

PURPLE ZONES AND TRAFFIC CONES: NAVIGATING BLUEBOOK & REDBOOK OVERLAPS

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The Bluebook is a legal citation manual.² The Redbook is a legal “style” manual, aimed at “the stuff that comes in between citations . . . sentences and their relationship to the authorities cited.”³ That distinction seems clear. Yet citation and style manuals drift into one another’s lanes and even drive squarely through them. These overlaps create “purple zones,” where both a Bluebook rule and a Redbook rule apply. One can embrace a purple zone, by following a Bluebook rule that applies to text or a Redbook rule aimed at citations, or keep the manuals’ domains distinct, by cordoning off the overlap with traffic cones. These overlaps have concrete consequences. Students graded on “Bluebook compliance” might want to know which Bluebook rules governing text they should follow when citation rules conflict with Redbook rules. So too with competitors in writing competitions and those tasked with scoring their submissions. Lawyers faced with court rules recommending the Redbook or requiring them to “follow the Bluebook” face similar dilemmas.

These overlaps can be used as teaching opportunities. Clear-sounding rules in these manuals might seem to offer certainty to 1Ls

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² *The Bluebook: A Uniform System of Citation* (Columbia L. Rev. Ass’n et al. eds., 21st ed. 2020). Other citations manuals include the *ALWD Guide to Legal Citation*, currently written by Carolyn V. Williams. While the color metaphor doesn’t work as nicely with other reference texts, such as the *ALWD Guide*, a local style guide, or, to add a third layer of complexity, manuals governing layout, such as Butterick’s *Typography for Lawyers*, the same principles, challenges, and opportunities discussed in this essay arise using those resources.

³ Bryan A. Garner, *The Redbook: A Manual on Legal Style* xi (West Acad. Pub., 5th ed. 2023).

adjusting to law’s complex, contingent texture, but instead echo the law’s complexity and require some of the same difficult judgment calls. How to resolve conflicting rules can lead to rich discussions of informal hierarchies of authority, the importance of context and rhetorical situation in legal writing, and the role of prestige in perceived authority.

Overlap Examples⁴

Although subtitled “a uniform system of citation,” the Bluebook has many rules that explicitly or implicitly apply to text.

The *explicit* rules are those that openly state they govern text, often in contrast to rules that apply to citations. They apply to things like:

- **How to indicate ordinals** in text (write “2nd” and “3rd,” not “2d” and “3d,” which is just for citations), 6.2(b)
- How to craft **short form** references in text, whether for case names, 10.2, regulations, 14.5(a), or statutes (this last one even includes a chart showing how short forms for text differ from those for citations), 12.10(a)
- Which words to **capitalize**, both in a document’s title or heading, 8(a), and in a document’s body text, 8(b)&(c)
- **How far to spell out numbers** before switching to numerals (do so up to “ninety-nine”), 6.2(a)
- Which **typeface** styles to set text in, whether in a court document, B2, or a law-review article, 2.2
- What to **abbreviate** in court documents, B8 & B10.1(vi)
- When to use **symbols**, such as ¶, \$, or %, in text, 6.2(c)&(d).

Examples of *implicitly* purple Bluebook rules—those that don’t openly state they apply to text, but strongly imply they do—include:

- Italicizing words “**for style**,” 7
- An exception to the rule for spelling out numbers that applies when numbers “**begin a sentence**,” 6.2(a), B6
- Capitalizing party designations but not generic references (thus “Defendant” for your client but “defendant” for a party in a precedent case), B8

⁴ All citations in this essay are to the current editions of the Bluebook, *supra* note 2, and the Redbook, *supra* note 3.

- And, finally, an **entire chapter on quotations**, 5, B5.

The Redbook also drifts, with rules that explicitly apply to citations, such as:

- What **punctuation** to use in citations, whether colons, § 1.27(a), semicolons, § 1.18(c), or em dashes, §§ 1.55(c) & 6.3(a)
- When to use **numerals** in citations, §§ 5.3(c) & 5.10
- How to format **plurals** in citations, whether for word abbreviations, § 7.10(f), or symbols, § 6.3(a)
- When to use italicize **case names**, §§ 3.5 & 3.8
- And, finally, **an entire chapter on citations**, §§ 9.1–9.23.

