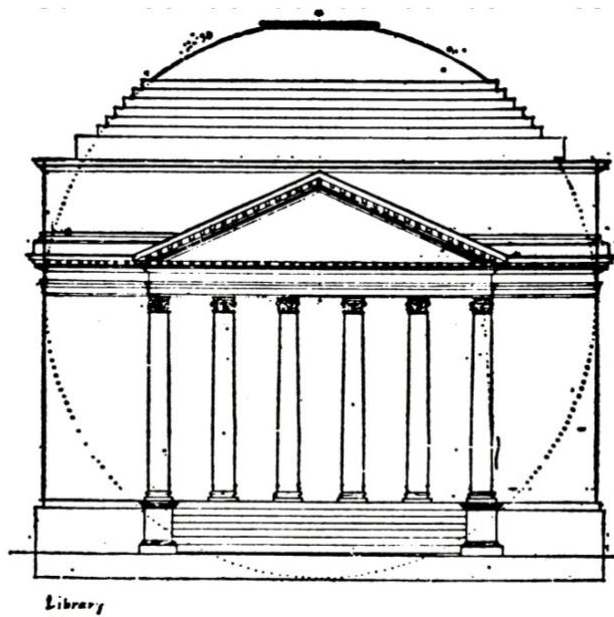


# *Virginia Law Review*



*Slatebook*

2023–2024

# SLATEBOOK GUIDING PRINCIPLES

## I. *Bluebook* Policy

VLR uses the twenty-first edition of the *Bluebook* wherever a *Slatebook* rule does not apply. Members who prefer the online edition of the *Bluebook* may access the twenty-first edition for free through the library.<sup>1</sup> Members who prefer using the hard copy version of the *Bluebook* may continue to do so. However, the Executive Department encourages use of the *Bluebook Online*.

In the event that a new edition of the *Bluebook* is released, members may continue to use the hard copy version already in their possession. The Executive Department will have extra copies of the most up-to-date edition of the *Bluebook* and will make sure that citations comply with any changes.

## II. Sources Not Covered by the *Bluebook*

If you encounter a source that does not correspond to any of the citation forms in the *Bluebook*, the rules of thumb are:

- Make sure you include the information necessary to find the source. The point of citation is that readers can access a source later on—that is more important than formatting.
- Pick the most analogous citation you can find in the *Bluebook*, follow that as a guide, and make whatever alterations are necessary so that it doesn't look too weird.

## III. Important Reminders

- Please remember to be diligent about double checking quotations, ellipses, and other punctuation in quotations, pincites, reporter numbers, and years of publication during your review. Any information contained in the consolidated PDF is a substantiation question that the Executive Department will not review and catch if there are errors.
- If you have any general Bluebooking questions, please direct those to the *#bluebook-questions* channel on Slack. If you encounter a difficult source or otherwise want to highlight something for the Executive Editor (“XE”), please try your best and leave an {XE: } comment in the piece explaining your thought process and what *Bluebook* rule(s) you used.

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<sup>1</sup> For *Bluebook Online* registration, visit <https://virginia-law.libwizard.com/f/bluebook>.

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## ***SLATEBOOK* CHEAT SHEET: COMMON MISTAKES**

The following are substantiation guidelines, citation rules (in the *Bluebook* and *Slatebook*), grammatical rules (in the *Bluebook* and *Chicago Manual of Style*), and technical tips for the *Virginia Law Review* that are frequently (understandably!) unfamiliar to new editors and often get overlooked.

This “cheat sheet” is a useful tool to remember key points in the *Slatebook*, but it is not an exhaustive summary—please be sure to read through the entire *Slatebook* before completing your first edit (and review it whenever necessary)! Keep in mind that you can also reach out to an XE directly or through the *#bluebook-questions* Slack channel with any questions.

### **SB1 Substantiation**

- (1) Double-checking quotations is an integral part of each edit, and it is very important for Editorial Board members (“EB”) to **diligently check all parts of a quote**. It is particularly important that quotes properly use ellipses to indicate omissions.

When a quote is treated as a full sentence, check that any ellipsis is in the correct place. There should be an ellipsis between the last quoted word and the ending punctuation. See *Bluebook* Rule 5.3(b) and *Slatebook* Rule 4.2(b).

- (2) When a citation indicates that a source is **forthcoming**, make sure that the source is *actually* forthcoming and has not been published in the interim. Many pieces cite to sources that were forthcoming when an author initially wrote the piece but have been published prior to the piece going to publication.
- (3) Remember that **quotes of fifty (50) words or more must be block quotes**. (Again, please be diligent when check the quote length during an edit.)
- (4) Pay attention to whether a case is being cited for a **concurring or dissenting opinion**. If it is, then it needs a parenthetical noting that as well as the judge(s) who are concurring/dissenting. This is a substantiation issue that can be difficult to catch once a piece reaches the Executive Edit stage. See *Slatebook* Rule 2.8(b).

### **SB2 Formatting Text & Citations**

- (1) There is **always a comma** after the abbreviation of “**editor**” to “ed.,” but **never a comma** after the abbreviation of “**edition**” to “ed.” See *Bluebook* Rule 15.4.
- (2) When using “supra”: if a shorter work *in a collection* has been cited previously, only “supra” to the shorter work. No further “supra” is necessary for the collection.

*Example:* <sup>24</sup> Elizabeth Douglas, A How-To Guide to Crafting Clever Clip Art Signs, *in* *Secrets of the Virginia Law Review* Office 14, 28–29 (2016).

<sup>26</sup> Douglas, *supra* note 24, at 32.

If the collection has been cited previously, but a particular shorter work in the collection has not, use the “supra” for the earlier cite to the collection.

*Example:* <sup>23</sup> See generally Carefully Thought-Out but Questionable Choices (Lauren O’Leary ed., 2014).

<sup>25</sup> See Ollie Engebretson, Buying Four Cases of Diet Dew for the VLR Office, *in* Carefully Thought-Out but Questionable Choices, *supra* note 23, at 156, 173.

- (3) Ellipses are formatted differently depending on whether the quotation containing the alteration is a phrase or a full sentence. See *Bluebook* Rule 5.3 for a detailed description.
- (4) The “see also” signal is in the same family as “see,” “e.g.,” “accord,” “c.f.,” and no signal. It should **not** stand alone when one of those is present. On the other hand, “see generally” is its own type and **always stands alone**. See *Bluebook* Rule 1.2 for the table of signals (helpful tip: it is separated by signal family).

*Example:* See Fed. R. Civ. P. 15(a); see also Fed. R. Civ. P. 15(c). See generally 13A Wright, Miller, & Cooper, Federal Practice and Procedure § 3531 (3d ed. 1998).

*NOT:* See Fed. R. Civ. P. 15(a). See also Fed. R. Civ. P. 15(c); see generally 13A Wright, Miller, & Cooper, Federal Practice and Procedure § 3531 (3d ed. 1998).

- (5) For all courts *other than* the U.S. Supreme Court, give the full name of a court **the first time that court is mentioned in the text**, but abbreviate “United States.” If the first textual reference to a court occurs in a footnote (before the first reference in the main text, use the full name in both instances.

*Example:* The U.S. District Court for the Western District of Virginia dismissed the *Harvard Law Review*’s complaint for failure to state a claim. The U.S. Court of Appeals for the Fourth Circuit affirmed.

- (6) When referencing state supreme courts or courts of appeal, check the respective court website to confirm how that state names their court. Not every state high court is the [state] Supreme Court!

*Example:* New York Court of Appeals; New York Supreme Court, Appellate Division; Supreme Court of Virginia; Montana Supreme Court

- (7) It is *not* necessary to include the case name in the citation (below the line) if the case name appears in the above-the-line sentence directly corresponding to that footnote *and* the citation clearly refers to that case. **Do** include the case name when there is some risk of confusion with another case/source (e.g., there are multiple cases referenced in the sentence but with only one footnote for the citations).

