

# A Contemporary Take on Strunk and White for Legal Writers

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## Introduction

Strunk and White's *The Elements of Style*<sup>1</sup> attracts superlatives. To its devotees, it's a "masterful standard,"<sup>2</sup> "the guiding light of grammar books,"<sup>3</sup> and "the mother of all grammar and style authorities."<sup>4</sup> One admirer gushed, "I love *The Elements of Style*. I love the idea of it; I love its execution. I love the book's history, and I love its attitude."<sup>5</sup> The book, often referred to as "Strunk and White," has been treated with special reverence in the legal profession. But its detractors say that the book serves up "limp platitudes and inconsistent nonsense"<sup>6</sup> and "prescriptive grammar" full of

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<sup>1</sup> William Strunk Jr. & E.B. White, *The Elements of Style* (4th ed., Longman 2000).

<sup>2</sup> Neal Feigenson, Book Review, 41 J. Legal Educ. 503, 517 n. 48 (1991) (reviewing Helene S. Shapo, Marilyn R. Walter & Elizabeth Fajans, *Writing and Analysis in the Law* (2d ed., Foundation Press 1991)).

<sup>3</sup> Daniel Richardson, Book Review, 30 Vt. B.J. 52, 52 (Summer 2004) (reviewing Bryan A. Garner, *The Redbook: A Manual on Legal Style* (West 2002)).

<sup>4</sup> Lawrence M. Friedman, *Riding Circuits*, 16 CBA Rec. 43 (July 2002).

<sup>5</sup> Mark Garvey, *Stylized: A Slightly Obsessive History of Strunk & White's The Elements of Style* x (Touchstone 2009).

<sup>6</sup> Geoffrey K. Pullum, *50 Years of Stupid Grammar Advice*, 55.32 Chron. Higher Educ. B15 (Apr. 17, 2009).

“hogwash.”<sup>7</sup> That’s strong stuff for a book whose original author, William Strunk Jr., called it simply “the little book.”<sup>8</sup>

The criticisms of Strunk and White raise questions about whether legal writers should continue to revere the book and, if not, what sources should take its place. In this article, I address those questions by examining *The Elements of Style*, the charges against it, and some potential alternative sources. I conclude that it’s time to demote Strunk and White from its hallowed position and replace it with more effective authorities.

### The history and reception of *The Elements of Style*

Casual users of *The Elements of Style* may not realize that William Strunk and E.B. White never collaborated on the book. White added his contributions years after Strunk’s death.

Nearly a century ago, in 1918, Cornell English professor William Strunk Jr. privately published a small grammar and style book for his students. That “*parvum opus*,” titled *The Elements of Style*, was a “clear, brief, bold” book<sup>9</sup> that Strunk hoped would evoke those traits in his students’ writing and thus save him time in grading papers.<sup>10</sup>

In 1919, a student named Elwyn Brooks White used the book in Strunk’s English course.<sup>11</sup> White went on to a successful career writing for the *New Yorker* as E.B. White. His body of work, including

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<sup>7</sup> R. James G. McLoughlin, Ltr. to the Ed., 55.37 *Chron. Higher Educ.* B18–19 (May 22, 2009).

<sup>8</sup> E.B. White, *Introduction to The Elements of Style* xiii, xiii.

<sup>9</sup> *Id.* at xviii.

<sup>10</sup> Garvey, *supra* n. 5, at xiii.

<sup>11</sup> White, *supra* n. 8, at xiii.

numerous essays and two beloved children's books, *Stuart Little* and *Charlotte's Web*, eventually won him a Pulitzer Prize.

Meanwhile, Strunk's pamphlet-sized book was published commercially, with editions appearing in 1920 and 1934.<sup>12</sup>

White kept in touch with his former professor until Strunk's death in 1946.<sup>13</sup> But White had forgotten about Strunk's little book until a friend sent him a copy in 1957, thinking it would amuse him. Discovering anew the book's "rich deposits of gold,"<sup>14</sup> White used his *New Yorker* platform to publish a paean to the book and its author.<sup>15</sup> This prompted the Macmillan Company to offer to publish Strunk's book. With White's additions, including an edited version of his *New Yorker* column as the introduction, *The Elements of Style* was published in 1959.

