### String Cites with Different Types of Authorities

Suppose you have a string cite with several different types of authorities in it. Stated differently, you're not citing to *just* cases. You're citing to cases and constitutions and treatises and statutes. Typically, you'll want to list these authorities from the most powerful to the least powerful, like so: (1) constitutions; (2) federal statutes; (3) state statutes; (4) federal cases; (5) state cases; and (6) secondary authorities.[[1]](#footnote-1) If you don't have signals, you'll adhere strictly to this six-part ordering scheme. If you have signals, each signal "re-starts" the scheme. All that said, these are our *default* rules. You can deviate from them if you have reason to do so. The diagram below shows how these rules apply to a specific string cite.

String Cites with Only Cases

**THE IMPACT OF SIGNALS**

A new signal re-sets things. Look at the signal above. After it appears, it's okay to list a federal case, even though, technically, it's following a treatise. The signal means we start the basic order anew.

 **BASIC ORDER**

Constitution precedes case which precedes secondary authority.

U.S. Const. amend. IV; Byars v. United States, 273 U.S. 28, 30 (1927); 3A Charles Alan Wright et al., Federal Practice and Procedure § 686 (4th ed. 2010); see also Stonehill v. United States, 405 F.2d 738, 739 (9th Cir. 1968).

Suppose now that you have a string cite with only cases. The rules are a little more complicated, but they're logical and, with a bit of practice, easy to remember. Basically, there are three ways you order cases: (1) rank order; (2) alphabetical order; and (3) reverse-chronological order.

* **Rank Order**. Put federal cases in descending-rank order so that higher-court cases precede lower-court cases. For example, if you're citing an 1865 case from the U.S. Supreme Court and a 1975 case from the Tenth Circuit, the Supreme-Court case comes first regardless of the fact that the circuit-court case is more recent. This is because the Supreme Court outranks the Tenth Circuit and we put federal cases in descending-rank order.
* **Alphabetical Order**. Put state cases in alphabetical order and *then* in descending-rank order. For instance, suppose you're citing only state high-court cases. You have a Colorado Supreme Court case, an Illinois Supreme Court case, and a Wyoming Supreme Court case. You would put the Colorado Supreme Court case first, the Illinois Supreme Court case second, and the Wyoming Supreme Court case third. This is because "C" precedes "I" which precedes "W" in the alphabet and we put state cases in alphabetical order. Now, if we throw a lower-court case into the mix, say a Colorado Court of Appeals case, where would it go? It would go after the Colorado Supreme Court case and before the Illinois Supreme Court case. This is because we put all of the cases from the same state in their correct spot alphabetically, and then, looking only at that state's cases, in descending-rank order.
* **Reverse-Chronological Order**. Put cases from the same court in reverse-chronological order. For example, suppose you're citing several Tenth Circuit cases, one from 1814, one from 1914, and one from 2014. You would put the 2014 case first, the 1914 case second, and the 1814 case third. This is because we always list the most recent cases first. In fact, you would order the cases the same way even if they came from three different circuits. This is because, for purposes of this rule, we treat the U.S. Court of Appeals as a single court. So, you never list, say, First Circuit cases before Ninth Circuit cases because "1" comes before "9"; you just list them in reverse-chronological order. Similarly, we treat all of the U.S. District Courts as a single court, so you don't list, say, cases from the federal trial court in Alabama before cases from the federal trial court in Wyoming because "A" comes before "W"; you just list them in reverse-chronological order.

The diagram below shows how these rules apply to a specific string cite.

**RANK & YEAR**

List cases in descending rank (higher-court cases before lower-court cases). List cases from the same court (e.g., the Supreme Court) in reverse-chronological order. Treat the U.S. Court of Appeals as one, single court, listing the cases in reverse-chronological order only.

Lustig v. United States, 338 U.S. 74 (1949); Byars v. United States, 273 U.S. 28 (1927); United States v. Maturo, 982 F.2d 57 (2d Cir. 1992); United States v. Delaplane, 778 F.2d 570 (10th Cir. 1985); Stonehill v. United States, 405 F.2d 738 (9th Cir. 1968).

All that said, these are, like the rules above, *default* rules. You can deviate from them if you have reason to do so. For example, suppose you mentioned two Tenth Circuit cases, Case A and Case B, in that order, in a sentence, and then you cited them. It would be appropriate to list Case A first and Case B second, to parallel your sentence structure, even if Case A was older than Case B.

1. There are additional rules, for ordering additional authorities in The Bluebook. Refer to Bluebook Rule 1.4 for more information. [↑](#footnote-ref-1)