

Washington Law Review Style Guide

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Preamble

This Style Guide describes the publication standards of *Washington Law Review* (WLR). It sets out WLR's publication standards and serves as a tool for editors and authors. It incorporates WLR's values of diversity, equity, and inclusion. Additionally, it aims to support consistency among WLR's publications.

General Guidelines: 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* (5th 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.

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 to indicate that no new material will be introduced) and conclusions. Footnotes should be used in "roadmap" paragraphs. Footnote numbers should immediately follow the specific portions of text to which they refer. Each separate idea requires a separate footnote. Internal cross-references can be used on a limited basis when no single authority states the proposition. WLR does not allow footnotes in the abstract.

If you have any questions or concerns about this Style Guide, please contact the Chief Managing Editor and Executive Managing Editors at managing_leadership@washlrev.org or the Editor-in-Chief at eic@washlrev.org.

Statement on Diversity, Inclusion, and Equity

WLR is committed to increasing diversity, equity, and inclusion within its membership and scholarship. This commitment extends to our Style Guide.

WLR's publication approach is adaptive to social change and considerate of various social issues. We seek to embrace a multi-faceted, intersectional approach to legal issues relevant to the Pacific Northwest and beyond.

Additionally, WLR aims to publish legal scholarship that encourages legal discourse that is affirming of marginalized voices and communities. WLR encourages its editors and authors to exercise care when engaging in work involving communities that tend to be historically underrepresented in legal scholarship.

In part, WLR prioritizes using language preferred by individuals and communities. This includes spelling, capitalization, and other grammatical conventions. WLR encourages authors to research and consult authentic resources created by the communities they are writing about. We recognize that different communities may prefer and use different terminology and we welcome authors reflecting such diversity in their work.

WLR publishes legal scholarship for a general legal audience and therefore aims to provide writing that is accessible to all communities.

1. Acknowledgement and Disclosure Statements

Footnotes associated with acknowledgments and disclosure statements should proceed any citations below the line. Acknowledgment and disclosure statements should be marked with an asterisk.

Both profession and student authors are required to disclose prior or current work affiliation or material interest that could be reasonably seen to influence their work. 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.

2. Acronyms

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.

A. 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.

B. Format for Acronyms and Initialisms

Abbreviate acronyms with capital letters. Introduce acronyms in parentheses without periods or quotation marks. Some initialisms use periods, e.g., “U.S.” and “U.N.”

Examples:

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

C. Article Usage

See *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.

Examples:

- An HMO
- A UFO

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

Examples:

- The members of NATO rejected the idea.
- The RCMP investigated the crime.

3. Adverbs

Avoid weak adverbs like “clearly” and “obviously.” Properly place adverbs to modify the intended word.

Examples:

- “I only want to take four classes next quarter.”
 - The person wants to take four classes next quarter; they do not want to go swimming, take piano lessons, or really do anything else besides their four classes.
- “I want to take only four classes next quarter.”
 - The person wants to take four classes next quarter; they feel strongly against taking five classes.

4. Apostrophes

A. Possessives

See *Redbook* § 7.11

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

- Examples: the alumni’s contributions, the children’s toys, the ship’s route

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

- Examples: states’ rights, books’ titles

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

- Examples: the witness's testimony, Congress's action

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

- Examples: Jesus', Moses', Socrates'

Possessive forms for pronouns do not include apostrophes.

- Examples: ours, mine, yours, hers

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.

Examples:

- Joint ownership: Jim and Kim's apartment
- Individual ownership: Jim's and Kim's apartments

B. No Contractions

Do NOT use contractions.

- Example: Use "Cannot," NOT "Can't"

"It's" is the contraction form for "it is." "Its" is the possessive form of "it."

Examples:

- It's going to be sunny today.
- Look at that plant; its flowers are in full bloom.

C. Years

Do not include apostrophes for dates.

- Example: Use "In the 1800s," NOT "In the 1800's"

D. Omitted Letters or Figures

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

Examples:

- "rock and roll" becomes: "rock 'n' roll"
- "the class of 1962" becomes: "the class of '62"

5. Appendix

If an author would like to include an appendix or index it should be formatted in accordance with the *CMS* sample appendix. If the appendix is functioning as an index for terms of art, each term should be formatted as a bullet point. The term should be in bold typeface. The term should be followed by a period in regular typeface. The definition should begin with a capital letter and conclude with appropriate punctuation and a footnote for a citation.

6. Capitalization

See *Bluebook* Rule 8; *Redbook* § 2

A. Adjectives Formed From Proper Nouns

See *Redbook* § 2.8

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

- Examples: American, Holmesian, Marxist

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

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

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.

- Example: The Seattle School District did not respond to Ms. Smith's concern. The District . . .

B. Articles, Comments, Essays, and Notes

Capitalize "Note," "Comment," "Essay," or "Article" when referring to the professional or student piece.

Examples:

- This Comment argues . . .
- This Article examines . . .

C. Article, Clause, and Section

Capitalize "section," "article," and "clause" when referring to sections of the U.S. Constitution. Do not capitalize these terms in the context of a state constitution or statute.

When referring to a specific clause of the U.S. Constitution (e.g., Takings Clause), capitalize "clause," even when "clause" stands on its own.

- Example: The problem with this argument is that even if "property" means the same thing in both the Takings Clause and the Due Process Clause, that sameness is irrelevant to the protections each Clause affords.

D. Court Titles

WLR expands on and departs from *Bluebook* Rule 8(c)(ii); *Redbook* § 2.12

Capitalize references to "the court" only when referring to the full name of a court (e.g., the United States District Court for the Western District of Washington), the specific name of a court (e.g., the Ninth Circuit Court of Appeals), or the highest court in any jurisdiction (e.g., the Supreme Court of Washington) once it has already been identified by its full name, see the examples below. "The Court" can be capitalized when referring to the United States Supreme Court or a state supreme court.

Examples:

- The California Supreme Court held . . .
- The state supreme court held . . .
- **Not:** The *Padgett* Court held . . . (unless the *Padgett* court is a state supreme court or the United States Supreme Court, and that court has already been named in full).

Full name: The United States Supreme Court

Short names: the Supreme Court OR the Court OR the United States Supreme Court

Full name: The Ninth Circuit Court of Appeals

Short names: the court of appeals OR the Ninth Circuit OR the court

Full name: The Supreme Court of Washington

Short names: the Court OR the state supreme court OR the Supreme Court of Washington

E. Headings

See *Bluebook* Rule 8(a); *Redbook* § 2.10

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.).

