

DISTRICT OF COLUMBIA COURT OF APPEALS
CITATION AND STYLE GUIDE

[2025-26 Revised ed.]

- *The Bluebook: A Uniform System of Citation* (21st ed. 2020), governs all work product in the D.C. Court of Appeals. Do NOT use “(cleaned up)” to avoid proper Bluebook citations. These rules below supplement *The Bluebook* rules as they apply to our cases.
- Please note that some abbreviations changed in the 21st edition of *The Bluebook*’s T6. For example, “professional” is now abbreviated as “pro.” instead of “prof.”
- Where *The Bluebook* is silent on a matter, please follow the *The Chicago Manual of Style* 15th ed, published in 2020.

TABLE OF CONTENTS

1. The Bluebook	1
2. Signals	1
2.1. See	1
2.2. E.g.	1
2.3. Infra/Supra.....	1
3. Abbreviations	2
3.1. Reporters, Court Names, and Periodicals	2
3.2. Footnotes	2
3.3. Government, Department, and Agency Names	2
4. Cases	3
4.1. Case Names	3
4.2. Superior Court Opinions	3
4.3. D.C. Court of Appeals Opinions	4
4.3.1. Memorandum Opinion and Judgment	4
4.3.2. Rehearing	4
4.3.3. En Banc	4
4.3.4. Appeal to the Supreme Court	5
4.4. D.C. Circuit Opinions	5
4.5. Order of Authority.....	5
4.5.1. En Banc Opinions	5
4.5.2. State Courts	6
4.5.3. Federal Courts	6

4.5.4. Supreme Court	6
4.6. Slip Opinions.....	6
4.6.1. Website	6
4.6.2. Pincites	6
4.6.3. D.C. Circuit Slip Opinions	7
4.6.4. D.C. Court of Appeals Orders.....	6
4.6.5. D.C. Superior Court Orders and Administrative Orders	7
5. Statutes.	7
5.1. D.C. Code.....	7
5.2. Section.....	8
5.3. Spacing.....	8
6. Legislative Materials.....	8
6.1. D.C. Rules and Regulations	8
6.2. D.C. Legislative History	9
6.3. Spacing.....	10
7. Court Rules.....	10
7.1. D.C. Court of Appeals.....	10
7.2. D.C. Bar	10
7.3. Superior Court.....	11
7.4. Rules of the Board on Professional Responsibility.....	12
8. Jury Instructions	12
9. Formatting.....	12
9.1. Font	12
9.2. Margins	12
9.3. Spacing.....	13
9.4. Block Quotations:.....	13
9.5. Punctuation.....	14
9.6. Ellipses/Omissions	14
9.7. Page Numbers	15
9.8. Headings.....	15
9.9. Capitalization	15
9.10. Numbers	15
9.11. Italics	15
10. Miscellaneous.....	16
10.1. Attorney’s fees	16

10.2. COVID-19.....	16
10.3. Cleaned up.....	16
10.4. Pronouns.....	16

1. The Bluebook. Whenever something in this memorandum conflicts with any provision of *The Bluebook: A Uniform System of Citation* (21st ed. 2020), this memorandum controls. **Otherwise, *The Bluebook* controls.**

2. Signals.

2.1. See: The word “see” should always be italicized. *See* Bluebook Rule (BB R.) R. 3.5.

2.2. E.g.: Never put a comma after *see* and *cf.*, except when they are followed by e.g.

2.3. Use of *supra*, *infra*, *ante*, and *post* cross-reference signals:

- When citing *within* a majority, concurring or dissenting opinion, use *supra* & *infra*.

-*Supra* = above (earlier in the text of the same opinion). Use *supra* to refer to preceding citations to articles and treatises as well as preceding sections of the opinion or footnotes. Ex/ *Supra* at 2, *Supra* at note 4.

-*Infra* = below (later in the text). Use *infra* to refer to subsequent sections of the opinion or footnotes. Ex/ *Infra* at 10.

- When citing *outside* an opinion to another opinion in the same case, use *ante* & *post*

-*Ante* = before (this opinion). For example, a dissent would refer to a section or page of the majority opinion, with a cite: Ex/ *Ante* at 5 or *Ante* at Part II.

-*Post* = after (this opinion). For example, the majority opinion would refer to a section or page of a concurring or dissenting opinion, with a cite: *Post* at 2, *Post* concurrence at 5, *Post* dissent at 5.

