

CITATION OF LEGAL MATERIALS

Accurate citations of material referred to in legal research and writing are absolutely essential. The citation gives the exact location of the reference and allows the reader, be that judge, fellow practitioner or other, to locate and verify or explore it. Conventions have been built up for citing references in legal writing and you are expected to follow those recognised in New Zealand. These conventions are fairly well settled in all but the area of electronically accessed material for which protocols are still being developed.

The following outline is given as a broad guide to citation. In no way is it intended as a complete reference work, but it does cover the citation of the most commonly used references. For more detailed studies the following works are recommended:

J P Kavanagh, "The Citation of Statutes and the Citation of Cases" [1966] NZLJ 385 at Law: K 211

Thomas & Cope, *How to use a Law Library, an introduction to legal skills* (Sweet & Maxwell, 1996) at Law: K 79

Fong, *Australian Legal Citation; a Guide* (Prospect, 1998)

Australian Guide to Legal Citation (MULR Assn, 1998) (also on the web at www.law.unimelb.edu.au/mulr/aglc.htm)

Canadian Guide to Uniform Legal Citation, (4th ed, Carswell, 1998)

Li & Crane, *Electronic Styles—a Handbook for Citing Electronic Information* (2nd ed, Mecklermedia, 1996)

Katrine Evans, Geoff McLay, Hart Schwartz, *Victoria University of Wellington Law Review Style Guide* (VUW, 1999)

The Bluebook; A Uniform System of Citation (17 ed, Harvard, 2000)

ALWD citation manual (Aspen, 2000)

all at Law: K 114

1.1. Citation of statutory material

(a) Acts

A NZ statute is referred to by its short title. This will incorporate the year in which the Act was passed. eg

The Electoral Act 1956

(b) Sections of an Act

- (i) If used in the main text of legal writing such as opinions, articles, essays and dissertations, abbreviations should not be used. They are acceptable in footnotes or less formal writing. eg

In the main text: Section 100 of the Electoral Act 1956

In a footnote: Electoral Act 1956, s100

- (ii) There is a set order of importance for the provisions of a section, namely:
- section
 - subsection
 - paragraph
 - subparagraph

For example:

In the main text: Section 105(1)(b)(iii) of the Land and Income Tax Act 1954

In a footnote: Land and Income Tax Act 1954, s105(1)(b)(iii)

The section number is 105, the subsection (1), the paragraph (b), and the subparagraph (iii).

(c) Amendments

- (i) Amendments to an Act are usually effected by the following formula in an Amendment Act:

“The principal Act is hereby further amended by repealing section ... and substituting the following section ...”

See, for example, section 3 of the Electoral Amendment Act 1971, which provides:

3.(1) Section 42 of the principal Act is hereby amended by repealing paragraph (a) of subsection (1), and substituting the following paragraphs:

“(a) Persons in respect of whom reception orders, other than temporary reception orders, under the Mental Health Act 1969 are in force: ...”

This should be cited *not* as section 42(1)(a) of the Electoral Amendment Act 1971. There is no such provision. The correct full citation is section 42(1)(a) of the Electoral Act 1956 as substituted by section 3(1) of the Electoral Amendment Act 1971. However when a statute has been consolidated this provision would *normally* be cited simply as section 42(1)(a) of the Electoral Act 1956, unless it was necessary to make it clear in your argument that this provision has been amended in, for example, 1971.

- (ii) Where a section appears in an amending Act with the following formula: “This section is in substitution for ...” the section is cited as it appears.

For example, see the Contracts Enforcement Act 1956. Section 2(6) of that Act provides:

(6) This section is in substitution for section four of the Statute of Frauds 1677 of the Parliament of England, and that section shall cease to be in force in New Zealand, except in respect of contracts made before the passing of this Act.

Thus a completely new section is created and the correct citation is section 2(6) of the Contracts Enforcement Act 1956.

(d) Schedules

Schedules are cited in the same way as provisions in Acts, except that particular provisions are referred to as “clauses” not “sections”. Eg

In the main text: Clause 4(1) of the First Schedule of the Privacy Act 1993

In a footnote: Privacy Act 1993, 1st Schedule, cl 4(1)

(e) Regulations

- (i) When regulations are cited they should be referred to by title and by the year and number in the Statutory Regulations series. eg

Economic Stabilisation (Import Deposit) Regulations 1976, SR 1976/22.

