over and over. Because there are ... I mean, honestly, there's probably 10% of this book that gets used over and over, and the rest of it you maybe look at once.

Lee Burgess: Very true. All right, any case citation starts with, shockingly enough, the party names. Here, the party names were Citizens United and the Federal Election Commission. It's important to note that case names are required to be italicized in text or in footnotes. This is your first clue that we are really getting down to the nitty gritty, just by putting together any sort of citation, because you're looking at when's something in italics, and when something is not.

Alison Monahan: Right. It's also important to note you're going to use these rules in the text of your paper, and also in the footnotes.

Lee Burgess: Ah, good point.

Alison Monahan: And particularly the footnotes, there are different rules about is that the first time you cite something, are you citing something you've already cited, how long ago did you cite it? You know, all of these things you need to really understand what the rules are, because they're easy to mess up.



- Lee Burgess: Yeah. And one thing that we I think are going to discuss a little bit later in the podcast, but I'll just mention here as well, is this is why often times, we recommend for a legal writing assignment that you have a separate document where you just do the citations, and you can have a full citation and a short citation, which is the one that comes after you've shortly referenced the one before in text citations. Things like that, so you can copy and paste things, because you're doing these citations so much throughout the entire writing that it's very easy to just create typos if you're typing out Citizens United each time.
- Alison Monahan: Yeah, there's no reason to be writing this out every single time.
- Lee Burgess: No.
- Alison Monahan: If it's a case that you're going to be citing a lot, just put it in your document and copy and paste it.
- Lee Burgess: Yeah, proof that document super carefully and make sure that there are no issues in it, and then you can just copy and paste.
- Alison Monahan: Yeah.
- Lee Burgess: All right, so now that we know that we have to do italics, and one of the rules I think that is used really, really often in one of the tables that is important to tab, is when you talk about how to abbreviate names. I think this is another thing that folks often overlook, because it seems silly, but it's still required by the Bluebook. And so, the-
- Alison Monahan: This one's easy. Like, all you have to do is look it up. Come on.
- Lee Burgess: Yeah, exactly. You just can't forget to look it up.
- Alison Monahan: Yeah.
- Lee Burgess: For text abbreviations, if you're following along in your Bluebook, you have to look at rule 10.2.1C, which states that in textual sentences, whether in main text or in footnote text, abbreviate only widely known acronyms under rule 6.1B. So the one beautiful thing, I'm going to take a pause, about the online version, is they link to the rules and then you can just click on that and it takes you-
- Alison Monahan: Yeah, you're like, "What in the world is this about?"
- Lee Burgess: Right, which I think saves you from flipping through. And these eight words, which is "and", "association" ... What is B-R-O-S?
- Alison Monahan: I guess brothers?



- Lee Burgess: Brothers? Maybe. "Co." for company, "Corp." for corporations, "Inc.", Limited "Ltd" and "No." for number. If one of these eight begins a party's name, however, you do not abbreviate it. So you can see that you can't just say, "Oh, I always remember that I need to abbreviate association." Well, only if association is not the first word.
- Alison Monahan: Right.
- Lee Burgess: That's why you have to go back, and even if you're very experienced, and Alison and I were both on law reviews, you're still looking this stuff up consistently, because there are these little nuances that you want to double-check.
- Alison Monahan: Yep, for sure.
- Lee Burgess: But in our case name, we have the widely known acronym Fed for federal, so in text we would probably still use Fed instead of Federal, because it's not the beginning of the case name. But for our footnote citation, we also need to look at the additional rule of 10.2.2, which tells us to look at table six for all the other words we should be abbreviating in a party's name, unless the word is a part of a state, country, or other geographical unit, that is the entire name of the party. So, if you flip over to table six or you look at that online, are any of these other words abbreviated, Alison?
- Alison Monahan: Well, turns out, yes.
- Lee Burgess: Woo-hoo!
- Alison Monahan: Federal is abbreviated to Fed period. We already knew this one. Our commission is also abbreviated, Comm'n. And so, that means that in our case name, the footnote citation would be ... Let me see if I can get this right. Citizens United, both of those are capitalized and italicized, V with a period, Fed period, Election Commission, abbreviated.
- Lee Burgess: Yes. And there's a period after commission. See, even my notes were wrong.
- Alison Monahan: Yeah, I was wondering about that, because I was like, wait, is this a sentence or is this actually an abbreviation?
- Lee Burgess: I think it is an abbreviation.
- Alison Monahan: Well, let's actually consult table six on-
- Lee Burgess: Oh, good call. Look at this, real life Bluebooking right here.
- Alison Monahan: No, there is not a period after commission.