### SB3 Grammar, Punctuation & Word Choice

- (1) *VLR* is a hyphen-preferred journal, and we spell words based on Merriam-Webster Dictionary. The following common phrases are often incorrectly hyphenated (or incorrectly *omit* a hyphen):
  - Decision-making **always** has a hyphen.
  - Rulemaking **does not** have a hyphen.
  - Policymaking and policy-making are *both* correct, but the spelling should be standard throughout the piece.
- (2) *VLR* largely follows the grammar rules of the *Chicago Manual of Style* (“*CMS*”). *CMS* is available online through the UVA Library website,<sup>2</sup> and it contains many helpful grammar tips—including a very useful chart for understanding proper hyphenation!
- (3) Titles of online articles (e.g., news articles, blog posts, etc.) should be capitalized according to the *Chicago Manual of Style* convention, regardless of how they appear online. Please keep in mind that this is not necessarily the same rule as the *Bluebook*.
- (4) Though used liberally throughout *Slatebook*, *VLR* does not use **bold** or underlining. *Italics* are used in limited circumstances or for emphasis, at the author’s discretion.

### SB4 Technical Tips

- (1) Several instances require the use of **non-breaking spaces** rather than normal spaces to keep a symbol or other short phrase (e.g., reporter names) together on one line. Most commonly, you should use a non-breaking space after the section symbol (§) and other abbreviated subdivisions. See *Slatebook* Rules 3.2(g), 4.2(b) & 4.3.
- (2) Any citation to other footnotes in the piece (and/or accompanying text) should be hyperlinked using the internal cross-reference tool. See *Slatebook* Rule 4.5.

*Example:* Douglas, *supra* note 24. {EB: Link internal cross reference to FN24.}

However, internal cross-references to Parts, Sections, or other subdivisions of the piece itself should not be hyperlinked using the internal cross-reference tool. See *Slatebook* Rule 4.4.

*Example:* See *infra* Part III. {EB: Do not link internal cross reference}

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<sup>2</sup> For online access to the *Chicago Manual of Style* (17th ed.) through the UVA Law Library website (Virgo), visit: [https://search.lib.virginia.edu/sources/uva\\_library/items/u7234401](https://search.lib.virginia.edu/sources/uva_library/items/u7234401)

# I. SUBSTANTIATION

## 1.1 Introductory Signals

Cross reference *Bluebook* Rule 1.2.

### (a) When Signals Require a Parenthetical

Unlike the *Bluebook*, *VLR* requires parenthetical explanations after the following signals:

- See also
- Cf.
- Compare . . . , with . . .
  - *Note*: Make sure that there is a parenthetical explanation following each authority.
- But cf.
- See generally

Explanatory parentheticals are optional with all other signals.

### (b) Exceptions to When Signals Require a Parenthetical

- (1) *Exception*: No parenthetical is required if the author is referencing the same piece (i.e., “supra” and “infra” citations to other parts of the same work).
- (2) *Exception*: No parenthetical is required if the preceding sentence describes the content of the work.

*Example*: A number of recent scholars, including Kelley, have taken this approach to determining when a scratch leads to “ball in hand.” See generally Connor Kelley, Rethinking the “Four Wall Contact” Rule, *VLR Off-Road* (2017).

### (c) When Signals Require a Pincite

Unlike the *Bluebook*, *VLR* requires—or, at least, strongly recommends—pincites for all citations regardless of the signal, with limited exceptions described in the following rule.

### (d) Exceptions to When Signals Require a Pincite

- (1) “See generally” signals do *not* require pincites since they presuppose that the work is being cited in its entirety. Pincites for “see generally” signals may be included at the author’s discretion or if the DE determines that one is necessary.
- (2) In the follow circumstances, regardless of the type of signal used, a pincite is *not* required:
  - a. A citation exists solely to prove that something exists; or
  - b. An author strongly believes and insists that a pincite is not necessary.

Ultimately, Departmental Editors (“DE”) and the Editor-in-Chief (“EIC”) retain discretion over whether to include a pincite for a particular citation based on the type of source and the proposition it is intended to support.

## 1.2 Order of Authorities

Cross reference *Bluebook* Rule 1.4.

*VLR* follows *Bluebook* Rule 1.4 for order of authorities, which requires authorities within each signal to be ordered in a “logical manner.” *VLR* defers to author preference for the order of authorities.

## 1.3 Parenthetical Information

Cross reference *Bluebook* Rules 1.5 & 5.2.

### (a) Emphasis, Omissions, Alterations, Quotations & Citations in Quotations

- (1) When there is a quotation within a parenthetical, any parentheticals indicating emphasis, omission, alteration, or quoting or citing another source go within it.

*Example:* Adam Sorensen, *Breaking Bluebook*, 88 Va. L. Rev. 320, 322 (2009) (“I am *totally* crushing this edit.” (emphasis added) (citation omitted)).

- (2) In parentheticals explaining alterations:

- a. Do **not** use “(emphasis in original)”—this does not exist and should be deleted.
- b. Only use “internal” for “(internal quotation marks omitted)”—**not** for “(citation omitted)” or “(footnote omitted)”.

- (3) When you have a citation with multiple alterations (e.g., internal quotation marks omitted *and* citation omitted), do not combine the parentheticals explaining each alternation into one. Combined alteration parentheticals are improper and must be separated into two parentheticals.

*Example:* *San Antonio Indep. Sch. Dist. v. Rodriguez*, 411 U.S. 1, 24 (1973) (internal quotation marks omitted) (emphasis added).

*NOT:* *San Antonio Indep. Sch. Dist. v. Rodriguez*, 411 U.S. 1, 24 (1973) (internal quotation marks omitted and emphasis added).

- (4) Pursuant to *Bluebook* Rule 1.5(b), when quoting or citing multiple authorities in a single parenthetical, use the following format: (first quoting [source 1]; then quoting [source]; . . . ; and then quoting [last source]).

- (5) *VLR* follows the order of parentheticals from *Bluebook* Rule 1.5(b).



## 1.4 Short Citation Forms

Cross reference *Bluebook* Rule 4.2.

### (a) Hereinafter

The *Bluebook* uses “hereinafter” only when the same author is cited multiple times in the same footnote or when the shortened form would be confusing.

*VLR* **also** allows “hereinafter” when multiple pieces by the same author are cited extensively throughout the text, even if the original citations are in different footnotes.

*Example:* <sup>26</sup> Kevin Palmer, *Ke\$ha’s Unsung Wisdom: How Yelling Timber Saves Lives* (2007) [hereinafter Palmer, *Yelling Timber*].

<sup>28</sup> Kevin Palmer, *The Legal Implications of Promoting Awareness of Fallen Trees* (2006) [hereinafter Palmer, *Legal Implications*].

*Note:* Hereinafter may still be appropriate even if the title is *not* shortened from the original title of the piece. However, hereinafter is not appropriate when a source is not cited later in the piece.

### (b) Supra

(1) When citing to a piece for which you may use “supra,” do not include the title of the piece *unless* the same author has multiple pieces cited within the same footnote or the previously cited source uses hereinafter.

*Example:* <sup>6</sup> Kevin Palmer, *Ke\$ha’s Unsung Wisdom: How Yelling Timber Saves Lives* (2007).

<sup>28</sup> Palmer, *supra* note 6, at 15.

*Example:* <sup>6</sup> Kevin Palmer, *Ke\$ha’s Unsung Wisdom: How Yelling Timber Saves Lives* (2007) [hereinafter Palmer, *Yelling Timber*]; Kevin Palmer, *The Legal Implications of Promoting Awareness of Fallen Trees* (2006) [hereinafter Palmer, *Legal Implications*].

<sup>28</sup> Palmer, *Legal Implications*, *supra* note 6, at 37.

