

# *Washington Law Review Style Guide*

## I. GENERAL GUIDELINES

### 1. Using this Style Guide

This style guide includes matters not covered by the main authorities used by *WLR*, as well as some matters covered by those sources that arise frequently. While non-exhaustive, this style guide supersedes any conflicting rules in other authorities. Otherwise, consult authorities as follows:

For citations: *The Bluebook: A Uniform System of Citation* (21st edition).

For style: *The Redbook: A Manual On Legal Style*, Bryan Garner's *A Dictionary of Modern Legal Usage* (4th edition), and *The Chicago Manual of Style* (17th edition), in that order.

For usage: *Black's Law Dictionary* (11th edition), Bryan Garner's *A Dictionary of Modern Legal Usage* (3d edition), and *Webster's Third New International Dictionary*, in that order.

### 2. Reference to *Washington Law Review*

Refer to this journal as *Washington Law Review*, *Law Review*, or *WLR*. Use italics, and do not precede the name with "the."

### 3. Headings

#### (a) Paper Headings

Capitalize all Roman numeral headings and keep them to two or fewer lines. Note that margins are narrowed for publication, so headings drafted in wide margins will often spill onto additional lines when re-formatted.

Italicize all other headings and keep them to three or fewer lines. Do not end headings with periods. For all headings, follow *Bluebook* Rule 8 and *Redbook* § 2 governing capitalization.

IV. MOUNT VERNON INAPPROPRIATELY RELIED ON LEGAL RULES PROPAGATED BEFORE THE GROWTH MANAGEMENT ACT

A. *The Court Erroneously Displayed a Traditional Aversion to Mixed-Use Zoning*

#### (b) Headings to Advance Argument

In the analysis section (not necessarily the background section), use headings to advance the Article's argument and the section's thesis.

B. *The Court Relied on Outdated Case Law and Failed to Reconcile the Comprehensive Plan and Development Regulations*

1. *The Court's Failure to Clarify Case Law Represents a Missed Opportunity*

*2. The Growth Management Act Indicates that Comprehensive Plans Can Be the Exclusive Basis for Some Permitting Decisions*

NOT: *2. The Growth Management Act*

(c) Case Names in Headings

In headings, do not italicize case names when the heading is otherwise italicized. Keep the “v.” lower case, even in an otherwise small caps title.

V. *HIRST V. ECOLOGY DID NOT WARRANT THE “HIRST FIX”*

A. *The Court Correctly Interpreted Roe v. Wade*

(d) Capitalization in Headings

Within headings, capitalize the following words: the initial word, the word immediately following a colon, and all other words **except** articles (a, an, the, etc.), conjunctions (and, but, nor, or, yet, etc.), and prepositions of four letters or fewer (as, at, by, down, for, from, in, of, on, onto, over, per, to, with etc.). See *Bluebook* Rule 8(a) and *Redbook* § 2.10:

Do not capitalize: and, to, on, up, the, a, off, with, in, for, that

Capitalize: Be, any conjunction or preposition that is five letters or more (About, etc.)

Special note about capitalizing “that” in headings:

1. if acting as a pronoun, it is capitalized (as in: “*That* is the one!”)
2. if acting as an adjective, it is not capitalized (as in: “It’s *that* one.”)
3. if acting as a conjunction, it is usually not capitalized (as in: “I think *that* I know which one it is.”)

#### 4. Audience

For students publishing in *Washington Law Review*, write for a general audience of law trained readers. Explain and define any terms of art, technical language, or concepts particular to a specialized area of law. Examples include intellectual property, water appropriation, military tribunals, etc.

#### 5. Formatting

(a) No Auto-Formatting

**Turn off auto-formatting before writing or editing in Microsoft Word.** See the Appendix for instructions on how to do this. For example, superscript ordinal numbers should not appear.

9th Cir.

NOT: 9<sup>th</sup> Cir.

(b) Emphasizing Words in Text

Use italics to emphasize text, not boldface or underlining.

(c) One Space Between Sentences

Use one space between sentences. This rule applies even to quoted sentences that use two spaces. Do not use brackets to indicate an omitted space between quoted sentences.

(d) Latin and Foreign Phrases – *Bluebook* Rule 7

In text, most Latin and foreign words and phrases should not be italicized. Please note that below the line there may be different rules, including for case names (*see Bluebook* Rules 2.1(a), 7, 10, and the ME Example Document).

stare decisis

NOT: *stare decisis*

(e) Notes, Comments, and Articles

Capitalize “Note,” “Comment,” or “Article” when referring to the professional or student piece.

This Comment argues . . .

This Note examines . . .

(f) Footnote Formatting

Footnotes associated with acknowledgments and disclosure statements come first below the line. Mark these with an asterisk.

(g) Cross-Referencing to “Parts” of the Article or Comment

Refer to subdivisions of Articles and Comments as either “Parts” or “sections.” Parts are the main headings of the piece, introduced by Roman numerals (II, V, etc.). Sections are the subdivisions of the piece (I.B.1, IV.A, etc.). In text and in footnotes, use a non-breaking space between the word Part/section and the number.

Always refer to a “section” and never “subsection.” Separate all subdivisions and Roman numerals or numbers with a non-breaking space. ***WLR* departs from *Bluebook* Rule 3.5 in that we lowercase the word section.**

section XI.A

Part VII

For cross-references in the footnotes, refer to Parts or sections. Connect headings and sub-headings with periods.

Part II of this Article focuses on the aspirational aspects of the statute . . .

<sup>23</sup> *See infra* Part II.

<sup>24</sup> *See infra* section II.B.2.

For information on using *id.* with cross-references see the ME Example Document and see generally *Bluebook* Rules 3.5, 4.1, 4.2, 15, and 16.9.

(h) Table and Figure Naming

Label information included in tables or figures should be labeled as such where appropriate. For example, label all tables numerically as “Table 1” through “Table #” and all figures as “Figure 1” through “Figure #.”

## 6. Disclosure Statement

If professional and student authors have a prior/current work affiliation or material interest that could be reasonably seen to influence their work, the author must provide a disclosure statement, included in the footnote attached to their name. Such authors should disclose all interests that are material to the main topics of their piece, as well as all interests that could be reasonably seen to significantly influence their work.

## II. LANGUAGE

### 1. Acronyms

(a) Acronyms and Initialisms

An acronym is a word formed from the initial letter or letters of each of the successive parts or major parts of a compound term, such as “NATO” or “NASA.”

An initialism is an abbreviation made of initial letters pronounced separately, such as “U.S.” or “FBI.”

In other words, acronyms (e.g., NATO) are read as words, while initialisms (e.g., E.U.) are read as a series of letters.

