Bates Numbering Decoded

Idea In Short

Use Bates numbering only when you produce documents in litigation, respond to a subpoena or meet a court or agency requirement, and use ordinary page numbers for everything else. A Bates number gives every page in a document set a permanent, unique identifier, usually a prefix, a fixed-length sequential number and an optional suffix, such as SMITH000001. Before stamping, finalize the page order, fix the prefix and number length, stamp copies instead of originals and keep a log of the ranges you hand to each party. Check first whether the court or agency actually requires the numbering, because reports, manuals, theses and proposals need only standard page numbers and far less setup.

Anyone who has handled documents for a lawsuit, an insurance dispute or a regulatory request has probably seen a code such as ABC000123 in the corner of every page. That code is a Bates number, and it does a job that ordinary page numbers cannot. Most documents do not require one, though, and understanding the distinction saves considerable time while preventing the unnecessary complication of a file that needs only straightforward numbering.

What Bates numbering does

So what is a Bates number? It is a unique identifier [ID] stamped on each page in a set of documents. The numbers run in order across the entire set, not only within one file, so no two pages share the same code. That arrangement makes every individual page straightforward to cite and impossible to confuse with another. In a case with thousands of pages, a lawyer can point to page ABC004512 in a deposition or court filing, and everyone involved finds the exact same sheet. Bates numbering also reveals a missing page, because a gap in the sequence stands out right away. A reviewer who receives pages ABC004511 and ABC004513 knows at once that one page is absent and can name it precisely when asking for it. The same identifiers allow an index of exhibits or a log of withheld documents to refer to entire ranges instead of describing each page, which shortens the paperwork that

accompanies a production and reduces disagreement over what a reference means.

Where the Bates stamp got its name

The name comes from Edwin G. Bates, an American inventor and patent attorney who patented an improvement to consecutive numbering machines in 1891.1 He had co-founded the Bates Manufacturing Company in 1890 with Samuel Insull. His hand stamp inked itself and moved to the next number every time it was pressed onto a page, so clerks no longer had to change the digits by hand. Offices relied on physical stamps like this for decades before electronic document handling replaced the manual process. Today software does the work, yet the term Bates stamp stuck, and people still use it alongside Bates numbering to mean the same thing. The machine's logic still defines the output: one sequential number for each impression, never repeated.

How a Bates number is built

A Bates number usually has two or three parts:

- A prefix, such as a case number, client name or company abbreviation
- A sequential number, padded with leading zeros to a fixed length
- An optional suffix, such as a date or document set code

Here is a Bates numbering example. A law firm producing records for a client named Smith might label the first page SMITH000001, the second SMITH000002 and so on through the last page of the production. Fixed-length numbers keep the codes sorting correctly in file lists and spreadsheets, because without padding SMITH10 sorts ahead of SMITH2 in an alphabetical list. A six-digit sequence holds up to 999,999 pages, so choose a length that leaves room for later productions. Suppose the firm sends a second wave of records after the first one ends at SMITH012400. The second wave continues at SMITH012401, and the receiving party can confirm that the sequence has no overlap and no gap. No single standard governs the format, so the firm and the receiving party need only agree on one and apply it consistently.2 The number typically sits in the header or footer, often in the lower right corner, where it is least likely to cover text.

Who uses Bates numbering

Law firms are the principal users, particularly during discovery, when each side exchanges substantial volumes of documents with the other. Courts and opposing counsel frequently expect productions to carry numbering of this kind. In United States federal civil cases, Rule 34 requires a party to produce documents as they are kept in the usual course of business or to organize and label them to match the categories in the request.3 The rule does not mention numbering, but a continuous identifier lets the producing party show exactly what it handed over and in what order. Pages covered by a protective order frequently carry a label such as Confidential next to the number, and a model protective order from a federal court in New York provides for designated material to be marked with a confidential stamp.4 Government agencies, insurers and medical practices use the same approach. Any organization that has to track, reference and prove the contents of large document sets can benefit from page-level IDs that never repeat. A receiving party can also acknowledge delivery by stating the first and last numbers it received, which turns a vague confirmation into a verifiable record of the exchange.

Bates numbering versus regular page numbers

Regular page numbers restart at the beginning of every individual document. Page 1 of a contract and page 1 of an email printout are both simply 1. Bates numbers continue across the whole set, carry a prefix that ties them to a case or client and work as permanent IDs. Plain numbering is a different tool for a different job. If all you need is to help readers find their way through one Portable Document Format [PDF] file, JPGtoPDF has a tool to add numbers to PDF pages that lets you choose where the number sits on the page and pick a numbering style. It adds standard page numbers, not Bates stamps, which is what most everyday documents need. A page number tells a reader where they are inside one file, while a Bates number identifies one page among every page in the set, regardless of how many files the set contains or how the files are later rearranged on a reviewer's computer. For that reason the two systems rarely compete, and a single page can legitimately carry both.

When simple page numbers are enough

Most documents never come anywhere near a courtroom or a regulatory proceeding. Reports, manuals, theses, proposals and meeting packets only need readers to find a page quickly, so it is enough to add page numbers to PDF files before you share them. Bates numbering makes sense when:

- You are producing documents in litigation or responding to a subpoena
- A court, agency or opposing counsel requires it
- Many separate files have to be referenced as one continuous set

If none of these conditions applies, standard page numbers accomplish the purpose with considerably less administrative setup. The extra setup is real: a prefix, a number length, a sequence log and a stamping pass for every file. A reader of a thesis gains nothing from that overhead, while a litigator depends on it.

Tips for applying Bates numbers

Finalize the page order before numbering, because rearranging pages afterward breaks the sequence and forces the entire production to be renumbered. Keep the same prefix and number length across the whole production, and check that the stamp does not cover any text, signatures or handwritten notes. Stamp copies rather than your original files, so you always keep a clean, unnumbered version, and apply the numbers after any redactions so the stamp sits on the page the other side actually receives. Keep a simple log of which number ranges went to which party and when, and continue the sequence in later productions instead of restarting it, because a repeated number defeats the purpose of a unique identifier. Most Bates numbering PDF software can stamp a batch of files in one pass, which helps when a production runs to hundreds of documents. Reconcile the totals before release: the last number minus the first, plus one, should equal the page count of the production, and any difference points to a skipped or duplicated page. Before you set any of this up, check whether a court or agency actually requires Bates numbering.

- 1Bates numbering machine, 1919-1925
- 2Bates numbering
- 3Rule 34. Producing documents, electronically stored information, and tangible things, or entering onto land, for inspection and other purposes
- 4Stipulation and proposed protective order

Summary

A Bates number gives every page in a document set its own permanent identifier, which is

why legal and regulatory work relies on it. The name traces to Edwin G. Bates and his self-advancing numbering stamp, and the practice survives in software that applies the same unbroken sequence across many files. Ordinary page numbers answer a narrower question, where a reader stands inside one document, and they remain the right choice for contracts, reports and other everyday files. The decision rests on one test: whether a court, an agency or opposing counsel needs to cite and verify individual pages across a whole set. Verify that requirement first, then set up the prefix, the number length and the log.