(2) Volume numbers may also be omitted in *supra* cites when it is clear which previously cited volume the author is referring to in the citation.

*Example:* <sup>5</sup> IIB Phillip E. Areeda, Herbert Hovenkamp & John L. Solow, *Antitrust Law* ¶ 503b (5th ed. 2021).

<sup>108</sup> Areeda et al., *supra* note 5, ¶ 117h.

## 1.5 Prior and Subsequent History

Cross reference *Bluebook* Rule 10.7 & Rule 12.7.

### (a) Statutes' Subsequent History

*Bluebook* Rule 12.7 generally requires that the later history of a statute be included where an author cites to an earlier version.

*VL*R has one exception to this rule: laws passed before 1900 (most notably the Judiciary Act of 1789) are exempt from this rule unless the subsequent history is relevant to the author's point.

### (b) Subsequent Case History

*Bluebook* Rule 10.7 generally requires that the subsequent history of a case be included every time that a case is cited in full, excluding denials of certiorari and similar discretionary appeals (as well as some others).

*VL*R only requires the entire subsequent history of case the first time that a case is cited in full. Later citations to the same case, even for full citations, may omit subsequent history, particularly if the case is the focus of the piece.

## 1.6 Docket Numbers in Case Names

### (a) Substantiating Docket Numbers

In general, docket numbers in citations should appear exactly as written in the original file-stamped document itself (i.e., the PDF that is uploaded on Freedcamp), *not* as written on Westlaw or Lexis. A screenshot of the docket number online is not enough to substantiate the source.

**State** docket numbers should match *exactly* the docket number in the case. However, this is not necessarily true for **federal** court cases. See below for special exceptions to docket numbers for federal district court cases.

*Example of correct docket number: screenshot from PDF of the complaint*

FILED: NEW YORK COUNTY CLERK 09/21/2022 11:10 AM INDEX NO. 452564/2022  
NYSCEF DOC. NO. 1 RECEIVED NYSCEF: 09/21/2022

SUPREME COURT OF THE STATE OF NEW YORK  
COUNTY OF NEW YORK

PEOPLE OF THE STATE OF NEW YORK, by LETITIA JAMES,  
Attorney General of the State of New York,

Plaintiff,

-against-

DONALD J. TRUMP, DONALD TRUMP, JR., ERIC TRUMP, IVANKA TRUMP, ALLEN WEISSELBERG, JEFFREY MCCONNEY, THE DONALD J. TRUMP REVOCABLE TRUST, THE TRUMP ORGANIZATION, INC., TRUMP ORGANIZATION LLC, DJT HOLDINGS LLC, DJT HOLDINGS MANAGING MEMBER, TRUMP ENDEAVOR 12 LLC, 401 NORTH WABASH VENTURE LLC, TRUMP OLD POST OFFICE LLC, 40 WALL STREET LLC, and SEVEN SPRINGS LLC,

Defendants.

Index No. \_\_\_\_\_

**SUMMONS**

Date Index No. Purchased: \_\_\_\_\_

*Example of incorrect docket number: screenshot of same case listed on Westlaw*

← [People Of The State Of New York, By Letitia James, Attorney General Of The State Of New York ...](#)  
Supreme Court - New York - NEW YORK - 0452564/2022 (Approx. 74 pages)

Document Filings (0) Related Opinions/Dockets (0) Timeline (1)

Go to < 47 of 67 results > Original terms >

### (b) Specific Omissions in Docket Numbers

When citing pending or unreported cases pursuant to *Bluebook* Rule 10.8.1, omit the judge's initials from the end of the docket number.

*Example:* Cosgrove v. Blue Diamond Growers, No. 19-cv-08993, 2020 WL 7211218, at \*3 (S.D.N.Y. 2020).

*NOT:* Cosgrove v. Blue Diamond Growers, No. 1:19-cv-08993 (VM), 2020 WL 7211218, at \*3 (S.D.N.Y. 2020).

If a docket number starts with a number before a colon (or similar notation), you should also omit the number and colon before the actual docket number.

*Example:* Cosgrove v. Blue Diamond Growers, No. 19-cv-08993, 2020 WL 7211218, at \*3 (S.D.N.Y. 2020).

*NOT:* Cosgrove v. Blue Diamond Growers, No. 1:19-cv-08993, 2020 WL 7211218, at \*3 (S.D.N.Y. 2020).

### **(c) Special Rules for Formatting Docket Numbers from Federal District Courts**

No matter what variation is included in a slip opinion, uniform federal docket numbers can be found via the federal courts docket management system, PACER. *Slatebook* requires uniformity among federal court docket numbers. There should be a two-digit year, a lowercase alphabetical abbreviation—such as “cv” (civil), “cr” (criminal), “md” (multidistrict litigation), or “mj” (magistrate judge)—followed by a five-digit number. If the docket number in the case is less than five digits, add leading zeros before the first number. Omit any court division number and colon from the beginning of the docket number.

*Format:* [Two-digit year]-[cv / cr / md / mj]-[five-digit number (preceded by zeros if < 5)]

Civil cases filed in federal court should use the lowercase indicator “cv” between the year and docket number of a case.

*Example:* Cosgrove v. Blue Diamond Growers, No. 19-cv-08993, 2020 WL 7211218, at \*3 (S.D.N.Y. 2020).

*NOT:* Cosgrove v. Blue Diamond Growers, No. 1:19 Civ. 08993 (VM), 2020 WL 7211218, at \*3 (S.D.N.Y. 2020).

Criminal cases filed in federal court should use the lowercase indicator “cr” between the year and docket number of a case.

*Example:* United States v. Burton, No. 15-cr-00474, 2020 WL 4226472, at \*4 (E.D. Pa. July 23, 2020).

*NOT:* United States v. Burton, Criminal Action No. 15-474-3, 2020 WL 4226472, at \*4 (E.D. Pa. July 23, 2020).

*NOT:* United States v. Burton, No. 15-CR-474, 2020 WL 4226472.

### **(d) Substantiating Slip Opinions**

If possible, you should always use the Westlaw citation for a slip opinion.

## **1.7 Internet Sources**

### **(a) Date & Time Parenthetical**

*Bluebook* Rule 18.2(c) generally requires that the date and time parenthetical include the month, day, year, and time of publication for internet sources, when available.

*VL*R requires that the time of an internet source be included where available. After the date of publication, include the time of publication. Do not include the time zone.

## 1.8 Substantiation Tips

Cross reference *Bluebook* Rules 16.4, 17 & 18.2.1(d), respectively.

### (a) The Five-Footnote Rule

If the preceding five footnotes contain a citation to the same source—whether as a full citation, short form, or even as an “id.”—then the source may be cited in its appropriate short form.

*Example:* <sup>1</sup> See *Brown v. Bd. of Educ. of Topeka (Brown I)*, 347 U.S. 483 (1954).

<sup>2</sup> *Id.* at 493.

<sup>3</sup> See, e.g., *Miranda v. Arizona*, 384 U.S. 436, 439 (1966).

<sup>4</sup> *Brown v. Bd. of Educ. of Topeka (Brown II)*, 349 U.S. 294 (1955).

<sup>5</sup> *Id.* at 301.

<sup>6</sup> *Id.*

<sup>7</sup> *Brown I*, 347 U.S. at 487.

*BUT:* <sup>1</sup> *Brown v. Bd. of Educ. of Topeka (Brown I)*, 347 U.S. 483, 493 (1954).

<sup>2</sup> See, e.g., *Miranda v. Arizona*, 384 U.S. 436, 439 (1966).

<sup>3</sup> G. Edward White, *Earl Warren As Jurist*, 67 *Va. L. Rev.* 461, 473 (1981).

<sup>4</sup> *Brown v. Bd. of Educ. of Topeka (Brown II)*, 349 U.S. 294 (1955).

<sup>5</sup> *Id.* at 301.