(The citation indicates that these regulations were the 22nd regulations made in 1976.)

It is also desirable to get into the habit of referring to the legislation pursuant to which the regulations were made. eg

Economic Stabilisation (Import Deposit) Regulations 1976, SR 1976/22, made pursuant to the Economic Stabilisation Act 1948.

- (ii) Particular provisions within a regulation are referred to as “regulations” (regs), not “sections”. eg

In the main text: Regulation 21(1)(a) of the Employment Court Regulations 1991

In a footnote: Employment Court Regulations 1991, reg 21(1)(a)

(f) Bills

As with Regulations, particular provisions are referred to as “clauses”. As there may be several versions of a particular piece of legislation considered before it becomes law, it is necessary to cite the bill number and stage of reading. eg

Severance and Re-employment Bill 1975, no 65-1, cl 3

(g) Parliamentary Debates (*Hansard*)

If citing NZ Parliamentary Debates, cite the year of the debate in brackets, volume number, title (ie NZPD) and page number. eg

(1990) 510 NZPD 4285

(h) Statutory Material from Other Countries

If citing statutes from another jurisdiction, identify that jurisdiction. If it is a country with a federal system (eg Australia, USA, Canada), identify whether the statute is a federal or state or provincial piece of legislation.

For particular conventions pertaining to specific countries, consult an appropriate guide (See 1 above). eg

For Australia: Fong, *Australian Legal Citation; a guide*

For Canada: *Canadian Guide to Uniform Legal Citation* (Useful for other countries as well, eg UK)

For the USA: *The Bluebook*

1.2 Citation of cases

1.2.1. Rule of Primary Citation

You should always cite the best available report of a case. The first citation must be that from the accepted official reports, the series of law reports published in each jurisdiction with the authority of an official Council of Law Reporting. A report of a case by that council is regarded as the report which is most likely to be correct.

This rule is of universal application. It follows that you should cite from the New Zealand Law Reports in preference to the Gazette Law Reports, or the New Zealand Administrative Reports.

Should, however, a case not be reported in the official reports, the best reference available should be cited.

1.2.2. Mode of Citation

In properly regulated reports, the mode of citation generally appears at the head of the Table of Cases. See, for example, volume 2 of the New Zealand Law Reports for 1975, p ix which provides:

“The mode of citation of cases in this volume of the New Zealand Law Reports is as follows:

[1975] 2 NZLR (page).”

When citing references from a judgment, the following should be given:

- (a) *name of the case* (in Italics)
- (b) reference to the report with the first page of that report
- (c) the page from which the citation is taken, eg

Simpson v Attorney-General [1955] NZLR 271, 280

- (a) Simpson v Attorney-General
- (b) [1955] NZLR 271
- (c) 280

In a citation of this sort the year in the reference is not necessarily that of the decision, and that year and volume number, if any, are important in locating the correct volume. Should the year of the decision or the Court need indicating that information follows the citation, eg

NZ Shop Employees IAW v A-G [1976] 2 NZLR 521 (1972, CA)

The Court of Appeal reached its decision in 1972; but the case was not reported until 1976.

Where the year appears at the beginning of a citation in parentheses - () - that indicates the year in which the case was decided. The number which follows the parentheses is the volume number and must be cited because it is the volume number rather than the year which is important in locating the correct volume, eg

Street v Union Bank of Spain and England (1885) 30 Ch D 156

1.2.3. Rules of Citation

From the above discussion two rules emerge:

1. (i) Where [] (brackets or square brackets, as they are commonly called) appear, the year must be quoted, eg [1953] NZLR 271.
(ii) And where [] are followed by a number, both the year and the volume number are quoted, eg [1975] 2 NZLR 62
2. Where a number precedes the name of the Report, that number must be quoted, eg 30 Ch D 156.

The year appearing in () - parentheses or round brackets, as they are commonly called - need not be quoted *orally*, unless requested by the Bench; it should, however, be quoted in written work.

