



# RHAPSODY IN BLUE

AN ODE TO *THE BLUEBOOK*

*Michael Coenen*

I'd like to say a word or two  
About a little book of blue<sup>1</sup>  
Whose sense of style shineth through  
The pages of each law review.

It took me time, I will concede,  
To grasp in full its holy creed,  
But when at last I did succeed  
My true-blue faith was guaranteed.

Its bluish streaks are chic and sleek.  
Its ring-shaped bindings far from weak.  
Its fonts and hues beyond critique.  
This beauty boasts a fine physique.

Surely, though, some doubt should hover  
When we judge a book by cover!<sup>2</sup>

---

*Michael Coenen is a member of the Yale Law School class of 2009.*

<sup>1</sup> THE BLUEBOOK: A UNIFORM SYSTEM OF CITATION (Columbia Law Review Ass'n et al. eds., 18th ed. 2005) [hereinafter "BABY BLUE"].

<sup>2</sup> Cf. GoEnglish.com Idioms: "You Can't Judge a Book by Its Cover," <http://www.goenglish.com/YouCantJudgeABookByItsCover.asp> (last visited Dec. 12, 2007) (noting that "[t]he value of something is not always obvious from what we see on the surface, so we should save our judgments until we have more experience").

Michael Coenen

To become a *Bluebook* lover  
One must learn more deeply of her.

Join me then as off I sail  
Set to harpoon this mighty whale.<sup>3</sup>  
With reverence for its epic scale,  
Let's wander down the blue-blazed trail.

In light-blue colored territory  
*Baby Blue* begins its story.<sup>4</sup>  
Lawyers browse this inventory  
When they strive for courtroom glory.

But we all know, it's fair to say,  
This intro stuff is child's play.<sup>5</sup>  
Beyond it lies the rich array  
Of guideposts for the scholar's way.

Our fearless peerless pioneer  
Describes with language crystal clear  
In one and twenty rules austere  
How faultless footnotes should appear.

Rule the First: It introduces  
Citing's structure and its uses.

---

*But see* BABY BLUE, *supra* note 1, R.18 (discouraging citation to electronic sources “because they often lack the permanence and authoritativeness of traditional printed material”).

<sup>3</sup> Cf. HERMAN MELVILLE, *MOBY DICK* (Northwestern Univ. Press 2001) (1851).

<sup>4</sup> See BABY BLUE, *supra* note 1, at 3-43. Interestingly, this introductory section, called “the Bluepages,” is treated as a singular whole (i.e., “The Bluepages provides,” rather than “The Bluepages provide”). See *id.* at 2.

<sup>5</sup> *Id.* at 2 (“The Bluepages provides only an abbreviated introduction to the *Bluebook* system . . . and will not contain answers to more difficult citation questions.”); see also Christine Hurt, *The Bluebook at Eighteen: Reflecting and Ratifying Current Trends in Legal Scholarship*, 82 IND. L.J. 49 (2007) (noting that “the Bluepages seem [sic] to reflect an attempt to be responsive to the needs of law students and first-year writing programs”).

## Rhapsody in Blue

Signal-ordering<sup>6</sup> abuses  
Will within find no excuses.

Rule Two has types of type in mind.  
Vanilla text is intertwined  
With styles of a special kind:  
*Italics*, caps, and underlined.

Of subdivisions speaks Rule Three  
Providing quite the panoply  
Of ways to point specifically  
To sections of an entity.

What enraptured Rule Four's drafter?  
*Supra!* *Id.!* And "hereinafter"!  
Though this may evoke some laughter,  
Thanks go to whoever staffed her.<sup>7</sup>

Rule Five is next then to arrive,  
And here quotations come alive.  
Ellipses, [sic]'s, and margins thrive  
Within its busy, bustling hive.

Rule Six rolls up its mighty sleeves  
For numbers, symbols, and abbrev.'s.<sup>8</sup>  
And just in case one misperceives,  
This well-constructed rule achieves.

The Seventh Rule in turn supplies  
Some phrases to *italicize*.

---

<sup>6</sup> See BABY BLUE, *supra* note 1, R.1.3 (specifying the proper order for signals such as *see*, *see, e.g.*, *compare*, *contra*, and, my all-time favorite, [no signal]).

<sup>7</sup> This ranks as quite possibly the feeblest stanza in the entire ode. For that, I apologize both to you and to *Baby Blue*.

<sup>8</sup> *Baby Blue* says nothing about the proper abbreviation for "abbreviation," but I suspect that it would if asked go with "abbrev." Cf. *id.* T.6 (abbreviating "rehabilitation" as "rehab." and "foundation" as "found."). But see *id.* (abbreviating "publication" as "publ'n" and "federation" as "fed'n" and thereby suggesting that "abbreviation" should be abbreviated as "abbr'n").

*Michael Coenen*

To “*vin de table*” it applies  
As well as words that *emphasize*.

With Rule the Eighth let’s now commence.  
Its guidelines might seem commonsense.  
But careful, citers! Don’t incense  
Its sense of capital offense.

The Ninth Rule offers some support  
On how to format terms of court.<sup>9</sup>  
Don’t blink or you’ll miss its report.  
This Rule is sweet, but very short.

About Rule Ten let’s talk a bit,  
No case citation fazes it.  
There’s guidance for the judge’s writ<sup>10</sup>  
And Circuit Five’s untimely split.<sup>11</sup>

To Rule Eleven come we next,  
A constitution-centric text.  
When founding charters have us vexed,  
Its wisdom leaves us unperplexed.

What’s the Twelfth Rule’s concentration?  
Laws of citing legislation!  
Codes’ and statutes’ presentation  
Lies within its regulation.