<sup>6</sup> *Id.*

<sup>7</sup> *Brown v. Bd. of Educ. of Topeka (Brown I)*, 347 U.S. 483, 495 (1954).

### (b) Consecutively Paginated Journals and Magazines

Some PDFs on HeinOnline contain a two-year date span. Refer to the article’s title page (or the issue in which the article appears) to determine the article’s year of publication.

### (c) Unpublished and Forthcoming Sources

Bring unpublished and forthcoming sources to the attention of your DE. DEs will get permission from authors of unpublished sources to cite or quote the source.

### (d) Archival Sources

If a source is archived by the *Virginia Law Review* using a permalink, the structure of the citation should follow *Bluebook* Rule 18.2.1(d).

*Example:* The Bachelor, Jewell’s Blog (Mar. 17, 2016, 11:05 PM), <http://www.-jewellblog.com/posts/thebachelor> [<https://perma.cc/K4KM-MVXQ>].

### (e) Hyperlinks

If there is doubt about whether a certain source is available in print, err on the side of including a URL where available. For sources that are online PDFs, include the URL in

the citation unless the DE or XE on the piece indicates otherwise. If a citation includes an SSRN link, it should be appended as the URL.

In general, the phrase “available at” should *not* precede the URL in a citation.

De-activate all hyperlinks in a Word document (right click on the link, then click “deactivate hyperlink”). This makes it easier to format the Article or Note later in the editing process.

#### **(f) Current State Statutes**

For citations to the code of a state, cite to the Westlaw or Lexis statutory compilation for the state listed in *Bluebook* Table T1.3.

## **II. FORMATTING TEXT & CITATIONS**

### **2.1 Distinguishing Citations from Textual Material**

A citation is any reference in a footnote that has a signal (or “no signal,” according to *Bluebook* Rule 1.2) followed by a source.

Textual material is everything else, including in footnotes, parentheticals, or the main text. Note that case names that are part of a sentence are considered text—not a citation—even in footnotes and parentheticals.

### **2.2 Italicization Generally**

Cross reference *Bluebook* Rule 2.

*VLR* generally does not use italicization. It is **only** used in the limited circumstances described in *Slatebook* Rules 2.3 & 2.4.

*Note:* In addition to the mandatory italicization rules below, authors may use italics in textual material to indicate emphasis of particular words (at their discretion).

### **2.3 Italicization in Citations**

#### **(a) Case Names in Citations**

(1) Do **not** italicize case names where they are part of a **full citation**. This rule includes procedural phrases like “in re” and “ex rel.”

*Example:* <sup>1</sup> See, e.g., *O’Leary v. Lile*, 30 F.2d 29 (2d Cir. 2009); *In re Estate of Lystash*, No. C7-95-2185, 1996 WL 118367 (Minn. Ct. App. Mar. 19, 1996).

(2) Do italicize cases names where they are part of a **short citation**.

*Example:* <sup>8</sup> *O’Leary*, 30 F.2d at 46 (comparing the time spent preparing for the competition with time spent studying for school); *In re Lystash*, 1996 WL 118367, at \*3 (linking the time spent preparing for the competition to health problems).

### **(b) Case Names in Textual Sentences**

**Do** italicize case names where they are part of a textual sentence, including in a footnote, even when the case name is followed by a citation clause.

*Example:* In *O’Leary v. Lile*, the Supreme Court affirmed the ruling of the Second Circuit.

*Example:* <sup>15</sup> The Supreme Court affirmed the Second Circuit’s ruling in *O’Leary v. Lile*, 901 U.S. 865 (2011).

### **(c) Case Names in Parentheticals**

In parentheticals, do **not** italicize case names following “quoting” or “citing”; **do** italicize case names in other textual parentheticals.

*Example:* <sup>2</sup> *Monaghan v. Sorensen*, 211 F.3d 372 (4th Cir. 2003) (quoting *Gorin v. Palmer*, 87 F.3d 372 (4th Cir. 1996)).

*Example:* <sup>2</sup> *Monaghan v. Sorensen*, 211 F.3d 372 (4th Cir. 2003) (rejecting an analogy to *Gorin v. Palmer*, 87 F.3d 372 (4th Cir. 1996)).

### **(d) Short Form Citations**

Do **not** italicize “id.,” “supra,” “infra,” or “hereinafter” when they appear in a citation. **Do** italicize them if they appear in a textual sentence (which is uncommon).

### **(e) Words and Phrases in Citations**

(1) Do **not** italicize signals.

(2) **Do** italicize the following words and phrases in citations:

a. The phrase “\_\_\_ *in*.” For instance: “*reprinted in*,” “*quoted in*,” “*cited in*,” “*in*.”

*Example:* <sup>8</sup> Alyson Sandler, *The Joys of Vineyarding*, *reprinted in* Monica Trueba, *Doing Charlottesville Right* 17 (2009).

b. The word “to” when citing to a preface, foreword, introduction, or epilogue by someone other than the author, according to *Bluebook* Rule 15.6.

*Example:* <sup>9</sup> See Meredith Loretta, *Introduction to Ollie Engebretson, To Bilt or Not to Bilt: Life as a Double Hoo* (2007).

- c. Words or phrases in the title of a book or an article that are italicized in the original.

*Example:*<sup>10</sup> See Alex Gorin, *How Virginia Law Review Online Is Changing Legal Scholarship* 2 (2004).

- (3) **Do** italicize procedural phrases indicating prior and subsequent case history.

*Example:*<sup>11</sup> See *Gore v. Harris*, 772 So. 2d 1243 (Fla. 2000), *rev'd and remanded sub nom.* *Bush v. Gore*, 531 U.S. 98 (2000)

See *Bluebook* T8 for a list of procedural phrases in prior and subsequent history.

## 2.4 Italicization in Textual Material

### (a) Case Names in Textual Material

- (1) **Do** italicize case names in textual sentences, both above and below the line, except when following a signal used as a verb below the line.

*Example:* The controlling precedent is *Mitchell v. Two Unnamed Miami-Dade County Prosecutors*,<sup>16</sup> which rejected a claim of malicious prosecution.

<sup>16</sup> The court in *Mitchell* also denied Rule 11 sanctions, despite repeated contempt threats by the judge during the proceedings.

- (2) **Do** italicize “id.” **only** where it refers to a case name in textual material.

*Example:* These laws and the Supreme Court cases that upheld them are discussed in *id.*

### (b) Signals & Cases Following Signals

- (1) Do **not** italicize signals.
- (2) **Do** italicize case names where they are part of a textual sentence, including in a footnote.

*Example:* The Supreme Court affirmed the Second Circuit’s ruling in *O’Leary v. Lile*, 901 U.S. 865 (2011).

*Example:* For a more thorough analysis, see *Monaghan v. Sorensen*, 211 F.3d 372 (4th Cir. 2003).

### (c) Certain Secondary Sources

- (1) **Do** italicize the following when it appears in textual material, independently from a citation: names of books, journals, newspapers, magazines, movies, plays, paintings, and television series.



- (2) Do **not** italicize the following even in textual material: the names of particular articles, episodes of TV shows, or song names. Instead, just capitalize the title.

*Example:* David Maranjian recently published *The Common Law of Music Festivals in the Virginia Law Review*.

**(d) Equations & Individual Letters**

- (1) Do italicize all equations. For guidance on formatting equations, see *Chicago Manual of Style* ¶ 12.21.

*Example:*  $e = mc^2$

- (2) Do italicize all individual letters, when used to represent the names of hypothetical parties, places, or things.

*Example:* Person *A* formed a contract with Person *B* to purchase Blackacre, located in State *X*.

- (3) Do italicize all individual numbers when used to represent a hypothetical time.

*Example:* The buyer paid the difference in price between Time *1* and Time *2*.

**(e) Words in Quotations or Titles**

Do italicize words in quotations or titles that are italicized in the original source.