(b) Use of Acronyms

Use acronyms sparingly. In acronym-heavy pieces (like those discussing administrative law), consider re-introducing unusual acronyms with the full term in new sections.

(c) Acronym and Initialism Format

Abbreviate acronyms with capital letters. Introduce acronyms in parentheses, with no periods or quotation marks.

The United Nations Children’s Fund (UNICEF) is a United Nations agency responsible for providing humanitarian and developmental aid to children worldwide. UNICEF is best known for . . .

The Environmental Protection Agency (EPA) enforces regulations for dump sites. By doing so, the EPA . . .

Some initialisms use periods, e.g., “U.S” and “U.N.”

The U.S. law regulating business entities . . .

(d) Article Usage – *Chicago Manual of Style* Rule 15.9

When an abbreviation follows an indefinite article, the choice of “a” or “an” is determined by the way an abbreviation would be read aloud.

An HMO

A UFO

Typically, “the” is not used in front of acronyms but is for initialisms.

The members of NATO rejected the idea.

The RCMP investigated the crime.

## 2. Adverbs

(a) Adverbs in Argument

Avoid weak adverbs like “clearly” and “obviously.”

(b) Adverb Placement

Properly place adverbs to modify the intended word.

“I only want to take four classes next quarter.”

The person wants to take four classes next quarter; she does not want to go swimming, take piano lessons, or really do anything else besides her four classes.

“I want to take only four classes next quarter.”

The person wants to take four classes next quarter; she feels strongly against taking five classes.

## 3. Commonly Misused Words

(a) Who v. Whom

“Who” is the subject of a sentence, clause or phrase. (Generally, “who” is the appropriate word if a subject pronoun such as “I,” “we,” or “she” would sound correct in a similar sentence.)

The woman who rented the car drove away. (She rented the car.)

Who is there? (They are there.)

“Whom” is the object of a verb or preposition. Use “whom” if an object pronoun such as “me,” “us,” “her,” or “him” would sound more natural. Consider re-wording if the sentence sounds pretentious.

The woman to whom I spoke said she would arrive soon. (I spoke to her.)

Whom do you wish to see? (I wish to see them.)

(b) Which v. That

Use “which” (following a comma) to introduce nonessential information. Use “that” (with no accompanying comma) to introduce essential information.

Jo will repeat the course that she failed.

NOT: Jo will repeat the course which she failed.

The university will offer the course that Jo failed, which Professor Smith taught, again next year.

NOT: The university will offer the course which Jo failed, that Professor Smith taught . . .

(c) Since v. Because

Use “since” only when referring to a time span. Use “because” to mean “as a result of.”

Since 1945, federal policy has been . . .

However, because the amendment does not apply to certain industries . . .

NOT: However, since the amendment does not apply to certain industries . . .

(d) Over v. More

Use “more,” not “over,” to describe a certain time span.

I have known Sarah for more than five years.

NOT: Titus covered the story for over seventy months.

(e) Fewer v. Less

Use “fewer” to refer to items that can be counted. Use “less” to refer to items that cannot be counted in units or are intangible.

Your paper should be ten fewer pages in length.

I feel less love for law school today than I felt yesterday.

I have less flour for baking.

I have fewer bags of flour in my pantry after baking cookies.

(f) Per v. A

Do not use “a” in place of “per.”

three examples per sentence

NOT: three examples a sentence

(g) Ensure v. Insure

Use “ensure” to refer to “guarantee” in the general sense. Use “insure” to refer to indemnification against loss for consideration (usually monetary).

(h) Case Law

“Case law” is two words, not separated by a hyphen.

(i) Argue v. Claim

Lead opinions do not “argue.” They “hold,” “reason,” etc. Similarly, courts do not “claim.” They “state.”

(j) Find v. Hold

Courts generally make findings of fact and holdings or conclusions of law. Use “find” to refer to findings of fact. Yet this can get mushy: whether the evidence supports a jury’s finding of fact is itself a legal conclusion. Use your judgment.

The lower court found that pollutants discharged from the defendant's treatment plant reached the ocean through groundwater. In *Maui*, the Supreme Court held that the plant’s owner must seek an EPA permit before emitting the pollutant.

Additionally, when courts affirm or reverse, they are affirming or reversing a judgment. Holdings are not affirmed. For example, a judgment could be affirmed even if the court disagrees with the lower court's holding.

(k) Dissents and Concurrences

Dissents and concurrences do not make holdings, only majority opinions do. Inform the reader when discussing a dissent, concurrence, or plurality opinion to avoid mischaracterizing the holding.

#### 4. Conjunctions

(a) However and Therefore

“However” and “therefore” are not coordinating conjunctions and cannot be used with commas to join two independent clauses that could stand alone as sentences. Both should be used sparingly. When introducing an independent clause, both words may only follow a period or semicolon.

The trial court held that the statute was constitutional; however, the appeals court reversed.

The trial court held that the statute was constitutional. The appeals court, however, reversed.

NOT: The trial court held that the statute was constitutional, however, the appeals court reversed.

#### 5. Language and Identity

(a) Gender-Inclusive Language

1. WLR requires gender inclusive language.

2. Gender Inclusive Pronoun Use

- i. When referencing an individual whose gender is not specified, relevant, lies outside of the binary, or is unknown, use they/them or other pronouns, remove the pronoun from the sentence, or repeat their name.

1. **Do not use** he as a universal pronoun, nor binary alternatives he/she, he or she, or (s)he.

- ii. If the person to whom the author is referring to uses they/them or other pronouns, use those pronouns as she/her or he/him pronouns would be used. Examples:

1. They/them, ze/zie/zim, or other pronouns can be used as a singular pronoun.

- a. **Biased:** A person should enjoy **his or her** vacation.
- b. **Improved:** A person should enjoy **their** vacation.
- c. **Improved:** A person should enjoy **zir** vacation.

2. Omit unnecessary pronouns

- a. **Biased:** **He** believes the claim lacks merit.
- b. **Improved:** **The client** believes the claim lacks merit.
- c. **Biased:** A judge must set aside **her** personal biases
- d. **Improved:** A judge must set aside personal biases.