White revised later editions to "delete bewhiskered entries" and add newer words and expressions.<sup>16</sup> After his death in 1985, his stepson, Roger Angell, wrote the foreword to a slightly revised 2000 edition.<sup>17</sup> Today, there's even an illustrated edition with whimsical Matisse-like pictures — one shows a "sentence fragment" as a stairway going nowhere.<sup>18</sup>

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<sup>12</sup> Jodi Lundgren, *Review Essay: Interrogating the Popularity of Strunk and White*, 18 *J. Teaching Writing* 123, 124 (2000).

<sup>13</sup> Garvey, *supra* n. 5, at 25.

<sup>14</sup> White, *supra* n. 8, at xiii.

<sup>15</sup> Garvey, *supra* n. 5, at xiv.

<sup>16</sup> White, *supra* n. 8, at xiv.

<sup>17</sup> Roger Angell, *Foreword* to William Strunk Jr. & E.B. White, *The Elements of Style* ix, ix (4th ed., Longman 2000); see also Richard H. Minear, *E.B. White Takes His Leave, or Does He? The Elements of Style, Six Editions (1918–2000)*, 45 *Mass. Rev.* 51, 69 (Spring 2004) (stating that the 2000 edition does not specify who made the editorial changes).

<sup>18</sup> William Strunk Jr. & E.B. White, *The Elements of Style Illustrated* 131 (Penguin Press 2005) (illustrated by Maira Kalman).

*The Elements of Style* became and remains a best seller, having sold more than 10 million copies since 1959.<sup>19</sup> Novelist Stephen King singled it out as the book that “every aspiring writer should read.”<sup>20</sup> And William Zinsser, himself the author of an acclaimed style guide, recommended that writers reread Strunk and White once a year.<sup>21</sup>

Legal writers tend to treat *The Elements of Style* as an iconic authority on matters of grammar and style, calling it a “seminal work[ ] on English composition,”<sup>22</sup> a “classic general writing guide,”<sup>23</sup> and a universally accepted “guiding light of grammar books.”<sup>24</sup> Some reread the book regularly or urge others to do so,<sup>25</sup> and many place it on a short list of references for legal writers.<sup>26</sup> Judges have

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<sup>19</sup> Garvey, *supra* n. 5, at xvi, xx.

<sup>20</sup> Stephen King, *On Writing: A Memoir of the Craft* ix (Scribner 2000).

<sup>21</sup> William Zinsser, *On Writing Well: The Classic Guide to Writing Nonfiction* 36 (6th ed., Harper Perennial 1998).

<sup>22</sup> Ira P. Robbins, *Best Practices on “Best Practices”: Legal Education and Beyond*, 16 Clin. L. Rev. 269, 271 n. 4 (2009).

<sup>23</sup> Eugene Volokh, *Writing a Student Article*, 48 J. Legal Educ. 247, 260 (1998).

<sup>24</sup> Richardson, *supra* n. 3, at 52.

<sup>25</sup> David F. Herr, *Book Review*, 56 Fed. Law. 61, 62 (Feb. 2009) (reviewing Antonin Scalia & Bryan A. Garner, *Making Your Case: The Art of Persuading Judges* (Thomson West 2008); Mark L. Evans, *Tips for Writing Less Like a Lawyer*, 7 Scribes J. Legal Writing 147, 154 (2000); Irene E. Ziebarth, *New Legal Software and Law Books Reviewed*, 40 Orange Co. Law. 36, 36 (Oct. 1998).

<sup>26</sup> E.g., Hethe Clark, *The Pen Is Mightier . . . A Law Clerk’s Perspective on Good Writing*, 49 Advoc. 49, 49 (July 2006) (listing Strunk and White among four standard references); Laurie A. Lewis, *Winning The Game of Appellate Musical Shoes: When the Appeals Band Plays, Jump from the Client’s to the Judge’s Shoes to Write the Statement of Facts Ballad*, 46 Wake Forest L. Rev. 983, 993 n. 47 (2011) (listing Strunk and White among five recommended books on writing).

required their clerks to read Strunk and White,<sup>27</sup> cited it as authoritative in published opinions<sup>28</sup> and law-review articles,<sup>29</sup> and even urged wordy lawyers to study it.<sup>30</sup> Experts in legal writing cite it.<sup>31</sup> A June 2012 search of the Westlaw “journals and law reviews” database revealed 288 citations to *The Elements of Style*, nearly all of them favorable.