- 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 (e.g., about)

Special note about capitalizing “that” in headings:

- If acting as a pronoun, it is capitalized. (*That* is the one!”)
- If acting as an adjective, it is not capitalized (“It’s *that* one.”)
- If acting as a conjunction, it is usually not capitalized (“I think *that* I know which one it is.”)

F. Part or Section

When referencing subdivisions of the article itself, the word “Part” (capitalized) should be used to refer to main headings. But the word “section” (lowercase) should be used to refer to subheadings.

Examples:

- In section I.B, this Article will propose a new way to analyze damages.
- In Part II, this Article will discuss the doctrine of standing.

G. Race

In accordance with *The Chicago Manual of Style*, *WLR* requires the capitalization of race (e.g., Black, Brown). The capitalization of “White” is left to the author’s discretion.

H. References to Antisemitism

Antisemitism is not hyphenated and should not be capitalized unless it begins a sentence.

I. Titles and Offices

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

- Examples: President Clinton; General Colin Powell; Princess Diana; Cardinal Smith

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

- Examples: Doctors Jones and Rogers; Mayors Walker and Charles

Titles, following a personal name or used alone, are generally not capitalized.

- Examples: 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

J. Web and Internet

Do not capitalize “web” and “internet” (except when beginning a sentence or using them in a title).

7. Cases

See *Bluebook* Rule 10; T1; T6

A. Citations 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.

- Example: In *Jones v. Wade*,¹ the court held . . .
 - NOT: In *Jones v. Wade*, 396 N.W.2d 984 (1979), the court held . . .

B. Concurrences, Dissents, and Plurality Opinions

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.

C. Geographical Locations in Case Names

WLR partially departs from *Bluebook* Rule 10.2(f) for geographical terms in case names

If the case name has a geographical location, but the geographical location is not the entire party name, abbreviate the geographical location per Bluebook T6 and T10.

- Example: *Planned Parenthood of Se. Pa. v. Casey*, 505 U.S. 833 (1992).
 - BUT: *Forsythe v. District of Columbia*, 159 A.3d 1221 (D.C. 2017).

D. Public Domain Format

WLR departs from *Bluebook* Rule 10.3.3; T1.3

Do not use the public domain format for cases published in states that use it.

E. State Names in Year Parenthetical

See *Bluebook* Rule 10.4(b)

Only add an abbreviated state name and/or court level to the year parenthetical when the regional reporter is ambiguous as to the state and/or court level. For example, add the state's initials when the regional reporter is cited. If, however, the state reporter is cited (e.g., N.Y.S.) "N.Y." would not be added to the date parenthetical. Additionally, the same applies to adding the court level abbreviation to the date parenthetical. For example, if the state reporter cited is "Md. App.," "Md. Ct. Spec. App." would not be added to the date parenthetical because it is apparent in the state reporter that the decision is from an appellate court.

Examples:

- ¹ *Swedloff v. Phila. Transp. Co.*, 187 A.2d 152 (Pa. 1963).
- ² *Vanderbilt v. Travelers' Ins. Co.*, 184 N.Y.S. 54, 56 (Sup. Ct. 1920), *aff'd*, 194 N.Y.S. 986 (App. Div. 1922).
 - **NOT:** ² *Vanderbilt v. Travelers' Ins. Co.*, 184 N.Y.S. 54, 56 (N.Y. Sup. Ct. 1920), *aff'd*, 194 N.Y.S. 986 (N.Y. App. Div. 1922).
- ³ *State v. Peeler*, 321 Conn. 375 (2016).
 - **NOT:** *State v. Peeler*, 321 Conn. 375 (Conn. 2016).
- BUT: *Superintendent of Belchertown State Sch. v. Saikewicz*, 370 N.E.2d 417 (Mass. 1977).

F. 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). 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 anytime the case is cited as a long cite (not just the first time the case is cited). A blank cite is two underscores. Where the volume number of the U.S. Reports is known, this information should be included. An "id." or short cite to the S. Ct. reporter can follow. (e.g., "*Id.* at 451." or "*Smith*, 357 S. Ct. at 455.")

Examples:

- *Smith v. Jones*, ___ U.S. ___, 357 S. Ct. 450 (2002).
- *Bond v. United States*, 572 U.S. ___, 134 S. Ct. 2077 (2014).

G. Unreported Cases

If a case is unreported, see *Bluebook* Rule 10.8.1. A non-breaking space should be added between "No." and the docket number. Only include the judges initials in the docket number when you cannot search the case without them. Remember to include the full date (not just the year) in the date parenthetical.

H. Washington Cases

WLR partially departs from *Bluebook* Rule 10.3.1 for Washington cases

i. Parallel Cite

For Washington cases, parallel cites to the Washington Reporter and the Pacific Reporter must be included. Because we require parallel cites, Wash. or Wash. Ct. App. will *never* appear in the year parenthetical. Where pincites are required, pincites to both reporters must be included. If the subsequent pincite is to the same page range in both reporters, "id." alone may be used.

Examples:

- ¹ State v. Sublett, 176 Wash. 2d 58, 77–78, 292 P.3d 715, 724–25 (2012).
- ² *Id.* at 75, 292 P.3d at 723.
- ³ *Id.*
 - For footnote 3, it is NOT: ³ *Id.* at 75, 292 P.3d at 723.

ii. Reporter Abbreviations

Washington reporters are abbreviated as “Wash. 2d” and “Wash. App.” See *Bluebook* T.I.

8. Centuries

Spell out particular centuries.

- Example: Nineteenth century; NOT: 19th century

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

- Example: She taught elementary school in the nineteenth century.

9. Citations Omitted

Citations should only be omitted from a direct quotation when the citation appears in the middle of the quotation and a quoting parenthetical is not required. If a citation is omitted, it must be noted in the citation. See *Bluebook* Rule 5.3(c).

10. Colons

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

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

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

- Example: They wanted to get three items: milk, cheese, and cookies.
 - NOT: They wanted: milk, cheese, and cookies.

A colon can be used for emphasis.

- Example: She had only one concern: grades.

WLR generally leaves the decision to capitalize following a colon to author preference. The author has discretion whether to capitalize the first word after a colon, unless it is introducing a list, in which case it should be not be capitalized. Capitalization after a colon when not introducing a list should be consistent throughout a piece.

11. Commas

Essential Clause: 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.