3. Abbreviations.

3.1. Reporters, Court Names, and Periodicals: When two or more letters are used in a single abbreviation, there should be no space between them. For this purpose, an ordinal number such as 2d, 3d, or 4th is treated as a single letter.

- U.S., D.C., A.2d, F.2d, S.D.N.Y., A.L.R.3d, F.4th

When an abbreviation contains more than one letter it should be preceded and followed by a space.

- S. Ct., N.D. W. Va., Cal. App. 2d, Ill. 2d, So. 2d
- U. Pa. L. Rev., A.L.R. Fed.

3.2. Footnotes: When citing a footnote in a case or other authority, use “n.” *See* BB R. 3.2(b) for general guidance. When referring to a footnote in the document you are writing, use “note.”

- *Coto v. Citibank FSB*, 912 A.2d 562, 566 n.4 (D.C. 2006).
- The court found that the Director of Sales position had been eliminated due to a reorganization at WCCA. *See supra* note 4.

3.3. Government, Department, and Agency Names: *See* BB R. 6(b) for general guidance; remember to always spell out the first use of the word/name/agency in the document and include any abbreviation in parenthesis and without quotation marks. For example, Administrative Law Judge, (ALJ), not (“ALJ”).

For D.C. legislation, agencies, and departments, use the following abbreviations:

- Administrative Law Judge: ALJ
- Basic Business License: BBL
- Civil Protection order: CPO
- D.C. Humans Rights Acts: DCHRA
- D.C Administrative Procedures Act: DCAPA
- Former D.C. Department of Consumer and Regulatory Affairs: DCRA; this agency no longer exists as of October 1, 2022, its successors are:

- Department of Buildings: DOB
- Department of Licensing and Consumer Protection: DLCP
- Notice of Infraction: NOI
- Office of Administrative Hearings: OAH
- Temporary Protective Order: TPO

3.4. Compass Directions: Always abbreviate northeast, northwest, southeast, and southwest without a period; e.g., NE, NW, SE, and SW.

4. Cases.

4.1. Case Names: *See* BB R. 10.2 for general guidance.

(a) *In re:* “*In the Matter of,*” “*Matter of,*” and “*Petition of,*” should always be abbreviated “*In re.*”

(b) District of Columbia: Abbreviate the District of Columbia to “D.C.” *unless* it is the entire name of the party (as opposed to just a part thereof), *see* BB R. 10.2.2.

- *Smith v. District of Columbia*, 399 A.2d 213 (D.C. 1979).
- *Smith v. D.C. Dep’t of Emp. Servs.*, 934 A.2d 428 (D.C. 2007).
- *Bd. of Trs., the Grand Lodge of the Indep. Ord. of the Odd Fellows of D.C.*, 225 A.3d 737 (D.C. 2020).

4.2. Superior Court Opinions: Opinions by Superior Court judges should be cited to the Daily Washington Law Reporter, if possible, giving the date of the opinion (not the date of publication):

- *Blue v. Gray*, 112 Daily Wash. L. Rptr. 2345 (D.C. Super. Ct. June 21, 1985).

If the opinion is not published, cite it like any other unpublished opinion:

- *Blue v. Gray*, No. 81-765 (D.C. Super. Ct. June 21, 1985). [*See* BB R. 4.6 below for an explanation of the proper citation of slip opinions.]

4.3. D.C. Court of Appeals Opinions: Cite all cases from this court and its predecessor, the Municipal Court of Appeals, as follows (for more information, *see* BB T1, which sets forth the proper reporters and abbreviations for the various iterations of the D.C. Courts):

- *Doe v. Roe*, 508 A.2d 1234 (D.C. 1985).

4.3.1. Memorandum Opinion and Judgment: Cite MOJs as follows:

- *Thomas v. United States*, No. 04-CM-722, Mem. Op. & J. at 7 (D.C. Feb. 14, 1999).

Short cite as “[NAME], Mem. Op. & J. at # (coincides with the short form of a slip opinion of BB R. 10.9(a)(iii)).

- *Thomas*, Mem. Op. & J. at 7.

Order of this court: Cite an order of this court as follows:

- *Mashaud v. Boone*, 269 A.3d 1022 (D.C. 2021) (order).

4.3.2. Rehearing: A denial of rehearing by any court—including the Supreme Court—should not be reflected in the citation unless it is accompanied by an opinion, or unless the denial is relevant to the point for which the case is cited.