But *The Elements of Style* has also drawn spirited criticism. Writing professor Ben Yagoda charged that its rules leach the flair out of writing; he wrote his own book to counter Strunk and White’s influence.<sup>32</sup> Feminist and English professor Jodi Lundgren berated

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<sup>27</sup> See, e.g., Allen D. Black, *Judge Wisdom, the Great Teacher and Careful Writer*, 109 Yale L.J. 1267, 1271 (2000) (stating that Fifth Circuit Judge John Minor Wisdom urged each new clerk to read Strunk and White); Christopher R. Green, *Some Themes from Judge Rhesa H. Barksdale’s Published Opinions*, 79 Miss. L.J. 261, 283 n. 77 (2009) (stating that Fifth Circuit Judge Barksdale recommended Strunk and White to new clerks on their first day).

<sup>28</sup> See, e.g., *HTC Corp. v. IPCom GmbH & Co.*, 667 F.3d 1270, 1274–75 (Fed. Cir. 2012); *State v. Ochoa*, 792 N.W.2d 260, 268–69 (Iowa 2010); *Cash Am. Net of Nev., LLC v. Commw., Dept. of Banking*, 8 A.3d 282, 293 n. 4 (Pa. 2010).

<sup>29</sup> See, e.g., Harry Pregerson & Suzanne Painter-Thorne, *The Seven Virtues of Appellate Brief Writing: An Update from the Bench*, 38 Sw. L. Rev. 221, 232 n. 30 (2008) (including Ninth Circuit Judge Pregerson’s editing checklist that incorporates Strunk and White’s caution against wordiness); Douglas O. Tice Jr., *Reflections on Opinion Writing and Publishing: Part I*, 24 Am. Bankr. Inst. J. 46, 46 (Mar. 2007) (mentioning Bankruptcy Judge Tice’s recommendation of Strunk and White as a “classic”).

<sup>30</sup> *Politico v. Promus Hotels, Inc.*, 184 F.R.D. 232, 234 (E.D.N.Y. 1999); *Quat v. Horowitz*, 882 F. Supp. 1296, 1297 (E.D.N.Y. 1995) (both recommending Strunk and White to lawyers who filed wordy complaints).

<sup>31</sup> E.g., Charles A. Calleros, *Legal Method and Writing* 247 n. 5 (5th ed. 2006); Bryan A. Garner, *Making Peace in the Language Wars*, 7 Green Bag 2d 227, 232 n. 25 (Spring 2004); Joseph Kimble, *The Struggle Against Suspect Arguments*, 83 Mich. B.J. 42, 44 n. 8 (Nov. 2004); Volokh, *supra* n. 23, at 260; Richard C. Wydick, *True Confessions of a Diddle-Diddle Dumb-Head*, 11 Scribes J. Legal Writing 57, 58 (2007).

<sup>32</sup> Ben Yagoda, *The Sound on the Page* xvii–xxiv (HarperResource 2004).

Strunk and White as overly judgmental in using words like *slumming* (applied to those who use *like* in place of *as*) and *perilous* (for loose sentences).<sup>33</sup> Worse, she accused the book of classism and sexism (a problem that the editors of the 2000 edition tried to fix).<sup>34</sup> And on the book's 50th anniversary in 2009, linguist Geoffrey Pullum sniffed, "I won't be celebrating."<sup>35</sup> He pilloried *The Elements of Style* in the *Chronicle of Higher Education* as prescriptive and often incorrect.<sup>36</sup> Pullum's critique generated impassioned reader responses, most of them defending the book.<sup>37</sup> *The Elements of Style* has even inspired a takeoff, *Spunk & Bite*, by Arthur Plotnik, who calls Strunk and White's advice too prescriptive and tame.<sup>38</sup> He proposes a livelier style as an antidote.<sup>39</sup>

## Strunk and White's guidelines

All this controversy concerns a small book that does not purport to be a comprehensive grammar and usage guide.<sup>40</sup> It's neither "a complete rhetoric" nor "an exhaustive, methodical grammar," but rather a "hodgepodge" of suggestions in five sections that are not mutually exclusive.<sup>41</sup> Each of the authors wrote with a distinc-

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<sup>33</sup> Lundgren, *supra* n. 12, at 126–27.

<sup>34</sup> *Id.* at 126–29 (characterizing the 2000 changes as "barely touch[ing] the deep masculinist bias of the work").

