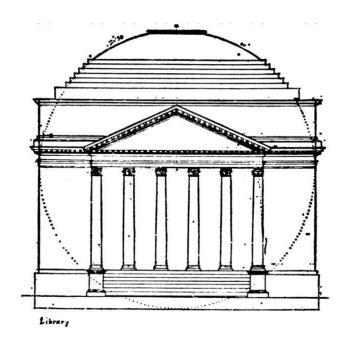
Virginia Law Review



Slatebook 2020–2021

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GUIDING PRINCIPLES

I. Bluebook policy

VLR uses the twenty-first edition of the *Bluebook* wherever a *Slatebook* rule does not apply. Members who prefer the online edition of the *Bluebook* may access the twenty-first edition for free through the library. Members who prefer using hard copy *Bluebooks* may continue to use their twentieth edition book. The XEs and the EIC have copies of the twenty-first edition and will make sure that citations comply with the new changes.

II. Sources Not Covered by the *Bluebook*

If you encounter a source that does not correspond to any of the citation forms in the *Bluebook*, the rules of thumb are:

- 1. Make sure you include the information necessary to find the source. The point of citation is that readers can access a source later on—that is more important than formatting.
- 2. Pick the most analogous citation you can find in the *Bluebook*, follow that as a guide, and make whatever alterations are necessary so that it doesn't look too weird.

SUBSTANTIATION

I. Introductory Signals (*Cross Reference Bluebook* Rule 1.2, p. 58)

Unlike the *Bluebook*, VLR requires parenthetical explanations after the following signals:

- See also
- Cf.
- Compare/with
- But cf.
- See generally

Parentheticals are optional with all other signals.

Exception: No parenthetical is required if the author is referencing the same piece (i.e., "supra" and "infra" citations to other parts of the same work).

Exception: No parenthetical when the preceding sentence describes the content of the work.

Example: A number of recent scholars, including Kelley, have taken this approach to determining when a scratch leads to "ball in hand." See generally Connor Kelley, Rethinking the "Four Wall Contact" Rule, VLR Off-Road (2017).

II. Order of Authorities (*Cross Reference Bluebook* Rule 1.4)

VLR follows the updated Rule 1.4 for order of authorities, which requires authorities within each signal to be ordered in a "logical manner." *VLR* defers to Author preference for the order of authorities.

III. Parenthetical Information (*Cross Reference Bluebook* Rule 1.5, p. 64; Rule 5.2, p. 83)

When there is a quotation within a parenthetical, any parentheticals indicating emphasis, omission, alteration, or quoting or citing another source goes within it.

Example: Adam Sorensen, Breaking Bluebook, 88 Va. L. Rev. 320, 322 (2009) ("I am *totally* crushing this edit." (emphasis added) (citation omitted)).

In parentheticals explaining alterations:

Do **not** use "(emphasis in original)" — this does not exist and should be deleted.

Only use "internal" for "(internal quotation marks omitted)" — **not** for "(citation omitted") or ("footnote omitted").

Note that the designation "(internal quotation marks omitted)" is permitted, but is <u>not</u> required if the AU did not already include it.

IV. Hereinafter (*Cross Reference Bluebook* Rule 4.2(b), p. 80)

The *Bluebook* uses "hereinafter" only when the same author is cited multiple times in the same footnote or when the shortened form would be confusing.

VLR **also** allows "hereinafter" when multiple pieces by the same author are cited extensively throughout the text, even if the original citations are in different footnotes.

Example: ²⁶ Kevin Palmer, Ke\$ha's Unsung Wisdom: How Yelling Timber Saves Lives (2007) [hereinafter Palmer, Yelling Timber].

²⁸ Kevin Palmer, The Legal Implications of Promoting Awareness of Fallen Trees (2006) [hereinafter Palmer, Legal Implications].

V. Statutes' Prior History (Cross Reference Bluebook Rule 12.7, p. 128)

Bluebook Rule 12.7 generally requires that the later history of a statute be included where an author cites to an earlier version. *VLR* has one exception to this rule.

