



## Citation Apps: Promising but Flawed

**Ah, Dear Reader.** By now, you've probably sensed that I have a bit of a love/hate relationship with legal citation (and, in particular, with our friend *The Bluebook*). But accurate legal citation is important. Lawyers must provide attribution for their assertions, and their citations must communicate that attribution both clearly and accurately. Certainly no judge or law clerk grows fond of a lawyer whose citations point to the wrong page, the wrong reporter, the wrong volume, the wrong statute, the wrong rule...

At the same time, adhering to every detail of a particular citation format<sup>1</sup> can be frustrating and sometimes consumes time better spent on thorough research, thoughtful analysis, and the type of audience-focused revision that makes your writing as accurate, brief, and clear as possible. Although most of us have memorized the outlines of a case or statute citation, often we nonetheless must consult the *Bluebook* or another manual to verify details like abbreviations or spacing.<sup>2</sup> Word-processing programs thwart our efforts to avoid inadvertent <sup>superscript</sup>. And no client wants to pay for time spent on the nuances of citation.

Wouldn't it be nice if there were a reliable and inexpensive shortcut? And doesn't it seem like there should be? After all, the Apple tagline "there's an app for that" resonates for a reason. The iTunes store alone currently includes more than a million apps. The Android store offers over a million more. A plethora of mobile apps, browser plugins, and other tech tools exist to help writers working in the sciences to generate accurate citations that comply with a variety of citation formats, including MLA, APA, Chicago, IEEE, and Harvard styles. Shouldn't at least one app be able to generate an accurate, brief, and clear legal citation that complies with whatever legal-citation style you follow?

Unfortunately, no app, plugin, or online tool currently exists that reliably creates a perfect legal citation every time. Zotero, RefWorks, and EndNote—all created for the sciences—list *Bluebook* among the citation formats they support, but none generates citations that comply with every aspect of *Bluebook's* rules. Zotero does the best job, but, probably because it is a tool for academics, it generates only White-pages-compliant citations, not citations that apply the rules for practice documents.

Fear not, though: There is hope! Although all require user caution, a few tools construct accurate legal citations most of the time.

Most of you are probably familiar with *WestlawNext's* copy-with-reference feature, which allows a user to paste text into work product, complete with a correctly formatted citation. Copy with reference seems to allow you to customize your citation format to comply with jurisdiction-specific rules, but note that if you want to follow Arizona's appellate rules, selecting "Arizona" from the drop-down menu will not get you there; you need to add the paragraph numbers yourself.<sup>3</sup> Overall, though, every citation the feature generated for me followed *Bluebook* and *ALWD* format.<sup>4</sup> Lexis Advance and Bloomberg Law offer similar options.

CiteGenie, a browser plugin, works in a way very similar to Westlaw's "copy with reference" to create accurate citations, complete with pinpoint citations.<sup>5</sup>

Most intriguingly, a Boalt Law 3L recently created a citation-generating tool called Bestlaw.<sup>6</sup> Bestlaw, a browser extension for Google Chrome, works with WestlawNext to add a toolbar that, among other things, generates *Bluebook*-compliant case citations. In its first iteration, Bestlaw only works for reported federal cases, but early reviews suggest that the citation results are wholly accurate.<sup>7</sup>

Of course we need to learn legal citation, and any 2L should be able to recognize a deficient citation. But once you know the basics, there's no shame in relying on shortcuts, so long as you provide the court with citations that are accurate, brief, and clear. **AZ**

### endnotes

1. Is it really going to kill anyone if the "th" in 9th Circuit is in superscript? (*Editor's Note: Perhaps.*)
2. Again, I'm not persuaded that a clear but non-*Bluebook*-compliant abbreviation should be a problem.
3. See Ariz. R. Civ. App. 13(f) ("Citations of Arizona case law must be to the volume, page number and, if available, the paragraph number, of the official Arizona reporter...").
4. Note that Westlaw's and Lexis's own citations, or the citations in the cases they reprint, do not always comply with *Bluebook* (or *ALWD*) format. Both Westlaw and Lexis have their own citation systems that are similar to *Bluebook's*, but both use abbreviations that deviate from those prescribed by *Bluebook's* tables. And courts use their own internal citation systems. If you want to follow *Bluebook* format religiously, you cannot just cut and paste from cases.
5. [www.citegenie.com/features.html](http://www.citegenie.com/features.html)
6. [www.bestlaw.io/](http://www.bestlaw.io/)
7. See, e.g., Ashley Ahlbrand, *Research Makeover: Updating Your (Research) Look With (Browser) Extensions*, M.S. J.D.: BLOG (Oct. 6, 2014), <http://ms-jd.org/blog/article/research-makeover-updating-your-research-look-with-browser-extensions>; Carli Spina, *Bestlaw: A New Tool That Aims To Make Westlaw Better*, HARV. L. SCHOOL LIBRARY BLOG (Oct. 9, 2014), <http://etseq.law.harvard.edu/2014/10/bestlaw/>.



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