<sup>35</sup> Pullum, *supra* n. 6, at B15.

<sup>36</sup> *Id.*

<sup>37</sup> See Ltrs. to the Ed., *Who's Afraid of Strunk and White?* 55 *Chron. Higher Educ.* B17–18 (May 22, 2009).

<sup>38</sup> Arthur Plotnik, *Spunk & Bite* 4 (Random House Reference 2005).

<sup>39</sup> *Id.* at 2, 4.

<sup>40</sup> White, *supra* n. 8, at xiv–xv.

<sup>41</sup> Garvey, *supra* n. 5, at xx.

tive voice — Strunk with his bracing commands, and White with the more careful tone of an experienced writer.<sup>42</sup> The book even has its playful passages, such as “Do not say ‘I feel nauseous,’ unless you are sure you want to have that effect on others.”<sup>43</sup>

Each of its sections has received both praise and criticism.

### *Elementary Rules of Usage*

The first section in *The Elements of Style*, titled “Elementary Rules of Usage,” is largely based on Strunk’s 1918 rules. Its 11 rules are arranged in somewhat random order, shifting between punctuation and grammar (thus violating the book’s admonition to “choose a suitable design and hold to it”<sup>44</sup>). The rules are standard, advising writers to avoid errors such as comma splices and dangling modifiers. Each guideline is illustrated with examples. The chapter’s short list is not a comprehensive set of grammar and usage rules — but then, as White explained, the book “does not pretend to survey the whole field” of English grammar.<sup>45</sup>

Commentators have praised the advice on grammar,<sup>46</sup> while the book’s main critics object that it is prescriptive.<sup>47</sup> Whether grammar books should be prescriptive is the subject of an ongoing battle

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<sup>42</sup> *Id.* at xviii–xix.

<sup>43</sup> Minear, *supra* n. 17, at 64; Strunk & White, *supra* n. 1, at 53.

<sup>44</sup> Strunk & White, *supra* n. 1, at v, vi, 15.

<sup>45</sup> White, *supra* n. 8, at xii.

<sup>46</sup> E.g., William F. Causey, *The Credibility Factor in Appellate Brief Writing*, 99 F.R.D. 235, 239 (1983, 1984) (calling *The Elements of Style* “an invaluable little book on the proper use of grammar and English”); Craig Hoffman, *Parse the Sentence First: Curbing the Urge to Resort to the Dictionary When Interpreting Legal Texts*, 6 N.Y.U. J. Legis. & Pub. Policy 401, 403 n. 1 (2002–2003) (calling *The Elements of Style* the “classic” grammar source).

<sup>47</sup> E.g., Plotnik, *supra* n. 38, at 4; McLoughlin, *supra* n. 7, at B17.

among grammarians that has raged for more than half a century.<sup>48</sup> In one camp are the prescriptivists, who favor linguistic standards and seek to guide writers toward effective expression within those standards. In a second camp, the descriptivists take a nonjudgmental approach, believing they should simply describe how native speakers use language.<sup>49</sup> Strongly leaning toward the prescriptivist side, White called the descriptivists the “Happiness Boys” and “anything-goes fellow[s]” when he firmly told his editor that he would not change “the unadjustable Mr. Strunk.”<sup>50</sup>

But despite both authors’ leanings toward convention, tagging the Elementary Rules section as prescriptive may be too sweeping. The exacting Strunk himself acknowledged the “danger of doctrine” and wrote that “the best writers sometimes disregard the rules of rhetoric.”<sup>51</sup> And White called his own guidelines “mere gentle reminders,” stressing that “there is no infallible guide to good writing.”<sup>52</sup> Still, this section does have its didactic passages. I’ll discuss later whether they are out of place in a reference for legal writers.

### *Elementary Principles of Composition*

The book’s second section, “Elementary Principles of Composition,” has received copious praise<sup>53</sup> as well as criticism. It focuses

<sup>48</sup> Plotnik, *supra* n. 38, at 3–4; Garner, *supra* n. 31, at 229.

<sup>49</sup> Garner, *supra* n. 31, at 227–28.

<sup>50</sup> Ltr. from E.B. White to J.G. Case (Dec. 17, 1958), in *The Letters of E.B. White* 455 (Dorothy Loblano Guth ed., Harper & Row 1976).

