



**BLUE
BOOK
WEDNESDAY**

Tip #75

**(CITING) VERSUS
(CITATION OMITTED)**

Suggestion from a BBW reader: “a deep dive on how to use the (citing) and (citation omitted) parentheticals.”

Further, he said: “I think it's become common practice to improperly omit citations for better readability, despite the *Bluebook's* rules.”

Let's start with what *The Bluebook* says on these parentheticals.

WHAT IS THE PURPOSE OF A PARENTHETICAL?

“Use parentheticals, as needed, to explain the relevance of a particular authority to the proposition given in the text. Parenthetical information is recommended when the relevance of a cited authority might not otherwise be clear to the reader”

(CITING)

“When a case cited as authority itself quotes or cites another case for that point, a ‘quoting’ or ‘citing’ parenthetical is appropriate per rule 1.5(b).”

(CITATION OMITTED)

“Indicate omission of a footnote or a citation with the parenthetical phrase ‘(footnote omitted)’ or ‘(citation omitted)’ immediately following the citation to the quoted source. Do not insert an ellipsis for an omitted footnote or citation.”

The Bluebook does not address the relationship between these two parentheticals. This seems to be a judgment call.

I am certainly not the authority here. As discussed in Tip #74, the “(citation omitted)” parenthetical may be useful to shorten a citation when the page limit is at play. Otherwise, my recommendation would be to err on the side of including the “(citing)” information, especially where it would be useful to the reader.

Follow along for more *Bluebook* fun!

Comment if you have a request for a future tip. For a library of all prior BBW tips, visit the [LegalEase Citations Blog](#).



Melanie C. Kalmanson
#bluebooknerd