VLR *Exception*: laws passed before 1900 (most notably the Judiciary Act of 1789) are exempt from this rule unless the subsequent history is relevant to the author's point.

VI. Substantiation Tips

1. Consecutively Paginated Journals and Magazines (*Cross Reference Bluebook* Rule 16.4, p. 162)

Some PDFs on HeinOnline contain a <u>two-year date span</u>. Refer to the article's title page (or the issue in which the article appears) to determine the article's year of publication.

2. Unpublished and Forthcoming Sources (*Cross Reference Bluebook* Rule 17, p. 172)

Bring unpublished and forthcoming sources to the attention of your Department Editor. DEs will get permission from authors of unpublished sources to cite or quote the source.

3. Archival Sources (*Cross Reference Bluebook* Rule 18.2.1(d), p. 181)

If a source is being archived by the Virginia Law Review using a permalink, the structure of the citation should follow BB Rule 18.2.1(d).

Example: The Bachelor, Jewell's Blog (Mar. 17, 2016, 11:05 PM), http://www.jewellblog.com/posts/thebachelor [http://permalink.com/12345].

4. Hyperlinks

Best practices for *VLR* is to de-activate all hyperlinks in a Word Document (right click on the link, click "deactivate hyperlink"). This makes it easier to format the article or note later in the editing process.

BLUEBOOKING & FORMATTING

I. Italicization (Cross Reference Bluebook Rule 2, p. 67)

VLR generally does not use italicization. It is **only** used in the following limited circumstances:

Distinguishing Citations from Textual Material

A citation is any reference in a footnote that has a signal (or "no signal," according to BB 1.2) followed by a source.

Textual material is everything else, including in footnotes, parentheticals, or the main text. Note that case names that are a part of a sentence are considered text—not a citation—even in footnotes and parentheticals.

Italicization in Citations

1. Case Names

Do **not** italicize case names where they are part of a **full citation**. This rule includes procedural phrases like "in re" and "ex rel."

Example: ¹ See, e.g., O'Leary v. Lile, 30 F.2d 29 (2d Cir. 2009); In re Estate of Lystash, No. C7-95-2185, 1996 WL 118367 (Minn. Ct. App. Mar. 19, 1996).

Do italicize cases names where they are part of a **short citation**.

Example: ⁸ O'Leary, 30 F.2d at 46 (comparing the time spent preparing for the competition with time spent studying for school); *In re Lystash*, 1996 WL 118367, at *3 (linking the time spent preparing for the competition to health problems).

Do italicize case names where they are part of a textual sentence, including in a footnote.

Example: The Supreme Court affirmed the Second Circuit's ruling in O'Leary v. Lile, 901 U.S. 865 (2011).

2. Case Names in Parentheticals

In parentheticals, do **not** italicize case names following "quoting" or "citing"; **do** italicize case names in other textual parentheticals.

Example: ² Monaghan v. Sorensen, 211 F.3d 372 (4th Cir. 2003) (quoting Gorin v. Palmer, 87 F.3d 372 (4th Cir. 1996)).

Example: ² Monaghan v. Sorensen, 211 F.3d 372 (4th Cir. 2003) (rejecting an analogy to *Gorin v. Palmer*, 87 F.3d 372 (4th Cir. 1996)).

3. Signals & Cases Following Signals

Do **not** italicize signals.

When a <u>case</u> follows a signal that is used as a <u>verb</u>, the case is then textual material and <u>should be italicized</u>.

Example, case following signal as a <u>verb</u>: ⁶ For a more thorough analysis, see <i>Monaghan v. Sorensen, 211 F.3d 372 (4th Cir. 2003).

Example, case following signal as a <u>signal</u>: ⁶ The Fourth Circuit provided a more thorough analysis in a recent case involving six authors, see Monaghan

v. Sorensen, 211 F.3d 372 (4th Cir. 2003), when it found the previous precedent unpersuasive.

