The Scrivener

Scribes — The American Society of Writers on Legal Subjects

Winter 2005

President's Column

Beverly Ray Burlingame
Partner, Thompson & Knight LLP

The Scoop on Scribes

Scribes has recently welcomed as institutional members the Michigan Court of Appeals and the Alaska Appellate Courts. Federal and state judges, of course, have always been key members of Scribes—serving on the board of directors, on committees, and as life members. Now we've expanded the category of institutional members—which was once limited to law schools—to include any federal or state appellate court. When a court joins Scribes, every judge who meets the eligibility requirements becomes a Scribes member. Of course, virtually all federal and state appellate judges meet the Scribes publication requirements. If you have a chance, please urge a court near you to consider institutional membership in Scribes.

The Scribes board of directors held its 2005 annual board meeting on Saturday, March 5, in Dallas. Bryan Garner, a new board member and former Scribes president, and his wife, Pan Garner, hosted the board members' Saturday-night dinner at their Dallas home. The Dallas-based law firm at which I've spent my entire legal career—Thompson & Knight LLP—sponsored the Scribes dinner by covering the cost of catering. This contribution enabled Scribes board members to meet informally with each other and with several prominent area judges and lawyers.

In past years, other board members and institutions have sponsored the board members' dinner after the meeting. For example, last year Dean Steven Smith, of the California Western School of Law in San Diego, and his wife, Lera, hosted the dinner at their home overlooking the Pacific Ocean.

Beverly Ray Burlingame, President of Scribes.

The annual board meeting enables officers and directors of Scribes to plan the year's activities and to discuss important legal and organizational issues. For example, at the 2004 board meeting, members voted to invite appellate courts to join Scribes as institutional members, agreed to publish a new Scribes brochure, and planned for the second Scribes Lifetime Achievement Award, which was presented to Judge Richard Arnold in August 2004. At this year's meeting, the board similarly planned for Scribes events at the upcoming August ABA meeting and discussed and voted on issues concerning scribes.org, Scribes committees, and Scribes publications.

Scribes' three award committees will soon begin their annual work of combing through the nominated books, briefs, and law-review articles to identify the entries that best exemplify the qualities we advocate: lucidity, concision, and felicitous expression. The 2005 Book Award and Brief-Writing Award will be presented at the Scribes luncheon, during the ABA Annual Meeting, which will take place this year in Chicago in early August. And the 2005 Law-Review Award will be

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presented during the National Conference of Law Reviews, which will take place in mid-March, in Charleston, South Carolina.

If you haven't visited scribes.org recently, I hope you will. The website now provides handy e-mail links to the officers and board members so that you can share your thoughts, send articles for possible publication in *The Scribes Journal of Legal Writing* and *The Scrivener*, and report member news to be included in *The Scrivener.*

Speaking of Scribes publications, I want to thank Thomas M. Cooley Law School for its continuing generous help in underwriting the cost of publishing both the *Journal* and *The Scrivener*. Cooley is the home of several key Scribes members, including Otto Stockmeyer, Scribes President-Elect; Joe Kimble, Editor in Chief of the *Scribes Journal*; and Jane Siegel, the new Editor in Chief of *The Scrivener*.

I'm glad you're among the judges, law professors, authors, legal publishers, and practicing lawyers who are members of Scribes. All of us share a noble goal—to improve legal writing and thus help restore respect for the legal profession. As always, I invite you to participate actively in Scribes, by attending its meetings and seminars, by volunteering for its committees, and by asking your prominent colleagues to join us.

Volume 9 of the *Scribes Journal*.

By now, you should have received Volume 9 of *The Scribes Journal of Legal Writing*. If you would like an extra copy (perhaps to give to a potential new member), please contact Joe Kimble at <kimblej@cooley.edu>.

A Legal-Writing Tidbit: The Benefits of a Good Edit

All of us aspire to be better writers. But even the very best writers can benefit from the work of a skilled editor—a colleague at the court, in the law firm, in the publishing house, or on the faculty who can read critically, spotting problems and ambiguities. As the following passage explains, a writer's ability to request editing help is a sign of strength, not weakness:

> It is not an admission of weakness to ask for help in preparing written material for other people. And it is not an affront to your professional integrity to have someone say that he or she cannot grasp what you mean by . . . a trial page of text. As we write, our minds get set on particular lines of thought, and we unconsciously ignore side-issues and mentally supply steps in an argument. To someone else, the gaps in our thought are obvious at once. Someone else sees implications other than those that stuck in our minds. Points that seemed implicit from our standpoint are often not at all obvious from someone else's frame of reference.[1]

If your syntax is tangled, your grammar wrong, your vocabulary mistaken, and your logic a thicket, your readers will stumble and lose their way. To find the meaning, they must retrace their steps and start again. A reader who is forced to reread too often will grow weary of the journey and quit. And when the reader quits, the writer has failed.