3. Pluralize pronouns
    - a. **Biased:** A judge must set aside **her** personal biases.
    - b. **Improved:** Judges must set aside **their** personal biases.
  4. Make subject substitutions
    - a. **Biased:** The **stewardess** helped me to my seat.
    - b. **Improved:** The **flight attendant** helped me to my seat.
  5. For more examples
    - a. Please visit the Inclusive Language page of the Washington Law Review’s website.
    - b. MIT also has an excellent Editorial Style Guide with many examples. We encourage you to review it at: [http://web.mit.edu/comdor/editguide/style-matters/gender\\_neutral.html](http://web.mit.edu/comdor/editguide/style-matters/gender_neutral.html)
3. Gendered Nouns (e.g., nouns ending in -man)
- i. Please avoid using gendered nouns unless in a direct quote. Seek substitutes where available.
    1. **Example:** Star Trek contemporary films changed “where no **man** has gone before” to “where no **one** has gone before.”
    2. Examples of gendered nouns and alternatives
      - a. Man→person, individual
      - b. Mankind→people, human beings, humanity
      - c. Common man→average person

(b) Identity-Based Descriptions:

When using identity-based descriptors like race, ethnicity, and sexual identity, precisely describe the person or group with deference to the subject’s preferred designation(s).

1. Do not nominalize identity-based descriptors; use them as adjectives.

Use identity-based descriptors as adjectives, not nouns (e.g. “people who are gay,” not “the gays”). Authors may deviate from this standard **only** when directly quoting from a source. When editing, bring such deviations to the attention of the Diversity & Inclusion Chair and the Chief of Articles, Online, or Notes & Comments (whichever is relevant).

2. Be cautious of normative characterizations of Disability, Race, Ethnicity, etc.

Please be cognizant of the use of normative descriptions. References to norms, even seemingly neutral descriptors such as “handicapped individuals” may reinforce divisions and stereotypes. If a norm has been formally defined by government institutions, communities, or other organizations, include a citation where possible.

When referring to groups characterized by disability, race, ethnicity, or any other affinity group, be sensitive to community and/or author-specific preferences.

Be aware of the significance of capitalization. For example, Deaf vs. deaf (where the former indicates membership in the Deaf culture and community) and Black vs. black. See the [Center for the Study of Social Policy](#).

When in doubt, research and/or ask!

1. Terminology constantly evolves. Engage in best practices by researching and asking for individual preferences where possible. Suggested resources: the [Conscious Style Guide](#) and the [Diversity Style Guide](#).
2. Some groups have established their language preferences. For example, the National Federation for the Blind has long advocated for identity-first language, preferring “blind person” over the person-first constructions like “individual with blindness” or “person who is blind.”
3. **Group preferences are not always individual preferences!** For example, individual preferences differ in respect to being referred to as indigenous vs. American Indian vs. Native American vs. tribe name vs. clan and so on.

## 6. Pronouns

### (a) Pronoun-Antecedent Agreement – *Redbook* § 11.10

Pronouns and their antecedents (the words they replace) must agree.

The jury rendered its verdict.

NOT: The jury rendered their verdict.

When two or more singular antecedents joined by *and* refer to the same thing or are modified by *each*, *every*, or *no* then the pronoun is singular.

The district attorney and the defense counsel announced that they were ready for trial

Every firm and bar association is required to have its attorneys take continuing-education courses.

A pronoun that refers to two or more singular antecedents joined by *or* or *nor* is singular.

Neither the prosecution nor the defense had its case ready for trial.

If antecedents of mixed number are joined by *or* or *nor*, the pronoun should agree with the closest antecedent. Put the plural antecedent last, if possible.

If you find my pen or my keys, bring them to me.

Avoid using a pronoun before its antecedent.

Because the plaintiffs were afraid of the expense and the uncertain outcome, they agreed to the settlement.

NOT: Because they were afraid of the expense and the uncertain outcome, the plaintiffs agreed to the settlement.

### (b) Collective nouns – *Redbook* § 11.10 (j)

If the action or state expressed by the predicate is collective then the pronoun is singular. If each member is acting separately, the pronoun is plural. If the object is uncountable then the pronoun is singular. Single entities are singular.

The crowd rose to *their* feet as the player scored.

The team gave *its* all in the game.

Some of the sugar fell out of *its* bag. (sugar is uncountable)

Some of the marbles fell out of *their* bag. (marbles are countable)  
The jury gave *its* verdict.  
The United States cherishes *its* democracy. (single entity)

## 7. Verbs

### (a) Passive Voice and Active Verbs

Avoid passive voice. Instead, use active verbs to make writing clearer, stronger, and more succinct.

The Court held X.

NOT: It was held by the Court that X . . .

The Law Review will publish that article in the fall book.

NOT: That article is going to be published by the Law Review in the fall book.

### (b) Subject-Verb Agreement

Subjects and verbs must agree. Singular subjects require singular verbs and plural subjects require plural verbs. Pay attention to possible mistakes when a clause separates subject from verb.

Evidence of the defendants' motives proves that they committed the crime.

Amendments five and fourteen guarantee due process of law.

### (c) Tenses

When the Article refers to itself, use the present tense.

This Comment argues . . .

NOT: This Comment will argue . . .

## III. PUNCTUATION

### 1. Apostrophes

#### (a) Possessives – *Redbook* § 7.11

For both singular and plural nouns not ending in *s*, 's forms the possessive.

the alumni's contributions, the children's toys, the ship's route

For plural nouns ending in *s*, only an apostrophe is added.

states' rights, books' titles

For singular nouns and singular proper names ending in *s*, 's is added.

the witness's testimony, Congress's action

Based on conventional usage, for some ancient multisyllabic names only an apostrophe is added.

Jesus', Moses', Socrates'

(b) Possessive Pronouns

Possessive forms for pronouns do not include apostrophes.

ours, mine, yours, hers

(c) Omitted Letters or Figures

Use apostrophes to indicate the place of omitted numbers or figures.

“rock and roll” becomes:

rock ‘n’ roll

“the class of 1962” becomes:

the class of ‘62

(d) Contractions v. Possessives

Do not use contractions.

Cannot

NOT: Can’t.

“It’s” is the contraction form for “it is.” “Its” is the possessive form of “it.”

It’s going to be sunny today.

Look at that plant; its flowers are in full bloom.

(e) Joint Possession

If ownership is joint, use a possessive form for only the last word. If objects are individually owned, use a possessive form for both words.

Joint ownership: Jim and Kim’s apartment

Individual ownership: Jim’s and Kim’s apartments

(f) Years

Do not include apostrophes for dates.

In the 1800s

NOT: In the 1800’s

**2. Capitalization** – See *Bluebook* Rule 8, *Redbook* § 2

(a) Titles and Offices

Capitalize military, religious, and professional titles when they immediately precede a personal name.

President Clinton

General Colin Powell

Princess Diana

Cardinal Smith

Capitalize titles when they precede more than one personal name and refer to both.

Doctors Jones and Rogers

Mayors Walker and Charles

Titles, following a personal name or used alone, are generally lowercased.