4. Short Forms

Do **not** italicize "id.," "supra," "infra," or "hereinafter" when they appear in a citation. **Do** italicize them if they appear in a textual sentence.

5. Words and Phrases

Do italicize the following words and phrases in citations:

The phrase " in." For instance: "reprinted in," "quoted in," "cited in," "in."

Example: ⁸ Alyson Sandler, The Joys of Vineyarding, *reprinted in* Monica Trueba, Doing Charlottesville Right 17 (2009).

The word "to" when citing to a preface, foreword, introduction, or epilogue by someone other than the author, according to BB 15.6.

Example: ⁹ See Meredith Loretta, Introduction *to* Ollie Engebretson, To Bilt or Not To Bilt: Life as a Double Hoo (2007).

Words or phrases in the title of a book or an article that are italicized in the original.

Example: ¹⁰ See Alex Gorin, How *Virginia Law Review Online* Is Changing Legal Scholarship 2 (2004).

Italicization in Textual Material

1. Case Names

Do italicize case names in textual sentences, both above- and below-the-line.

Example: The controlling precedent is *Mitchell v. Two Unnamed Miami-Dade County Prosecutors*, ¹⁶ which rejected a claim of malicious prosecution. ¹⁶ The court in *Mitchell* also denied Rule 11 sanctions, despite repeated contempt threats by the judge during the proceedings.

Do italicize "id." <u>only</u> where it refers to a case name in textual material.

Example: These laws and the Supreme Court cases that upheld them are discussed in id.

2. Certain Secondary Sources

Do italicize the following when it appears in textual material, independently from a citation: names of books, journals, newspapers, magazines, movies, plays, paintings, and television series.

Do **not** italicize the following even in textual material; instead just capitalize the title: the name of particular articles, episodes of TV shows, or song names

Example: David Maranjian recently published The Common Law of Music Festivals in the Virginia Law Review.

3. Equations and Individual Letters

Do italicize all equations. For guidance on formatting equations see *Chicago Manual of Style* ¶ 12.21.

Example: e = mc2

Do italicize all individual letters, when used to represent the names of hypothetical parties or places.

Example: A formed a contract with B to purchase Blackacre, located in state X.

4. Words in Quotations or Titles

Do italicize words in quotations or titles that are italicized in the original source.

Example: Gorin's How Virginia Law Review Online is Changing Legal Scholarship has received widespread critical acclaim.

Note: as seen above, words italicized in the original <u>and</u> italicized under a *Slatebook* convention are in Roman; two italicizations cancel each other out.

5. Foreign Words

Do **not** italicize the commonly-used words on the following list, or any variation thereof:

- a fortiori • Certiorari • ex ante • per se • de facto • prima facie • a posteriori • ex post • a priori • de jure • inter alia • quasi-• amicus curiae • de minimus • mens rea • res ipsa loquitor • bonafide • dictum • per curiam • sic
 - stare decisis

For foreign words not on this list, follow the Author's preferred convention; XEs can make a final decision.

6. Ship Names

Do italicize the names of ships.

Example: A worrying number of crimes have been tried aboard the U.S.S. Seahawk.

II. Bold, Underlining, & Capital Letters (*Cross Reference Bluebook* Rule 2, p. 67)

<u>LARGE & SMALL Capitals</u>: Never used in citations; only in Part headings in the text. <u>Bold & Underlining</u>: Never used (except in the *Slatebook*, because we believe in healthy irony).

III. Short Forms for Cases (*Cross Reference Bluebook* Rule 10.9, p. 115)

Generally

The *Bluebook* offers a choice of short forms; *VLR* prefers:

Trombley-Shapiro Jonas, 480 U.S. at 170.

VLR permits dropping the party name from the short form if it's already been mentioned in the textual material that the short form citation supports.

Example: The Court in *Trombley-Shapiro Jonas* disagreed.⁴ 480 U.S. at 170.

Use "id." anywhere that is applicable under *Bluebook* Rule 4.1.