- Example: Authors who do not proofread their papers should not criticize their editors.

Nonessential Clause: 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.

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

Independent Clause: 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.

Examples:

- 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.

Examples:

- I like to study art history but not biology.
- I enjoy reading fiction and baking pies.

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

- Example: 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).

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

Serial 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.

Examples:

- He ordered a hamburger, fries, and a shake.
- She wanted to swim, bike, or run.

12. Commonly Misused Words

A. Argue v. Claim

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

B. Case Law

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

C. 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.

Examples:

- 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.

D. 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).

E. 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.

- Example: 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.

F. 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.

Examples:

- 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.

G. Over v. More

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

Examples:

- I have known Sarah for more than five years.
- NOT: Titus covered the story for over seventy months.

H. Per v. A

Do not use “a” in place of “per.”

Examples:

- three examples per sentence
- NOT: three examples a sentence

I. Since v. Because

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

Examples:

- 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 . . .

J. Toward v. Towards

Use “toward” not “towards.”

K. Which v. That

Use “which” (following a comma) to introduce nonessential information. Use “that” (with no accompanying comma) to introduce essential information. In most cases, “which” should be preceded by a comma.

Examples:

- 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 . . .
- My bike, which has a broken seat, is in the garage.

L. Who v. Which

“Who” and “which” can both serve as subjects of a sentence, but “who” always refers to people. “Which” should be used when referring to entities.

Examples:

- They were specialized maritime courts, which did not employ juries.
- Anna is the one who saved the squirrel.
- NOT: They were specialized maritime courts, who did not employ juries. (A specialized maritime court is not a “who.”)

M. 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.

Examples:

- 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.

Examples:

- 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.)

13. Coronavirus (COVID-19)

Use “coronavirus (COVID-19)” for the first reference to the coronavirus pandemic or virus.

- Example: Apple, in partnership with HHS, CDC, and the White House Coronavirus Task Force, releases an app with a coronavirus (COVID-19) symptom and exposure questionnaire.

14. Cross-References

See *Bluebook* Rule 3.5; 4.

A. Parts or Sections

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.”

- Examples: section XI.A; Part VII

For cross-references in the footnotes, refer to Parts or sections. Parts refer to an above the line discussion under a main heading. Sections refer to an above the line discussion under a subheading. Connect headings and sub-headings with periods.

Examples:

- Part II of this Article focuses on the aspirational aspects of the statute . . .
- ²³ See *infra* Part II.
- ²⁴ See *infra* section II.B.2.

Do NOT use the Microsoft Word cross-reference feature to link Parts or sections in citations. *WLR* only uses this feature to cross-reference footnotes because of issues with our macro for publishing.

For information on using “*id.*” with cross-references see *Bluebook* Rules 3.5, 4.1, 4.2, 15, and 16.9.

B. Footnotes

See Appendix B of this Style Guide for instructions to insert a cross-reference to a footnote. Cross-references should NOT include a non-breaking space between “note” and the footnote number. Cross-references to paginated sources should almost always include a pincite.

Examples 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).

Examples 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.

15. Date Ranges

When using a range of years, do not abbreviate the first two digits of the end year. Use an en dash.

- Example: Their years as Managing Partner, 2005–2015, were a period of rapid growth for the firm.

16. Ellipses

See *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.

Examples:

- ...
 - NOT ... or ...
- The court reiterated its position that “responsibility . . . should be evaluated based on a reasonable person standard.”

If a direct quotation stands alone as a complete sentence or functions as a complete sentence by following a colon, and the end of the quoted sentence is omitted apply *Bluebook* Rule 5.3(b) and add an ellipsis between the final word and the closing punctuation. If a direct quote is a phrase, clause, or fragment, apply *Bluebook* Rule 5.3(a) and do not end the quotation with an ellipsis.

Examples:

- Full Quotation: “Sometimes fate is like a small sandstorm that keeps changing directions. You change direction but the sandstorm chases you. You turn again, but the storm adjusts. Over and over you play this out, like some ominous dance with death just before dawn. Why? Because this storm isn't something that blew in from far away, something that has nothing to do with you. This storm is you. Something inside of you.”
- Modified under Rule 5.3(b): Some of Murakami's most powerful words come from *Kafka on the Shore*: “[F]ate is like a small sandstorm”
- Modified under Rule 5.3(a): In *Kafka on the Shore*, Murakami laments that “fate is like a small sandstorm.”

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). Examples:

- 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). Examples:

- “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.
- **Modified Quote in the Piece:** “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.
- **Modified Quote in the Piece:** “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.

17. Em Dash (—)

Redbook § 2.5; *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.

Examples:

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

Example:

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

18. Emphasis

A. Emphasizing Words in Text

Use italics to emphasize text, not boldface or underlining.

B. Direct Quotations

WLR partially departs from the *Bluebook* Rule 5.2 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.

Examples:

- *Jones*, 552 P.2d at 981 (emphasis in original). This means that 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).

However, when a parenthetical identifying emphasis added implies there was emphasis in original, it not necessary to use two parentheticals.

Example:

- *Jones*, 552 P.2d at 981 (first emphasis added).
- NOT: *Jones*, 552 P.2d at 981 (first emphasis added) (emphasis in original)

19. 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.

Examples:

- 225–50 (to indicate pages 225 to 250)
- Green Bay beat Denver 31–24.
- Their college years, 1998–2002 . . .
 - BUT: From 1998 to 2002 . . .

20. Epigraph

WLR defers to an author’s preference on the placement of an epigraph above or below the introduction to the piece or a heading. Epigraphs will be formatted as a block quotation and italicized.

21. First Reference to a Case or Statute

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. If the citation is for a case, it should not include the case name; only the reporter information and year. **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.

Example:

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

³ See *Roe v. Joe*, 837 U.S. 966, 968 (1954).
⁴ 837 U.S. 966 (1954).
⁵ See *id.* at 972.
- The Social Security Act²⁰ in particular impacts workers’ retirement prospects.

²⁰ 42 U.S.C. §§ 401–434 (2012).

This rule does not apply if a case name or statute is cited in the abstract text. In that case, you would still give the full case name but no footnote following the case name. Then, when the case name is stated in the body text of the piece, you would follow this rule, spelling out the full name and including a footnote attached to the name.

22. 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,” pincite.)

- Example: See *Smith*, *supra* note 6, at 773.