- Lee Burgess: Oh. See, this is why-
- Alison Monahan: I think because it has the apostrophe.
- Lee Burgess: The apostrophe. This is why you got to look it all up, guys. You got to look it up. My Bluebooking skills are not what they used to be, I'll be honest.
- Alison Monahan: No, for sure not. I actually used to be good at this.
- Lee Burgess: All right. Okay, so-
- Alison Monahan: Yeah, so it looks like generally speaking, if it has an apostrophe in it, then it does not have a period. But if it doesn't, it does have a period.
- Lee Burgess: Okay. Good rule of thumb. All right.
- Alison Monahan: Yeah, but don't follow that. Look it up.
- Lee Burgess: Yeah, look it up. Now that we've gotten through the case name, and it's hard to believe that there was that much talk just about the case name, so ...
- Alison Monahan: Well, then actually in the text, I think it would be different again, right?
- Lee Burgess: Yes, that's right. The text would be *Citizens United v. Fed. Election Commission*, italicized, because Commission is not one of the most commonly abbreviated words.
- Alison Monahan: All right, I'm getting a headache already.
- Lee Burgess: I know, right? See, I told you you should have had coffee before this meeting. I don't know that your tea was going to do it this morning for the Bluebooking.
- Alison Monahan: True. True.
- Lee Burgess: Okay, so we talked about kind of that secondary document if you're doing this Bluebooking exercise for a legal writing assignment separate from when you're doing the actual writing. So you often times will have what it looks like in a footnote, and then what it looks like in text, because that way, you can catch these differences. Because if you use an abbreviation in text that is not allowed by the Bluebook, you will likely lose points.
- Alison Monahan: Well, you would definitely lose points.
- Lee Burgess: Yes.



Alison Monahan: Now I'm curious. Wait, so what told us to abbreviate-

Lee Burgess: You mean to not abbreviate?

Alison Monahan: Fed, there's a different ... I'm not even sure I ever knew this. There's a different list of abbreviations for in text. Oh, wow, that's right, I forgot.

Lee Burgess: Yeah, 10.2.1C.

Alison Monahan: Yeah. No, and that one has some crazy stuff in it. I was reading this earlier. For example, spacing. Spacing is one of those things that people mess up all the time in the Bluebook.

Lee Burgess: Oh, all the time.

Alison Monahan: For example, I love this. This is just the craziest thing ever. In 6.1A, they have spacing. "In general, close up all adjacent single capitals", and they give the example of S, D, and Y. And then they continue, "But do not close up single capitals with longer abbreviations. For example, D. Mass., which is also a district court, does not get closed up and has a space." I'm like, this is completely insane.

Lee Burgess: Oh, it's totally insane.

Alison Monahan: And you're just like, this is mind-mindbogglingly crazy that this is what we have to think about. But anyway, you do.

Lee Burgess: Yep, you absolutely do.

Alison Monahan: All right, so now I've clarified for myself why we abbreviate Fed but not Commission in one both, and do both in the other.

Lee Burgess: Yeah. And you know what's funny?

Alison Monahan: Don't ask me for any of the logic here.

Lee Burgess: You know what's funny is when I was pulling together notes for this podcast, I was trying to just think of a random Supreme Court case to pull up, and I didn't even know that I was going to find one with this tricky in text rules versus footnote rules, but that's because almost all the case names have these crazy rules.

Alison Monahan: Yeah, you probably could've picked at random.

Lee Burgess: I think I could probably have picked at random.



Alison Monahan: I think that one's a little weirder, but that's actually good, because now people know that rule.

Lee Burgess: Exactly. All right, so now that we have finally finished the case name and reviewed our rules again, now we need to think about how to cite to the reporter.

