

# Introductory Signals

The following information regarding The Bluebook Citation format is an adapted version of the style and formatting guidelines found in *The Bluebook*, 20th ed. (2015). This sheet is to serve as a ready-reference; more information can be found in the handbook sections provided.

## Basic Information About Introductory Signals

### WHY USE SIGNALS? (Rule 1.2, 1.3, 1.4)

A signal sends a shorthand message to the reader about the relationship between a proposition and the source or authority cited for that proposition.

Signals should always be used in citations.

Signals should be underlined or italicized.

### HOW DO I KNOW WHICH SIGNAL TO USE?

There are specific signals used that indicate support, contradiction, background material, etc. Examples for each different signal are listed below.

## Signals that Indicate Support

### When [no signal] is used:

The authority directly states the proposition, is the source of a quotation, or was mentioned in the proposition.

**Example:** A law declaring that one group of citizens shall not be afforded equal opportunity to seek assistance from the government violates the Equal Protection Clause. Romer v. Evans, 517 U.S. 620, 633 (1996).

### When E.g., is used:

The authority is one of multiple authorities directly stating the same position.

**Example:** Many states have established a statutory presumption in favor of equal division of marital property. E.g., N.C. Gen. Stat. § 50-20(c) (2001); Wis. Stat. Ann. §767.255(3) (West 2001).

### When Accord is used:

The authority is one of multiple authorities directly stating or supporting the proposition, and one of the other authorities was mentioned in the proposition.

**Example:** Our inquiry is limited to “whether, after viewing the evidence in the light most favorable to the prosecution, any rational trier of fact could have found the essential elements of the crime beyond a reasonable doubt.” Jackson v. Virginia, 443 U.S. 307, 319 (1979); accord People v. Cox, 195 Ill.2d 378, 387 (2001).

### When see is used:

The authority supports, but does not directly state, the proposition.

**Example:** The Sixth Amendment’s guarantee of the right to assistance of counsel ensures that criminal defendants without legal training are not left to fend for themselves in our complex system of criminal justice. See Powell v. Alabama, 287 U.S. 45, 69 (1932) (arguing that, without guidance of counsel, a layperson charged with a crime “faces the danger of conviction because he does not know how to establish his innocence”).

### When see also is used:

The authority provides additional material supporting the proposition.

**Example:** In *Ash*, the handicapped student attended private school starting in 1983, but his parents did not provide meaningful notice to the school district until 1989. *Ash v. Lake Oswego Sch. Dist.*, 766 F. Supp. 852, 853-55, 864 (D.Or.1991); see also *Ash*, 980 F.2d at 586 (incorporating the district court's account of the facts).

### When Cf. is used:

Means “compare.”

The authority is different from the main proposition but sufficiently analogous to lend support.

**Example:** It is precisely this kind of conflict that the Supreme Court wanted to avoid when it fashioned the bright-line rule in *Miranda*. Cf. *Davis*, 512 U.S. at 461 (arguing that, when a suspect asks for counsel, the benefit of the bright-line rule is the “clarity and ease of application” that “can be applied by officers in the real world without unduly hampering the gathering of information”).

---

## Signal that Suggests a Useful Comparison

### When Compare ... [and] ... , with... [and]...:

The authorities are similar or different in important respects.

**Example:** Compare *Michael H. v. Gerald D.*, 491 U.S. 110, 121 (1989) (rejecting the claim by a putative natural father of the right to visit his child conceived by a married woman), *and* *CATHARINE A. MACKINNON*, *Feminism Unmodified* 49 (1987) (contending that what connects all women is their oppression in a sexual hierarchy), with *Loving v. Virginia*, 388 U.S. 1, 12 (1967) (naturalizing language about marriage).

---

## Signals that Indicate Contradiction

### When Contra is used:

The authority directly states a proposition contrary to the main proposition.

“*Contra*” is used where “[no signal]” would be used for support.

**Example:** Because the Telecommunications Industry Association's purpose is comprehensive, arguments based on congressional silence on the question whether the TIA applies to actions that increase moneys a state tax system collects are of no consequence. Contra, *Winn*, 307 F.3d, at 1017-1018 (relying on *Dunn v. Carey*, 808 F.2d 555, 558 (C.A.7 1986)).

### When But see is used:

The authority clearly supports a proposition contrary to the main proposition.

“*But see*” is used where “*see*” would be used for support.

**Example:** The Federal Courts of Appeals have reached the same conclusion in applying the federal hearsay rule. *United States v. Garnett*, 122 F.3d 1016, 1018-1019 (C.A.11 1997) (*per curiam*); but see *United States v. Oates*, 560 F.2d 45, 82 (C.A.2 1977).

### When But cf. is used:

The authority supports a proposition analogous to the contrary to the main proposition.

**Example:** But cf. 995 F.2d, at 1137 (observing that “[i]n the ordinary tort claim arising when a government driver negligently runs into another car, jury trial is precisely what is lost to a plaintiff when the government is substituted for the employee”).

---

# Signal that Indicates Background Material

**When See generally is used:**

The authority is helpful background material related to the proposition.

**Example:** It is a form of “discrimination” because the complainant is being subjected to differential treatment. See generally Olmstead v. L. C., 527 U.S. 581, 614, 144 L. Ed. 2d 540, 119 S. Ct. 2176 (1999) (Kennedy, J., concurring in judgment) (the “normal definition of discrimination” is “differential treatment”).

**Note:** When using more than one type of signal in a citation sentence, the signals (together with the authorities they introduce) should appear in the order in which they appear in this guide.