*Example:* Gorin's *How Virginia Law Review Online is Changing Legal Scholarship* has received widespread critical acclaim.

*Note:* As seen above, words italicized in the original *and* italicized under a *Slatebook* convention are in regular Roman typeface; two italicizations cancel each other out.

**(f) Foreign Words**

- (1) Do **not** italicize commonly used words on the following list or any variation thereof:

- |                 |              |                |                     |
|-----------------|--------------|----------------|---------------------|
| • a fortiori    | • certiorari | • ex ante      | • per se            |
| • a posteriori  | • de facto   | • ex post      | • prima facie       |
| • a priori      | • de jure    | • inter alia   | • quasi-            |
| • ad hoc        | • de minimis | • inter partes | • res ipsa loquitur |
| • amicus curiae | • dictum     | • mens rea     | • sic               |
| • bona fide     | • et cetera  | • per curiam   | • stare decisis     |

Latin phrases not on the above list should be italicized. For foreign words in other languages, follow the author's preferred convention; XEs can make a final decision.

(2) Do **not** italicize the names of Greek letters.

*Example:* The delta variant of COVID-19 led to a resurgence of business closures.

### **(g) Ship Names**

Do italicize the names of ships.

*Example:* A worrying number of crimes have been tried aboard the *U.S.S. Seahawk*.

## **2.5 Bold, Underlining & Capital Letters**

Cross reference *Bluebook* Rule 2.

LARGE & Small Capitals: Never used in citations; only in Part headings in the text.

**Bold & Underlining**: Never used (except in the *Slatebook*, because we believe in healthy irony).

*Note:* Authors *do not* have discretion to add bold or underlining based on preference. They may only add italics, as noted in *Bluebook* Rule 2.2.

## **2.6 Short Forms for Cases**

Cross reference *Bluebook* Rule 10.9.

### **(a) Short Forms Generally**

The *Bluebook* offers a choice of short forms; *VLR* prefers:

*Trombley-Shapiro Jonas*, 480 U.S. at 170.

*VLR* permits dropping the party name from the short form if it has already been mentioned in the textual material that the short form citation supports.

*Example:* The Court in *Trombley-Shapiro Jonas* disagreed.<sup>4</sup>  
<sup>4</sup> 480 U.S. at 170.

Use “id.” anywhere that is applicable under *Bluebook* Rule 4.1.

### **(b) Short Form Citations Above the Line**

#### **(1) Short Form Citations in Parts of a Piece**

In the main text, use a case’s shortened name (generally, the name of one of the parties) only when the case has already been named in full in the main text of the same Part.

*Example:*

## II. THE SUPREME COURT’S APPROACH

The Court in *Monaghan v. Sorensen* attempted to resolve the conflict among the various circuits.<sup>3</sup>

...

### A. Criticisms and Commentators

It is unclear why the Court granted certiorari in *Monaghan*.

...

## III. NEW DIRECTIONS

The future of the holding in *Monaghan v. Sorensen* is uncertain.<sup>24</sup>

### (2) Short Form Citations in Conclusions

Any case name that appears anywhere in the text may be short-cited in the conclusion.

#### (d) When a Case is the “Focus of the Piece”

If the DE memorandum designates a case the “focus of the piece,” then that case can be short-cited above the line throughout after the first reference in the main text. Follow standard *Bluebook* short-cite rules for below-the-line citations (the short form is used within five footnotes of the previous citation).

## 2.7 Capitalization

Cross reference *Bluebook* Rule 8 and *Slatebook* Rule T1.

### (a) Capitalization Generally

Follow *Bluebook* Rule 8, rather than deferring to the capitalization as it appears in the original source.

### (b) Prepositions in Titles

Under *Bluebook* Rule 8, prepositions of four letters or fewer are not capitalized unless they begin the title or heading. However, *VLR* permits capitalizing prepositions of four letters or fewer—even when they do not begin the heading or title, or immediately follow a colon—if they are important to the title or it will otherwise look weird.

*Example, Important Preposition:* Author, Where Are You **From**? [pincite] (2017).

*Example, Not Important:* Author, The Rules **from** the *Bluebook* and *Slatebook* Are Very Important [pincite] (2017).

### (c) “Black” versus “black”

*VLR* capitalizes Black when describing people and cultures of African origin.

*Example:* The literature course highlighted Black authors.

#### **(d) Supreme Court (and Its Nicknames)**

When referring to the Supreme Court of the United States, *VLR* capitalizes Supreme Court. If it is unclear *which* supreme court a piece is referring to, include the relevant jurisdiction.

*Example:* The U.S. Supreme Court recently heard a case about artificial intelligence in briefs. The case had already been heard by the Supreme Court of Pennsylvania.

However, when using a phrase such as “high court” or “apex court” to describe the U.S. Supreme Court, those phrases should remain lowercase.

*Example:* The Supreme Court decided *South Bay Pentecostal Church v. Newsom* in 2021. The case would return to the high court later that year.

When referring to the highest court of a state judiciary, follow the *Bluebook* naming conventions in *Bluebook* T1.3.

## **2.8 Titles of Judges, Officials & Terms of Courts**

Cross reference *Bluebook* Rule 9.

### **(a) Judges**

Always use the title “Judge” or “Justice” (the latter for the U.S. Supreme Court and some state supreme courts) before the last name of the judge. Only use a Supreme Court Justice’s first name if there have been multiple Justices with that name, *unless* one of them was the Chief Justice.<sup>3</sup>

*Examples:* Justice Robert Jackson, Justice Ketanji Brown Jackson, and Justice Howell Jackson; Justice Thomas Johnson and Justice William Johnson; Justice Byron White and then-Justice Edward White (before he was elevated to Chief Justice)

*BUT:* Chief Justice Marshall and Justice Marshall

If a Justice is referenced pursuant to this Rule and then mentioned again in close proximity such that subsequent mentions clearly refer to the same Justice, you may omit the Justice’s first name in the subsequent instance(s).

*Example:* President Biden appointed Justice Ketanji Brown Jackson to the Supreme Court in 2022. Justice Jackson was confirmed and sworn in the same year, filling the seat vacated by retired Justice Breyer.

---

<sup>3</sup> If uncertain about the naming conventions of a particular Supreme Court Justice, reference this webpage: [https://www.supremecourt.gov/about/members\\_text.aspx](https://www.supremecourt.gov/about/members_text.aspx).

### **(b) Multiple Justices in Dissenting & Concurring Opinions**

Some parentheticals may indicate that an opinion is a dissent or concurrence written by one Justice and joined by multiple other Justices. Use the following format to signify a Justice joining a particular opinion:

*Format:* [Judge], J., dissenting/concurring, joined by [Judge(s)], J(J).

*Example:* *Miranda v. Arizona*, 384 U.S. 436, 504 (1966) (Harlan, J., dissenting, joined by Stewart & White, JJ.)

*Example:* *In re Winship*, 397 U.S. 358, 375 (1970) (Burger, C.J., dissenting, joined by Stewart, J.)

### **(c) Professors**

Student authors should always use the honorific “Professor” when they refer to any individual professor for the first time in their notes or comments. Other authors are encouraged to use it; EB members should add the title where it seems appropriate and DEs/XEs will make the final call with the author. The honorific may be omitted if the professor is deceased—tenure ends when you do.

If the honorific is first given in a footnote, use it again at the first appearance above the line. After the honorific is used the first time, the last name alone is an appropriate way to refer to the professor.

### **(d) Courts**

For all courts *other than* the U.S. Supreme Court, give the full name of a court the first time that court is mentioned in the text, but abbreviate “United States.” If the first textual reference to a court occurs in a footnote before the first reference in the main text, use the full name in both instances.

*Example:* The U.S. District Court for the Western District of Virginia dismissed the *Harvard Law Review*’s complaint for failure to state a claim.