Concrete Consequences

Yes, some rules in a citation manual apply to text, and some rules in a style manual apply to cites. This overlap has concrete consequences, in at least three different legal writing contexts: classrooms, writing competitions, and litigation.

First, teaching. Some law professors require students to format papers consistently with a particular reference manual, such as the Bluebook, and then assess student performance in part based on how well they do so.

A student in such a class—especially a student with academic or professional writing experience in a different field—might puzzle over the Bluebook rule 5.3, which governs how to form an ellipsis to indicate an omission in a quotation. According to the Bluebook, the student does so not by using the ellipsis character (“...”), which is built into modern font files and which word-processing programs create automatically, but instead by inserting a space (ideally a “hard-breaking” space), then a period/full-stop, then another hard space, then another period, again and again three or four times (“. . .”).

This rule made sense in the age of the mechanical typewriter, when the number of mechanical keys was physically limited and there wasn’t

room for a key with a true ellipsis. Today, it's anachronistic and confusing.⁵

A student might then wonder, and raise their hand to ask: (1) do I *really* have to do format quotations this way, just because (2) a *citation* manual says so?

The professor might want to have an answer ready. The answer could be yes, do embrace that purple zone, do honor the Bluebook rule for formatting ellipses in text. Or the professor could say no, putting “traffic cones” around that purple zone to mark a detour around it. Rather than address such issues piecemeal as they arise, the professor might want to decide how to handle all non-citation rules in the Bluebook (or ALWD guide), and, if assigned, what to do with the Redbook or other reference style, usage, or grammar text. Whichever approach the professor takes, they might want to be ready to explain the reason for their approach, and do so preemptively in their syllabus or assignment directions.

Similar concerns apply outside the classroom, in writing competitions. Making things worse, that context offers fewer opportunities for clarification or discussion. Competition writers aren't seated together, like students in a classroom, but scattered across the country or world. And it isn't just one professor evaluating the papers, who can make judgment calls as they arise and apply them consistently, but dozens of competition judges working asynchronously.

Thus, both competitors and judges alike might appreciate knowing whether “Bluebook compliance” as a scoring criteria means following things like that book's distinction between how to format ordinals in text (“2nd & 3rd”) versus how to do so in citations (“2d & 3d”).

The consequences of overlap extend to a third field: litigation. Court rules often state, without much elaboration, that motions, briefs, and other papers filed with that court must comply with the Bluebook.⁶

⁵ When a Bluebook-style ellipsis is combined with a period/full stop, it also invites ambiguity, as it could indicate any of four different kinds of omission. See Matthew Butterick, *Typography for Lawyers* 52–53 (2d ed. 2018), available at <https://typographyforlawyers.com/ellipses.html>.

⁶ Rules mentioning the Bluebook appear in all kinds of courts, from federal appellate courts like the 11th Circuit (Rule 28–1(k)), federal district courts, such as the District of Montana, (L.R. 1.5(d)), state supreme courts, such as Delaware (R. 14(g)), and in rules applicable to all state appellate courts, such as in Iowa (R. App. P. 6.904(2)(a)). They also appear outside court rules, such as in individual trial judges' submission guidelines or in court style guides, such as that for the Virgin Islands, which mentioned both the Bluebook and Redbook (V.I.S. Ct. I.O.P. Appx).

What does that mean? Does such a court want filings to comply with the *whole* Bluebook, not just the svelte, practice-focused Bluepages? Does such a court want just the *citations* in filings to be formatted in accord with the Bluebook, or headings, quotes, and running text, too? Does the court even know what its requirement means, or care how litigants interpret it? Is it enough for litigants to just make cites consistent and clean? What are the consequences for non-compliance?

Different courts might have different preferences. Some courts might want pleadings to conform to all Bluebook rules, whether they govern citation form or other things. Some instead might just want citations to be Bluebook-compliant (or just Bluepages compliant). Some courts' preferences might be strong, while others might be weak. To help litigants understand what they want and meet their needs, courts whose rules or guidelines currently just state, "comply with the Bluebook" may wish to clarify.