The primary purpose of editing is to make thought intelligible to the reader. The rules of grammar, syntax, and style are not artificial dictates of some long-forgotten high-school English teacher, but essentials by which effective writers make their thoughts clear. As Bryan Garner has explained, a good editor can perform the following steps to improve legal writing:

- Create transitions and signposts to ease the reader's way, including persuasive headings in sentence form.
- Eliminate tiresome repetitions and over-particularization.
- Break up complex sentences, aiming for an average sentence length of 20 words.
- Eliminate "legalese."
- Minimize the passive voice, replace *be*-verbs with more forceful ones, and uncover buried verbs (especially words ending in *-tion*).

- Ensure that a short subject is close to its verb and that a verb is close to its object.
- Edit crucial sentences to end with a punch.
- Cut filler phrases such as *there is* and *there are*.
- Edit out unnecessary words—for example, by using *claim*, not *cause of action*.
- Eliminate unnecessary prepositional phrases—especially those starting with *of*.
- Use parallel constructions and lists to enumerate parallel ideas.
- Suggest distinctive nouns and verbs, minimizing adjectives and adverbs.
- Use *that* restrictively and *which* nonrestrictively.
- Correct grammar and punctuation.
- Edit out those often embarrassing potential miscues, such as a sentence referring to notice and a hearing as "prophylactics against a wrongful discharge."[2]

At the 2002 Scribes luncheon in Chicago, Judge Richard Posner remarked: "If only lawyers would strive to write clearly and simply, avoiding legal jargon, exaggeration, and polemic, the improvement would be vast." And editing is an essential step in improving legal writing, as recognized by the Seventh Circuit: "The brief was . . . a poorly written product with numerous typographical errors. It was obviously never edited by a caring professional. As a panel of judges already overburdened with cases and paper, we find it insulting to have to dutifully comb through a brief [that] even its author found little reason to give such attention. We condemn this type of shoddy professionalism."[3]

As professional writers, we shouldn't allow a lingering fear of criticism to deprive us of a powerful tool. By gaining the insights of a good editor, we can quickly and effectively improve our writing.

[1] Christopher Turk & John Kirkman, Effective Writing: Improving Scientific, Technical, and Business Communication 41 (2d ed. 1989).

[2] *See* Bryan A. Garner, The Winning Brief: 100 Tips for Persuasive Briefing in Trial and Appellate Courts 175–221 (2d ed. 2004) (more fully describing these editing steps, among others).

[3] *United States v. Devine*, 787 F.2d 1086, 1089 (7th Cir. 1986).

What peeves you?

What words agitate you? What phrases make you apoplectic? What constructions cause you to rend your garments in despair? Go ahead—complain about something in legal writing that really sends you. Send us your pet peeves—and your solutions. We invite your submissions for a future peevish issue of *The Scrivener.*

In This Issue

Submit Your Articles

Please send items for upcoming issues of *The Scrivener* (electronically or on disk) to the address shown below.

Deadlines

Spring	May 15
Summer	July 15
Fall	September 15

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Corrections

In our last issue, we inadvertently misspelled Justice Breyer's name and the word "elusive." We apologize for these errors.

You Be the Judge

Joseph Kimble
Thomas M. Cooley Law School

All too often, the debate over plain legal language is abstract and theoretical. We form impressions about how legal writing should "sound" or what kind of style will be most "effective" or what courts and clients "prefer." And we misjudge what it means to write in plain language. So let's get concrete.

For more than two years, the federal Advisory Committee on Civil Rules has been involved in a huge project to "restyle" the Federal Rules of Civil Procedure. The project has produced more than 600 documents scrutinizing every sentence, word, and comma, and the restyled rules were published for comment in February. (See www.uscourts.gov/rules.)

Below are some short before-and-after examples. You be the judge. Which one is clearer? Which one would you prefer to read? Which one would you prefer to have written? Which one reflects better on the legal profession?

There is already a body of strong empirical evidence that "plain language saves money and pleases readers: it is much more likely to be read and understood and heeded—in much less time."[1] Now I invite you to consider the evidence of your own senses.

Current Rule 8(e)(2)

When two or more statements are made in the alternative and one of them if made independently would be sufficient, the pleading is not made insufficient by the insufficiency of one or more of the alternative statements.

Restyled Rule

If a party makes alternative statements, the pleading is sufficient if any one of them is sufficient.

Current Rule 30(g)

(1) If the party giving the notice of the taking of a deposition fails to attend and proceed therewith and another party attends in person or by attorney pursuant to the notice, the court may order the party giving the notice to pay to such other party the reasonable expenses incurred by that party and that party's attorney in attending, including reasonable attorney's fees.