<sup>51</sup> White, *supra* n. 8, at xvii; William Strunk Jr., *The Elements of Style* § I (W.P. Humphrey 1918), available at <http://www.bartleby.com/141/>.

<sup>52</sup> Strunk & White, *supra* n. 1, at 66.

<sup>53</sup> E.g., James Lindgren, *Fear of Writing*, 78 Cal. L. Rev. 1677, 1682 n. 27 (1990) (stating that the book’s “general style advice is good”); Francisco Ramos, *Improving Your Firm’s Writing One Lawyer at a Time*, 26 No. 1 Tr. Advoc. Q. 26, 27 (2007) (asking “who could do without” Strunk and White’s style and grammar advice).

on style and contains Strunk's admonition against wordiness, which is probably the book's most-quoted line.<sup>54</sup> Strunk "put his heart and soul" into that idea, White wrote, describing how Strunk would clasp his lapels and pronounce conspiratorily to his class, "Omit needless words! Omit needless words! Omit needless words!"<sup>55</sup> The book elaborates on that rule: "Vigorous writing is concise. . . . This requires not that the writer make all his sentences short, or that he avoid all detail and treat his subjects only in outline, but that every word tell."<sup>56</sup> Strunk's emphasis on succinctness is no doubt responsible for much of the book's influence.<sup>57</sup>

The section contains another often-quoted principle, "Choose a suitable design and hold to it," along with a corollary: "planning must be a deliberate prelude to writing."<sup>58</sup> Another organizational principle counsels writers to "[m]ake the paragraph the unit of composition."<sup>59</sup> One law professor called that "timeless little gem"<sup>60</sup> the "single most important principle of legal writing."<sup>61</sup> The section also recommends using parallel structure, keeping related words together, and using a single tense in summaries.

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<sup>54</sup> See Scott Longman, *The Architecture of Legal Writing*, 15 CBA Rec. 40, 44 (Apr. 2001) (stating that "Omit needless words" is "the most widely quoted edict" in *The Elements of Style*).

<sup>55</sup> White, *supra* n. 8, at xv.

<sup>56</sup> Strunk & White, *supra* n. 1, at 23.

<sup>57</sup> See Garvey, *supra* n. 5, at xxv (attributing the book's success to its emphasis on "lean, sturdy" prose).

<sup>58</sup> Strunk & White, *supra* n. 1, at 15.

<sup>59</sup> *Id.*

<sup>60</sup> Eugene Gressman, *Winning on Appeal: The Shalls and Shall Nots of Effective Criminal Advocacy*, 1 Crim. Just. 10, 46 (Winter 1987).

<sup>61</sup> Jonathan K. Van Patten, *Twenty-Five Propositions on Writing and Persuasion*, 49 S.D. L. Rev. 250, 250 (2003–2004).

Other principles in this section promote bold writing. Strunk, who “scorned the vague, the tame, and the colorless,”<sup>62</sup> urged writers to “Use the active voice,” “Put statements in positive form,” “Use definite, specific, concrete language,” and “Place the emphatic words of a sentence at the end.”<sup>63</sup> These blunt directives have led observers to compare Strunk to a sheriff<sup>64</sup> and a sergeant.<sup>65</sup> But although Strunk did disdain the pusillanimous and irresolute,<sup>66</sup> he also recognized that writers who have mastered the basics can break rules to good effect.<sup>67</sup> So, for example, both Strunk’s original little book and the current Strunk and White acknowledge that a passive verb may sometimes be an appropriate choice.<sup>68</sup> Strunk gave this example: “The dramatists of the Restoration are little esteemed today.” Ordering the sentence this way, he explained, could effectively unite a discussion about the Restoration.<sup>69</sup>

Critics have charged that the Elementary Principles of Composition section is inaccurate and inconsistent.<sup>70</sup> Joseph Williams pointed out the section’s weakness by showing that White violated two of its principles in other writing.<sup>71</sup> And although Pullum found

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<sup>62</sup> White, *supra* n. 8, at xviii.

<sup>63</sup> Strunk & White, *supra* n. 1, at 18, 19, 21, 32.

<sup>64</sup> Plotnik, *supra* n. 38, at 3.

<sup>65</sup> White, *supra* n. 8, at xiv.

<sup>66</sup> *Id.* at xviii.

<sup>67</sup> Strunk, *supra* n. 51, at § I.

