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.

Adapted from A Uniform System of Citation (9th ed. 1955) with the permission of The Harvard Law Review Association.