

Tip Sheet

Australian Guide to Legal Citations (AGLC), 4th edition

Repeated Citations in Footnotes

The [Australian Guide to Legal Citations \(AGLC\), 4th edition](#), provides guidance on how to cite two types of repeated citations:

1. Repeated citations in consecutive footnotes
2. Repeated citations in non-consecutive footnotes

This tip sheet will distil the key points from the AGLC guide for these two types of repeated citations.

1. Repeated citations in consecutive footnotes (using **Ibid**)

When the same citation is repeated in consecutive footnotes, replace the repeated citation with the word **Ibid**. *Ibid* means *exactly what is referred to in the previous footnote*, including pinpoints.

Some things to note:

- If the previous footnote included a pinpoint; and in the subsequent footnote, you are referring to *that exact* pinpoint, then use the word *Ibid alone*. It is assumed that you are referring to the pinpoint in the previous footnote.
- If the previous footnote included a pinpoint, and in the subsequent footnote you are referring to a different pinpoint, then add the *different* pinpoint after the word *Ibid*.
- If the previous footnote included a pinpoint, and in the subsequent footnote you *don't want any* pinpoint, then you must use the *non-consecutive* format (even though it is consecutive).
- If a footnote has more than one citation, and you refer to any of them in the next footnote, you must use the *non-consecutive* format (even though it is consecutive). See footnotes
- You should use *Ibid* even if the citation in the preceding footnote was in non-consecutive footnote format.
- *Ibid* can be used in a footnote directly following *another Ibid*, with the *same* rules applying.
- Don't use *Ibid* to refer to a previous citation in the *same* footnote. Rule 1.4.6 of the Guide covers this.
- As with all footnotes in AGLC, repeated citations in consecutive footnotes should end with a full stop. So if there are pinpoints, *Ibid* would be followed by a space, a pinpoint, and *then* a full stop.

Examples of repeated citations in consecutive footnotes

56. *Smith v Jones* (2009) 89 CLR 78, 79.
57. *Ibid*.
58. *Ibid* 80.

In the above, the *Ibid* in footnote 57 refers specifically to page 79 because *Ibid* means *exactly* what is in the previous footnote. In footnote 58, because we now want to refer to page 80, we add that pinpoint after *Ibid* to show that we are still referring to the same case, but now to a different page.

For more details, please refer to [Rule 1.4.3, page 11 of the AGLC guide](#).

2. Repeated citations in non-consecutive footnotes (using n#)

When referring to a source that has been cited in an earlier footnote but not the immediately preceding one, replace the repeated citation with a **short version** (see below), and then **(n #)** where # is the number of the first footnote where the source was cited.

Short version

Human author	<ul style="list-style-type: none"> For up to 3 authors, use the surnames of all the authors, with <i>and</i> between the last two surnames. For 4 or more authors, use the surname of the first author followed by et al. For different works by authors with the <i>same</i> surname but <i>different</i> first names, use the first names with the surnames in both short versions (see footnotes 14, 15, 18, 20 & 21 below). If you have more than one work by the same authors, add the title of each work into the relevant short versions (see footnotes 16, 17, 19 & 24 below). If a title is long, use an abbreviated version of the title.
Organisation as author	<ul style="list-style-type: none"> Use a short version of the <i>title</i> if this is clearer (for example, if you have multiple works by the same organisation). See footnotes 23 & 25 below).
No author	<ul style="list-style-type: none"> Use a short version of the title in the original citation.
Case Law	<p>For Case Law, use a short title, following this order of preference:</p> <ul style="list-style-type: none"> The popular case name if there is one, The first party (shortened to just a few words or less) if this is not the Crown, The second party (shortened to just a few words or less) if the first party is the Crown, The name of a ship in an admiralty case, If none of these seem sensible, use a short name that makes it clear which case is being referred to. For example, if you have an original case and an appeal case with the same names, you could use the short title of the original case plus the word "Appeal" for the appeal case.
Legislation	<ul style="list-style-type: none"> If the name of the legislation is only 2 or 3 words long, you don't need to use a short title - just use the full title but without the year and jurisdiction. For legislation with a longer title, create a short title that makes it clear what is being referred to. Add more detail to the short title to avoid ambiguity. For example, in a document you might refer to both the <i>Crimes Act 1900</i> (NSW) ('<i>Crimes Act NSW</i>') and the <i>Crimes Act 1958</i> (Vic) ('<i>Crimes Act Vic</i>').