(2) If the party giving the notice of the taking of a deposition of a witness fails to serve a subpoena upon the witness and the witness because of such failure does not attend, and if another party attends in person or by attorney because that party expects the deposition of that witness to be taken, the court may order the party giving the notice to pay to such other party the reasonable expenses incurred by that party and that party's attorney in attending, including reasonable attorney's fees.

Restyled Rule

A party who, expecting a deposition to be taken, attends in person or by an attorney may recover reasonable expenses for attending, including attorney's fees, if the noticing party failed to:

(1) attend and proceed with the deposition; or

(2) serve a subpoena on a nonparty deponent, who consequently did not attend.

Current Rule 50(b)

In ruling on a renewed motion, the court may:

(1) if a verdict was returned:

(A) allow the judgment to stand,

(B) order a new trial, or

(C) direct entry of judgment as a matter of law; or

(2) if no verdict was returned:

(A) order a new trial, or

(B) direct entry of judgment as a matter of law.

Restyled Rule

In ruling on the renewed motion, the court may:

(1) allow judgment on the verdict, if the jury returned a verdict;

(2) order a new trial; or

(3) direct the entry of judgment as a matter of law.

Current Rule 56(e)

Supporting and opposing affidavits shall be made on personal knowledge, shall set forth such facts as would be admissible in evidence, and shall show affirmatively that the affiant is competent to testify to the matters stated therein. Sworn or certified copies of all papers or parts thereof referred to in an affidavit shall be attached thereto or served therewith.

Restyled Rule

A supporting or opposing affidavit must be made on personal knowledge, set out facts that would be admissible in evidence, and show that the affiant is competent to testify on the matters stated. If a paper or part of a paper is referred to in an affidavit, a sworn or certified copy must be attached to or served with the affidavit.

Current Rule 69(a)

The procedure on execution, in proceedings supplementary to and in aid of a judgment, and in proceedings on and in aid of execution shall be in accordance with the practice and procedure of the state in which the district court is held, existing at the time the remedy is sought, except that any statute of the United States governs to the extent that it is applicable.

Restyled Rule

The procedure on execution—and in proceedings supplementary to and in aid of judgment or execution—must follow the procedure of the state where the district court is located, but a federal statute governs to the extent it applies.

Current Rule 71A(k)

The practice as herein prescribed governs in actions involving the exercise of the power of eminent domain under the law of a state, provided that if the state law makes provision for trial of any issue by jury, or for trial of the issue of compensation by jury or commission or both, that provision shall be followed.

Restyled Rule

This rule governs an action involving eminent domain under state law. But if state law provides for trying an issue by jury—or for trying the issue of compensation by jury or commission or both—that law governs.

[1] Joseph Kimble, *Writing for Dollars, Writing to Please*, 6 Scribes J. Legal Writing 1, 37 (1996–1997) (summarizing the results of dozens of studies).

This article is reprinted, with permission, from the Michigan Bar Journal (December 2004).

Excerpts from *Garner's Modern American Usage*

Bryan Garner, a former President and current board member of Scribes, has kindly agreed to let us print excerpts from his invaluable *Modern American Usage*, the second edition of which has recently been published by Oxford University Press. Please note that some of the items do not contain the full entry as it appears in the book; they are abbreviated excerpts, if you will. Also note that the terms in small capitals cross-refer to other entries. Obviously, we can't do justice to the book. But we've picked some items that should be interesting to legal writers, and we'll continue with more in the next issue.

codify is best pronounced /**kod**-ə-fɪ/, not /**koh**-də-fɪ/. This word, like *codification*, was one of the philosopher Jeremy Bentham's NEOLOGISMS; it dates from around 1800.

compare with; compare to. The usual phrase is *compare with*, which means "to place side by side, noting differences and similarities between" <let us compare his goals with his actual accomplishments>. *Compare to* = to observe or point only to likenesses between <the psychologist compared this action to Hinckley's assassination attempt>. Cf. **contrast (A).**

Compare and contrast is an English teacher's tautology, for in comparing two things (one thing *with* another) one notes both similarities and differences.

Congress does not require an article, except in references to a specific session <the 104th Congress>. Although some congressional insiders use the phrase, *the Congress* is a quirk to be avoided in polished prose. The possessive form is preferably *Congress's*—e.g.: "Ms. Rosen said it is *Congress's* responsibility because it gave regulators the framework for RESPA." "HUD Supports RESPA Review," *Nat'l Mortgage News*, 4 Nov. 1996, at 16.

> "*close proximity* is a redundancy."
> —Bryan Garner
> *Garner's Modern American Usage*

court of appeals; court of appeal. Both forms occur in AmE, but *court of appeals* is more common. (*Court of appeal*, though, is the only form in BrE.) The correct form is the one that is statutorily prescribed or customary in a given jurisdiction. For example, although most appellate courts in the United States are individually called a *court of appeals*, the term in California is *court of appeal*.