- *Breezevale Ltd. v. Dickinson*, 759 A.2d 627, 640 (D.C. 2000), *aff’d on reh’g*, 783 A.2d 573, 575 (D.C. 2001) (en banc).
- *Lyons v. United States*, 622 A.2d 34 (D.C.), *reh’g granted en banc*, 635 A.2d 902 (D.C. 1993). [Note that no year appears in the citation for the original opinion because both the original opinion and the opinion granting rehearing en banc issued in the same year.]

4.3.3. En Banc: Cite en banc decisions as follows:

- *Wilson-Bey v. United States*, 903 A.2d 818, 816 (D.C. 2006) (en banc).

4.3.4. Appeal to the Supreme Court: Be particularly careful to know the Supreme Court status of this court’s cases. The grant or denial of a petition for a writ of certiorari should always be reflected in the citation if the case is less than two years old or the denial is particularly relevant. In all other circumstances, it may be assumed that certiorari was either denied or that no petition was filed.

When you are citing a case in which certiorari has been denied and wish to add something parenthetically about the case, the parenthetical comment should precede the “*cert. denied.*”

- *Doe v. Roe*, 508 A.2d 1234 (D.C. 1985) (holding the plaintiff liable), *cert. denied*, 462 U.S. 987 (1986).

4.4. D.C. Circuit Opinions: Cite only to F., F.2d, F.3d, or F.4th. Note that the court and jurisdiction—i.e., “D.C. Cir.”—are added to the date parenthetical.

- *United States v. Doe*, 730 F.2d 1529 (D.C. Cir. 1984).

Include pinpoint cites as follows:

- *Doe v. Webster*, 606 F.2d 1226, 1244 (D.C. Cir. 1979).
- *Doe*, 606 F.2d at 1244.
- *Id.* at 1244.

4.5. Order of Authority.

4.5.1. En Banc Opinions: In string citations for a single proposition, cite this court’s en banc decisions ahead of other decisions from this court.

- *Wilson-Bey v. United States*, 903 A.2d. 818, 836 (D.C. 2006) (en banc); *Downing v. United States*, 929 A.2d 848, 863 (D.C. 2007).

4.5.2. State Courts: In string citations for a single proposition, cite this court's decisions ahead of those from state courts, irrespective of the year decided.

- *Smith v. Jones*, 342 A.2d 987 (D.C. 1975); *Roberson v. Commonwealth*, 185 S.W.3d 634 (Ky. 2006).

4.5.3. Federal Courts: In string citations for a single proposition, cite this court's decisions ahead of those from the D.C. Circuit, the U.S. District Court for D.C., or other federal courts, irrespective of the year decided.

- *Smith v. Jones*, 342 A.2d 987 (D.C. 1975); *Brown v. Green*, 598 F.3d 321 (D.C. Cir. 2000).

4.5.4. Supreme Court: In string citations for a single proposition, cite Supreme Court decisions before those of this court, unless the issue is one of District of Columbia law, irrespective of the year decided.

- *Crane v. Kentucky*, 476 U.S. 683 (1986); *Coto v. Citibank FSB*, 912 A.2d 562 (D.C. 2006).

4.6. Slip Opinions: For opinions that do not have an official A.3d citation yet, use the Westlaw citation. If the Westlaw citation is not available, use the LEXIS citation or the slip opinion on the Court of Appeals website.

4.6.1. Website: When citing opinions that appear on the Court of Appeals website, give the court's case number and the date of decision.

- *Doe v. Roe*, No. 85-1876 (D.C. July 31, 2007).

4.6.2. Pincites: When referring to a specific page of a slip opinion, cite as follows:

- *Doe v. Roe*, No. 85-1876, slip op. at 4 (D.C. July 31, 2007).

4.6.3. D.C. Circuit Slip Opinions: Cite D.C. Circuit slip opinions for which there is no Westlaw or LEXIS cite as follows:

- *United States v. Jones*, No. 85-6789 (D.C. Cir. Aug. 2, 2007).
- *United States v. Jones*, No. 85-6789, slip op. at 4 (D.C. Cir. Aug. 2, 2007).

4.6.4 D.C. Court of Appeals Orders, Administrative Orders, and Slip Opinions:

- DCCA Admin Order, No. XX-XXX, Title, (DATE) [URL (if it has one)]; [permalink (if using a URL)] (Cross reference with Opinion/MOJ formatting guide on how to format permalinks).
- Ex/ DCCA Admin Order, No. 19-2004, Order re: Style Guide, (Jan. 13, 2004), www.order.com; <https://perma.cc/425D-XXXX>.
- Slip. Opinion- Case name, No. XX-XXX at (D.C. DATE).
- Ex/ Bishop v. United States, No. 22-CO-0650 at 41-42 (D.C. Feb. 29, 2024).

