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## Key to Purpose Signals Used in Footnote Citations

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## KEY TO PURPOSE SIGNALS USED IN FOOTNOTE CITATIONS

### *Signals preceding citations:*

No signal preceding a case citation indicates that the case is cited for a holding exactly in point.

*See*: In its signal sense indicates the basic source material on which the author relies to support his own opinion or conclusion of law or fact; in its non-signal sense indicates supplemental source material and may be found as "see also."

*Accord*: Indicates a holding that, although it may be factually distinguishable, substantially upholds the proposition stated in text.

*Cf.*: Indicates a case parallel to the proposition for which it is cited but which involves facts materially different. A greater distinction is indicated by *cf.* than by *accord*.

*Contra*: Indicates a square holding in opposition to the statement in text, or to the preceding cases cited.

*But see*: Indicates a holding that casts doubt upon the proposition in text, or upon the preceding cases cited.

*But cf.*: Indicates a decision suggesting an opposite result, although on materially different facts; it is to be compared with or distinguished from the point under discussion.

### *Signals following citations:*

*Dictum*: Indicates that the case is cited for a statement therein that was not essential to the holding.

*Semble*: Indicates that the holding in the case is not clear.

When applicable these signals are used with noncase citations.

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