---

<sup>9</sup> The title of Rule 9 (“Titles of Judges, Officials, and Terms of Court”) uses the phrase “Terms of Court” to refer to time periods (*e.g.*, “the 1999 term”). Parsed in a different way, however, the phrase creates an interesting sort of redundancy because titles of judges, officials, and [temporal] terms of court can all be characterized as terms of court.

<sup>10</sup> Admittedly, this is a strained use of the word writ. Some dictionaries suggest, however, that the word can refer generally to “[w]ritings.” See Writ – Definition of Writ by the Free Online Dictionary, Thesaurus, and Encyclopedia, <http://www.thefreedictionary.com/writ> (last visited Dec. 12, 2007).

<sup>11</sup> See *BABY BLUE*, *supra* note 1, R.10.8.2 (devoting an entire paragraph to the Fifth Circuit split that took place in October 1981).

## *Rhapsody in Blue*

The law-creating dance routine  
Is choreographed by Rule Thirteen.  
It paints a scintillating scene  
Of hearings, bills, and all between.

Rule Fourteen next provides the keys  
To cite execs and agencies,  
While never failing (mind you, please!)  
To dot its *i*'s and cross its *t*'s.

The Fifteenth Rule then struts on stage.  
Of books and pamphlets, it's the sage.  
Here on a very special page  
*The Bluebook* does itself engage.<sup>12</sup>

Journal-based citation trouble?  
See Rule Sixteen on the double!  
Zooming in like Edwin Hubble,<sup>13</sup>  
It will crush your doubts to rubble.

How to cite unpublished work,  
Like memos from a SCOTUS clerk?  
In Rule One-Seven, answers lurk –  
Here *Baby Blue* just goes berserk.

In Rule Eighteen (yourself, please brace)  
*The Bluebook* enters cyberspace!<sup>14</sup>  
Prescribing with frenetic pace  
The rules for every web-based place.

---

<sup>12</sup> *Id.* R.15.8(c)(v).

<sup>13</sup> Edwin Hubble was a 20th century astronomer. See GALE E. CHRISTIANSON, EDWIN HUBBLE: KING OF THE NEBULAE (1996).

<sup>14</sup> The Eighteenth Edition of *The Bluebook* made major changes to the rules regarding internet citations. See Hurt, *supra* note 5, at 56 (noting that the Eighteenth Edition “brings citation practice into the new millennium”).

*Michael Coenen*

Those case reporters in loose-leaf  
The Nineteenth Rule commands in chief.  
Affording scholars much relief  
When referencing these readings brief.

The long arm of Rule Twenty reaches  
Past our borders and our beaches.  
Foreign stuff is what it teaches.  
Worldliness is what it preaches.

Rule Twenty-One's another guide  
When we are thinking worldwide.  
In U.N. items it takes pride  
Not to mention pacts allied.

And now you say, "*The Bluebook's* done."  
But hold your horses; there's more fun.  
Like colors 'round the setting sun,  
Its coda will the spectrum run.

A throng of tables, sixteen strong  
Concludes *The Bluebook's* buoyant song.  
Abbreviations here belong.  
All are right, and none are wrong.

T1: U.S. Jurisdictions:  
Here you'll find no legal fictions.  
T2: Those That Lie Abroad:  
Its mammoth scope will leave one awed.

T3: Some Intergov'ment Groups:  
It jumps with grace through all the hoops.  
T4: You Need a Treaty Source?:  
It's useful in your IR course.

T5: Arbitral Reporters:  
ICSID's and The Hague's headquarters.  
T6: Case Abbreviation:  
Use "Fed'n" for "Federation."

## *Rhapsody in Blue*

T7: Names of Different Courts:

Like B.T.A. and its cohorts.

T8: Those Phrases That Explain:

Where *aff'd* and *rev'd* are in the main.

T9: Here's Legislative Docs!:

Off it will knock my *Bluebook* socks!

T10: Terms of Geography:

My state is "Conn." and not "CT."

T11: Names for Judges:

"B." for "Baron," it begrudges.

T12: Months (Read More Than Yearly):

Dozenth table. Genius, sheerly.

T13: Periodi-Cool!:

Use "Sch.," it says, when cutting "School."

T14: Terms for Publishing:

Abridge "abridge" it does with zing.<sup>15</sup>

T15: Serving Service Works:

Not any looseleaf this one shirks.

T16: Subdivision Land:

With § and ¶ and "nn." on hand.

To finish, let me recommend

The index at *The Bluebook's* end.

To each detail does it attend.

Your search time it will not misspend.

And when that final page is turned

And edit sessions have adjourned

From *Baby Blue* you'll much have learned

And your respect it will have earned.

---

<sup>15</sup> T.14 provides that "abridged" should be abridged as "abr." It also provides that "unabridged" should be un-unabridged as "unabr." See *BABY BLUE*, *supra* note 1, T.14.

*Michael Coenen*

Yes, though my *Bluebook* belt's not black  
And citing prowess I might lack,<sup>16</sup>  
I'll never ever turn my back  
From this lean ledger's trodden track.

And now (for real) I'll say adieu,  
But not without reminding you  
That when perfection you pursue  
There's nothing like my *Baby Blue*.<sup>17</sup>



---

<sup>16</sup> Look at, e.g., *hic* note 16 (displays a number of egregious Bluebook errors).

<sup>17</sup> Compare BABY BLUE, *supra* note 1, with THE UNIVERSITY OF CHICAGO MANUAL OF LEGAL STYLE (University of Chicago Law Review and University of Chicago Legal Forum eds., 2d ed. 2000) (codifying a far inferior system of style than *The Bluebook's*) and ALWD CITATION MANUAL: A PROFESSIONAL SYSTEM OF CITATION (Darby Dickerson and Association of Legal Writing Directors eds., 3d ed. 2005) (similar).