The congressman from Oregon

The chief justice of the United States Supreme Court  
The secretary of state  
John Doe, mayor of Boise, Idaho  
The mayor  
But: Mayor John Doe

(b) Court Titles – *Bluebook* Rule 8(c)(ii); *Redbook* § 2.12

Capitalize references to “the court” only when referring to the full name of a court, the specific name of a court, the court as a proper noun (e.g., “the *Lochner* Court”), or the highest court in any jurisdiction (once it has been identified) whether it is the United States Supreme Court or a state supreme court.

California Supreme Court  
The state supreme court held . . .  
The United States Supreme Court = the Court OR the United States Supreme Court  
The Ninth Circuit Court of Appeals = the court of appeals OR the Ninth Circuit  
The Supreme Court of Washington = the Court OR the state supreme court

Supreme Court of Washington

Refer to the Supreme Court of Washington as either the Washington State Supreme Court or the Supreme Court of Washington. If previously identified, it can be referred to as “the Court.”

NOT: Washington Supreme Court

(c) Short-Form Proper Nouns – *Redbook* § 2.7

**Full and short names:** When referring first to a full name and then a shortened name (which is a common noun but refers to a specific governmental entity or officer, or to a corporate entity), capitalize the common noun.

The Seattle School District did not respond to Ms. Smith’s concern. The District . . .

**Specific governmental acts:** When referring to a specific governmental act that contains one of the words enumerated in *Redbook* § 2.7(b), and the word is used as a short form on a subsequent reference, capitalize the word.

List of Specific Governmental Acts to capitalize: “Act,” “Amendment,” “Article,” “Bill,” “Charter,” “Code,” “Doctrine,” “Ordinance,” “Pact,” “Proclamation,” “Regulation,” “Report,” “Resolution,” “Statute,” “Survey,” and “Treaty.”

(d) Adjectives Formed From Proper Nouns – *Redbook* § 2.8

**Exclusively proper nouns:** Capitalize adjectives derived from words that exist only as proper nouns.

American, Holmesian, Marxist

**Nonexclusive nouns:** When a word does not exist exclusively as a proper noun, the adjective derived from it is lowercase.

congressional (*but* Congress), constitutional (*but* U.S. Constitution)

(e) Web and Internet

Lowercase “web” and “internet” (except when beginning a sentence or using them in a title).

### 3. Colons

(a) Introducing Lists or Text

Use a colon at the end of a sentence to introduce lists or text.

They considered three factors: time, expense, and feasibility.

A colon cannot be used for this purpose unless preceded by a complete sentence.

They wanted to get three items: milk, cheese, and cookies.

NOT: They wanted: milk, cheese, and cookies.

A colon can be used for emphasis.

She had only one concern: grades.

*WLR* leaves the decision to capitalize following a colon to Author preference.

### 4. Commas

(a) Essential Clauses

An essential clause is one that cannot be eliminated without changing the meaning of the sentence. Do not separate an essential clause from the rest of the sentence with a comma.

Authors who do not proofread their papers should not criticize their editors.

(b) Nonessential Clauses

A nonessential clause can be eliminated without changing the basic meaning of the sentence. Separate nonessential clauses from the rest of the sentence with commas.

Authors, who want their articles carefully proofread, usually benefit from the help of editors.

(c) Serial Comma (a.k.a. Oxford Comma)

Use commas to separate words or phrases in a series. Use a serial comma between the conjunction and the last item in a series.

He ordered a hamburger, fries, and a shake.

She wanted to swim, bike, or run.

(d) Independent Clauses

Use a comma between two independent clauses joined by a coordinating conjunction (e.g. and, but, or, nor, for, so, yet). Note that an independent clause must have its own subject and verb, and be able to stand alone as a sentence.

I prefer sushi for dinner, but my friend wants pasta.

We plan to visit Italy, and we would like to see Germany too.

Do not use a comma when the second clause contains no second subject.

I like to study art history but not biology.

I enjoy reading fiction and baking pies.

(e) Introductory Clauses

Use a comma to separate an introductory clause or phrase from the main clause.

When he grew tired of the fast pace of city life, he moved to the country.

Do not use a comma to introduce a direct question, rather, use a colon. **This is a departure from *Redbook* § 2.5(a).**

I need to call my lawyer: What is the number?

NOT: I need to call my lawyer, what is the number?

## 5. Dashes

(a) Em Dash (—) – *Chicago Manual of Style* Rules 6.87–6.92

Use an em dash to set off an amplifying or explanatory element. Commas, parentheses, or a colon perform a similar function, but an em dash provides the most emphasis. Do not use em dashes more than twice in one sentence.

My family—do not ask me why—hates it when I bring my boyfriend over.

His plan took a wrong turn—one that ended up ruining all our lives.

Use an em dash to separate a subject or series of subjects from a pronoun that introduces the main clause.

Money, power, bloodlust—they were motivated by little else.

Do not use an em dash to introduce a direct question. Use a colon for this purpose. **This is a departure from *Redbook* § 2.5(a).**

It makes you wonder: how can the State prove intent?

NOT: It makes you wonder—how can the State prove intent?

(b) En Dash (–) – *Chicago Manual of Style* Rule 6.83

Use an en dash in place of “to” to indicate a range, such as a page range. However, when “from” precedes the first element, “to” should be used to precede the second element.

225–50 (to indicate pages 225 to 250)

Green Bay beat Denver 31–24.

Her college years, 1998–2002 . . .

BUT: From 1998 to 2002 . . .

In Microsoft Word, both em dashes and en dashes can be found under “Insert/Symbol/More Symbols/Special Characters,” as the first two entries. See the Appendix below for instructions on how to insert them.

*See also* entry on “Hyphens” and *WLR* Style Guide Rule IV(1)(d) on “Pinpoints.”

## 6. Ellipses—*Bluebook* Rule 5.3 and the ME Example Document

### (a) Indicating Omissions – *Bluebook* Rule 5.3

Ellipses should be used to indicate material omitted from direct quotes. When omitting words from a **single** sentence, ellipses consist of **three** periods, with non-breaking spaces **around** each period. Non-breaking spaces are made in Microsoft Word (for PCs) using <shift/ctrl/space>; in Microsoft Word (for Macs) using either <shift/ctrl/space> or <option/space>. Press the ¶ symbol in the top tool bar to see non-breaking spaces indicated with a circle, and breaking spaces indicated with a filled-in dot.

...

NOT ...

The court reiterated its position that “responsibility . . . should be evaluated based on a reasonable person standard.”