Teaching Opportunities

Aside from these practical implications, these purple zone overlaps can be used as occasions to teach students about the law.

For example, a professor might use the existence of a conflicting rule between the Bluebook and Redbook as an opportunity for the class to explore how to reconcile competing rules. One student might suggest a purposive approach: let the manual aimed at citations govern citations and the manual aimed at text govern text. A different student might impose a hierarchy on the sources: because the Bluebook is a required text in our class, while the Redbook is just on reserve, then for all conflicts the Bluebook should trump. A third student might also tip things in the Bluebook's favor, but based on perceived authority: everyone had heard of the Bluebook, and our journals require it, so for that reason it should control.⁷

Class discussion might move beyond absolute choice-of-law rules to an "it depends" approach, basing each decision on things like document context or rhetorical situation. For example, if, in a particular

⁷ Such discussion could be informed by Amy J. Griffin's *Problems with Authority*, 97 St. John's L. Rev. 115 (2023).

place in a document, following a Bluebook rule for a citation but a Redbook rule for text might be noticeable, thus distracting the reader or even they wonder if the distinction was accidental, then pick one approach for both the sentence and the cite. Or, in a rhetorical situation where the audience is a well known Bluebook stickler, such as 2L student editors evaluating 1L write-on applications, aim for absolute Bluebook compliance.

Purple zones can also be used to help students develop comfort with legal uncertainty and confidence exercising judgment. The transition to law school can be unsettling; new law students may feel vertigo when faced with the complexity and contingency of American law. They might cling to the few absolutes they can find, such as clear citation or usage rules. When writing, they might spend too much time on matters of mechanical polish, rather than the more demanding work of rereading, rethinking, and rewriting. Revealing that even these manuals contain ambiguity, fuzzy standards, conflicts, and gaps may help students become more comfortable with this reality and refocus their energies.

These manuals' goals and crossovers also present an opportunity to critically examine the implications of standardization as a goal, as well as which kinds of people and organizations in legal society feel comfortable proclaiming such standards.⁸

Another tack would be to compare what both manuals claim to cover (citations, sentences) with how they're used on the ground, as a way of understanding why they might usefully stray from their stated purposes. For example, "cite-checking" a document involves more than just evaluating how its citations are formatted.⁹ A cite-checker is also confirming other things, including substance and formatting. Checking a citation requires ensuring both that quotes are accurate and correctly formatted. When doing so, it might be natural for the cite-checker to reach for the same blue-colored manual they're using for other aspects of the cite-checking process.

⁸ Texts for such discussions might include Steven K. Homer's *Hierarchies of Elitism and Gender: The Bluebook and the ALWD Guide*, 41 *Pace L. Rev.* 1 (2020), Alexa Z. Chew's *The Fraternity of Legal Style*, 20 *Legal Comm'n & Rhetoric* 39 (2023), Richard A. Posner's *The Bluebook Blues*, 120 *Yale L.J.* 850 (2011), and Paul Gowder's *An Old-Fashioned Bluebook Burning*, 1 *Nw. L.J. des Refusés* 1 (2024).

⁹ This idea, like many others, came from David J.S. Ziff, specifically, his article *The Worst System of Citation Except for All the Others*, 66 *J. Legal Educ.* 668, 671-74 (2017).

Similarly, how the Redbook is actually used might shed light on its scope. Unlike the Bluebook, which is likely to be kept within arm's reach while cite-checking, the Redbook is more likely to be pulled off the shelf occasionally. A writer might only open it to refresh their recollection or to resolve a particular grammatical or usage issue. When doing so, they might appreciate knowing how that principle might also apply (or not apply) in the context of citations.

Conclusion

These “purple zones” thus present questions: In the case of overlap, which rule should control, and why? Should that preference be absolute, as to all overlaps, or should it vary, either by overlap or situation? If one wants to direct traffic away from an overlaps, marking the detour with traffic cones, how should that choice be communicated, whether in a classroom, a competition, or a court rule? And how might these overlaps facilitate other kinds of discussions? That opportunity to discuss the complexities is alone worth embracing.