*Example:* The U.S. Court of Appeals for the Fourth Circuit affirmed.

Subsequent mentions of the same level of court may be shortened. For these purposes, the first mention of any one circuit court or district court is considered to be the first reference for all subsequent circuit courts or district courts.

For example, after a first reference to the U.S. Court of Appeals for the Third Circuit, it is acceptable to call it the Third Circuit anytime thereafter. When you then reference the Fifth Circuit, you should omit the formal title too. But you would still need to include the court’s name when you mention the lower court decision from the U.S. District Court for the Eastern District of Pennsylvania for the first time later in the piece.

## 2.9 Additional Rules for Citations

Cross reference *Bluebook* Rules 10.8.3 & 15.1(b)

### (a) Use of “et al.”

“Et al.” may only be used under the two circumstances described below.

*Note: Slatebook* conventions on this point are significantly different from the *Bluebook*.

#### (1) First Time Citing a Piece

**Only use** “et al.” when listing authors, translators, or editors if the work has *six or more* authors, translators, or editors.

#### (2) Subsequent Short Cites

“Et al.” may be used in short form citations for pieces with more than two authors.

## III. GRAMMAR & PUNCTUATION

Generally, grammar and punctuation should follow the *Chicago Manual of Style*, available to all UVA law students for free if connected to the law school’s network at: <http://www.chicagomanualofstyle.org/home.html>. You can also find it by searching “Chicago Manual of Style” using the law library’s online search function (Virgo). It will be the second result (the seventeenth edition e-book).

The following Rules provide a quick reference to recurrent grammar and style issues.

### 3.1 Grammar

#### (a) Contractions

*VLR* generally does not use contractions. EB members should change contractions during initial edits and cite checks to allow for later author review.

#### (b) First Person

Student Note authors are strongly discouraged from using the first person. Other authors may use it as they see fit.

#### (c) Digressions

Use em-dashes (—) to set off amplifying, explaining, and digressive elements.

*Example:* Alex Gorin—whose name happens to be an anagram for axle groin—keeps trying to patent his paella recipe.

#### **(d) Legal Units**

Do not use a hyphen for common legal units, even if the Merriam-Webster Dictionary or *Chicago Manual of Style* hyphenation rules would typically require doing so.

*Examples:* the common law doctrine; state law claims; amount in controversy requirement; subject matter jurisdiction

#### **(e) Compound Modifiers**

Generally, use a hyphen where a group of words collectively modify a noun. See *Chicago Manual of Style* ¶¶ 7.77–7.85 (including a better chart than the one that follows).

#### **(f) The Subjunctive Mood**

The subjunctive is used in fact-conditional sentences (e.g., those using the words if, as if, although, as though, unless, and (more occasionally) whether).

*Example:* If I **were** a rich man, I would not have to work hard.  
I would not state that the Spurs are the greatest basketball team of all time unless it **were** true.

*NOT:* If I **was** a rich man, I would not have to work hard.

*NOR:* I would not state that the Spurs are the greatest basketball team of all time unless it **was** true.

#### **(g) Verb Tense**

When an author describes what they discuss or write about later in the article, the verb should be in present tense. Authors often use future tense, but *VLR* prefers present tense.

*Example:* In this Article, I argue that *VLR* needs more Diet Coke in the office. Part I lays the historical foundation of discrimination against Diet Coke, and Part II analyzes the persistent absence thereof before arguing that more is necessary.

#### **(h) Abbreviating “Versus”: “v.” or “vs.”?**

“Versus” should be abbreviated as “v.” to separate opposing parties in the name of a case. Outside of case names, *VLR* generally prefers that authors spell out the word “versus.” However, when comparing opposing items, people, organizations, etc., the use of “vs.” is permissible.

*Example:* In the case of *Krabs v. Plankton*, the plaintiff sued the defendant for trade secret theft, accusing the defendant of stealing a secret, proprietary formula.

*Example:* In this Part, I conduct an analysis of the age-old dilemma: Pepsi vs. Coke.

## 3.2 Punctuation

### (a) Hyphens & Dashes

#### (1) Prefixes

*VLR* prefers hyphens with prefixes, especially if the word can be ambiguous. Prefixes should be hyphenated unless the author has made a deliberate stylistic choice otherwise.

*Example:* “anti-discrimination,” *NOT* “antidiscrimination”  
“anti-male,” *NOT* “antimale”

*Note:* If Merriam-Webster Dictionary permits a word to be written without a hyphen, then that form of the word may also be acceptable, depending on author preference.

#### (2) Numbers & Ranges

Use hyphens for section numbers or hyphenated numbers that do not indicate a range.

*Example:* M.G.L. § 38-10

Use en-dashes to indicate continuing or inclusive numbers, dates, times, or references numbers.

*Examples:* 1968–72; id. at 38–42.

*Note:* When a decision is “5-4” or odds are “50-50,” use a hyphen, not an en-dash

#### (3) The “Legal Unit” Rule

Cross reference *Slatebook* Rule 3.1(d).

Do **not** use a hyphen where a term is recognized as a specific legal unit.

*Example:* amount in controversy requirement objection, Supremacy Clause-based doctrine

### (b) Colons, Commas & Quotations

#### (1) Capitalization After a Colon

Capitalize the first letter of the word after a colon if it is part of a title or proper noun, if the material introduced by the colon is a quotation that is a full sentence, if the colon precedes a set of (i.e., two or more) closely related sentences, or if the colon precedes a question. Otherwise, do not capitalize the word following the colon.

*Example:* If there’s a guiding principle at *VLR* it’s this famous quotation: “There are snacks in the office.”



*Example:* There are three reasons why the *VLR* office is the best: First, it has the most natural light. Second, it's the biggest. And third, it has the coolest couch.

*Example:* Only one question remains: Why are law review articles so long?

*Counter-Example:* At least he died doing what he loved: editing law review articles.

## (2) Capitalization at the Beginning of Quotations

When a comma or colon introduces a quotation, the first letter of the word after the comma or colon should be capitalized.

*Examples:* The professor left the class with the following question: "How much wood would a woodchuck chuck if a woodchuck could chuck wood?"  
Dorothy said, "We are not in Kansas anymore."

**Except** when the quotation is merely a phrase and the comma is part of the overall sentence.

*Example:* Ben Kuder, a renowned alligator wrestler, "has never lost a fight."

## (c) Lists & Series

*VLR* uses an Oxford comma: "X, Y, and Z," **not** "X, Y and Z."

*Example:* The defendant was charged with battery, simple assault, and trespassing.

However, do **not** use the Oxford comma when a list uses an ampersand (&) instead of the word "and."

*Example:* Colons, commas, and quotations. *BUT:* Colons, commas & quotations

## (d) Quotation Marks

Cross reference *Bluebook* Rule 5.1(b)(iv).

Commas and periods go inside quotation marks; colons, semicolons, question marks, and exclamation marks go outside unless they are part of the quoted passage.

## (e) Abbreviating Long Names with Short Forms & Acronyms

### (1) Abbreviating with Short Forms

Cross reference *Slatebook* Rule 2.6.

*VLR* allows for abbreviating case names to a common or short-form case name when the case is a key case used throughout the piece. When the full case name is used for

the first time in a piece, the common or short-form name should immediately follow the case names, and it should be italicized and enclosed in parentheses.

*Example:* In *Youngstown Sheet & Tube Co. v. Sawyer (The Steel Seizure Case)*, the Court held that the President could not seize control of the nations' steel mills in anticipation of a widespread strike. Unlike many Civil War-era cases, the *Steel Seizure Case* represents a major modern constraint on the wartime power of the executive.

If the short form is first used in a footnote, use it again at the first appearance of the full case name above the line.