<sup>68</sup> *Id.* at § III; Strunk & White, *supra* n. 1, at 18.

<sup>69</sup> Strunk, *supra* n. 51, at § III.

<sup>70</sup> Pullum, *supra* n. 6, at B15.

<sup>71</sup> Joseph M. Williams, *The Phenomenology of Error*, 32 *College Composition & Comm.* 152, 156 (1990) (stating that White violated his own rules about parallelism and the use of *which* in *The Death of a Pig* 17, 24, in *Essays of E.B. White* (Harper & Row 1977)).

the style pointers in this section “mostly harmless,” he thought some were useless: “omit needless words,” he said, will not help a struggling writer who does not know which words are needed.<sup>72</sup>

Pullum further charged that neither Strunk nor White understood syntax well.<sup>73</sup> He pointed out their incorrect labeling of some verbs as transitive and their confusing examples of weak, but nonetheless active, verbs in the section on the passive voice.<sup>74</sup> Pullum maintained that English syntax “is much too important to be reduced to a bunch of trivial don’t-do-this prescriptions by a pair of idiosyncratic bumlbers who can’t even tell when they’ve broken their own misbegotten rules.”<sup>75</sup>

Despite the soundness of this section’s general principles, then, the flaws in their exposition compromise the section’s value.

### *A Few Matters of Form*

The book’s third section covers “A Few Matters of Form.” Among them is a useful discussion about punctuating quotations. But the section’s other points are not particularly helpful for lawyers or law students. The authors advise against calling attention to a colloquialism by putting it in quotation marks, but colloquialisms have little place in legal writing anyway. And rules about syllabication at the end of a line are unnecessary in the computer age.

### *Words and Expressions Commonly Misused*

Strunk’s list of misused words and expressions, as doctored by White, has been justly criticized. The section contains some valid

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<sup>72</sup> Pullum, *supra* n. 6, at B15.

<sup>73</sup> *Id.*

<sup>74</sup> *Id.* (citing Strunk & White, *supra* n. 1, at 18–19).

<sup>75</sup> Pullum, *supra* n. 6, at B15.

points — for example, its rejection of the clumsy *and/or* construction. But much of the section is idiosyncratic or outdated. It disapproves of the verbs *finalize* and *contact*, but both are now widely accepted, even by the venerable *Oxford English Dictionary*.<sup>76</sup> And the rejection of *hopefully* in the sense of “it is to be hoped,” an entry added by White, articulates a rather recent fetish that has been exposed as unfounded.<sup>77</sup>

James Lindgren called this section “embarrassingly bad.”<sup>78</sup> Its rickety advice must be read critically.

### *An Approach to Style*

Somewhat confusingly, since the title of the entire book refers to style, White’s 1959 additions included a new subdivision titled “An Approach to Style (with a list of reminders).” Here White, in a voice less dictatorial than Strunk’s,<sup>79</sup> covered not rules but “reminders” about what makes writing distinguished. White’s introduction to the section, in which he elaborated on the idea that “style is something of a mystery,”<sup>80</sup> has been hailed as masterly.<sup>81</sup>

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<sup>76</sup> See *Oxford English Dictionary* vol. 5, 920 (J.A. Simpson & E.S.C. Weiner eds., 2d ed., Clarendon Press 1989) (listing *finalize* as a verb, with its earliest noted use in 1922); *Oxford English Dictionary* vol. 3, 806 (J.A. Simpson & E.S.C. Weiner eds., 2d ed., Clarendon Press 1989) (listing *contact* as a verb, with its earliest noted use in 1834).

<sup>77</sup> Williams, *supra* n. 71, at 191–92 (pointing out that analogous words, such as *seriously*, are standard usage); see also *Oxford English Dictionary* vol. 7, 378 (J.A. Simpson & E.S.C. Weiner eds., 2d ed., Clarendon Press 1989) (accepting use of *hopefully* in the sense of “it is to be hoped”).

<sup>78</sup> Lindgren, *supra* n. 53, at 1682 n. 27.

<sup>79</sup> Minear, *supra* n. 17, at 59.

<sup>80</sup> *Id.* at 67.

<sup>81</sup> *Id.* at 57.