An ellipsis indicating omission of matters before or after a quotation is not needed when the quoted material is used as a phrase or clause. *Bluebook* Rule 5.3(a).

The court held that because the light was green, he was “not guilty.”

NOT: The court held that because the light was green, he was “not guilty . . . .”

An ellipsis indicating an omission of the end of a quoted sentence is needed when the quoted material is used as a full sentence. *Bluebook* Rule 5.3(b)(iii). Indicate the omission by inserting an ellipsis between the last word being quoted and the final punctuation of the sentence (with non-breaking spaces).

“National borders are less of a barrier to economic exchange . . . .”

“Why, then, are certain scholars advocating less . . . .?”

When the quote omits material after the end of a quoted sentence and continues with further quotation a sentence or more later, retain the punctuation following the first sentence then insert an ellipsis before the start of the later sentence. *Bluebook* Rule 5.3(b)(v).

#### **Example:**

**Full quote:** Under the authority of Art. II, § 2, Congress has vested in the Attorney General the power to conduct the criminal litigation of the United States Government. It has also vested in him the power to appoint subordinate officers to assist him in the discharge of his duties. It is also established that, in creating offices in the executive branch and in creating independent agencies, Congress has considerable discretion in statutorily limiting the power to remove of the President or another appointing authority.

**Quote in the Article:** “Under the authority of Art. II, § 2, Congress has vested in the Attorney General the power to conduct the criminal litigation of the United States Government. . . . It is also established that, in creating offices in the executive branch and in creating independent agencies, Congress has considerable discretion in statutorily limiting the power to remove of the President or another appointing authority.”

If the language at the end and after the end of the quoted sentence is omitted, and followed by further quoted material, **four** periods with non-breaking spaces around **each** are used.

*Bluebook* Rule 5.3(b)(vi).

**Example:**

**Full quote:** Under the authority of Art. II, § 2, Congress has vested in the Attorney General the power to conduct the criminal litigation of the United States Government. It has also vested in him the power to appoint subordinate officers to assist him in the discharge of his duties. It is also established that, in creating offices in the executive branch and in creating independent agencies, Congress has considerable discretion in statutorily limiting the power to remove of the President or another appointing authority.

**Quote in the Article:** “Under the authority of Art. II, § 2, Congress has vested in the Attorney General the power to conduct criminal litigation . . . It is also established that, in creating offices in the executive branch and in creating independent agencies, Congress has considerable discretion in statutorily limiting the power to remove of the President or another appointing authority.”

Per *Bluebook* Rule 5.3(c), when omitting a footnote or citation from a direct quote, do not insert ellipses to indicate the omission. Insert a (footnote omitted) or (citation omitted) in the citation.

## 7. Hyphens

(a) To Separate Characters – *Chicago Manual of Style* Rule 6.82

Use hyphens to separate numbers that are not inclusive, such as telephone numbers and statute numbers, and to separate letters when spelling out words.

1-800-621-2376

A proficient signer can fingerspell C-O-L-O-R-A-D-O in less than two seconds.

*See also* entry on “Dashes.”

## 8. Numerals / Numbers

(a) Spelling Out – *Bluebook* Rule 6.2

Generally, avoid beginning a sentence with a number. If a sentence does begin with a number, spell it out.

Two-hundred years ago . . .

NOT: 200 years ago . . .

Spell out numbers zero through ninety-nine. Use numerals for larger numbers. For very large round numbers, spell out the number.

The nun told the police she had collected ninety-six rosaries.

The detective solved 103 murders.

The hurricane caused three million dollars in damages.

BUT: The hurricane caused \$102,205,436.55 in damages.

(b) Commas in Numerals – *Bluebook* Rule 6.2

Use commas to separate numbers that consist of four or more digits.

Joe read 1,000 pages from a 20,000-page treatise.

(c) Centuries

Spell out particular centuries.

Nineteenth century

NOT: 19th century

The words should be lowercase when used in the middle of a sentence.

She taught elementary school in the nineteenth century.

(d) Percentages

Use the numeral and symbol for a percentage, unless it begins a sentence.

To get an A, students need to attend at least 80% of their classes.

BUT: Sixty percent of students live off campus.

(e) Date Ranges

Where using a range of years, do not abbreviate the first two digits of the end year. Notice the en dash!

Her years as Managing Partner, 2005–2015, were a period of rapid growth for the firm.

## 9. Quotation Marks

(a) Direct Quotations

In body text, use direct quotations only when necessary to quote particular language with significant meaning (such as statutory wording or a case holding) or when it is difficult to convey the same message well in a writer's own words. Writers are encouraged to paraphrase material in the body text. **Writers are more likely to be quoted by others if they use their own words.**

(b) Brackets to Indicate Changes – *Bluebook* Rule 5.2

Place brackets around any wording changes in a direct quotation. Brackets belong around any letter changed from capital to lowercase or vice versa. A bracket can also be used to indicate an omission of letters (omissions of entire words are denoted by ellipses, *Bluebook* Rule 5.3).

The Court held that the defendant “[was] only acting in self-defense.”

The Court held that “[n]o contract exist[ed].”

Justice Jones wrote: “[T]he contract is invalid.”

The Court held that the defendant must “act[] in self-defense.”

(c) Placement of Quotation Marks

Place commas and periods inside closing quotation marks even when the quoted material does not contain the period or comma in that location.

In addition to holding that the defendant did not intend a “true threat,” the Court held that such threats “must be distinguished from protected speech.”

Closing quotation marks, however, precede colons and semicolons.

The judge said the defendant’s trial had been “absolutely prejudiced”; she therefore declared a mistrial.

NOT: The judge said the defendant’s trial had been “absolutely prejudiced;” she therefore declared a mistrial.

(d) Nested Quotations (quotation within quotation) – *Redbook* § 1.29

Use single quotation marks around a quotation within a marked quotation, and use alternate double and single quotation marks for more deeply nested quotations.

The Chapa-Garza court noted that “8 U.S.C. § 1101(a)(43) provides, in relevant part: ‘[T]he term “aggravated felony” means . . . a crime of violence for which the term of imprisonment [is] at least one year.’”

However, if the quote is a direct quote of a quote, then only use one set of double quotation marks. Include a quoting parenthetical subject to *Bluebook* Rule 5.2(e).

Mr. Thompson did not “delegate the conduct of his affairs.” Citation (quoting XXX).

NOT: Mr. Thompson did not ““delegate the conduct of his affairs.”” Citation (quoting XXX).

(e) Block Quotes

For a direct quotation consisting of fifty or more words, single-space and indent on both sides. Do not use quotation marks around a block quote. If the block quote has internal quotations, use double quote marks. Block quotations will be indented 1 inch from the left and right margins. Do not use block quotations in footnotes. *See Bluebook* Rule 5.1(a)(ii).