23. Headings

A. 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.

Examples:

- V. *HIRST V. ECOLOGY DID NOT WARRANT THE “HIRST FIX”*
- A. *The Court Correctly Interpreted Roe v. Wade*

B. Formatting

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. See Style Guide Rule 6.E.

Examples:

- IV. *MOUNT VERNON INAPPROPRIATELY RELIED ON LEGAL RULES PROPAGATED BEFORE THE GROWTH MANAGEMENT ACT*
- *The Court Erroneously Displayed a Traditional Aversion to Mixed-Use Zoning*

C. Advance Argument

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

Examples:

- B. *The Court Relied on Outdated Case Law and Failed to Reconcile the Comprehensive Plan and Development Regulations*
- *The Court’s Failure to Clarify Case Law Represents a Missed Opportunity*
- *The Growth Management Act Indicates that Comprehensive Plans Can Be the Exclusive Basis for Some Permitting Decisions*
 - NOT: *2. The Growth Management Act*

24. Hyphen (-)

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.

Examples:

- 1-800-621-2376
- A proficient signer can fingerspell C-O-L-O-R-A-D-O in less than two seconds.

25. 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). 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 based on these rules, it is sometimes appropriate to allow author-guided style choices that differ from our rules on a case-by-case basis. Such determination can be made during any stage of the publication process by WLR staff in consultation with the Chair of Diversity and Inclusion and Department leadership. The purpose of these rules is inclusivity and to ensure our scholarship is respectful and reflects our mission and statement on diversity, equity, and inclusion. So long as this purpose is served, deviations may be permissible.

Authors should 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.

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.” Authors, however, should be aware that 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.

When in doubt, research and/or ask. Terminology constantly evolves. Engage in best practices by researching and asking for individual preferences where possible. WLR is committed to continuing to revise this Style Guide to best reflect current best practices. We welcome feedback and suggestions for how to improve our guidance for authors.

A. Conflict Terms or Phrases

Some legal terms or phrases may be in conflict with our people-first and/or inclusive language policies. Where this happens, alternative phrasing is preferred. There are some legal terms that are unfortunately not respectful to the folks or communities they describe, or that have racist histories. Because these terms may be in conflict with our people-first and/or inclusive language policies, editors should offer alternative phrasing where possible.

For example, “indigent defendant” is a legal term that, while appearing to be a noun (defendant) with a preceding descriptor (indigent), it actually functions as a compound noun. Nevertheless, editors should encourage authors to say “defendants who are indigent” or “defendants that the court has deemed indigent” where possible.

While this has become a more commonly-used phrase outside of the legal profession, the phrase “grandfathered in” or “grandfather clause” originally referred to provisions adopted by Southern states after the Civil War in an effort to disenfranchise African-American voters by requiring voters to pass literacy tests or meet other significant qualifications, while exempting from such requirements those who were descendants of men who were eligible to vote before 1867. See *Grandfather Clause*, WEBSTER’S THIRD NEW INTERNATIONAL DICTIONARY 987 (3d ed. 2002) (definition of “grandfather clause”); Benno C. Schmidt, Jr., *Principle and Prejudice: The Supreme Court and Race in the Progressive Era*, 82 COLUM. L. REV. 835 (1982); see also *Comstock v. Zoning Bd. of Appeals*, 98 Mass. App. Ct. 168, n.11 (2020). Again, while the phrase “grandfathering” has become more commonplace, we should encourage and prefer other synonyms like “incorporated” or “integrated” where possible.

B. Disability

WLR encourages authors to mention a disability only if it is relevant to the piece. If the person’s disability is not relevant to the content of the piece, do not include it. When writing about a person with a disability, authors should use language that reflects the preferences of that person, when possible. Authors should consult or do research on the particular disability and its advocates to understand their preference, if desired, for person-first language and other specific words and phrases related to that disability.

Authors should not use medical language associated with mental illnesses or disorders to describe non-health issues. For example, do not call a certain area of the law “schizophrenic” or that a policy choice is “crazy.” Authors should be

aware that using such terms may unintentionally perpetuate ableism and/or stigmas and stereotypes around disability or mental health.

Authors should exercise caution when describing the condition of a person's disability. For example, do not use phrases such as "high-functioning" and "low-functioning" when describing the condition of a person diagnosed with autism or ADHD. At the same time, *WLR* recognizes there is no simple solution. Authors are best advised to approach this with sensitivity.

Authors should avoid using phrases where language including a disability is used colloquially as a stand-in for something with a negative connotation, like "falling on deaf ears" to mean ignorant. In these contexts, authors should use appropriate alternative phrases that do not involve disability.

In general, authors should avoid describing living with a disability in overly negative words, like "bound to a wheelchair," "suffering with depression," or "burdened with autism." Instead, authors should use neutral language, e.g., "person who uses a wheelchair" as opposed to "bound to a wheelchair," or someone "who has depression" as opposed to someone "suffering from depression."

Authors should avoid colloquialisms that are generally used only outside of disabled communities, like "differently abled," "diversability," "handicapable," or describing a person as "courageous," "brave," or "inspirational" only because they are living with a disability.

When specific terms are used to discuss disability, *WLR* encourages authors to provide a footnote, located immediately where the term is used, explaining why that term was selected. When applicable, we encourage authors to engage in a brief discussion in the footnote as to why other terms were less appropriate. *WLR* encourages authors to consult resources such as the [National Center on Disability and Journalism's Disability Language Style Guide](#) for more information.

C. Dual Heritage

Generally, dual heritages should not be hyphenated. If an author chooses to hyphenate a dual heritage, *WLR* encourages the inclusion of a footnote to describe the rationale for the hyphenation.

- Example: Asian American; NOT Asian-American

D. Gender-Inclusive Language

WLR requires gender inclusive language.

i. Gendered Pronouns

When referencing an individual (1) who is discussed in a source and whose gender is not specified in that source, (2) lies outside of the binary, or (3) cannot be determined, use they/them or other pronouns, remove the pronoun from the sentence, or repeat their name. Authors are encouraged to omit unnecessary pronouns and make appropriate substitutions with the subject.

Use gender-neutral names and they/them pronouns for hypothetical persons. Authors may use either "themselves" or "themselves" to refer to singular persons for whom they/them pronouns are being used.

For authors' pronouns, use they/them unless you can find specific pronouns on a source under the individual's control (e.g., a faculty page) or a reputable secondary source (e.g., a news publication, encyclopedia).