Some things to note:

- You don't need to use a short title unless it is referred to in non-consecutive footnotes.
- The short title comes at the end of the original citation, *after* any pinpoints, in the format: ('*Short Title*').
- The short title can be in italics or not, depending on the format of the original version. For example, if you use a short title for cases, legislation, or works with an organisation as author, it must be in italics, and would be added to the end of the original citation in the format ('*Short title*'), after any pinpoints. Short versions that use author names would not be in italics.
- As with all footnotes in AGLC, repeated citations in non-consecutive footnotes should also end with a full stop (which would come after any pinpoints).

Examples of repeated citations in non-consecutive footnotes

6. *Smith v Jones* (2009) 34 CLR 56, 58 ('*Smith*').
7. *R v Wilson* [2019] HCA 10, [3] ('*Wilson*').
8. *Crimes Act 1900* (NSW) s 41A ('*Crimes Act*').
9. Mary Brown and Charles Roberts, 'The Attorney General' (2018) 6(2) *UTS Law Review* 18, 22.
10. *Smith* (n 6) 59.
11. *Wilson* (n 7) [6].
12. *Crimes Act* (n 8) s 58.
13. Brown and Roberts (n 9) 24.
14. Jane Williams, 'Thoughts About the Constitution' (2022) 10(1) *UTS Law Review* 28.
15. Robert Williams, 'Magna Carta Revisited' (2010) 34(3) *Journal of Legal History* 34, 38.
16. Albert Smith, James Baker and Anna Price, *History of NSW* (Routledge, 2003) 123.
17. Albert Smith, James Baker and Anna Price, *History of Victoria* (Routledge, 2004) 78.
18. Jane Williams (n 14) 33.
19. Smith, Baker and Price, *History of NSW* (n 16) 130.
20. Robert Williams (n 15) 40.
21. Brown and Roberts (n 9) 25; Jane Williams (n 14) 35.
22. Brown and Roberts (n 9) 26.
23. Department of Primary Industry, *Water Rationing: A Comprehensive Survey* (Final Report, 2020) 34 ('*Water Rationing*').
24. Smith, Baker and Price, *History of Victoria* (n 17) 80.
25. *Water Rationing* (n 23) 35.
26. *Ibid* 36.

Note: for a consecutive citation directly after any of these footnotes, use *Ibid* (as in footnote 26). We don't use *Ibid* in footnote 22 because even though Brown and Roberts is being cited in consecutive footnotes, there are two references in footnote 21.

For more details, please refer to the following sections of the [AGLC guide](#):

- Rule 1.4.1, pp. 9-10 (For General Rules)
- Rule 1.4.4, pp. 12-13 (For Short Titles)
- Rule 2.1.14, pp. 46-47 (For Case Law)
- Rule 3.5, p. 75 (For Legislation)
- Rule 4.3, p. 89 (For Secondary Sources)

3. How to keep track of your non-consecutive citations in Word: using the Cross-reference feature (optional).

When typing in the (n #) of a non-consecutive footnote, type (n, then a space, but instead of typing the number #, choose **References** from Word's tool bar and then choose **Cross-reference**.

- A window opens. Choose *Footnote* in the *Reference type* drop down menu.
- A list of all the footnotes in the document comes up. Select the one with the number that you want (ie the footnote where your reference was cited for the first time).
- Click on the *Insert* button, and then the *Close* button. You'll now see the number next to (n in your footnote (the number might be shaded, which is fine). Type a close bracket, and if you have a pinpoint type a space and then the pinpoint. Finally, type a full stop.
- At any later time, to make sure all the (n #) are properly referring to their original footnotes, pretend to print the document by using *Control+P* (Windows) or *Command+P* (Mac). Then return to the document. This cancels the print, and also corrects all the footnote references.