

Consider *The Indigo Book: A Manual of Legal Citation*

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If you are looking for a new addition to your reference shelf, consider *The Indigo Book: A Manual of Legal Citation*.¹ *The Indigo Book* is a free, online, open-source legal-citation manual available in HTML and PDF formats.² Whether you are quickly looking up a citation's style or meticulously crafting and editing a legal document, *The Indigo Book* is an excellent resource.

I first learned about *The Indigo Book* in 2017 during a search for free online citation resources that would be useful and easy for students to understand and follow. The first edition had been published online by Public.Resource.Org, and I immediately noticed its positioning as a creative new resource for legal citation style. It seemed comprehensive but different in tone and approach from *The Bluebook: A Uniform System of Citation*. As *The Indigo Book*'s codicil indicates, "To clearly distinguish our work from other citation manuals, we have forgone the use of the color Royal Blue in favor of Indigo, in solidarity with the ryots of Bengal who were oppressed by the insatiable British demand for blue and the profits that flowed from it, leading to the Nilbridroha (Indigo revolt) and the beginning of the road that led to independence."

¹ Christopher Sprigman & Jennifer Romig et al. eds., Public.Resource.Org (2d ed. 2021).

² The master page linking to all editions of *The Indigo Book* can be found at <https://indigobook.github.io/>, maintained by Jurism Project developer Frank Bennett. The HTML and PDF versions of the second edition with 2023 updates can be found at <https://indigobook.github.io/versions/indigobook-2.0.html> and <https://indigobook.github.io/versions/indigobook-2.0.pdf>, respectively.

The Indigo Book showed its independence in other ways as well, with fresh examples and a bit of an attitude. It's difficult to make subsequent history fun, but the first edition did so via the well-known case of *Leonard v. Pepsico, Inc.*, involving Pepsi's 1995 advertisement purportedly offering a Harrier jet for 7 million Pepsi Points. Beyond the whimsical, the first edition of *The Indigo Book* offered valuable context, such as teaching how to make a section symbol (§); how to distinguish between hyphens, en-dashes, and em-dashes; and why judgment is essential for long documents incorporating numerous full and short citations. Speaking to the basics and more nuanced matters of discretion and style, the first edition launched an important feature called "Indigo Inklings." These Inklings are distinct and recognizable bits of advice and commentary interspersed throughout the rules. This commentary steps back from the direct delivery of rules to reflect awareness of widely varying skill levels and purposes among *Indigo Book* users. Back in 2017, the helpfulness of these Inklings and the comprehensiveness of the manual led me to form a new citation habit — that of looking things up quickly online in *The Indigo Book* with its easy full-text search of the whole HTML text. The first edition became one of my most-visited websites, and then I had *The Indigo Book* color-printed and bound, which cost me only the copy charges plus a plastic spiral binding to hold the pages together. I quickly filled my low-budget copy of *The Indigo Book* with yellow sticky notes, dog-eared pages, and marginalia.

Like any other reference resource, *The Indigo Book* must be maintained or its usefulness wanes over time. Also, any first edition is a huge undertaking that necessarily benefits from use, testing, and feedback leading to later editions. The pandemic lockdown presented an unfortunate but unique opportunity for me to step in and volunteer as coeditor of the second edition. Just as law students at NYU had assisted Professor Sprigman in creating the first edition in 2016, law students at Emory University School of Law

assisted me in researching updates to the second edition. And Carl Malamud and Frank Bennett, who offered ideological and practical support for the first edition, provided the same the second time around.

The second edition is slightly reorganized, streamlined, and expanded from the first edition. The table of contents begins with citation mechanics (Rules 1–10) and then detailed rules and examples (Rules 11–34), followed by abbreviations and jurisdiction-specific information (Tables 1–20). Enriched state tables are a particular enhancement of the second edition, with updated links to selected state-specific sources. The second edition was published in beta in 2021 and finalized in 2022; thus, it is the first citation manual to recognize the new West Virginia Intermediate Court of Appeals that debuted in July 2022. In 2023, we prepared an updated “printing” of the second edition to acknowledge the renamed Maryland Supreme Court. This new printing is posted on the Github master page mentioned above in footnote 2.

One question of interest to *Scribes Journal* readers, given the journal’s founding by citations-in-footnotes advocate Bryan Garner, is how *The Indigo Book* treats the integration of citations. Rule 3 and the Indigo Inkling accompanying Rule 3.4 take a flexible, ecumenical position on the in-text-or-footnotes debate, showing that citations can be either integrated in text or placed in footnotes.

The body of *The Indigo Book* shows citation formats for standard legal documents — memos, briefs, and other practical documents. *The Indigo Book* also acknowledges the more intricate citation style used in academic legal documents and provides a brief conversion resource in Table 19. In prioritizing practical documents and practitioner-oriented citation formats, *The Indigo Book*’s proportion and emphasis are essentially the inverse of *The Bluebook*’s. Despite these different editorial choices, *The Indigo Book* and *The Bluebook* provide largely consistent information on crafting legal citations.

Beyond rules and examples and tables, *The Indigo Book* offers commentary and analysis about citation mechanics and the deeper values reflected in citation formats. On the mechanical side, *The Indigo Book* recommends against some of the inexplicable abbreviation changes in the 21st edition of *The Bluebook*, such as abbreviating *Laboratories* as *Lab’ys* and the Restatement (Second) of Contracts (1981) as the Restatement (Second) of Confs. (Am. L. Inst. 1981).

On a more substantive issue and following recent developments in citation scholarship, in 2021 the second printing of *The Bluebook*’s 21st edition adopted new Rule 10.7.1(d), requiring a parenthetical to indicate an enslaved person as a party. Following this update, *The Indigo Book* contains a parallel Rule 14.4 and adjacent Indigo Inkling commentary citing some of the formative scholarship and advocacy behind this rule. Citation trends often emerge not only from scholarship but from practice developments. Thus, in another Indigo Inkling, the second edition now acknowledges the trend initiated by attorney Jack Metzler to use the parenthetical “(cleaned up)” rather than verbiage such as “(internal citation and quotations omitted).”

It was an honor for me to join the Indigo team with the students from NYU and now Emory, as well as Professor Sprigman, Carl Malamud, and Frank Bennett. Special thanks are due to Mr. Bennett, now-retired law professor and Juris-M developer, whose computer wizardry transformed the second edition from Word files to a well-functioning online site. These efforts mean that the published *Indigo Book* is completely free to use and adapt under a Creative Commons Zero Public Domain license. You can go to the HTML link on your smartphone browser and add it to your home page for a free citation app. You can also print and spiral-bind the PDF for a hard-copy resource costing no more than the paper and plastic binding that holds it together.

Whether you print it, bookmark it in your browser, or save it to your phone’s home screen, the second edition of *The Indigo*

Book is a valuable and up-to-date resource on legal citations. I hope and believe that in five years or so, the *Scribes Journal* will be printing news of *The Indigo Book*'s third edition, maintained and enhanced by yet another coeditor with a tireless passion for publicly accessible legal information and resources.