Alison Monahan: Lee, before you get started on that, what is a reporter?

Lee Burgess: Well, back in the day, and I think they still do it now, but nobody really looks at the books anymore. But back in the day-

Alison Monahan: They do exist. They're decoration.

Lee Burgess: They are. They're pretty.

Alison Monahan: Law firm and judge offices.

Lee Burgess: Yes. There are reporters, both official ones and unofficial ones, that are books where opinions are published. They have volumes and they have page numbers, clearly, and they have names. A lot of the citations around cases are, if you were going to go look at the paper book, this is how you would find the case in the paper book. Now, with things like Lexis and Westlaw, you still use the same citations to find it electronically, because they're still keyed by the volume and the actual reporter, and the page number. But it used to be old school, that you would march back to the book, pull out the book, look through the pages. But not anymore as much.

Alison Monahan: Yeah, it's pretty straightforward. I mean, this can seem kind of mysterious if you don't realize that they're just books. It's really just telling you, "Okay, this is the name of the book, and this is the volume of the book you need to find, and this is the page number you need to find, and this is where you're going to find this information."

Lee Burgess: Yeah.

Alison Monahan: So if I keep that in mind, I think citations in that sense make more sense.

Lee Burgess: What about the difference, Alison, between the official reporters and the unofficial reporters?

Alison Monahan: You know, those just give me a headache.

Lee Burgess: I know.



- Alison Monahan: I don't know, there's a rule somewhere that tells you which ones to cite to. Particularly this actually becomes more of an issue with state cases, because with state cases, often it's not really obvious which should be the reporter that you're citing to. But the Bluebook will just tell you that, so look it up.
- Lee Burgess: When you pull a case, even if you pull it electronically, usually you'll see two or three cites that look the same, and those are the different reporters.
- Alison Monahan: Yeah, but they'll have a different name and different page number
- Lee Burgess: Exactly.
- Alison Monahan: ... and volume, and you've got to make sure that you're citing to the one you're supposed to cite to.
- Lee Burgess: Yeah. So, I decided that we should cite to the official reporter.
- Alison Monahan: I think that's usually right.
- Lee Burgess: Okay, good. Citizens United, the case, is found in volume 558 of the United States Reports, which is where all Supreme Court cases are published. That is noted in your Bluebook as U.S. and as I mentioned, that's official. There are unofficial reporters, too, but because I didn't want to send us down the rabbit hole anymore than we already are going on this podcast, we're just going to stick to the official one this time.
- Alison Monahan: Yeah, and that's what you're going to see. I mean, obviously if someone's citing a Supreme Court case in a legal document, it's almost always going to be to U.S. whatever.
- Lee Burgess: Exactly.
- Alison Monahan: And each branch of the federal courts have their own reporters, so you might see F.Supp. or F2d. What those are is they're different district or appellate court reporters.
- Lee Burgess: Yep.
- Alison Monahan: Are your eyes crossing from too much Bluebooking? Well, today's your lucky day. We want to take a moment and thank [Warby Parker](#), our sponsor, for this episode of the Law School Toolbox Podcast. If you don't know about Warby Parker, well, buying glasses can be super expensive, frustrating, and time consuming. Warby Parker has tried to find a solution to that. They're selling glasses directly to consumers online and in their stores, and they provide high quality eyewear at a fraction of the usual price. Lee and I have both spent two



or three times as much on glasses. Well, in some cases, even more. Warby Parker glasses start at just \$95, which includes frames, lenses, and coatings.

Lee Burgess: Super cheap. That's super cheap for glasses.

Alison Monahan: Yeah.

Lee Burgess: You can try on Warby Parker glasses through their free home try-on program, where they ship you five pairs of glasses that you selected online. Then you have five days to try them on, take selfies, yes, I totally did that, show your significant other, your pet, your friends, and then decide if you want to purchase one of those pairs. Alison and I have both done this. And then Alison, after you picked a pair, you ended up going to one of their brick and mortar stores as well, right?