While the Act offers more job protection than pure at-will employment, it also removes many employees’ common law rights and prohibits compensatory and punitive awards, and therefore may ultimately put workers at a greater disadvantage than they are under current law. The Act offers inadequate protection for many employees and, by limiting employers’ liability, fails to provide incentives for employers to act fairly and lawfully.<sup>46</sup>

## 10. Subdivision Symbols

(a) Section – *Bluebook* Rule 12.9, 6.2(c), 11

Spell out the word “section” in law review text and footnote text, unless referring to the United States Code. In text, capitalize the word “section” only when referring to sections of the U.S. Constitution. The symbol “§” may be used in citations and should be followed by a non-breaking space.

In text: section 1 of the Administrative Procedure Act

In citation: Administrative Procedure Act § 1

U.S. Code in citation or text: 42 U.S.C. § 1983

U.S. Constitution in text: Article IV, section 1

State constitution in text: article I, section 12

(b) Citation to subdivisions

Follow all subdivision references, such as section (“section” and “§”), paragraph (“¶”), part (“Part”), and article (“Art. or “art.”) with a non-breaking space. This links the subdivision reference to the number.

Under *Bluebook* Rule 3.3, Pin cites to sections or paragraphs should not be preceded by “at.”

*Id.* § 3

NOT *Id.* at § 3

HOWARD, *supra* note 10, ¶ 56,230.

NOT HOWARD, *supra* note 10, at ¶ 56,230.

## 11. Semicolons

(a) Joining Independent Clauses

Semicolons can be used to join two closely related independent clauses.

The court had previously found parole evidence inadmissible in such circumstances; the *Sato* decision represented a significant departure from prior analyses.

(b) In Series

Use semicolons to separate items in a series when one or more of the items contains an internal comma.

The court considers such factors as distance from the home; efforts, if any, to screen the area from view; and the type, frequency, and duration of occupation.

## IV. CITATIONS

The following citation rules are not comprehensive. The following sections contain a discussion of footnotes generally and the ways *WLR* departs from the *Bluebook*. Consult the law review and journal section of the *Bluebook* for the full rules and guidance. **Do NOT consult the *Bluebook*'s Practitioners' Notes (“Blue Pages” section in the front).** *WLR* has a separate ME Example Document that provides examples of many *Bluebook* rules.

### 1. Footnotes

(a) Generally

For student authors, a footnote should be used to show support for almost every proposition. Even writers' own thoughts should be grounded in support. Footnotes should be used in every section, with the exceptions of summary paragraphs (which should start with some phrase such as “In sum” to indicate that no new material will be introduced) and conclusions. This means

that footnotes will be used in “roadmap” paragraphs. Internal cross-references can be used on a limited basis when no single authority states the proposition.

(b) Placement in Text

When a case or statute is cited for the first time in the body text, a footnote with the general citation information must follow immediately. **This rule supersedes the five-footnote rule, such that a short cite should never be used following the first mention of a case in text.** Furthermore, a footnote must be placed with the appropriate pinpoint cite at the end of the sentence. For subsequent in-text references to the same case, a footnote directly after the case name is not required.

The Court has repeatedly addressed the issue of contract enforcement.<sup>3</sup> In *Roe v. Joe*,<sup>4</sup> the Supreme Court held that oral contracts could be enforced.<sup>5</sup>

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<sup>3</sup> See *Roe v. Joe*, 837 U.S. 966, 968 (1954).

<sup>4</sup> 837 U.S. 966 (1954).

<sup>5</sup> See *id.* at 972.

The Social Security Act<sup>20</sup> in particular impacts workers’ retirement prospects.

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<sup>20</sup> 42 U.S.C. §§ 401–434 (2012).

Footnote numbers should immediately follow the specific portions of text to which they refer. Each separate idea requires a separate footnote. Footnote numbers should relate to punctuation based on *Bluebook* Rule 1.1(a).

In *Smith v. Jones*,<sup>5</sup> the Court held that the statute was constitutional;<sup>6</sup> it did not violate the interstate commerce clause.<sup>7</sup>

All states require the plaintiff to prove offer,<sup>8</sup> acceptance,<sup>9</sup> and consideration<sup>10</sup>: without each of these elements, there is no valid contract. Some states—like Oregon<sup>11</sup>—make plaintiffs prove each element twice.

(c) No Citation in Body Text

Citations should not be included in the body text of a law review article, unlike in a legal brief. Body text should contain case names, but all citation information belongs in a footnote.

In *Jones v. Wade*,<sup>1</sup> the court held . . .

NOT: In *Jones v. Wade*, 396 N.W.2d 984 (1979), the court held . . .

(d) Pinpoints

A pinpoint cite indicates the page number of the source where the specific information can be found. **Pinpoint cites must be used for virtually every reference—to a holding, language, or any specific information found in a source. Pinpoints must be used with cases that follow the signal *e.g.***

*Smith*, 345 P.2d at 101.

When citing information that spans more than one page, the inclusive page numbers must be given. The last two digits of the page number should be retained, but other repetitive digits dropped. *WLR* requires that an en-dash separate page ranges.

*Smith*, 345 P.2d at 103–05.

*Jones*, 573 P.3d at 2798–800.

(e) Referring to discussions in other parts of the Article or other footnotes – internal cross references, *Bluebook* Rule 3.5

*WLR*'s preferred format for citing other parts of the Article or other footnotes is as follows:

Citing an above the line discussion accompanying a certain footnote:

*See supra* text accompanying note 8.

*See infra* text accompanying note 10 (from interview with John Strait).

Citing an above the line and below the line discussion accompanying a footnote(s):

*See infra* notes 8–11 and accompanying text.

*See supra* note 11 and accompanying text.

Referring to an above the line discussion under a main heading:

*See infra* Part I.

*See supra* Part II.

Referring to an above the line discussion under a subheading:

*See infra* section I.B.

*See supra* section II.C.i.

See the ME Example Document for more information. *Bluebook* Rule 4 also broadly addresses *supra* use for referencing previously cited materials (for example: O'neil, *supra* note 15).

(f) Five-Footer Rule – *Elaborating on Bluebook* Rule 10.9(a)

If a case or statute has not been cited in any form in the previous five footnotes, the full citation (including any necessary subsequent history) must be used. If a case or statute has been cited in any of the preceding five footnotes, then the short cite must be used. “*Id.*” is considered a citation to the source for purposes of the five-footnote rule. **The five-footnote rule does not apply to periodicals and books. Instead, “*supra*” should be used to cross-reference to the previous full citation.** *Bluebook* Rules 4.2 and 16.9 (“*See,*” author’s last name, “*supra,*” appropriate note, “*at,*” pinpoint.)