4.6.5. D.C. Superior Court Orders and Administrative Orders: Use a comma after the year when referring to orders. For example, “the May 29, 2020, order,” and cite administrative Orders as follows:

- D.C. Super. Ct. Admin Order No. 95-11, [TITLE (if known)], ([DATE]).
- D.C. Super. Ct. R. Promulgation Order 22-05 ([DATE], [EFFECTIVE DATE]).

5. Statutes.

5.1. D.C. Code: Cite the District of Columbia Code as follows:

- Only list a D.C. Code year when referring to a historical version of the statute; when no year is listed, the document is referring to the current version of the code; same for the D.C.M.R., U.S. Code, and the C.F.R.

5.2. Section: Always use the section symbol (§) when providing a full citation.

- “Citing D.C. Code §§ 22-3223(d) and -1803, appellant appeals his conviction in a bench trial of attempted credit card fraud.”

Spell out the word “Section” in textual sentences when not using the full statutory citation.

- “The appellant relies on Section 16-916.01 in making his argument.”

5.3. Spacing: When citing statutes, use a non-breaking space between the “§” symbol and the section number. (On Windows computers, you can do this by pressing CTRL + SHIFT + space. On most Macs, you can do this by pressing OPTION + space. You can also go to Insert > Symbols > More Symbols > Special Characters, and choose “non-breaking space.”)

Do not leave a space between the section number and any subdivisions enclosed in parentheses. If the citation requires a date/year, there should be a non-breaking space between the cite and the date/year, and the date/year should be in parenthesis.

- D.C. Code § 11-721(a)(2)(A).

Use a non-breaking hyphen within statutory and regulatory cites to avoid breaking across lines. (On Windows computers, you can do this by pressing CTRL + SHIFT + hyphen. On most Macs, you can do this by pressing OPTION + hyphen. Insert > Symbols > More Symbols > Special Characters, and choose “non-breaking hyphen.”)

6. Legislative Materials.

6.1. D.C. Rules and Regulations: Cite the Daily Washington Law Reporter, the District of Columbia Register, the District of Columbia Municipal Regulations, and the District of Columbia Rules and Regulations as follows:

- (a) 112 Daily Wash. L. Rptr. ____ ([YEAR]).

(b) District of Columbia Register:
51 D.C. Reg. 6052 ([YEAR]).

(c) District of Columbia Municipal Regulations:
1 D.C.M.R. § 2800.

Only list a D.C.M.R. year when referring to a historical version of the regulation; when no year is listed, the document is referring to the current version of the D.C.M.R.

(d) District of Columbia Rules and Regulations:
__ D.C.R.R. § __ (20xx).

Only list a D.C.R.R. year when referring to a historical version of the regulation; when no year is listed, the document is referring to the current version of the D.C.R.R.

6.2. D.C. Legislative History: Cite as follows:

D.C. Laws:

[TITLE], D.C. Law 10-177, § 3, 41 D.C. Reg. 524 (1995).

D.C. Acts:

[TITLE], D.C. Act 23-328, 67 D.C. Reg. 7598 (June 19, 2020).

D.C. Council Reports:

[TITLE], D.C. Council, Report on Bill 16-205 at 4 (Feb. 28, 2006).

D.C. Committee Hearing Reports/Transcripts:

[TITLE], [Report/Hearing] on Bill No. XX-XXX before the Committee on [NAME], Council of the District of Columbia, Statement of [NAME], [AFFILIATION] at X ([DATE]).

D.C. Statutes at Large:

[TITLE], D.C. Law [No.], (DATE RANGE), D.C. Stat. [PAGE].

D.C. legislation that has changed since being introduced:

[TITLE], D.C. Bill [number if there is one], as introduced by [names], (DATE).

6.3. Spacing: When citing regulations, use a non-breaking space between the “§” symbol and the section number. (On Windows computers, you can do this by pressing CTRL + SHIFT + space. On most Macs, you can do this by pressing OPTION + space. You can also go to Insert > Symbols > More Symbols > Special Characters, and choose “non-breaking space.”)

Do not leave a space between the section number and any subdivisions enclosed in parentheses. If the citation requires a date/year, there should be a non-breaking space between the cite and the date/year, and the date/year should be in parenthesis.