1.2.4. Unreported Judgments

When citing unreported judgments in full, record as follows:

the names of the parties (as for reported cases) the information that it is unreported, the court and registry, the case number assigned to the case by the court, the date of the judgment, the identity of the judge if appropriate. eg

Martin v Grenada Developments Ltd unreported, HC Palmerston North, AP 26/95, 16 August 1996, Goddard J

The format of current case numbers assigned is as follows:

XXX-CCYY-NNN-NNNNNN, where

XXX is the Jurisdiction (eg CIV=Civil; CRI=Criminal etc)

CCYY is the year (eg 2003)

NNN is the court ID (0=DC; 2=YC; 4=HC, 6=CA etc)

NNNNNN is the case number, starting at 000001 at the beginning of the year

1.2.5. Reports of Particular Importance

(a) New Zealand Cases

(i) New Zealand Law Reports (official reports)

(i) Series 1, Vols 1–5: The first five volumes of the New Zealand Law Reports contain two separately numbered and separately paged parts: Court of Appeal cases; and Supreme Court cases.

Citation: New Zealand Law Reports (vol no) Court of Appeal page, eg NZLR 3 CA 130

New Zealand Law Reports (vol no) Supreme Court page, eg NZLR 3 SC 57

(ii) Series 2, Vols 6–34: From 1888 onwards the decisions of the Supreme Court and the Court of Appeal are mixed within the volumes. Series 2 of the New Zealand Law Reports continued until 1915.

Citation: (Number) New Zealand Law Reports page, eg 13 NZLR 139

(iii) Series 3: In 1916 Series 3 commenced. Since 1932 all Privy Council cases from New Zealand are reported in the New Zealand Law Reports. And since 1973 more than one volume of the Reports has been produced each year.

Citation: [YEAR] (Number of volume for that year) New Zealand Law Reports page, eg [1976] 2 NZLR 521

(ii) *Magistrates' Courts Decisions* (up to 1979)

Each volume of these reports contains decisions over a number of years, eg: vol 13 contains the years 1969 to 1973.

Citation follows the rule in **1.2.2 above**.

Citation: Year, volume, *Magistrates' Courts Decisions* page, eg (1972) 13 MCD 455.

(iii) *District Court Reports* (since 1980)

In 1980 *Magistrates' Courts* were renamed *District Courts* and a new series of reports began. Three volumes were published between 1980 and 1988. In 1988 the series began publishing annual volumes.

Citations: (1986) 3 DCR 532 [1988] DCR 1

(iv) *Other New Zealand Reports*

There is a growing number of specialist series reporting cases in New Zealand. Eg *Criminal Reports of New Zealand (CRNZ)*, *New Zealand Administrative Reports (NZAR)*, *New Zealand Employment Law Cases (NZELC)* etc. Citation generally follows the same patterns as that for the *NZLR* (see **1.2.2 above**), but to be sure, check the reports themselves.

(b) United Kingdom Cases

(i) *Medium-Neutral Citation*

From 2001, a system of medium-neutral citation is being introduced in the English Court of Appeal and High Court. Judgments are allocated a unique official number and this is to be cited when referring to the case, even after it has been reported. Eg

Smith v Jones (2001) EWCA Civ 10 at (30); [2001] QB 124 (the tenth case in 2001 from the Civil Division of the Court of Appeal at paragraph 30)

(ii) *Law Reports Series* (1865 — onwards)

Note the *Law Reports* were first published in 1865. If the date of a case is before 1865 it is most likely to be found in one or more of the many series of reports, collectively described as “*Nominate Reports*”, published privately and often named after their publisher or reporter. These reports have been collected and reprinted in the *English Report series (ER)*. There is a table that shows in which volume of the *English Reports* a case reported originally in the *Nominate Reports* can be found.

The *Law Reports* are semi-official and have been published in four major groupings, with subdivisions which correspond to the varying structures of the court system over the years.

Details, with examples of correct citation forms, are:

<i>Abbreviation</i>	<i>Series</i>	<i>Period</i>	<i>Example</i>
Appeals series			
LR HL	English and Irish Appeals	1866-75	LR 1 HL
LR Sc & Div	Scotch and Divorce Appeals	1866-75	LR 1 Sc & Div
LR PC	Privy Council Appeals	1865-75	LR 1 PC
App Cas	Appeal Cases	1875-90	1 App Cas
AC	Appeal Cases	1891-	[1891] AC
Chancery series			
LR Ch App	Chancery Appeal	1865-75	LR 1 Ch App
LR Eq	Equity Cases	1865-75	LR 1 Eq
Ch D	Chancery Division	1875-90	1 Ch D
Ch	Chancery Division	1891-	[1891] Ch
Common Law series			
LR CCR	Crown Cases Reserved	1865-75	LR 1 CCR
LR CP	Common Pleas	1865-75	LR 1 CP
CPD	Common Pleas Division	1875-80	1 CPD
LR Ex	Exchequer	1865-75	LR 1 Ex
Ex D	Exchequer Division	1875-80	1 Ex D
LR QB	Queen's Bench	1865-75	LR 1 QB
QBD	Queen's Bench Division	1875-90	1 QBD
QB/KB	Queen's/King's Bench	1891-	[1891] QB
Probate, Family, etc series			
LR A &E	Admiralty & Ecclesiastical	1865-75	LR 1 A &E
LR P &D	Probate and Divorce	1865-75	LR 1 P &D
PD	Probate Division	1875-90	1 PD
P	Probate	1891-1971	[1891] P
Fam	Family	1972-	[1972] Fam

