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# An Introduction to The Bluebook



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### Short Citation Forms (Id., Supra, Hereinafter)

Overview

*Id.*

*Supra*

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## Overview

**Rule 4** governs the general use of the short citation forms *id.*, *supra*, and hereinafter. A number of materials have their own rules governing the use of short citation forms; see the table at the beginning of Rule 4.

### *Id.*

**Rule 4.1** governs the use of *id.* generally.

For law review articles, "use *id.* when citing the immediately preceding authority within the same footnote or within the immediately preceding footnote *when the preceding footnote contains only one authority.*"

For instance:

Footnote 1: Johnson v. Phelan, 69 F.3d 144, 145 (7th Cir. 1995).

Footnote 2: *Id.*

(Footnote 1 is the footnote immediately preceding Footnote 2, and cites to only one authority (a case). Footnote 2 also cites to the same case, so *id.* may be used.)

Footnote 15: Pamela Laufer-Ukeles, *Collaborative Family-Making: From Acquisition to Interconnection*, 64 VILL. L. REV. 223, 223 (2019). Laufer-Ukeles observes that "domestic adoption involves a widely-accepted system of what is considered 'non-commercial adoption,' including private adoption...." *Id.* at 238.

(Here, the same authority is cited twice in a single footnote. *Id.* is used when citing to the source a second time, after it has already been cited.)

If the subsequent citation is to the same material but a different page than was earlier cited, simply list the new page number in the "*id.*" citation:

Footnote 17: Franklin A. Gevurtz, *Building a Wall Against Private Actions for Overseas Injuries: The Impact of RJR Nabisco v. European Community*, 23 U.C. DAVIS J.INT'L L. & POL'Y 1, 2 (2016).

Footnote 18: *Id.* at 15.

If the immediately preceding footnote lists more than one authority, *id.* should *not* be used in the very next footnote. In this instance, you should use *supra*.

For example:

Footnote 20: Hannah L. Buxbaum, *The Scope and Limitations of the Presumption Against Extraterritoriality*, 110 AJIL UNBOUND 62, 62 (2016); *see also* Gevurtz, *supra* note 17, at 3.

Footnote 21: Buxbaum, *supra* note 20, at 64.

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Supra

Rule 4.2(a) governs the use of *supra*.

*Supra* may be used to refer to a previously fully cited authority, unless *id.* would be more appropriate or *supra* cannot be used.

In the below examples, *supra* is appropriate because an authority was fully cited in an earlier footnote, but not the immediately preceding one. (In the latter case, *id.* would be more appropriate.)

- Footnote 1: William Baude & Stephen E. Sachs, *The Law of Interpretation*, 130 HARV. L. REV. 1079, 1107-10 (2017).
- Footnote 10: Baude & Sachs, *supra* note 1, at 1136 ("Interpretive rules can change over time.").
- Footnote 5: *Green Card Processes and Procedures*, U.S. CITIZENSHIP & IMMIGRATION SERVS., <https://www.uscis.gov/greencard/greencard-processes-procedures> [<https://perma.cc/CJ82-M6NJ>]
- Footnote 10: U.S. CITIZENSHIP & IMMIGRATION SERVS., *supra* note 5.

*Supra* may only be used to refer to certain categories of materials.

Can use for:	Cannot use for:
Legislative hearings	Cases
Court filings	Statutes
Books, pamphlets, reports	Constitutions
Unpublished materials	Legislative materials (other than hearings)
Nonprint resources	Restatements
Periodicals and services	Model Codes
Treaties and international agreements	Regulations
Regulations, directives, and decisions of intergovernmental organizations	(An exception may be made for any of these authorities if they have extremely long names)
Internal cross-references	See the relevant rules for appropriate short forms for these materials

## Hereinafter

**Rule 4.2(b)** addresses the use of "hereinafter". Generally, "hereinafter" can be used to shorten names of cited authorities. According to *The Bluebook*, "after the first citation of the authority, but before any explanatory parenthetical, place the word "hereinafter" and the shortened form in brackets."

The same guidelines as to when "*supra*" can and cannot be used also apply to "hereinafter". See above under "*supra*".

Examples for appropriate usage of "hereinafter" (see highlighted areas):

<p><b>The title of an authority is long or cumbersome, and shortening the title would reduce confusion.</b></p>	<p><u>Ex. 1:</u> Protocol Additional to the Geneva Conventions of 12 August 1949, and Relating to the Protection of Victims of International Armed Conflicts (Protocol I), June 8, 1977, art. 10 [hereinafter AP I].</p> <p><u>Ex. 2:</u> Prosecutor v. Jean-Pierre Bemba Gombo, ICC-01/05-01/08-3636, Judgment on the appeal of Mr. Jean-Pierre Bemba Gombo against Trial Chamber III's "Judgment pursuant to Article 74 of the Statute" (June 8, 2018) [hereinafter Bemba Appeal Judgment].</p>
<p><b>You need to clearly distinguish between two authorities in one footnote, especially if you plan to cite to one or both of them later on.</b></p>	<p>Footnote 3: Lisa Pruitt, <i>Who's Afraid of White Class Migrants? On Denial, Discrediting, and Disdain and Toward a Richer Conception of Diversity</i>, 31 COLUM. J. GENDER &amp; L. 196, 197 (2015) [hereinafter <i>White Class Migrants</i>]; Lisa Pruitt, <i>Welfare Queens and White Trash</i>, 25 S. CAL. INTERDISC. L.J. 289, 290 (2016) [hereinafter <i>Welfare Queens</i>].</p> <p>Footnote 4: Pruitt, <i>White Class Migrants</i>, <i>supra</i> note 3, at 198.</p> <p>*Here, both authorities in Footnote 3 are by the same author, Lisa Pruitt. If "hereinafter" was not used to shorten both article titles, Footnote 4 would have looked like this:</p> <p style="padding-left: 40px;">Pruitt, <i>supra</i> note 3, at 198.</p> <p>In this case, we do not know which Pruitt article from Footnote 3 is being referenced.</p>