- 5-A D.C.M.R. § 100.

Use a non-breaking hyphen within statutory and regulatory cites to avoid breaking across lines. (On Windows computers, you can do this by pressing CTRL + SHIFT + hyphen. On most Macs, you can do this by pressing OPTION + hyphen. You can also go to Insert > Symbols > More Symbols > Special Characters, and choose “non-breaking hyphen.”)

7. Court Rules. Always include a non-breaking space between R. and before the Rule number. (On Windows computers, you can do this by pressing CTRL + SHIFT + space. On most Macs, you can do this by pressing OPTION + space. You can also go to Insert > Symbols > More Symbols > Special Characters, and choose “non-breaking space.”) Abbreviation of rules is appropriate in text, citations, and footnotes.

- We note at the outset that appellees made no attempt to obtain sanctions under Super. Ct. Civ. R. 11.

Because “R.” in citations refers to either “Rule” or “Rules,” it should be used in citing multiple rules as well as single ones.

- D.C. App. R. 26(c), 31(a)(5).

Do not include a date in the citation for court rules unless you are citing a previous version of the rules.

7.1. D.C. Court of Appeals: Cite this court’s rules as D.C. App. R. 26(c).

7.2. D.C. Bar: Cite as D.C. Bar R. XI, § 1(a)

7.3. Superior Court: Cite the Superior Court's various rules as follows:

- (a) Superior Court Rules of Civil Procedure:
Super. Ct. Civ. R. 4.
- (b) Superior Court Rules of Criminal Procedure:
Super. Ct. Crim. R. 4.
- (c) Superior Court General Rules of the Family Court:
Super. Ct. Fam. R. 4.
- (d) Superior Court Rules of Procedure for the Small Claims and Conciliation Branch:
Super. Ct. Sm. Cl. R. 4.
- (e) Superior Court Rules of Procedure for the Landlord and Tenant Branch:
Super. Ct. L&T R. 4.
- (f) Superior Court Rules for Domestic Relations Proceedings:
Super. Ct. Dom. Rel. R. 4.
- (g) Superior Court Rules Governing Juvenile Proceedings:
Super. Ct. Juv. R. 4.
- (h) Superior Court Rules for Mental Retardation Proceedings:
Super. Ct. Ment. Ret. R. 4.
- (i) Superior Court Rules for Neglect and Abuse Proceedings:
Super. Ct. Neg. R. 4.
- (j) Superior Court Rules of the Probate Division:
Super. Ct. Prob. R. 4.
- (k) Superior Court Rules for the Tax Division:
Super. Ct. Tax R. 4.
- (l) Superior Court Rules of Civil Procedure Agency Review:
Super. Ct. Agency Rev. R. 1(b).

(m) Superior Court Rules Governing Proceedings in the Domestic Violence Division:

Super. Ct. Dom. Violence R. 4.

(n) Rules Governing Proceedings under D.C. Code § 23-110

Super. Ct. § 23-110 R. 2(b).

7.4. Rules of the Board on Professional Responsibility:

Bd. Pro. Resp. R. 2.15.

7.5. Rules of Professional Conduct:

D.C. R. Pro. Conduct 1.1.

8. Jury Instructions.

Cite jury instructions as follows:

(a) Standardized Civil Jury Instructions (the “Blue Book”):

Standardized Civil Jury Instructions for the District of Columbia, No. 15-6 (rev. ed. 20XX).

(b) Criminal Jury Instructions for the District of Columbia (the “Red Book”):

Criminal Jury Instructions for the District of Columbia, No. 4.102 (5th ed. 20XX).

Cite the most recent edition applicable to the instructions given in a particular case, but not an edition issued after the relevant time period, unless the later edition contains the precise wording of the applicable instruction.

9. Formatting.

9.1. Font: Times New Roman (14-point size).

9.2. Margins: Use one-inch margins on the left, right, top, and bottom of the page layout.

9.3. Spacing:

Use two spaces after the end of a sentence. Double space all text, except block quotations and footnotes. Only a single hard return is necessary between paragraphs.

Use a non-breaking hyphen (-) for page ranges. (On Windows computers, you can do this by pressing CTRL + SHIFT + hyphen. On most Macs, you can do this by pressing OPTION + hyphen. You can also go to Insert > Symbols > More Symbols > Special Characters, and select “non-breaking hyphen.”)

Use one space after a colon.

Do NOT use a space between a word and a dash.