(ii) *Weekly Law Reports*

The Weekly Law Reports form part of the English Law Reports series. Volume 1 in each represents a permanent record of the cases reported in that volume. As such, Volume 1 is the primary reference for those cases:

Citation: [YEAR] one Weekly Law Reports, page, eg [1975] 1 WLR 32

Volumes 2 and 3 contain “weekly reports” of cases, which subsequently appear, with argument of counsel, in the permanent Law Reports Series (ie Queen’s Bench, Chancery, Probate, the Appeal Cases), when revised by Judges. Therefore, those two volumes are not primary references. Instead, they must be regarded as a temporary expedient, or best available reference.

(iii) *All England Reports* (1936 — onwards)

Each volume appears with a year of designation. Generally, three volumes are published each year. The All England Reports are not Official Reports. Thus, they may only be used as the best available reference.

Citation: [YEAR] (number of volume) All England Reports page, eg [1978] 3 All ER 62.

(c) Australian Cases

Following the development of the comprehensive electronic database *AustLII*, Australian modes of citation have become more complex. Every case now is allocated a unique referent by the court itself. For instance *Pyranees Shire Council v Day* is [1998] HCA 3, which means that it is the third High Court decision of 1998. For material taken directly from the database, this will be the only reference needed. However, printed material from published reports must still be cited in the normal way. (This development is likely to be mirrored in other jurisdictions as official databases are developed – the higher English courts have already done so.)

Australia has a federal system. There are courts with federal jurisdiction and courts with state jurisdiction. While *AustLII* includes material from both jurisdictions, published reports specialise.

(i) Courts of Federal Jurisdiction:

- *Commonwealth Law Reports* 1903-date: This is the most widely used set of reports and the reports are authorised. It includes the decisions of the High Court of Australia and the opinions of the Privy Council before appeal to this court was abolished in Australia.

Citation: (1982) 151 CLR 1

- *Federal Court Reports* 1984-date: This is the authorised set of reports of the federal Court of Australia.

Citation: (1982) 19 FCR 1

- *Federal Law Reports* 1957-date: This series reports decisions of the courts of federal jurisdiction other than the High Court of Australia.

Citation: (1990) 102 FLR 1

- *Australian Law Journal Reports:* This series reports decisions of the High Court of Australia. The reports are included in a separate section of the Australian Law Journal, but are subsequently bound separately.

Citation: (1985) 59 ALJR 1

- *Australian Law Reports* 1973-date: This series reports cases determining Federal law.

Citation: (1990) 94 ALR 11

(ii) Courts of State Jurisdiction

- *New South Wales Law Reports* 1971-date: the authorised reports of the superior courts of New South Wales.

Citation pre 1985: [1984] 3 NSWLR 1

Citation post 1985: (1985) 2 NSWLR 1

- *Victoria Reports* 1957-date: the authorised reports of the Supreme Court of Victoria.

Citation: [1994] 1 VR 1

- *South Australian State Reports* 1921-date: the authorised reports of the Supreme Court of South Australia.

Citation: [1971] SASR 1

- *Queensland Reports* 1959-date: the authorised reports of the Supreme Court of Queensland.

Citation: [1987] 1 Qd R 1

- *Western Australia Reports* 1960-date: the authorised reports of the Supreme Court of Western Australia.

Citation pre 1989: [1988] WAR 84

Citation post 1989: (1993) 9 WAR 27

The authorised version of decisions of the family Court and District Court are reported in the State Reports (Western Australia) 1979-date.

Citation: [1979] SR (WA) 1

- *Tasmanian Reports* 1979-date: the authorised reports of the Supreme Court of Tasmania.