Short Form Above the Line

In the main text, use a case's shortened name (generally, the name of one of the parties) only when the case has already been named in full in the main text of the same Part.

Example: II. THE SUPREME COURT'S APPROACH

The Court in *Monaghan v. Sorensen* attempted to resolve the conflict among the various circuits.³

. . .

A. Criticisms and Commentators

It is unclear why the Court granted certiorari in *Monaghan*.

. .

III. NEW DIRECTIONS

The future of the holding in *Monaghan v. Sorensen* is uncertain.²⁴

Conclusions

Any case name that appears anywhere in the text may be short-cited in the conclusion.

Focus of the Piece

If the DE Memorandum designates a case the "focus of the piece," then that case can be short-cited <u>above-the-line</u> throughout after the first reference in the main text. Follow standard *Bluebook* short-cite rules for below-the-line citations (the short form is used within five footnotes of the previous citation).

IV. Capitalization (*Cross Reference Bluebook* Rule 8, p. 91)

Capitalization in Titles, Generally

Follow Bluebook Rule 8, even when the original source uses a different capitalization rule.

Infinitive Verbs in Titles

Capitalize "to" when it is part of an infinitive verb in a title.

Example: Author, How To Crush Your First Cold Call [pincite] (2020).

Prepositions in Titles

Unlike the *Bluebook*, *VLR* permits capitalizing prepositions of four letters or fewer—even when they do not begin the heading or title, or immediately follow a colon—if they are important to the title or it will otherwise look weird.

Example, Important Preposition: Author, Where Are You From? [pincite] (2017). Example, Not Important: Author, The Rules from the Bluebook and Slatebook Are Very Important [pincite] (2017).

Black versus black

VLR capitalizes Black when describing people and cultures of African origin.

Example: The literature course highlighted Black authors.

Capitalization Supplement

Do NOT Capitalize	DO Capitalize		
Article, Essay, Book Review, Note,	Article, Essay, Book Review, Note,		
Comment, etc., when referring to <i>another</i> work	Comment, etc., when referring to <i>the piece itself</i>		
• Adjectives like "constitutional," "govern-	• "State" and "Commonwealth" when		
mental," "congressional," "presidential." • The word "government"	referring to them as actors, regulators, or litigants in a suit		
• "executive branch"	• "Executive," if referring to a specific		
	Executive		
• "judge" and related judicial titles when not	• "Judge" and related judicial titles when		
attached to a proper name, even if	the title accompanies a proper name		
referring to a specific individual	• "Justice" when referring to a U.S.		
	Supreme Court Justice, even if not		
Doctrines like "substantive due process"	referencing a specific justice • Specific clauses/Amendments to the		
Documes like substantive due process	Constitution ("Commerce Clause"; "Due		
	Process Clause")		
	"Clause" or "Amendment" when referring		
	to a specific clause or amendment, even if		
	the specific provision is not named		
	• "Act" when referring to a specific statute		
	• "Title"; "Section"; and "Paragraph" when		
	referring to specific provisions		
	• "Founding"; "Framing"; "Founding-era"		
	References to foreign political units if they		
	would be capitalized in their native		
	language (e.g., "several German Lander") • "Internet," whether used as a noun or		
	adjective		
	"Black," when used to describe people		
	and cultures of African origin		

V. Titles of Judges, Officials, & Terms of Court (Cross Reference Bluebook Rule 9, p. 94)

Professors

Student authors should always use the honorific title "Professor" when they refer to any individual professor for the first time in their notes or comments. Other authors are encouraged to use it; EB members should add the title where it seems appropriate and DEs/XEs will make the final call with the author.

If the honorific title is first given in a footnote, use it again at the first appearance above the line.

Courts

Give the full name of a court the first time that court is mentioned in the text, but abbreviate "United States." If the first textual reference to a court occurs in a footnote before the first reference in the main text, use the full name in both instances.

Example: The U.S. District Court for the Western District of Virginia dismissed the Harvard Law Review's complaint for failure to state a claim.

Example: The U.S. Court of Appeals for the Fourth Circuit affirmed.