## (2) Abbreviating with Acronyms

*VLR* allows for abbreviating long institutional names into acronyms, even when the institution is not necessarily commonly referred to by the acronym. If an author chooses to follow this convention, when the long institutional name is mentioned for the first time in the body of the piece, the acronym should immediately follow the long institutional name, and it should be enclosed in quotation marks and parentheses.

*Example:* The Consumer Financial Protection Bureau (“CFPB”) issued a declaration. The Department of Justice (“DOJ”) and the Federal Trade Commission (“FTC”) worked together to revise the guidelines.

If the acronym is first used in a footnote, use it again at the first appearance of the long institutional name above the line.

## (f) Apostrophes & Possession

Cross reference *Chicago Manual of Style* Rules 5.20, 6.116–.118 & 7.5–.30.

### (1) Joint Possession

If two or more entities possess something jointly, the latter noun takes the possessive ending.

*Example:* Adam and Maria's office.

If two nouns each possess something separately, they each receive a possessive ending.

*Example:* Adam's and Maria's cell phones.

### (2) Decades

Do not use an apostrophe when you are referring to a decade as a period of time.

*Example:* “1980s.” *NOT:* “1980's”

If an author refers to a decade in shorthand without the millennium (e.g., the '80s), the apostrophe should face toward the omitted numbers, like a contraction.

### (3) Omissions with Apostrophes

When an apostrophe is used to indicate an omission in part of a word, the apostrophe should face toward the omitted letters. See *CMS* Rule 7.30.

*Example:* Texas Hold 'Em

### (4) Words Ending in “S”

Singular words and names ending in “s” should always use an apostrophe and the letter “s” to indicate possession, regardless of whether the final “s” is pronounced.

*Examples:* Congress’s sole authority; Kansas’s legislature; Albert Camus’s novels; Euripides’s tragedies

Plural words and names—including places and organizations—ending in “s” should **only** use an apostrophe to indicate possession.

*Examples:* the Lincolns’ marriage; these species’ unique traits; puppies’ paws

Although singular in construction, “the United States” should receive only an apostrophe to indicate possession, **not** an apostrophe and an “s.”

*Example:* The United States’ bicameral legislature produces questionable results.

### (g) Non-Breaking Spaces

A non-breaking space ensures that the things to the left and right of the space stay on the same line. A section symbol and number, or the dots in an ellipsis, falling on different lines looks bad. PC users type Ctrl + Shift + Space; Mac users type Option (⌘) + Space. When “show formatting” is on, a non-breaking space will appear as <sup>◦</sup> (in light blue or grey, depending on whether you have a Mac or Windows computer).

#### (1) Common Uses of Non-Breaking Spaces

Use non-breaking spaces in the following instances:

- Between each footnote number and the first word of the citation
- Between each section symbol and the number (§<sup>◦</sup>1983)
- Between each paragraph symbol and the number (¶<sup>◦</sup>317h)
- Between abbreviations for “article” and “clause” and the number (art.<sup>◦</sup>I; cl.<sup>◦</sup>8)
- Between separate words of a single reporter (F.<sup>◦</sup>Supp. and S.<sup>◦</sup>Ct.)
- Between the ellipsis and the words before and after the ellipsis (like<sup>◦</sup>.<sup>◦</sup>.<sup>◦</sup>this)
  - See *Slatebook* Rule 4.2(b) for more detail about using ellipses.

## (2) Slashes with Open Compounds

Use non-breaking spaces between each side of a slash (“/”), where at least one side of the slash involves an open compound (i.e., a term that includes two or more words). See *CMS* Rule 6.106.

*Example:* appellate lawyer/advocate; market definition/market share paradigm.

In these circumstances (with open compounds), a space before and after the slash helps make the text more readable, but the phrase can still be confusing if it is broken across multiple lines, so the non-breaking space fixes this problem. However, there should *not* be a non-breaking space (or any space) when the terms on both sides of the hyphen are single words.

*Example:* lawyer/advocate; and/or; his/her

## (h) Spaces After Periods and Colons

In accordance with the *Chicago Manual of Style*, *VLR* uses a **single** space after periods at the ends of sentences and after colons. (Double spaces are for typewriters.)

# IV. TECHNICAL TIPS

## 4.1 Revealing Formatting

To more easily view formatting features within the Word document, click the paragraph symbol (¶) on the “Home” ribbon. Mac users can also type Cmd (⌘) + 8 to reveal formatting.

## 4.2 Formatting Quotations

Cross reference *Bluebook* Rule 5.1 & Rule 5.3

### (a) Block Quotations

The *Bluebook* Rule requiring block quote formatting for quotes of fifty (50) or more words **does** apply to quotes that appear in footnote text.

*But note:* It does **not** apply to quotes that appear in a citation’s explanatory parenthetical.

### (b) Ellipses

Cross reference *Bluebook* Rule 5.3.

Use an ellipsis when one or more words have been omitted from a quotation. *VLR* generally follows *Bluebook* Rule 5.3 about omissions from quotes to determine when to use an ellipsis.

Always use non-breaking spaces when inserting ellipses. Insert non-breaking spaces:

- Between the word immediately preceding the ellipsis and the first period of the ellipsis;
- Between each period of the ellipsis;
- Between the last period of the ellipsis and (a) the next word if the ellipsis occurs midsentence, or (b) the punctuation if the ellipsis occurs at the end of a sentence.

*Example:* “Formatting ellipsis correctly creates less work later<sup>◌◌◌</sup>and more time for pizza.”

*Example:* “Cheese pizza is superior to pepperoni<sup>◌◌◌◌</sup>.”

### (c) The “Triple Boi”

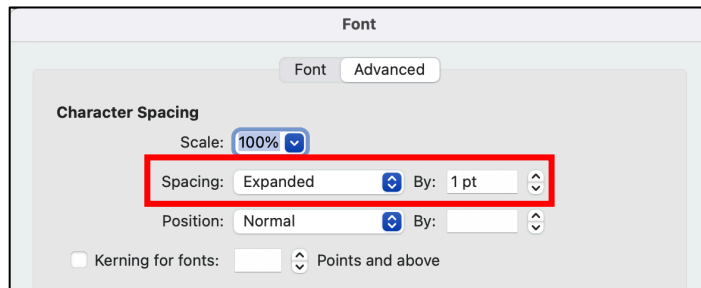
When an internal quotation begins or ends at the same place as the primary quotation (and so the quotation marks appear next to each other), insert a hairline space between single quotation marks and double quotation marks.

*Example:* “Pizza with pineapple toppings has been ‘accepted by Italian culture.’”

*Becomes:* “Pizza with pineapple toppings has been ‘accepted by Italian culture.’”

Add a hairline space between the quotation marks by selecting the single apostrophe and quotation mark, and then, while the text is highlighted, expand the spacing by 1 point using the advanced tab in the font formatting dialogue box.

*Example:* Advanced tab in the font dialogue box; spacing changed to “Expanded”



## 4.3 Formatting Section & Paragraph Symbols

Cross reference *Bluebook* Rule 6.2.

According to *Bluebook* Rule 6.2, *VLR* permits the use of the section symbol rather than writing out “Section” both above and both the line only in the following two instances: (i) when the symbol does not begin a sentence; and (ii) when referring to a provision in the U.S. Code or a federal regulation.

Use non-breaking spaces between the paragraph or section symbol and the number. You should also use non-breaking spaces following abbreviations of subdivisions that may be used in citations, such as the abbreviations for “article” and “clause.”

*Example:* U.S. Const. art. °I, §°8, cl. °15

## 4.4 Internal References to the Piece

### (a) Terms for Internal Cross-References

For references within a piece to another subpart of that piece, use the following terms:

- I. Part
  - A. Section
    - 1. Subsection
      - i. Paragraph
      - ii. Paragraph
    - 2. Subsection
  - B. Section
- II. Part

Contrary to *Bluebook* Rule 3.5, *VLR* uses these terms for internal cross-references, rather than calling everything a Part.