Use a non-breaking space immediately following any numbers/letters used to denote items in a list, so that numbers do not break across lines (e.g., “(i) duty, (ii) breach, . . .”).

Ensure that every heading is on the same page as the immediately following paragraph, so that a heading and the first paragraph under that heading do not break across two pages (can be accomplished by checking the box “Keep with Next” in the paragraph-formatting box of Microsoft Word.)

Within a footnote, place one space after the footnote number before you begin typing the text of the footnote.

As a reminder, do not hyphenate prefixes; examples include such words as codefendant, pretrial, reelection, misspell, nonstatutory, and cosponsor.

9.4. Block Quotations:

Quotations of fifty or more words should be indented 1” from the left and right text margins of the document (as opposed to the left and right borders of the page). When quoted material is set off by being indented in a document, do not use quotation marks.

The source of the quotation should not be enclosed in brackets, nor should it be indented. Instead, it should appear at the left margin on the line immediately following the quotation. For an illustration, *see* BB R. 5.1(a).

When adding a footnote to a block quotation, place the FN call number in superscripted brackets (only applies to footnotes *not* in the original, quoted material).

9.5. Punctuation: Always place periods and commas within a close quotation mark. Only place other forms of punctuation within a close quotation mark if they are part of the original quote (e.g., the plaintiff asked, “Who are you?”; How can this goal comport with the “demanding rigors of strict scrutiny”?).

9.6. Ellipses/Omissions:

See BB R. 5.3 for general guidance. Be sure to use a non-breaking space between the periods in an ellipsis to avoid breaking across a line.

Where language from the middle of a quoted sentence is omitted, use an ellipsis as follows:

“The very integrity of the judicial system . . . depends on compulsory process.”

For omission of language at the end of a quoted sentence, use an ellipsis as follows (and *see* BB. R. 5.3(b)):

“To ensure that justice is done, it is imperative that compulsory process be available”

Where language after the end of a quoted sentence is deleted and the sentence is followed by additional quoted material, use an ellipsis as follows:

“The need to develop all relevant facts in the adversary system is both fundamental and comprehensive. . . . The very integrity

of the judicial system therefore depends on compulsory process.”

For omissions in general, follow BB R. 5.2(d)(ii). “Citation omitted” should only be used if the omitted citation comes in the middle of the quoted text—it is unnecessary when the citation follows the end of the quote.

9.7. Page Numbers: Place page numbers at the top of the page. Do not number the first page.

9.8. Headings: Roman numerals should be in bold and followed by a period; for guidance on sub-headings, consult the DCCA Opinion and MOJ Formatting Guide.

9.9. Capitalization:

Do not capitalize “government” when referring to the United States or the District of Columbia as a party.

Do not capitalize “appellant,” “appellee,” “petitioner,” “respondent,” or “claimant.”

Do not capitalize “court” when referring to this or any other court except the Supreme Court of the United States.

9.10. Numbers: Follow BB R. 6.2(a) regarding numbers (spell out numbers zero through ninety-nine).

9.11. Italics:

Italicize rather than underline case names. *See* BB R. 8 for general guidance.

Do not italicize common legal terms such as *arguendo*, *de novo*, *en banc*, *ex parte*, *inter alia*, *lis pendens*, *mens rea*, *pro se*, *respondeat superior*, *res judicata*, or *sua sponte*, but italicize less common legal terms such as *feri facias*. *See* BB R. 7(b) (“Latin words and phrases that are often used in legal writing are considered to be in common English usage and should not be italicized.”).

Do not italicize “e.g.” or “i.e.” unless “e.g.” is part of a citation signal.

10. Miscellaneous.

10.1. Attorney’s fees: In general, use “attorney’s fees.” “Attorneys’ fees” is acceptable in circumstances where the fees involve more than one attorney. Do NOT use “attorney fees” or “attorneys fees.”

10.2. COVID-19: Use “COVID-19” when referring to the global pandemic beginning in late 2019/early 2020. Use a non-breaking hyphen between “COVID” and “19.” Do NOT use “Covid,” “covid,” “Covid-19,” “covid-19,” or “coronavirus.”

10.3. Cleaned up: Do NOT use “(cleaned up)” as shorthand for avoiding proper *Bluebook* citations. “Cleaned up” does not comply with *The Bluebook* and necessarily omits all relevant citation information.

10.4. Pronouns: When using pronouns, follow the parties’ self-references (e.g., “he,” “she,” “they,” “it,” etc.).