Alison Monahan: I did. I went in and the guy was basically like, "Yep, these frames don't really work for you." I was like, "Well, I'm not really good at picking glasses," and then he helped me pick a different pair, and they actually remade them and sent me the new pair, which was kind of amazing, and then those, I needed to get some adjustments, just basic fit and that kind of thing, so I went back to a different store. These were all in different parts of the country, so they have stores in a lot of different locations, and yeah, you can just pop in and they adjust them for you, and it's kind of amazing.

Lee Burgess: Yeah. It's become this interesting hybrid from the brick and mortar traditional glasses store, but this online process as well, so if you can do it from the comfort of your own home, that's great. But if you can't quite make it work, you can talk to a person and have somebody help you.

Alison Monahan: Yeah, and I think at this point, a lot of the stores even have people who can do your prescription, which is kind of amazing.

Lee Burgess: Yeah, that is kind of amazing. It also is cool to know that Warby Parker does sunglasses. I've got a pair of sunglasses from them. Sunglasses, especially if you wear prescription sunglasses, are incredibly expensive, so it is nice to know that I paid much less for them, and I think about that every time I put them on, because it makes me happy. And one of the things I liked about the home try-on is I even got creative with some of my selections and ended up picking a pair that I was kind of surprised by, but I ended up liking them a lot.

Alison Monahan: Yeah, I actually got mine ... I was not intending to get them, but when I went into the store to get the frames replaced, or just ask them what I could do about that, I ended up ... The guy was so great. He had me try on a bunch of sunglasses, and I got a pair of those, too. So it was kind of amazing.



- Lee Burgess: Nice. So, if you're a law student, we know you don't have any extra money to spend on glasses, and we know that things like the Bluebook make you need glasses.
- Alison Monahan: Literally, your eyes will probably get worse in law school.
- Lee Burgess: Yeah, my prescription definitely got worse in law school actually, but it got a lot worse when I did doc review, when I was staring at the computer all the time. So, things to look forward to. [Warby Parker](http://www.warbyparker.com) could be a great solution for you. If you want to give it a try, you can go to www.warbyparker.com, that's W-A-R-B-Y-P-A-R-K-E-R.com/lawschooltoolbox to get started with your free at-home try on, and you too can take selfies and try and pick your best glasses.
- Alison Monahan: Fun times. All right, now let's get back to the Bluebook.
- Lee Burgess: So, you're also going to have to know what page the case starts on, and this case starts on page 310. You also need to know the year it was published, and this was published in 2010, so that's also very important so people know when a case was published. All of the details about how to put these cases together are in rule 10.2 of your Bluebook. Should we put this cite together?
- Alison Monahan: Yes, let's do it.
- Lee Burgess: Dun dun dun dun. Okay, so *Citizens United* in italics, versus, which the v., Fed. Election Commission. This would be the in-text version, right? Because we're spelling out Commission.
- Alison Monahan: Yep.
- Lee Burgess: Comma, very important. You also have a comma after the case name. 558 space U.S. (is the official reporter) 310, and then parentheses, 2010. So, you've got the italics for the case name, a comma after the case name, and if this was a footnote, you're going to further abbreviate the word Commission.
- Alison Monahan: Right, and note that everything after the case name is not italicized, including the comma, and believe it or not, you can see the difference if you really look between an italicized comma and a non-italicized comma. You can arguably even see the difference between italicized periods and not, and these are the things you deal with on the law review.
- Lee Burgess: That's true, and I just noticed my comma was totally italicized in our notes.
- Alison Monahan: I noticed that as well.
- Lee Burgess: You're like, "No judgment, but your comma is italicized."



Alison Monahan: No judgment, but that should not be italicized. I mean, you might not believe us that you can tell at a glance if a comma has italics, but it's actually really easy to tell once you've looked at enough of them.

Lee Burgess: Yeah. You have a very impressive attention to detail, Alison.

Alison Monahan: You know, I'm a visual person, so having those things italicized when there shouldn't be ... I mean, I might not be able to tell you what the cite should be, but I can tell you if you have an italicized comma that you shouldn't have.

Lee Burgess: Totally. Now, one of the other common things that you do with citations is not just cite the whole entire case name, but you want to cite to a specific page in the opinion, and this is called a pin cite. This tells you where within the case to look at. A cite with a pin for this case would have the same case name, comma, 558 U.S. 310, comma, 311 if you were looking on page 11, and then 2010. You have to make sure that there's a comma between the page number that the case starts on and the page number of the pin cite, so that people know that they're two different numbers, and that that's ... the 311 number is where they're going to find whatever you're specifically citing to.