*Example:* <sup>150</sup> See *infra* Section III.A; see also *supra* Subsection I.C.2.

### (b) Punctuation for Internal Cross References

Internal references do **not** have periods at the end, unless they are at the end of a sentence.

*Example:* Section I.B will provide an overwrought description of a philosophical background that will be largely irrelevant to Parts II–IV.

### (c) Capitalization in Internal Cross References

Capitalize internal references above and below the line; do not capitalize external references.

*Example:* The third Part of this Note will discuss the rise of the elite group referred to most commonly as the “reference librarians.”

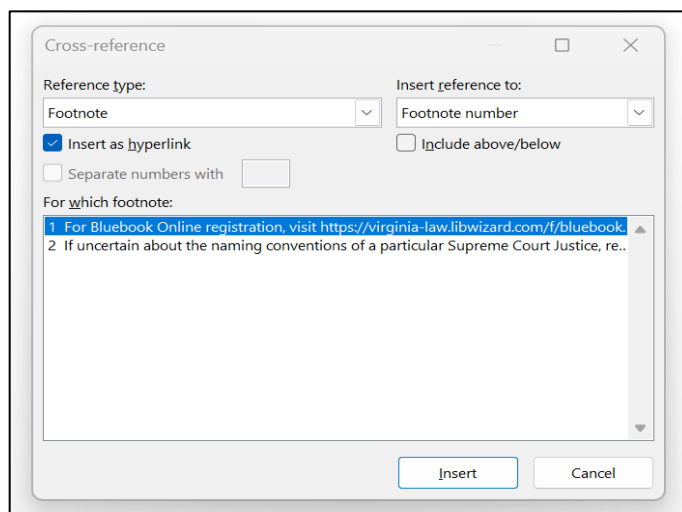
*Example:* In this Section of the Article, I argue that the pool table in the office is a waste of space.

## 4.5 Inserting Cross References

When using “supra” or “infra” to refer to another footnote (or footnotes) in the piece, it is imperative that you insert a cross-reference rather than just type in the number. This means replacing all existing jump cites with cross-references. This causes the cite to automatically update when new footnotes are added or others deleted. Only the footnote number itself needs to contain the cross-reference link.

To insert a cross-reference, go to:

Insert → Links → Cross-reference → Footnote, and then click on the appropriate footnote.



Do **not** use cross-references where “supra” or “infra” are used in textual material.

## TABLES

### T1 Capitalization Supplement

Do NOT Capitalize	DO Capitalize
<ul style="list-style-type: none"> <li>Article, essay, book review, note, comment, etc., when referring to <i>another</i> work in a textual sentence.</li> </ul>	<ul style="list-style-type: none"> <li>Article, Essay, Book Review, Note, Comment, etc., when referring to <i>the piece itself</i></li> </ul>
<ul style="list-style-type: none"> <li>Adjectives like “constitutional,” “governmental,” “congressional,” “presidential.”</li> <li>The word “government”</li> <li>“executive branch”</li> </ul>	<ul style="list-style-type: none"> <li>“State” and “Commonwealth” when referring to a specific state or commonwealth</li> <li>“Executive,” if referring to a specific Executive</li> <li>“President,” if referring to a specific President</li> </ul>
<ul style="list-style-type: none"> <li>“judge” and related judicial titles when not attached to a proper name, even if referring to a specific individual</li> </ul>	<ul style="list-style-type: none"> <li>“Judge” and related judicial titles when the title accompanies a proper name</li> <li>“Justice” when referring to a U.S. Supreme Court Justice, even if not referencing a specific justice</li> </ul>
<ul style="list-style-type: none"> <li>Doctrines like “substantive due process”</li> </ul>	<ul style="list-style-type: none"> <li>Specific clauses/Amendments to the Constitution (“Commerce Clause”; “Due Process Clause”)</li> <li>“Clause” or “Amendment” when referring to a specific clause or amendment, even if the specific provision is not named</li> <li>“Act” when referring to a specific statute</li> <li>“Title”; “Section”; and “Paragraph” when referring to specific provisions</li> </ul>
	<ul style="list-style-type: none"> <li>“Founding”; “Framing”; “Founding Era”</li> </ul>
	<ul style="list-style-type: none"> <li>References to foreign political units if they would be capitalized in their native language (e.g., “several German Lander”)</li> </ul>
	<ul style="list-style-type: none"> <li>“Black,” when used to describe people and cultures of African origin</li> </ul>

### T2 Common Unitalicized Latin Phrases

- |                 |              |                |                     |
|-----------------|--------------|----------------|---------------------|
| • a fortiori    | • certiorari | • ex ante      | • per se            |
| • a posteriori  | • de facto   | • ex post      | • prima facie       |
| • a priori      | • de jure    | • inter alia   | • quasi-            |
| • ad hoc        | • de minimis | • inter partes | • res ipsa loquitor |
| • amicus curiae | • dictum     | • mens rea     | • sic               |
| • bona fide     | • et cetera  | • per curiam   | • stare decisis     |



### T3 Microsoft Word Shortcuts

Most special characters can be found by going to: Insert → Symbols → Special Characters.

Displayed next to each character will be the relevant keyboard shortcut for your version of Word. You can personalize these shortcuts or create new ones by clicking “Keyboard Shortcut.”

Symbol	On a Mac	On a PC
Non-breaking Space (°)	Option + Spacebar	Control + Shift + Space
Section Symbol (§)	Option + 6	We recommend creating your own shortcuts for these symbols as they occur frequently!
Paragraph Symbol (¶)	Option + 7	
En Dash (–)	Option + -	
Em Dash (—)	Shift + Option + -	

### T4 When to Use Hyphens

Category/Description	Needs a Hyphen	Does Not Need a Hyphen
Adjective + noun used as an adjective	<ul style="list-style-type: none"> <li>“small-state senators”</li> <li>“middle-class family”</li> </ul>	<ul style="list-style-type: none"> <li>“venture capital fund”</li> </ul>
Types of Law*  *Note that this is an exception to the <i>Chicago Manual of Style</i> Rules		<ul style="list-style-type: none"> <li>“common law” and “state law” <b>when used as nouns</b>: “the common law does not permit it”</li> <li>“common law” and “state law” <b>when used as adjectives</b>: “the common law system is pretty loopy”</li> </ul>
Noun + verb used as an adjective	<ul style="list-style-type: none"> <li>“fire-brewed beer”</li> </ul>	<ul style="list-style-type: none"> <li>“This beer is fire brewed.”</li> </ul>
Adverbs modifying adjectives		<ul style="list-style-type: none"> <li><b>Adverbs ending in “-ly</b>”: “highly qualified editor”</li> </ul>
Century	<ul style="list-style-type: none"> <li><b>Used as adjectival phrase</b>: “Beyoncé is a twenty-first-century Renaissance woman.”</li> <li><b>E.g.</b>, “mid-twentieth-century developments,” “late twentieth-century developments”</li> <li><b>But</b> “developments of the mid-twentieth century”</li> </ul>	<ul style="list-style-type: none"> <li><b>Used as a noun</b>: “Beyoncé reached her artistic peak in the twenty-first century.”</li> <li>“developments of the late twentieth century”</li> </ul>
Ages	<ul style="list-style-type: none"> <li>“behavior of a six-year-old child”</li> </ul>	<ul style="list-style-type: none"> <li>“a child of six years”</li> </ul>
Decision + Making	<ul style="list-style-type: none"> <li><b>Used as an adjective</b>: “their decision-making strategy was very bad”</li> <li><b>Used as a noun</b>: “their decision-making was very bad”</li> </ul>	
Policy + Making	<ul style="list-style-type: none"> <li><b>Used as an adjective</b>: “their policy-making goals were very good”</li> <li><b>Used as a noun</b>: “their policy-making was very effective”</li> </ul>	