The plural forms are *courts of appeals* and *courts of appeal*. The singular possessive forms are *court of appeals'* and *court of appeal's*; the plural possessives are *courts of appeals'* and *courts of appeal's*.

deem is a FORMAL WORD that imparts the flavor of ARCHAISM. It frequently displaces a more down-to-earth term such as *consider*, *think*, or *judge*—e.g.:

- "*Deeming* [read *Finding*] them 'fatally flawed,' the Howard County School Boundary Line Committee put two elementary school redistricting plans out of their misery last night during its final meeting." Tricia Bishop, "Boundary Panel Puts End to 2 Elementary Redistricting Plans," *Baltimore Sun*, 11 Oct. 2002, at B3.
- "The authorities have in several cases used rape charges to imprison religious leaders *deemed* [read *thought*] to be a menace." Rik Eckholm, "3 Church Leaders in China Are Sent to Prison for Life," *N.Y. Times*, 11 Oct. 2002, at A10.

discrete; discreet. Although the two words ultimately have the same Latin origin, the spelling *discreet* came into English through French. Today the two spellings are treated as different words. *Discrete* means "separate, distinct"; *discreet* means "cautious, judicious." *Discreet* is most commonly used in reference to behavior, especially speaking or writing.

end product is usually a REDUNDANCY for *product*.

end result is a REDUNDANCY for *result*. Safire calls it "redundant, tautological and unnecessarily repetitive, not to mention prolix and wordy." William Safire, "Peace-ese," *N.Y. Times*, 17 Nov. 1991, § 6, at 22. The only exception occurs when the writer needs to refer to *intermediate results* as well as *end results*. Cf. **final outcome.**

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Send the news to:

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A Verb's Lament

Mark Cooney

On a hunch, I stepped into a bar around the corner. B.B. King riffs filled the smoky room. And there it was: Sitting at the bar, with its head hung over a Scotch and water, was a verb.

Author: Why so glum?
Verb: You know, just the usual stuff.

Author: What usual stuff?
Verb: Well, it's those lawyers again. A lot of them just don't seem to like me. They make me feel so . . . so . . . well . . . *nominalized*.

Author: Buddy, I'm no psychiatrist. What do you mean?
Verb: I'm a nice, simple verb, but they aren't satisfied with that. They try to change me into some highfalutin, abstract noun with a bunch of extra words.

Author: Give me an example.
Verb: Sure. Suppose a lawyer wants to say that a statute *protects* a certain class of people. That's just fine the way it is. But lawyers inflate simple verbs like "protects" to make them sound more impressive: "The statute *provides protection for* workers who are discriminated against based on their age." That took three words to say what one simple verb said better. They . . . they do it to me all the time. [The author hands the verb a tissue.]

Author: Does nominalizing a verb always add extra words?
Verb: I can't see how it wouldn't. Sometimes it takes three, four, even five words to say what one little verb says just fine. Check these out:

Example: The defendant *made the argument* that the plaintiff's lawsuit was untimely.
Better: The defendant *argued* that the plaintiff's lawsuit was untimely.

Example: The parties *engaged in a discussion over* the possibility of settlement.
Better: The parties *discussed* the possibility of settlement.

Author: I see the improvement.
Verb: Some writing experts call nominalized verbs "buried" verbs. When a writer nominalizes a verb, he has killed the poor thing, so it might as well be buried. It's verbicide!

Author: Settle down, fella. Is this really that big a deal?
Verb: Imagine being forced to read these wordy nominalizations page after page in a long brief. Which style do you think a busy judge would rather read?

Author: Okay, okay, I get it. But what makes you think that lawyers are the culprits?
Verb: Don't get me started on letters to clients, with all that "we have effectuated service on" junk instead of "we served." And I see it in briefs all the time.

Author: Prove it.
Verb: Okay, smart guy. Here are some real-life examples:

Brief: "This event . . . *caused an interruption in* the flow of their testimony."
Better: This event *interrupted* the flow of their testimony.

Brief: "Neither she nor any other individual had *made an assessment of* [the] attachment."
Better: Neither she nor any other individual had *assessed* the attachment.

Brief: "APHIS then *undertook an investigation into* the cause of the larvae finds."
Better: APHIS then *investigated* the cause of the larvae finds.

Author: You've certainly done some digging.
Verb: You and your lawyer friends will impress judges, clerks, and clients far more if you just give us verbs a chance.

Author: Yeah, well, I guess now we've come to an understanding about each other.
Verb: You mean, now we *understand* each other. You're all hopeless. Bartender!

Mark Cooney teaches at Thomas M. Cooley Law School and chairs the Appellate Practice Section of the Michigan State Bar.

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