Some of the section's recommendations are particularly relevant for legal writers. "Place yourself in the background" is good advice for most legal writing, where wording like "I think" only distracts from the substance of the writer's points.<sup>82</sup> "Do not overstate" will warn a lawyer to be exact in stating the law and the facts, thus meeting a professional obligation<sup>83</sup> and enhancing the lawyer's credibility.<sup>84</sup> "Do not affect a breezy manner" cautions against an increasing hazard — the encroachment of informal e-mail and text-message language into professional writing.<sup>85</sup> And the suggestion to "[r]evise and rewrite" points legal writers toward habits that will improve their writing.<sup>86</sup>

Other suggestions, however, are less appropriate for legal writers. "Do not explain too much" could steer lawyers away from the detailed analysis that legal issues require. Even more dangerous is

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<sup>82</sup> See, e.g., Anne Enquist & Laurel Currie Oates, *Just Writing* 134–35 (3d ed., Wolters Kluwer Law & Bus. 2009) (pointing out that the focus should be on facts and the law, not on the writer); Bryan A. Garner, *The Elements of Legal Style* 83 (2d ed., Oxford U. Press 2002) (stating that "the personal views of counsel are irrelevant").

<sup>83</sup> See Judith D. Fischer, *Pleasing the Court: Writing Ethical and Effective Briefs* 3 (2d ed., Carolina Academic Press 2011) (discussing lawyers' obligation to state the law correctly).

<sup>84</sup> See Antonin Scalia & Bryan A. Garner, *Making Your Case: The Art of Persuading Judges* 13–14 (Thomson West 2008) (advising lawyers not to lose credibility by overstating a case).

<sup>85</sup> Enquist & Oates, *supra* n. 82, at 99 (stating that legal writers should choose language that "reflect[s] seriousness and professionalism"); Mary Barnard Ray, *Writing on the Envelope: An Exploration of the Potentials and Limits of Writing in Law*, 49 Duq. L. Rev. 573, 604 (2011) (explaining that texting and e-mail instill habits of informality in law students).

<sup>86</sup> See Anne M. Enquist, *Unlocking the Secrets of Highly Successful Legal Writing Students*, 82 St. John's L. Rev. 609, 670 (2008) (reporting a study showing that successful legal-writing students devoted more time to editing and revision than did less successful students); see also Scalia & Garner, *supra* n. 84, at 80 (advising lawyers to "revise. Then revise again. Finally, revise.").

the notion that “your whole duty as a writer is to please and satisfy yourself.” A lawyer’s duties to clients, employers, and courts preclude that sort of self-indulgence.<sup>87</sup>

### Evaluating *The Elements of Style* as a guide for legal writers

The major objections to *The Elements of Style* are that it is prescriptive, stuffy, incorrect, internally inconsistent, and inappropriate for unsophisticated writers. Some of these criticisms have enough merit to establish that lawyers should not treat Strunk and White as a sacrosanct authority on writing.

#### *Criticism that the book is prescriptive*

In the battle between prescriptive and descriptive grammarians, the descriptivists believe that “native speakers of English can’t make a mistake,” which makes usage guides unnecessary.<sup>88</sup> So the prescriptive tone of *The Elements of Style* rankles those in the descriptive camp. They object to the “bossiness”<sup>89</sup> of “constables” Strunk and White, whom they accuse of beating the freshness out of writing.<sup>90</sup>

But this criticism is misplaced in the legal profession. Employing standard usage makes sense for legal writers, who are expected

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<sup>87</sup> See Fischer, *supra* n. 83, at 3.

<sup>88</sup> Garner, *supra* n. 31, at 229.

<sup>89</sup> Pullum, *supra* n. 6, at B15.

<sup>90</sup> Plotnik, *supra* n. 38, at 4–7; *but see* Minear, *supra* n. 17, at 59 (arguing that White is not “an unreconstructed prescriptivist”); *see also* Stanley Fish, *How to Write a Sentence and How to Read One* 36–37 (Harper 2005) (explaining that prescriptive advice is useful in some contexts); Garner, *supra* n. 31, at 230 (stating that Garner places himself “mostly in the prescriptive camp”).

to write in somewhat formal English.<sup>91</sup> Many judges have little patience with departures from that standard; lawyers have been scolded and even disciplined for submitting incoherent and ungrammatical documents.<sup>92</sup> Not surprisingly, then, books by current legal-writing experts such as *Just Writing*, by Anne Enquist and Laurel Currie Oates, and *Legal Analysis and Writing*, by Linda Edwards, present variations on many of Strunk and White's guidelines.