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

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.

ii. Gendered Nouns

Authors should avoid using gendered nouns unless in a direct quote. Seek substitutes where available.

- Example: Star Trek contemporary films changed "where no man has gone before" to "where no one has gone before."

Examples of gendered nouns and alternatives

- Person, individual; NOT man
- People, human beings, humanity; NOT mankind
- Average person; NOT common man

E. Indigenous People, Tribes, and Indian Law

WLR encourages authors to research authentic resources created by Indigenous-led organizations and the nations they are writing about. *WLR* prioritizes publishing pieces that reflect how tribal nations prefer to identify themselves, including spelling, capitalization, and other conventions. We recognize that different tribal nations may prefer and use different terminology and we welcome authors reflecting that diversity in their work.

"Aboriginal" and "Indigenous" are treated as proper nouns and capitalized when used in a context that clearly references people.

"Native American," "American Indian," "Indian Country," "Alaska Native," "Native Hawaiian" and "Native" should be capitalized.

"Tribe" should be capitalized when referring to a specific tribal nation. *WLR* encourages authors to consider using "nation" instead of "tribe" when referring to tribal nations out of respect for and in recognition of tribal sovereignty. "Nation" should be capitalized when referring to a specific tribal nation's name. "Tribal" should be capitalized when referring to a specific program or organization. *WLR* strongly encourages authors ensure that naming conventions reflect how a tribe or tribal organization would like to be referred to (e.g., use "Navajo Nation" not "Navajo Tribe") and to rely upon and consult tribal law and resources created by the particular tribe or tribal organization to do so.

Authors should be aware of possessive language when referring to land and geography; how verb tense and word choice can mischaracterize or erase the history of tribal nations; and the use of colonial language. For example, authors should avoid implying that tribal rights are "given" rather than "reserved" through treaty rights.

F. LGBTQIA2S+

Authors are encouraged to use "queer/queer community" or "LGBTQIA2S+/LGBTQIA2S+ community" unless (1) they are part of the community and identify it differently or (2) are only referring to a specific community (e.g., trans persons, polyamory/polygamy, Two Spirit, etc.).

Replace "homosexual" with one of the above options, even in quotes. Replace "transsexual" or "transvestite" with "trans" or "transgender," even in quotes

If discussing a discrete person, use the label they used. If that is unknown, do not refer to them by a sexuality/queer label; instead, refer to practices (e.g., "Kimmy occasionally had sex with women" instead of "Kimmy was bisexual"; "Martha P. Johnson presented as female even though she was assigned male at birth" (since we do not know that she referred to herself as transgender but we do know her pronouns)).

G. Minority and Similar Terms

The word "minority" replaces a group's actual identity or makes it ambiguous, sometimes contributing to erasure. For example, if an author is talking about race, editors should encourage the author to be more specific and say "communities of color" instead of "minority." Additionally, "minority" can convey the sense of being lesser (given the "minor" root of the word). Synonyms like "disadvantaged" or "underprivileged" should also be avoided for similar reasons. Instead, terms like "historically oppressed" or "marginalized" are more appropriate alternatives authors can use.

H. Pronouns

Pronoun Antecedent Agreement: *Redbook* § 11.10

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

- Example: 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.

Examples:

- 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.

- Example: 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.

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

Avoid using a pronoun before its antecedent.

- Example: 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.

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.

Examples:

- 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)

I. Nationality & American

If an author references an individual or a group with an ethnic descriptor with a nationality modifier, they should take care to verify if that corresponds to the way that individual or group identifies themselves or itself. Unless the source contains a statement from that individual or group, use the broadest terminology without a nationality modifier.

When referring to matters related to the United States of America, *WLR* will defer to the author's preferred phrasing. "American" may be considered exclusionary or inappropriate other cultures in North or South America. *WLR* encourages authors to be thoughtful about the use of their terminology.

J. Socio-economic and Housing Status

Authors should avoid using broad, pejorative, and generalizing terms to discuss socio-economic and housing status (e.g., "the homeless," or "the poor"). When discussing people without a fixed, regular, or adequate residence, use specific language to describe the quality or lack of housing, (e.g., "people who are homeless," "people in emergency shelter," or "people in transitional housing"). Avoid suggesting that people who are not wealthy are in an undesirable position (e.g., "poverty-stricken" or "the less fortunate").

Authors have autonomy to use different terms when discussing issues related to housing or housing status. The term "unhoused" has recently gained popularity in many advocacy-based settings, while agencies and research institutions

often continue to use the word “homeless.” What is appropriate often depends on context. *WLR* encourages authors to be thoughtful about their diction, and, when writing about specific individuals or organizations, consult with those people and organizations about preferred language.

When specific terms are used to discuss socio-economic and housing status, *WLR* requests that authors provide a footnote explaining why that term was selected. When applicable, we encourage authors to engage in a brief discussion as to why other terms were less appropriate.

26. Institutional Authors

Under *Bluebook* T6, do not omit “a,” “at,” “in,” “of,” and “the” for institutional authors in citations. This rule only applies for periodical titles.

- Example: COMM’N ON HUM. RTS.; NOT: COMM’N HUM. RTS.

27. Internet Sources

See *Bluebook* Rule 18

A. Date and Time

Departure from *Bluebook* Rule 18.2.2(c).

When citing internet sources, do not include the time the source was published unless the source has been updated. Examples:

- See Juliet Eilperin & Brady Dennis, *How James Inhofe Is Upending the Nation’s Energy and Environmental Policies*, Wash. Post (Mar. 14, 2017), https://www.washingtonpost.com/national/health-science/how-james-inhofe-is-upending-the-nations-energy-and-environmental-policies/2017/03/14/2bebdbfa-081c-11e7-a15f-a58d4a988474_story.html [<https://perma.cc/93DF-RNKK>].
- See Nina Shapiro, *Do Feds Have Evidence that Detained Dreamer Is a Gang Member Beyond Tattoo?*, SEATTLE TIMES (Feb. 16, 2017, 10:58 AM), <https://www.seattletimes.com/seattle-news/feds-says-detained-dreamer-is-gang-member-lawyer-denies-it/> [<https://perma.cc/JD9A-XXQ2>].

B. Last Updated Parentheticals

Some internet sources do not have a date associated with the webpage. This is common when the webpage is not an article with an associated “print” date. When there is no date associated with the webpage, a “last updated” or “last modified” date should be supplied in a parenthetical *after* the URL. (Rule 18.2.2(c)). Without an associated date, either parenthetical is required with or without a perma.cc link because this rule is separate from the rule for “last visited” parentheticals. To ensure clarity, include the words “last updated” or “last modified” in the parenthetical.