Subsequent mentions of the same court may be shortened. For these purposes, the first mention of any one circuit court or district court is considered to be the first reference for all subsequent circuit courts or district courts.

Example: After a first reference to the U.S. Court of Appeals for the Fourth Circuit, it is acceptable to say "the Third Circuit" the first time that court is mentioned.

VI. Docket Numbers (*Cross Reference Bluebook* Rule 10.8.1)

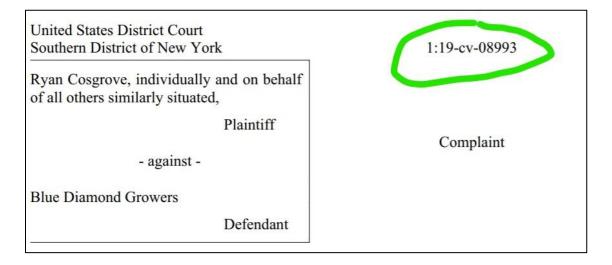
When citing pending or unreported cases per Rule 10.8.1, omit the judge's initials from the end of the docket number.

Example: Ogale v. Edwards, **No. 01-CV-123**, 2004 U.S. Dist. LEXIS 12345, at *4 (W.D. Va. 2020)

NOT: Ogale v. Edwards, **No. 01-CV-123(HL**), 2004 U.S. Dist. LEXIS 12345, at *4 (W.D. Va. 2020)

Docket numbers in citations should appear exactly as written in the original document itself (i.e., the PDF that is uploaded on Freedcamp), *not* as written on Westlaw or Lexis.

Example of correct docket number: screenshot from PDF of the complaint



Example of incorrect docket number: screenshot of same case listed on Westlaw



VII. Use of "et al."

First time citing a piece:

Do **not** use "et al." when listing authors, translators, or editors if the work has five or fewer authors, translators, or editors.

Subsequent short cites:

"Et al." may be used in short form citations for pieces with more than two authors.

VIII. Formatting Quotations (Cross Reference Bluebook Rules 5.1 & 5.3, pp. 82 & 85)

Block Quotations

Note that the *Bluebook* Rule requiring block quote formatting for quotes of fifty or more words **does** apply to quotes that appear in <u>footnote text</u>.

But note that it does **not** apply to quotes that appear in a citation parenthetical.

Ellipses

Use a nonbreaking space when inserting ellipses. PC users type Ctrl+Shift+Space; Mac users type Option+Space. When "show formatting" is on, a nonbreaking space will appear as °.

Insert non-breaking spaces:

Between the word immediately preceding the ellipsis and the first period of the ellipsis

Between each period of the ellipsis

Between the last period of the ellipsis and the next word if the ellipsis occurs midsentence

Example: Formatting ellipsis correctly creates less work later°.°.°.°and more time for pizza.

IX. Formatting Section & Paragraph Symbols (Cross Reference Bluebook Rule 6.2, p.88)

The *Bluebook* requires using the Section and Paragraph symbols in textual material, except in a full citation. *VLR* follows this convention <u>above-the-line</u>:

Example: The case was filed under Section 1983. *Example*: The case was filed under 42 U.S.C. § 1983.

VLR uses the section or paragraph symbols in <u>footnote text</u>, even in textual material, unless it comes at the beginning of a sentence.

Example: 1 The case was filed under § 1983.

Example: ² Section 1983 claims have increased over the years.

Use non-breaking spaces between the symbol and the number.

X. Common Mistakes

The following are rules in the *Bluebook* that are often (understandably!) unfamiliar to new editors and so often get overlooked:

- 1. There is **always a comma** after the abbreviation of "**editor**" to "ed.," but **never a comma** after the abbreviation of "**edition**" to "ed." *See Bluebook* Rule 15.4, p. 152.
- 2. When using "supra": if a shorter work in a collection has been cited previously, only "supra" to the shorter work. No further "supra" is necessary for the collection.