Alison Monahan: Yeah, and then you have to be careful about things that go over pages and I don't even remember the rules for that, but there are rules.

Lee Burgess: Yeah, if it's 311 to 312.

Alison Monahan: Say you left some stuff out, it gets kind of complicated to pin. But just look it up.

Lee Burgess: Look it up. All right, so to end the pain of listening to us cite to cases, let's review what we've learned from this exercise. What I learned when I started to put this exercise together was, I had somewhat blocked out how many tedious rules there are for even what I would consider a [very straightforward cite](#), and I would consider this a very straightforward cite.

Alison Monahan: Yeah, it does not get more straightforward than citing to a U.S. Supreme Court case.

Lee Burgess: Yes. I also think that citations can take a long time. I mean, granted, we were kind of bantering about it, but you still have to go through and look all of this stuff up. Citations are time consuming, and you need to allocate time to them on your assignments so you don't run out of time and miss this very important work.

Alison Monahan: Yeah, absolutely. I mean, in this, we haven't even really touched on short citations or ids and things like that, because again, there are very specific rules about, say you cite a case and then you refer to it 12 times. Every single one of



those times, you may or may not be able to use a reference back to it. It depends on how long ago you cited it, how many things were in between, all these things. You just need to understand what the rules are because you might think, "Oh, well, I'll just do a full citation each time. That'll make me look really diligent." No, it doesn't.

Lee Burgess: Right, because then you're not following the rules.

Alison Monahan: Yeah, you're not following directions.

Lee Burgess: Yeah, and if you're new to law school or new to legal writing, I think another thing to remember is, you might listen to us pontificating about this and say, "How many times am I going to cite in a legal writing assignment?" And the answer is, almost every sentence is going to have at least one cite.

Alison Monahan: Yeah, you need evidence for basically everything you're saying. And it might be that ... you know, you might not be citing just the cases. You might be citing to the records. If you're doing your statement of facts, for example, you have to tell us where those facts came from. You don't get to just say it.

Lee Burgess: Yep. It's like almost everything you say in a legal writing is either some reference to somewhere else, or it is at least pulled from somewhere else. Like you said, if you're laying out facts, where do those facts come from? They don't want to just trust you that you know the facts.

Alison Monahan: Right, and you might be citing statutes, you might be citing sources from the internet. You might be citing articles. All of these things. How do you cite a magazine article? Well, that's in the Bluebook.

Lee Burgess: Right. It's true.

Alison Monahan: How do you cite a website? That's in the Bluebook. So you've literally got to look up basically every single thing.

Lee Burgess: Yeah, exactly. And we have a great blog post that we'll link to in the show notes on the [anatomy of case citations](#). If this has really boggled your mind and made you more confused than you were before, I think that checking out that blog post can help walk you through this as well. But you know, become friendly with your Bluebook. And if you are really running into issues before you're working on your legal writing final, go to your professor and try and get some help on navigating the Bluebook to get more comfortable with it, because you don't want to be realizing that you're having some troubles at the night that you're editing your citations.



Alison Monahan: No, do not do that. Typically in legal writing, they're going to hand you out some sort of document to help you navigate this, but you might get that the first week and never look at it.

Lee Burgess: Right.

Alison Monahan: That is not a good idea.

Lee Burgess: Yeah. If you are getting ready to do a legal writing assignment, Alison, what are some tips that we can share to keep your citations up to snuff and make sure that you have enough time to do all of this work?

Alison Monahan: Well, I think the key here really is just getting organized. We've talked about before you even start working on this assignment, you can make the Bluebook easier to use by putting your tabs and that kind of thing. Me, I'm just kind of [getting familiar with it](#). I mean, it sounds dorky, but go get a coffee and sit in the coffee shop for an hour and just kind of see what's in the book. I think that will really pay dividends later on, because you're going to be like, "Oh, I do remember there was a section ..." You don't have to read it. Just kind of flip through it, and making some type of document, whether it's a spreadsheet or a Word document or whatever it is, where you perfect all the different versions of a footnote.