*See Smith, supra* note 6, at 773.

*See* the ME Example Document for more information.

**2. Signals** – *See Bluebook* Rule 1 and ME Example Document for more information on when to use each signal

(a) Indicating Degree of Support

Signals indicate the degree of support or contradiction provided by the cited authority. **Student writers almost always need a signal, especially in the argument section.** Signals show whether the authority supports, compares, contradicts, or provides background.

(b) Use of “See”

**Unless a sentence could be used as a headnote for the case, a “see” signal is necessary.** If the reader must make any sort of intuitive or logical leap, or could not look to the case and find a sentence stating essentially the same proposition for which it is being cited, *see* should be used. When in doubt, a signal should be used.

(c) Parentheticals

**Student writers should include an explanatory parenthetical after the citation when using the following signals:**

*See also*

*See, e.g.,*

*Cf.*

*Compare . . . , with . . .*

*But cf.*

(d) Use of “See generally” and “See, e.g.,”

*See generally* can be used if the entire work cited supports a general proposition. When making a specific proposition, and referring to something that is an example of this proposition, *see, e.g.*, should be used (with a pinpoint and parenthetical). Note: a parenthetical is *required* for both student and professional authors when using *see, e.g.*

(e) Use of “Cf.” and “Contra”

*Cf.* means “to compare.” *Cf.* should not be used to show contrast. For contrast, *contra* should be used. *Cf.* should be used if the proposition being cited to is analogous to the proposition, but is not sufficiently similar to use *see*.

(f) Order of Signals – *Bluebook* Rule 1.3

*WLR* adheres to *Bluebook* Rule 1.3. Support signals precede contradiction signals. If more than one case gives the same type and degree of support, the cases should be separated with a semicolon. The signal should not be repeated. Signals within the same category should be separated with semicolons. Signals in different categories should be separated with a period.

*See* Smith v. Jones, 111 F.2d 222 (9th Cir. 1977). *But see* Kane v. Webster, 555 F.2d 324 (10th Cir. 1980).

*See* Smith v. Jones, 111 F.2d 222 (9th Cir. 1977); Kane v. Webster, 555 F.2d 324 (10th Cir. 1980).

(g) Italicizing Signals

Signals should always be italicized unless used as a verb in a textual sentence.

*Compare* Jay v. Jo, 124 F.3d 2 (9th Cir. 1999), *with* OK Ranch v. Bay, 155 F.3d 543 (9th Cir. 1997).

For a more detailed discussion of this topic, see *Kane v. Webster*, 555 F.2d 324, 330–32 (10th Cir. 1980).

3. **Quotations** – *Bluebook* Rule 5 and ME Example Document

This portion of the *WLR* Style Guide only address departures from the *Bluebook*, please see *Bluebook* Rule 5 for all quotation rules.

(a) Emphasis in Direct Quote – *WLR* partially departs from the *Bluebook* Rules for Emphasis in Quotes

When including, in the text, a direct quote that has any sort of emphasis (italics or capitalization), use parentheticals in the citation to indicate that the emphasis was included in the original source (**this is a departure from *Bluebook* Rule 5.2(d)(iii)**). Parentheticals must indicate as much whenever emphasis is added or omitted.

*Jones*, 552 P.2d at 981 (emphasis in original). [ie the original had emphasis and the Author retained it].

*Jones*, 552 P.2d at 981 (emphasis added).

*Jones*, 552 P.2d at 981 (emphasis omitted).

4. **United States Supreme Court Cases** – *WLR* departs/expands on *Bluebook* Rule 10.3 and T1.1 for Supreme Court Cases

Supreme Court cases are always cited to U.S. Reports ONLY per the *Bluebook* Whitepages (10.3 and T1.1). However, if a case has not yet been published in U.S. Reports, **WLR requires** a blank cite for U.S. Reports must be included along with the published cite. A blank cite is two underscores. But where the volume number of the U.S. Reports is known, this information should be included.

*Smith v. Jones*, \_\_\_ U.S. \_\_\_, 357 S. Ct. 450 (2002).

*Bond v. United States*, 572 U.S. \_\_\_, 134 S. Ct. 2077 (2014).

An “*id.*” or short cite to the S. Ct. reporter can follow. (e.g., “*Id.* at 451.” or “*Smith*, 357 S. Ct. at 455.”)

5. **Washington Cases** – *WLR* partially departs from *Bluebook* Rules for Washington Cases

(a) Parallel Cites– Departure from *Bluebook* Rule 10.3.1

**For Washington cases, parallel cites to the Washington Reporter and the Pacific Reporter must be included.** Where pinpoint cites are required, pinpoints to both reporters must be included. If the subsequent pinpoint citation is to the same page range in both reporters, “*id.*” alone may be used.

<sup>1</sup> *State v. Sublett*, 176 Wash. 2d 58, 77–78, 292 P.3d 715, 724–25 (2012).

<sup>2</sup> *Id.* at 75, 292 P.3d at 723.

<sup>3</sup> *Id.*

NOT: <sup>3</sup> *Id.* at 75, 292 P.3d at 723.

(b) Reporter Abbreviations

Washington reporters are abbreviated as “Wash. 2d” and “Wash. App.” See **T1 in the *Bluebook***.

(c) Supreme Court

The highest state court is the Supreme Court of Washington or the Washington State Supreme Court, **NOT** the Washington Supreme Court.

**6. Internet Sources** – *Bluebook* Rule 18 and ME Example Document

Citations to internet sources are generally governed by *Bluebook* Rule 18. However, there are some difficult rules and *WLR*-specific issues worth noting.

(a) Permalinks

**While not mandated by the *Bluebook***, *WLR* permanently archives all links using perma.cc. Permalinks should immediately follow the use of any standard URL. The permalink URL should be preceded by “https://” and enclosed in brackets. When a permalink is available, do not use a last visited parenthetical. Rule 18.2.2(c). For example:

<sup>1</sup> Google, <http://www.google.com> [<https://perma.cc/KNH6-ZPB3>].

<sup>2</sup> Joan Smith, *The Best Way to Bake*, Baking Blog (Aug. 15, 2004),

<http://www.fakebakingblog.com/best-bake/thisisntarealcitation> [<https://perma.cc/WXC4-ZPB3>].

NOT: <sup>1</sup> Google, <http://www.google.com> [<https://perma.cc/KNH6-ZPB3>] (last visited Dec. 15, 2008).