Example:

- ¹ Google, <http://www.google.com> [perma.cc/XXX] (last updated Dec. 15, 2008).
- ² Joan Smith, *The Best Way to Bake*, Baking Blog, fakebakingblog.com/best-bake/thisisntarealcitation (last updated Aug. 15, 2004) (last visited June 1, 2012).
- ³ *Independent*, MERRIAM-WEBSTER DICTIONARY, <https://www.merriam-webster.com/dictionary/independent> [<https://perma.cc/YUE6-S84S>] (last updated Nov. 11, 2023).

C. PDFs

See *Bluebook* Rules 15.9, 18.2.1(b)(ii), 18.2.2(f)

As a general rule, cite reports that are available as PDFs under *Bluebook* Rule 15.9(b), not Rule 18.2.2(f). It is optional to include the URL and permalink. Cite the report under Rule 18.2.2(f) if, and only if, it is absolutely clear that the report was never printed.

Websites require URLs, but there are many types of sources found on the internet, that may not require a URL in *The Bluebook*. *WLR* allows authors to append a URL to a PDF found online if an Author prefers (even if the PDF potentially exists in print).

Sources for which no URL information is required 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.

D. 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. See *Bluebook* Rule 18.2.2(c).

Examples:

- ¹ Google, <http://www.google.com> [<https://perma.cc/KNH6-ZPB3>].
 - NOT: ¹ Google, <http://www.google.com> [<https://perma.cc/KNH6-ZPB3>] (last visited Dec. 15, 2008).
- ² Joan Smith, *The Best Way to Bake*, Baking Blog (Aug. 15, 2004), <http://www.fakebakingblog.com/best-bake/thisisntarealcitation> [<https://perma.cc/WXC4-ZPB3>].

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. Do not add permalinks to sources that are available only by clicking a download button or its functional equivalent and where the paginated version of the source cannot be linked directly, such as articles on SSRN or some science journals. 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.

Examples:

- ¹ Google, <http://www.google.com> (last visited Dec. 15, 2008).
- ² 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).

28. Jury Instructions

WLR expands on *Bluebook* Rule 12.9

In general, format citations pursuant to this formatting and the elements listed below:

<VOL#> <Location> <Type> Jury Instr. – <Civ./Crim.> <rule/section #> <(edition date)>.

Example citation of a particular section within the third edition of Alabama's civil pattern jury instructions:

- 1 ALA. PATTERN JURY INSTR. – CIV. 4.01 (3d ed. 2016).

A. Elements of a Jury Instruction Citation

- Volume number (if multi-volume set)
- Title (Small Capitals)
 - State Name (for information about federal jury instructions, see below)
 - Abbreviate according to *Bluebook* table T10
 - Type
 - If applicable, include any terms descriptive of the instructions' authority (i.e., pattern, standard, model, official, approved, etc.)
 - Examples:
 - ILL. PATTERN JURY INSTR. – CIV. 120.02 (2017).
 - MO. APPROVED JURY INSTR. – CIV. 32.07 (7th ed. 2017).
- Civil or criminal
 - After an en dash, specify whether the jury instructions pertain to civil matters or criminal matters

- o Note: For jury instructions with titles that do not readily conform to the above format, cite the title as it appears on the title page of the publication. However, if possible, still append the Civil/Criminal distinction to the end of the title.
 - o Example: JUD. COUNCIL OF CAL. JURY INSTR. – CIV. 1408 (2017).
- Page, section, or paragraph
 - o Include the page, section, or paragraph being cited. There should be a non-breaking space between the page, section, or paragraph, and the civil or criminal designation.
 - o Examples:
 - COLO. JURY INSTR. – CIV. 9:1 (2017).
 - WASH. JURY INSTR. – CIV. § 105 (2017).
- Edition / Date
 - o Always cite to the most recent updated edition of jury instructions, unless an earlier edition would be particularly relevant.
 - o Examples:
 - FLA. STANDARD JURY INSTR. – CIV. 401.9 (3d ed. 2015).
 - JUD. COUNCIL OF CAL. JURY INSTR. – CIV. 352 (2017).

B. Federal Jury Instructions:

When citing to jury instructions for a particular federal judicial circuit, use the same formatting as above, but use the circuit name instead of a state name. Abbreviate according to Bluebook table T7.

Examples:

- 5TH CIR. PATTERN JURY INSTR. – CRIM. 2.04 (2015).
- 3 FED. JURY PRAC. & INSTR. – CIV. § 105:01 (6th ed. 2016).

C. Short Form Citation

Use “*id.*” when appropriate. When *id.* is not appropriate, set out the location, followed by “Jury Instr.” (both in small caps), followed by a *supra* cross-reference to the earlier footnote containing the full citation. Include a pincite to the page, section, or paragraph being cited.

Examples:

- ILL. JURY INSTR., *supra* note 12, at 220.21.
- 11TH CIR. JURY INSTR., *supra* note 2, at B2.2.

29. Latin and Foreign Phrases

In text, most Latin and foreign words and phrases should not be italicized. Sometimes it is unclear whether a foreign word has been incorporated into common English usage—checking a word’s heading in *Black’s Law Dictionary* can provide a helpful rule of thumb. Please note that below the line there may be different rules, including for case names. See *Bluebook* Rules 2.1(a), 7, and 10.

- Example: stare decisis; NOT: *stare decisis*

30. More than Two Authors for a Book or Periodical

WLR departs from *Bluebook* Rule 15.1(b).

WLR always requires that the names of each author be listed for a source that has more than two authors the first time that source is cited. For subsequent short form citations, *WLR* follows *Bluebook* Rule 4.2, which provides that “et al.” should be used following the name of the first author.

31. Non-Breaking Spaces

WLR requires non-breaking spaces to be used *above and below the line* whenever there is a reference to a subdivision, a numbered list, a statute, a rule, a clause, an article, an amendment, etc. When in doubt, add a non-breaking space.

Examples:

- Title VII requires employers to . . .
- Part III of this Comment discusses . . .

- The court held that: 1) the plaintiff had standing; 2) the issue was not moot; and 3) summary judgment was appropriate on the defendant's counterclaims.
- A Rule 12(b)(6) motion requires . . .