Citation: [1989] Tas R 25

(d) Cases from Other Countries

As with statutes, for citation conventions in other jurisdictions, consult appropriate references. (See **1.1(h) above**) Note that in jurisdictions which operate state and federal courts, an indication of the exact court may be of importance.

1.2.6. Oral Citations

IN ORAL CITATIONS, the following points should be noted:

- The terms “The King” or “The Queen” must always be used for R. R v Cruise will be cited orally as: The King and Cruise.

- The symbol “v” as in R v Cruise should be cited orally as “and”. Thus, R v Cruise is cited The King and Cruise.
- A Judge, while referred to in reports by the abbreviation “J”, should be referred to orally as Justice. Thus, Speight J becomes Justice Speight. Similarly, Oliver LJ becomes Lord Justice Oliver.
- A District Court Judge is referred to in writing as, eg, Sullivan DCJ but orally as Judge Sullivan.

1.3. Judges

All judges should be referred to by their correct title. In legal writing it is not usual to write a judge's title in full. In most cases it is sufficient to write the judge's surname followed by an initial or initials signifying her or his title. The appropriate initials differ each jurisdiction. The following titles are the ones you are most likely to come across.

(a) New Zealand Judges

In written work their name appears first, followed by the appropriate title in abbreviated form: eg

Tompkins J; Cartwright J

The *Chief Justice* is referred to as Elias CJ

The *President of the Court of Appeal* is referred to as Gault P

District Court and Family Court judges are referred to as Saunders DCJ

All judges of the District Court, High Court, Court of Appeal and Supreme Court may be referred to as His or Her Honour.

Judges of the High Court, Court of Appeal and Supreme Court may also be referred to in written work as 'Justice' followed by the name: eg

Justice Cartwright or Justice Tompkins.

The title Justice is no longer prefaced by 'Mr' since the appointment of Justice Cartwright to the Bench. Nor are these judges ever referred to as Judge Tompkins or Judge Cartwright.

When referring to two or more judges, the correct mode of citation is Tipping and Doogue JJ.

If reference is made to a Family Court or District Court Judge it should be 'Family Court Judge' or 'District Court Judge' followed by the surname or simply 'Judge' followed by the surname eg

District Court Judge Saunders or Judge Saunders.

Masters of the High Court are referred to as Master followed by their surname: eg

Master Gambrill.

Alternatively they may be referred to simply as Master, even if they are female!
(It is not yet clear what the conventions will be for the Supreme Court)

(b) Australian judges

Similar rules apply in Australia. The initial J and the title Justice is used when referring to a judge of the State Supreme Court or to the High Court of Australia. As in New Zealand, the title Justice is not prefaced by Mr or Madam.

(c) English judges

Slightly different rules apply in England.

High Court judges are referred to by their surname followed by the initial J.: eg

Vinelott J

Judges of the Court of Appeal are referred to by their surname followed by the initials LJ.

If you are referring to more than one judge they should be cited by their surnames followed by JJ for High Court judges and LJJ for judges of the Court of Appeal: eg

Dillon and Leggatt LJJ.

The *Master of the Rolls* is always referred to by surname followed by the initials MR. He may also be referred to as the Master of the Rolls.

The *Lord Chancellor* is referred to by surname followed by the initials LC. He may also be referred to as the Lord Chancellor.

The *Judges of the House of Lords* are referred to as Lord or Lady followed by their surname and the place of their peerage eg Lord Keith of Kinkel. They may also be referred to as His Lordship or as Lord Keith.

Judges at all levels are referred to as His Lordship or Her Ladyship, not as His or Her Honour.

1.4. Citation of books

The correct citation of a book is Author (in the form used in the book itself), title (underlined or italicised) then, in brackets, edition, publisher, parts, date of publication, then outside brackets, page no, eg

S A de Smith *Constitutional and Administrative Law* (2nd ed, Penguin, 1973)
24.

1.5 Citation of loose leaf services

Loose leaf services are updated periodically and this may involve modifications to the material itself. When citing from them, it is important to record the date of the last update at the time you consulted the publication.

Page numbers may also change, so references to paragraph numbers are more reliable. eg

D A Rennie, *Brooker's Accident Compensation in New Zealand*, (Brookers, 1992) para. 26.04, (updated 6/11/98)

1.6. Citation of articles

The correct citation of an article takes the following form - Name of author, title in quotation marks, date in brackets, volume no, periodical name or abbreviation, page, eg

N Sissons "Friendly Societies" (1977) 9 VUWLR 59.