When in doubt as to if a permalink should be added for a URL, *WLR*’s preference is to add it.

However, in some cases, a permalink may not be available for an online source. A permalink is considered unavailable where the source is behind a paywall, only accessible by members of *WLR* in its permalinked form, or incapable of being permalinked for some other reason. In such cases, include a “last visited” parenthetical instead of a permalink. The last visited date should be the date on which the editor performing the QA last verified the source—the date on which the permalink would have been created. For example:

<sup>1</sup> Google, <http://www.google.com> (last visited Dec. 15, 2008).

<sup>2</sup> Joan Smith, *The Best Way to Bake*, Baking Blog (Aug. 15, 2004), [fakebakingblog.com/best-bake/thisisntarealcitation](http://www.fakebakingblog.com/best-bake/thisisntarealcitation) (last visited June 1, 2012).

(b) Direct Citations of Internet Sources

Generally, see *Bluebook* Rule 18 and the ME Example Document (and more specifically, 18.2.1). While websites require URLs, there are many types of sources found on the internet, each of which has unique citation quirks and may not require a URL. *WLR* is fine with appending a URL to a pdf found online if an Author prefers (even if the pdf potentially exists in print).

1. **Sources for which no URL information is required.** Such sources include PDFs of law review articles, statutes, or cases that were found online that are exact copies of the print versions. These sources include the PDF of the original reporter downloaded from Westlaw, but NOT the version of a case that appears in the main Westlaw interface, as this is not an exact copy of the print version and may contain errors.
2. **Sources with print characteristics for which URL information is required.** These sources include reports and working papers found online that are paginated (such as a PDF). According to the *Bluebook*, “if an online source shares the characteristics of a print source such that it could be fully cited according to another rule in *The Bluebook*, the citation [and permalink] should be made as if to the print source and the URL appended directly to the end of the citation, even if it is unknown whether the cited information is available in print.”
3. **Sources for which a special online citation form is appropriate.** The *Bluebook* provides specific citation forms for blog posts, newspaper articles available online, social media posts, websites, etc. See *Bluebook* Rule 18 and ME Example Document.

V. APPENDIX

1. Quick Abbreviation Reference Chart (still see each *Bluebook* Rule for specifics)

<b>Case Names in Text</b>	<b><u>ONLY</u></b> abbreviate per 10.2.1!!!!!!
<b>Case Names in Footnotes</b>	Abbreviate per: 10.2.1, 10.2.2, T6, T10 (you only abbreviate a state or country name if it IS NOT the only party)
<b>Periodical Name</b>	Rule 16, T6, T10, and T13
<b>Internet Domain Main Page Title</b>	18.2.2(b)(i), T6, T10, and T13
<b>Interviews (Author title, institutional affiliation, and location)</b>	17.2.5, T6, and T10

<b>Letters, Memoranda, and Press Releases</b>	17.2.3, T6, and T11
<b>Speeches and Addresses (Author title and institutional affiliation)</b>	17.2.6, T6, and T10
<b>Institutional Author (book (15.1c), working paper (17.4), or website Authors (18.2.2))</b>	15.1(d), T6, and T10
<b>Publishing abbreviations</b>	T14, Rule 15.4
<b>Subdivisions of Constitutions</b>	Rule 11, T10, T16
<b>Statutes/Rules/Ordinances</b>	Rule 12 (sometimes per other tables too, see the rule for more info)
<b>Legislative Materials</b>	Rule 13, T9, (sometimes T6 and T10, see the rule for more info)
<b>Admin and Executive Materials</b>	Rule 14 (sometimes T1.2, T6, T13, and T15, see the rule for more info)
<b>Services (ie often the unofficial publisher of some cases or materials)</b>	Rule 19, T15 (for service and publisher abbreviations), T13 (for if a service is not listed under T15), 15.1(d) (if a publisher is not listed under T15)

## 2. Table of Keyboard Shortcuts

	<b>PCs</b>	<b>Macs</b>
<b>Non-breaking spaces</b>	Ctrl+Shift+Space	Option+Space
<b>Small Caps</b>	Ctrl+Shift+K	Shift+Option+K
<b>En-dash</b>	Ctrl+Num+-	Option+-
<b>Em-dash</b>	Alt+Ctrl+Num+-	Shift+Option+-

<b>Section Symbol</b>	Insert, Symbol, Special Characters	Option+6
<b>Supra Updates</b>	Cmd A > F9	Cmd A > cmd. + shift + option + U

### 3. Cross-Referencing – Point People will update cross-references, NOT EDITORS

#### (a) Microsoft Word Function

**Writers MUST use the Microsoft Word cross-reference function whenever using “supra” or “infra” in reference to other footnotes.** Instructions for inserting cross-references in Microsoft Word:

- 1) Place cursor at the location in the footnote where you want to insert a cross-reference to another footnote number.
- 2) Click on “insert” menu.
- 3) Choose “cross-reference.”
- 4) Select “footnote” as your “reference type.”
- 5) Under “insert reference to,” choose “footnote number.”
- 6) Select the appropriate footnote from the “for which footnote” window.
- 7) Click “insert.” The program will insert the “referenced to” footnote at the insertion point.

**After the procedure above, the program will not show the changes until the cross references are updated.** Instructions for updating:

- a) Put cursor anywhere in a footnote.
- b) Click on “edit” menu.
- c) Choose “select all.”
- d) Press F9.

<https://drive.google.com/file/d/11QBh9SHIDxoCofiDAFDMu49waJc2z0Br/view> [shows how to update cross-references, this will be done SOLELY BY THE POINT PERSON].

### 4. Superscript

Superscript formatting should be turned off in Microsoft Word: In the Tools menu, choose Auto Correct Options, then choose the Auto Format As You Type tab. Un-check the box marked “Ordinals (1st) with superscript.”

### 5. How to check for improperly italicized commas or periods

Make sure commas and other punctuation after italics are not italicized.

- (a) Choose Edit, Find.
- (b) Click Format, Click Font, Highlight italic, Click OK.
- (c) Click Find Next.
- (d) All italicized phrases will be highlighted. Make sure the comma or other punctuation after the phrase is not included. If not, cancel find, and manually change the formatting of the punctuation. After making the change, go back to find and continue.
- (e) Note: Punctuation within an italicized passage should be italicized. E.g., *Waiting for the Electrician, or Someone Like Him*, an album by the Firesign Theater.
  - 1) Also, the first comma in See, e.g., is italicized.
- (f) Note: This procedure should be run in both the text AND the footnotes.
- (g) Remember! When you are done, change the style in the Find box back from italics to nothing. Do not select regular, because then it won't find things in bold and italics.