A. Article, Clause, Paragraph, Section

Bluebook Rules 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. Words like "section," "article," or "clause" should be followed by a non-breaking space. The symbol "§" may be used in citations and should be followed by a non-breaking space.

Follow all subdivision references with a non-breaking space. Subdivisions include:

- app.
- Article, Art. or art.
- ch.
- Clause or cl.
- No.
- ¶
- Part
- § or section

Examples:

- In text: section I of the Administrative Procedure Act
- In citation: Administrative Procedure Act § I
- U.S. Code in citation or text: 42 U.S.C. § 1983
- U.S. Constitution in text: Article IV, Section I
- State constitution in text: article I, section 12
- In text: In article 4 of Washington's Constitution, there is a discussion of the powers, rights and obligations of the state's courts and judges.
- In citation: Omnibus Budget Reconciliation Act of 1990, Pub. L. No. 101-508, §§ 4206, 4751, 104 Stat. 1388, 1388-115-117, 1388-204-206 (1990).
- In citation: See *infra* section IV.A.
- In citation: See *infra* Part III.

B. Cross-references

Do NOT add a non-breaking space between "note" and the cross-referenced footnote number in "supra" or "infra" short citations.

Example:

- COLBY, *supra* note 3.
 - NOT: COLBY, *supra* note 3.
- BUT: See *infra* Part III.

C. Prefixes, Titles, and Initials

Use non-breaking spaces between prefixes or titles and the names that follow them. Where an author's name begins with a single initial, use non-breaking spaces between the initial and the next part of the name.

Examples:

- Dr. Kim Paris
- President Barack Obama
- F. Scott Fitzgerald
- Mx. Jan Doe

D. Statutes

Insert non-breaking spaces between the title of a statute.

- Example: Patient Protection and Affordable Care Act

32. Numbers and Numerals

See *Bluebook* Rule 6.2

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

Examples:

- 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 beginning with one million, spell out the number. Numbers less than 100 should not be spelled out if discussed alongside numbers that are greater than 99, such as when discussing money or using serial lists, or when they contain decimals. Do not modify how a quote uses numbers.

Examples:

- 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.
- "The magistrate judged waived the standard \$44 fee for violating the seventy-two-hour parking limit, reduced Long's impoundment fees from \$946.61 to \$547.12, and added a \$10 administrative fee."
- Idaho, Oregon, Washington, and California have over 70, 750, 1,100, and 3,000 wineries, respectively.
- The study concluded that 25.56 percent of X can be attributed to Y.
- "In Tacoma, Washington, a city ordinance makes it unlawful for a vehicle to be 'used for human habitation purposes for a period exceeding 72 hours on a public street or public right-of-way.'"
-

Commas in Numerals: Use commas to separate numbers that consist of four or more digits. See *Bluebook* Rule 6.2

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

33. Percentages

Spell out numerals and "percent" unless the percentage includes a decimal.

Examples:

- To get an A, students need to attend at least eighty percent of their classes.
- BUT: 68.2% of students live off campus and 31.8% of students live on campus.

34. Pincites

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

- Example: *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.

Examples:

- *Smith*, 345 P.2d at 103–05.
- *Jones*, 573 P.3d at 2798–800.

Under *Bluebook* Rule 3.3, pincites to sections or paragraphs should not be preceded by "at."

Examples:

- *Id.* § 3
 - NOT *Id.* at § 3
- HOWARD, *supra* note 10, ¶ 56,230.

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

35. Prefixes

Generally, authors are encouraged not to use gendered prefixes (e.g., Ms. or Mr.). If a prefix is used, a non-breaking space should follow it.

If the author of a source is identified as a judge or justice within the source, include “Hon.” in their name. If it is not included in the source, do not include it. Do not include any other prefixes before the author’s name (e.g., “Dr.”).

Example:

- See Hon. Bernice B. Donald & Pablo J. Davis, “*To This Tribunal the Freedmen Has Turned*”: *The Freedmen’s Bureau’s Judicial Powers and the Origins of the Fourteenth Amendment*, 79 LA. L. REV. 1, 4 (2018).
- BUT: RUTH BADER GINSBURG WITH MARY HARTNETT & WENDY W. WILLIAMS, *MY OWN WORDS* (2018).

36. Profane Language

Profane language, especially potentially offensive statements, should be used to emphasize or augment an existing point and not exclusively to shock, inflame, or offend the reader. While evocative, emotional language is a persuasive and permissive tool, language that lacks evidentiary or argumentative support only detracts from the credibility of the writing. Strong language (including slurs, swear words, or innuendo) should be flagged for subsequent review by WLR editors.

37. Punctuation

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.

Footnote numbers should relate to punctuation based on *Bluebook* Rule 1.1(a).

Examples:

- In *Smith v. Jones*,⁵ the Court held that the statute was constitutional;⁶ it did not violate the interstate commerce clause.⁷
- All states require the plaintiff to prove offer,⁸ acceptance,⁹ and consideration¹⁰; without each of these elements, there is no valid contract. Some states—like Oregon¹¹—make plaintiffs prove each element twice.

A. Okina

When referring to the State of Hawai‘i, use the okina (‘). Use of the okina for other Hawaiian words is at the author’s discretion.

38. Quotation Marks

A. Alterations

See *Bluebook* Rule 5.2

Place brackets around any letter changes, substituted words, or substituted letters 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).

Examples:

- 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.”

B. Block Quotes

A direct quotation consisting of fifty or more words should be formatted using single-space and indentation 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 one inch from the left and right margins.

WLR encourages authors not to use block quotations in footnotes. See *Bluebook* Rule 5.1(a)(ii). If an Author does include a quote over 50 words in a footnote textual sentence, we will format them as a block quote within the footnote through our pre-publishing formatting.

C. 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.

D. Nested Quotations

See *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.

- Example: 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).

Examples:

- 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. 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.

- Example: 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.

Examples:

- 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.

39. Semicolons

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

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

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

- Example: 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.

40. Signals

See *Bluebook* Rule 1

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

A. Choosing the Appropriate Signal

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, a “see” signal should be used. When in doubt, a “see” signal should be used.

See also: See also signals should be used only when (1) other sources supporting the assertion have already been introduced (i.e., following a see signal or no signal), and (2) the sources that follow the see also signal provide weaker or less direct support for the assertion than the preceding sources. See also signals must follow another citation because the meaning of their support requires comparison to the citation or citations that precede them.

See generally: *See generally* can be used if the entire work cited supports a general proposition.