Most periodicals or journals indicate on their title page the correct citation.

1.7. Citing electronically accessed material

(a) In General

The conventions for citing electronically accessed material are still being developed. There are some general points that should be noted:

- If there is a hard copy (paper) version of the material available, reference should be made to that version rather than the electronically accessed version.
- Because of the ever-changing nature of the Internet in particular, it may be more difficult for readers to access for themselves the material you have referred to.
- Whereas the date of publication is important when citing hard copy material, this may be less helpful for electronic material. Either the date the data was last modified or updated or the date on which you accessed the data is more likely to allow a reader to find that same material.
- If material is downloaded from a database or from the Internet, there may be problems with pagination. If paragraph numbers are given, these should be referred to. If not, refer to the page numbers indicated on the database itself, if there are any. Page numbers on downloaded material should be avoided as these may vary depending on the printer used.
- Keep in mind that your aim in giving a citation is to allow the reader to go to the same place that you went to. The information given in the citation must allow the reader to do just that.

(b) Citing Material from CDROM Databases (Bibliographic & Full text)

Some databases are similar to loose leaf services. The information may be updated periodically by being added to or modified. If citing these sources, the following information should be included:

- Description of the material in the same form as for paper references, eg author and title, case name, heading, etc.
- Title of the database
- Publication medium
- Date of last update (this can usually be obtained from the opening screen) eg

Anker v Australian Consolidated Press NZ Ltd, unreported, DC Auckland, November 15, 1997, NP 2134-97, *LINX Plus* (CDROM) updated 21/12/99
Adams on Criminal Law, para CA 178.04 (CDROM) updated 5/11/99

(c) Citing Material from On-line Databases

With on-line databases if the last modification date is not apparent, the date the database was accessed may be substituted. Eg

Youngerwood v Guardian Newspapers Ltd QBD 13 June 1997, Eady J, Lexis, (on line) accessed 10 /2/00

Recognition of specific databases by the courts as acceptable official sources of primary material has led to recognition of specific modes of citation. For instance, the Australian cases sourced from *AustLII* can be cited by their official court record number. Eg

Pyranees Shire Council v Day [1998] HCA 3

Similar patterns are emerging for New Zealand Court of Appeal cases housed on *AustLII* and British cases on *BAILII*. On such databases paragraph numbers are cited rather than page numbers for locations within the judgment.

Note too the emerging use of medium-neutral citation as in the English Court of Appeal and High Court. See **1.2.5(b)** above.

LEXIS-NEXIS has developed its own special form of citation for cases decided since 1987 and accessed from the *Nexis* service. This form shows: the year, jurisdiction, the word “LEXIS” and the number assigned to the case by the service. eg

1991 Ohio LEXIS 2117

However, until there is official acceptance of such conventions, we would prefer that you use the general pattern indicated in the *Youngerwood* example above.

Remember, too, that if there is a reported version of the case, it must be cited in preference to an electronically accessed version.

(d) Citing Material from the Internet

If citing from the Internet, again the description of the material itself should be in conventional form (author, title, etc). The publication medium (Internet) should be indicated along with the exact location (URL or Uniform Resource Locator) between caret marks (< >), and the date on which the site was modified or date on which you accessed it. Keep in mind that not only may material on the Internet change, but whole sites may disappear. Relying on such material as authority for propositions can then present considerable difficulties. Exact locations may also be quite cumbersome and care is needed in exact transcription.

eg

Gregg Abbott Basic Elements of Defamation Law (Internet) <www.abbottlaw.com/defamation.html> updated 1/5/98
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<i>Re: Australian Broadcasting Corporation and: Comalco Ltd</i> No ACT G19 of 1985, Aust Fed Ct, ACT, 11/9/85 (Internet) <www.austlii.edu.au/cgi-bin/disp.pl/au/cases/cth/federal%5fct/unrep2398.html> accessed 10/02/00
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1.8. Conclusion

In both written and oral work, the lawyer must try to use precise language. Since accuracy in citations provides precision in references, the observation of the accepted modes of citation is far removed from a pedantic exercise. Instead, proper citation is an essential practice both for the student training to become a professional and for the lawyer who claims to be a professional.