Example: ²⁴ Elizabeth Douglas, A How-To Guide to Crafting Clever Clip Art Signs, *in* Secrets of the Virginia Law Review Office 14, 28–29 (2016). ²⁶ Douglas, supra note 24, at 32.

If the collection has been cited previously, but a particular shorter work in the collection has not, use the "supra" for the earlier cite to the collection.

Example: ²³ See generally Carefully Thought-Out but Questionable Choices (Lauren O'Leary ed., 2014).
 ²⁵ See Ollie Engebretson, Buying Four Cases of Diet Dew for the VLR Office, *in* Carefully Thought-Out but Questionable Choices, supra note 23, at 156, 173.

3. Ellipses are formatted differently depending on whether the quotation containing the alteration is a phrase or a full sentence. Check *Bluebook* Rule 5.3 for a detailed description.

XI. Microsoft Word Formatting

Note that most special characters can be found by going to:

Insert → Symbols → Special Characters

Displayed next to each character will be the relevant keyboard shortcut for your version of word. You can personalize these shortcuts or create new ones by clicking "Keyboard Shortcut."

Symbol	On a Mac	On a PC
Nonbreaking Space	Option+Spacebar	Ctrl+Shift+Spacebar
Section Symbol	Option+6	Alt+0167
Paragraph Symbol	Option+7	Num Lock, then: Alt+2+0
En Dash	Option+-	Alt+0150
Em Dash	Shift+Option+-	Alt+0151

Cross-Reference Instructions:

When using supra or infra to refer to another footnote or footnotes in the piece, it is imperative that you insert a cross-reference rather than just type in the number. This means replacing all existing jump cites with cross-references. This causes the cite to automatically update when new footnotes are added or others deleted.

To insert a cross-reference, go to:

Insert \rightarrow Links \rightarrow Cross-reference \rightarrow Footnote, and click on the appropriate footnote.

Do **not** use cross-references where "supra" or "infra" are used in <u>textual material</u>.

INTERNAL REFERENCES TO THE PIECE

For references within a piece to another subpart of that piece, use the following terms:

- I. PART
 - A. Section
 - 1. Subsection
 - 2. Subsection
 - B. Section
- II. PART

Contrary to *Bluebook* Rule 3.5, *VLR* uses these terms for internal cross-references, rather than calling everything a Part.

Example: 1 See infra Section II.A.

Internal references do **not** have periods at the end, unless they are at the end of a sentence.

Example: Section I.B will provide an overwrought description of a philosophical background that will be largely irrelevant to Parts II–IV.

Capitalize internal references above and below the line; do not capitalize external references.

Example: The third Part of this Note will discuss the rise of the elite group referred to most commonly as the "reference librarians."

GRAMMAR, PUNCTUATION, & WORD CHOICE

Generally, grammar and punctuation should follow the sixteenth edition of the Chicago Manual of Style, available to all UVA law students for free if connected to the law school's network at: http://www.chicagomanualofstyle.org/home.html.

To access this from outside the law school, follow this link and sign in using NetBadge: http://search.lib.virginia.edu/catalog/u5221984.

The following list provides a quick reference to recurrent grammar and style issues.

1. Contractions

VLR generally does not use contractions. EB members should change contractions during initial edits and cite checks to allow for later author review.

2. First Person

Student note authors are strongly discouraged from using the first person. Other authors may use it as they see fit.

3. Hyphens & Dashes

Prefixes

VLR prefers hyphens with prefixes, especially if the word can be ambiguous. Prefixes should be hyphenated unless the author has made a deliberate stylistic choice otherwise.

Example: "re-call," NOT "recall"

"anti-male," NOT "antimale"

"anti-discrimination," NOT "antidiscrimination"

Numbers & Ranges

Use hyphens for section numbers or hyphenated numbers that do not indicated a range.

Example: M.G.L. § 38-10

Use en-dashes to indicate continuing or inclusive numbers, dates, times, or references numbers.

Examples: 1968-72; id. at 38-42.

Digressions

Use em-dashes to set off amplifying, explaining, and digressive elements.