In our case, we might have, this is the in-text version. This is the first footnote version. This is a short format version. In-text or footnotes, I can't even remember if you can use them in text. Don't quote me, but figure out what that rule is and just have those ready to go so that when you cite this case, you don't have to be thinking about it. And if you can make sure those are perfect, that's going to go a long way towards getting you to the point you need to be at.

Lee Burgess: Yeah, agreed. I also think that you need to set up time to look up the citations-

Alison Monahan: Yes.

Lee Burgess: ... for all of the sources referenced in your assignment. If this stuff really makes your eyes want to cross, then break up this work and don't do it for like a three hour block.

Alison Monahan: Right.

Lee Burgess: That could be too much. Some students may just take an hour to start working on the citation document that we've been talking about that they're going to reference in their paper, but again, if you only have so much patience for this stuff, do it for like an hour and then come back to it later. But don't get



complacent and lose that attention to detail, because you're going to pay for that in the points on your paper.

Alison Monahan: Yeah, and sometimes people think, "Oh, there are these online tools that I can just run my citations through to make sure they're perfect." A, that is a high likelihood you might be cheating, so you want to make sure that that's actually allowed by your legal writing professor, and B, those are not necessarily totally accurate. You know?

Lee Burgess: Right.

Alison Monahan: You can't rely on those things.

Lee Burgess: And as much as this stuff is tedious, like we said I think earlier in the podcast, when you do a lot of these, you get pretty good at them.

Alison Monahan: Yeah.

Lee Burgess: And so, it gets easier. This is the beginning of your legal writing career is probably the worst that it's ever going to be.

Alison Monahan: Yeah, and then you definitely get better. I feel like during my first year, I definitely was not that competent, but then within a few weeks of starting law review, where all you do is check citations, you're like, "Oh, okay, I get this. It's not that complicated."

Lee Burgess: Yeah. When I was editing the law review, when you're reading every single article and you're checking every single footnotes, you start to notice the italicized commas, and you notice where people make those common mistakes. It becomes a lot easier than if I was doing footnotes on one of my own assignments, I was incredibly fast. I'm just a little rusty. It's been a while.

Alison Monahan: Yeah, exactly. You forget all these rules. I think it's also important to set aside time once you've completed, say, a first draft of your assignment to really proofread just for citations and formatting. In fact, I know this is true because my moot court partner had not done this, and he had done a brilliant brief or whatever. And for whatever reason, at two in the morning the night before this was due, he decided to do a quick citation check and did a find and replace of something that somehow messed up his entire document-

Lee Burgess: Oh my gosh.

Alison Monahan: ... and he was literally up all night trying to ... It was something insane, like it had taken out all the periods or something. It was just one of those things where we



were like, how did this even happen? So do not be doing this at 2:00 AM the night before it's due.

Lee Burgess: No. I have heard some people, what they will do is they will do full citations for every cites in the document until it's finalized, and then they will go in and do the short cites based on that, because one of the other things that is easy to trip up is that you reorganize the paper after you've done a lot of these citations, and then your short cites and your full cites become out of order. That can be problematic, so another trick that can be done is if you only do full cites throughout the paper, and then when you go back to do your proofreading version, you can say, "Okay, there's my full cite. One, two, three ..." I think it's like five short cites.

Alison Monahan: Yeah, I think it's five you get, yeah.

Lee Burgess: And then you're like, "Okay, now I've done that. Okay, then I can replace those by copy and pasting from my short cite that I've proofed in the other Word document." But reorganizing the paper can totally mess things up quickly.

Alison Monahan: Yeah, I think that's a good idea in general. I mean, definitely we would do that sometimes writing stuff in practice. Because you just don't know, you know? Somebody might come in at the last minute. A partner might suddenly decide to read this and start reorganizing sections, and you don't want to have your cites be ... Because if it just says id, you're like what is that an Id. to?

Lee Burgess: Right, exactly. It's like the phantom Id.

Alison Monahan: Yeah, you're like, "Does anyone have any idea what case we were citing here?" That's a disaster.