See, e.g.: 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: an explanatory parenthetical is **required** for both student and professional authors when using “see, e.g.”

Cf.: *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 it is not sufficiently similar to use “see.”

E.g.: Use when the cited source states the proposition, other authorities also state the proposition, but citing to them would not be helpful or is not required.

B. Formatting Signals

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

Examples:

- *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).

C. Order of Signals

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.

Examples:

- 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); *cf.* Kane v. Webster, 555 F.2d 324 (10th Cir. 1980).
- Braudo-Bahat, *supra* note 33, at 132; see also NEDELSKY, LAW’S RELATIONS, *supra* note 29, at 55.

D. Required Explanatory Parentheticals

Student authors are required to include an explanatory parenthetical after the citation when using the following signals:

- *See also*
- *See, e.g.,*
- *Cf.*
- *Compare . . . , with . . .*
- *But cf.*

Professional authors are required to include an explanatory parenthetical after a citation when using the signal “see, e.g.”

41. Slurs

Slurs or language that reflects judgment on identity, in particular, should be flagged for review by WLR editors.

42. Statutes

Departure and expansion from *Bluebook* Rule 12.10

A. State Statutes

To be short cited, the same title of the statute must have been cited within the past five footnotes (see the five-footnote rule, *Bluebook* Rule 10.9(a) and *WLR* Style Guide Rule IV.1.f). For example for WASH. REV. CODE § 9A.44.130, the title is 9A, the chapter is 44 and the section is 130.

i. Washington

Short cites of Washington's statutes should retain the WASH. REV. CODE. label unless it is an *id.*

Examples:

- ¹ WASH. REV. CODE § 9A.44.130(6)(b) (2019).
- ² *Id.* § 9A.44.132.
- ³ WASH. REV. CODE § 4.24.550(6)(b) (2019).
 - **NOT:** WASH. REV. CODE § 4.24.550(6)(b).
- ⁴ WASH. REV. CODE § 9A.45.131.

ii. Other States

If the statute or code is named or has a specific subject, short cite by referring to that name/subject. See *Bluebook* T1.

Examples:

- ¹ CAL. EDUC. CODE § 290.012(C) (Deering 2020).
- ² *Id.* § 290.013.
- ³ WASH. REV. CODE § 9A.44.130(6)(b) (2019).
- ⁴ EDUC. § 290.200.
 - **NOT:** CAL. EDUC. CODE § 290.200.

If the statute does not have a name or subject, short cite by referring to the full name.

Examples:

- ¹ WIS. STAT. § 290.012(c) (2020).
- ² WASH. REV. CODE § 9A.44.130(6)(b) (2019).
- ³ WIS. STAT. § 290.013.

B. Short Cite to the U.S.C.

When short citing a United States Code section, refer to it as you would in a long cite, unless it is an *id.*

Examples:

- ¹ 29 U.S.C. § 157.
- ² *Id.* § 156.
- ³ CAL. PENAL CODE § 290.012(C) (Deering 2020).
- ⁴ 29 U.S.C. § 158(a).
 - **NOT:** § 158(a).

43. Superscript

Turn off auto-formatting before writing or editing in Microsoft Word. See Appendix B of this Style Guide. For example, superscript ordinal numbers should not appear.

- Example: 9th Cir.; NOT: 9th Cir.

44. Tables and Figures

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 #."

45. Terms of Art

Authors publishing in *WLR* should write for a general audience of law trained readers. Authors should explain and define any terms of art, technical language, or concepts particular to a specialized area of law.

46. Verbs

Passive Voice and Active Verbs: Avoid passive voice. Instead, use active verbs to make writing clearer, stronger, and more succinct.

Examples:

- 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.

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.

Examples:

- Evidence of the defendants' motives proves that they committed the crime.
- Amendments five and fourteen guarantee due process of law.

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

- This Comment argues . . .
 - NOT: This Comment will argue . . .

47. 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."

48. Washington State Supreme Court

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." Do NOT use "Washington Supreme Court."

Appendix A: Abbreviation Reference Chart

| | |
|----------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------|
| Case Names in Text | <u>ONLY</u> abbreviate per 10.2.1 |
| Case Names in Footnotes | 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) |
| Periodical Name | Rule 16, T6, T10, and T13 |
| Internet Domain Main Page Title | 18.2.2(b)(i), T6, T10, and T13 |
| Interviews (Author title, institutional affiliation, and location) | 17.2.5, T6, and T10 |
| Letters, Memoranda, and Press Releases | 17.2.3, T6, and T11 |
| Speeches and Addresses (Author title and institutional affiliation) | 17.2.6, T6, and T10 |
| Institutional Author (book (15.1c), working paper (17.4), or website Authors (18.2.2)) | 15.1(d), T6, and T10 |
| Publishing abbreviations | T14, Rule 15.4 |
| Subdivisions of Constitutions | Rule 11, T10, T16 |
| Statutes/Rules/Ordinances | Rule 12 (see the rule for use of other tables) |
| Legislative Materials | Rule 13, T9, (sometimes T6 and T10, see the rule for more info) |
| Admin and Executive Materials | Rule 14 (sometimes T1.2, T6, T13, and T15, see the rule for more info) |
| Services (often the unofficial publisher of some cases or materials) | 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) |

Appendix B: Auto-Correct

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."

Appendix C: Cross-References

Authors must use the Microsoft Word cross-reference function whenever using "*supra*" or "*infra*" in reference to other footnotes.

To insert a cross-references in Microsoft Word:

- Place cursor at the location in the footnote where you want to insert a cross-reference to another footnote number.
- Click on "insert" menu.
- Choose "cross-reference."
- Select "footnote" as your "reference type."
- Under "insert reference to," choose "footnote number."

- Select the appropriate footnote from the “for which footnote” window.
- Click “insert.” The program will insert the “referenced to” footnote at the insertion point.

Appendix D: Table of Keyboard Shortcuts

| | PCs | Macs |
|---------------------|------------------------------------|-----------------------------------|
| Non-breaking spaces | Ctrl+Shift+Space | Option+Space |
| Small Caps | Ctrl+Shift+K | Shift+Option+K |
| En dash | Ctrl+Num+- | Option+- |
| Em dash | Alt+Ctrl+Num+- | Shift+Option+- |
| Section Symbol | Insert, Symbol, Special Characters | Option+6 |
| Supra Updates | Cmd A > F9 | Cmd A > cmd. + shift + option + U |