Example: Alex Gorin—whose name happens to be an anagram for axle groin—keeps trying to patent his paella recipe.

Compound Modifiers

Generally use a hyphen where a group of words collectively modify a noun. See *Chicago Manual of Style* ¶¶ 7.77-7.85 (including a better chart than the one that follows).

Category/Description	Needs a Hyphen	Does Not Need a Hyphen
	• "small-state senators"	• "venture capital fund"
	• "middle-class family"	
Types of law* *Note that this is an exception to the <i>Chicago Manual of Style</i> Rules		 "common law" and "state law" when used as nouns ("the common law does not permit it") "common law" and "state law" when used as adjectives ("the common law system is pretty loopy")
	• "fire-brewed beer"	• "This beer is fire brewed."
Adverbs modifying adjectives		• "highly qualified editor"

Century	•	Used as adjectival phrase ("Beyoncé is a twenty-first-century Renaissance woman.") "mid-twentieth-century developments" "developments of the mid-twentieth century" "late twentieth-century developments"	•	Used as a noun ("Beyoncé reached her artistic peak in the twenty-first century.") "developments of the late twentieth century"
Ages	•	"behavior of a six-year- old child"	•	"a child of six years"
Decision + Making	•	Used as adjectival phrase ("their decision- making strategy was very bad")	•	Used as a noun ("their decision making was very bad")

4. Colons, Commas, & Quotations

Capitalization

Capitalize the first letter of the word after a colon if it is part of a title or proper noun, if the material introduced by the colon is a quotation that is a full sentence, if the colon precedes a set of sentences, or if the colon precedes a question. Otherwise, do not capitalize the word following the colon.

Examples: At least he died doing what he loved: editing law review articles.

If there's a guiding principle at VLR it's this famous quotation: "There

If there's a guiding principle at *VLR* it's this famous quotation: "There are snacks in the office."

There are three reasons why the XE office is the best: First, it has the most natural light. Second, it's the biggest. And third, it has the coolest couch.

The property lecture left us with an important question: Where is the infamous Blackacre?

When a comma or colon introduces a quotation, the first letter of the word after the comma or colon should usually be capitalized.

Examples: The professor left the class with the following question: "How much wood would a woodchuck chuck if a woodchuck could chuck wood?" Dorothy said, "We are not in Kansas anymore."

Except when the quotation is merely a phrase and the comma is part of the overall sentence. *Example*: Ben Kuder, a renowned alligator wrestler, "has never lost a fight."

5. Lists & Series

VLR uses an Oxford comma: "X, Y, and Z," not "X, Y and Z."

6. Quotation Marks

Commas and periods go inside quotation marks; colons, semicolons, question marks, and exclamation marks go outside unless they are part of the quoted passage.

7. Apostrophes & Possession

<u>The United States</u>: although singular in construction, "the United States" should receive only an apostrophe to indicate possession, **not** an apostrophe and an "s."

Example: The United States' bicameral legislature produces questionable results.

<u>Joint Possession</u>: If two or more entities possess something jointly, the latter noun takes the possessive ending.

Example: Adam and Maria's office.

If two nouns each possess something separately, they each receive a possessive ending. *Example*: Adam's and Maria's cell phones.

Decades: "1980s," not "1980's."

8. The Subjunctive Mood

The subjunctive is used in fact-conditional sentences (e.g., those using the words if, as if, although, as though, unless, and (more occasionally) whether).

Example: If I were a rich man, I would not have to work hard.

I would not state that the Spurs are the greatest basketball team of all time unless it **were** true.

NOT: If I was a rich man, I would not have to work hard.

I would not state that the Spurs are the greatest basketball team of all time unless it **was** true.

9. "Myriad"

"Myriad" literally means "ten thousand." It is therefore important to some people that it never be written with "a" or "of," just as you wouldn't say "a ten thousand of."

Example: There are myriad reasons why this construction is correct.

NOT: There are **a** myriad reasons why this entry is obscure to the point of absurdity.