Lee Burgess: Right, and if you don't know what id is yet, it just basically means "see above". The thing before.

Alison Monahan: The thing before. But if there's no thing there, you've got a problem.

Lee Burgess: Yeah, you've got a problem. I also think that just coming up with some sort of method to keep this clean makes sense. Decide that you're going to do all the full cites first, and then just stick to that. Because what you don't want to be doing is deciding how you're going to do it late in the game, and redoing work. Also-

Alison Monahan: Yeah, you want to have a process.

Lee Burgess: Yeah. Also, and I know that sometimes now with technology, it's possible to do this; save some actual versions of your paper, because-



- Alison Monahan: Yes, please.
- Lee Burgess: ... like your story, Alison. If he'd had a backed up version before he had done that
- Alison Monahan: Yeah, we had this conversation.
- Lee Burgess: I'm sure you did.
- Alison Monahan: I was just like, "I'm sorry, what?" Well, I think he actually, the next morning, I had the latest copy that he'd printed for me or something, and he was like, "I need that back. Here's what happened." I was like, "Oh my God, I cannot believe this."
- Lee Burgess: Yeah, so it's-
- Alison Monahan: Luckily he didn't call me at three in the morning to ask.
- Lee Burgess: Yeah. Saving versions at the end of a day, or if you're working on this throughout the day, save a version at lunch. Save a version late in the day. Can do wonders. It's totally worth it.
- Alison Monahan: Yeah, things happen. And print it occasionally, just in case.
- Lee Burgess: Yeah. Yeah. Because hard drives crash, so save to Dropbox or some other cloud software.
- Alison Monahan: Yeah, just think ... I think the key point to take away is, think how you're going to do this and think about what's going to make it most efficient for you, and then do that. Don't just make it kind of scattershot of, "Well, I'll figure out the citations at the end." Think through this beforehand, and it's going to go a lot better.
- Lee Burgess: Yeah. One last thing about proofreading is, I think that especially if you're someone who struggles with proofreading, doing an entire citation proofread of an assignment before you turn it in is very important, and I would get a ruler or a piece of paper and really go line by line, because I think one of the things that can happen when students are proofing citations is it's super boring, and you start skimming, and you have to slow yourself down to get that attention to detail, especially if you're tired. So, that's one thing I would also recommend. Go old school, kind of like you did when you were learning how to read with the ruler, going line by line, but there's reason why you did that in elementary school; because it was to slow you down and keep you focused.



- Alison Monahan: Yeah, sometimes I've seen people in firms even read from the bottom of the page up with a piece of paper covering the rest of it. Anything you can do to just kind of make you focus on this stuff, which is very tedious, is going to help.
- Lee Burgess: Yep. All right, well, with that, I don't even know if we have any more to say about the Bluebook, but I think we're out of time.
- Alison Monahan: Well, I mean, literally we've talked about one type of citation.
- Lee Burgess: I know.
- Alison Monahan: We could do an entire week on this.
- Lee Burgess: I don't really know if our listeners want a week of it. But we'll see.
- Alison Monahan: No, just ask your legal writing professor.
- Lee Burgess: Exactly. If you enjoyed this episode of the [Law School Toolbox podcast](#), please take a second to leave a rating and review on your favorite listening app. We'd really appreciate it, and be sure to subscribe, so you don't miss anything. If you have any questions or comments, please don't hesitate to reach out to Lee or Alison at Lee@LawSchoolToolbox.com, or Alison@LawSchoolToolbox.com. Or, you can always contact us via our website [contact form](#) at LawSchoolToolbox.com. We love suggestions for topics for the podcast. We just got a couple of those recently, and they are on our Trello board where everything is – our topics to discuss. So, if you've got questions that you'd like us to talk about, please send us an email. Thanks for listening, and we'll talk soon.

RESOURCES:

- [Why Citations are Important and Should Not be Ignored](#)
- [Buying the Bluebook: Spiral-Bound or Online?](#)
- [What Signals are Your Signals Sending?](#)
- [The Anatomy of a Case Citation](#)
- [Warby Parker](#)
- [Bluebook Oddities: 10 Unlikely Citations](#)
- [How to Get Answers from the Bluebook](#)