### *Criticism that the book is stuffy*

The core of *The Elements of Style* is nearly 100 years old, and those who find the book stuffy object to the "stubborn, doctrinal, vaguely medicinal air that they claim clings to it."<sup>93</sup> But if the accusation of stuffiness refers to the book's didactic approach, that is not a reason to abandon it for legal writing, which requires correct usage and a formal tone. And if the accusation means that the book promotes inflated language, that charge is baseless. Strunk and White did just the opposite, counseling against wordiness, overwriting, and "fancy words."<sup>94</sup>

Moreover, Strunk and then White, each in his turn, updated the book.<sup>95</sup> One set of changes addressed the criticism that the book was sexist.<sup>96</sup> The 1918 edition favored the now-musty convention

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<sup>91</sup> Enquist & Oates, *supra* n. 82, at 163; see also Joseph Kimble, *Lifting the Fog of Legalese: Essays on Plain Language* 69 (Carolina Academic Press 2006) (advising legal writers to be natural but "not too informal").

<sup>92</sup> See generally Fischer, *supra* n. 83, at 29–32, 39–41 (examining courts' negative reactions to lawyers' errors, including lack of clarity and poor grammar).

<sup>93</sup> Garvey, *supra* n. 5, at xx.

<sup>94</sup> Strunk & White, *supra* n. 1, at 32, 72, 76.

<sup>95</sup> Garvey, *supra* n. 5, at xv; Minear, *supra* n. 17, at 55–56.

<sup>96</sup> See Lundgren, *supra* n. 12, at 128–29.

of using the pronoun *he* for unknown or unidentified antecedents.<sup>97</sup> White expanded on that point in the 1979 edition, stating that a writer might replace the generic *he* with *he or she* “if it works,” yet concluding that it “often doesn’t.”<sup>98</sup> Not until after both authors’ deaths did the editors of the 2000 edition acknowledge that the generic *he* is offensive to some and offer strategies to avoid it.<sup>99</sup> Seven references to male authors were also struck and replaced by references to eight female authors.<sup>100</sup> And some passages that trivialized women were changed. One of the book’s older examples, “Chloe smells good, as a pretty girl should,”<sup>101</sup> became the less gender-biased “Chloe smells good, as a baby should.”<sup>102</sup>

These changes toward gender-neutrality are consistent with the legal profession’s shift away from gender bias.<sup>103</sup> They suggest that the charge of stuffiness is not a sufficient reason for lawyers to reject Strunk and White.

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<sup>97</sup> Strunk, *supra* n. 51, at § V.

<sup>98</sup> Strunk & White, *The Elements of Style* 60–61 (3d ed., Macmillan 1979).

<sup>99</sup> Strunk & White, *supra* n. 1, at 60–61. See generally Enquist & Oates, *supra* n. 82, at 137–39; Judith D. Fischer, *Framing Gender: Federal Appellate Judges’ Choices About Gender-Neutral Language*, 43 U.S.F. L. Rev. 473 (2009) (both presenting ways to avoid gender-biased pronouns).

<sup>100</sup> Minear, *supra* n. 17, at 68.

<sup>101</sup> Strunk & White, *supra* n. 98, at 51–52.

<sup>102</sup> Strunk & White, *supra* n. 1, at 51.

<sup>103</sup> See Fischer, *supra* n. 99, at 486–88 (describing the widespread acceptance of gender-neutral language in the legal profession); Leslie M. Rose, *The Supreme Court and Gender-Neutral Language: Setting the Standard or Lagging Behind?* 71 Duke J. Gender L. & Policy 81, 82 (2010) (stating that lawyers and law students are often told that using gender-neutral language is an aspect of effective advocacy).

### Criticism that the book is incorrect

Objections that the book is incorrect have some validity. *The Elements of Style* counsels against splitting infinitives,<sup>104</sup> beginning sentences with *however*,<sup>105</sup> and beginning restrictive clauses with *which*.<sup>106</sup> But linguist Pullum pointed out that good English authors have always used those constructions.<sup>107</sup> Authorities on grammar recognize that split infinitives are acceptable standard English.<sup>108</sup> So is starting a sentence with *however*,<sup>109</sup> although some find it stylistically clunky. And the supposed rule against using *which* with restrictive clauses remains “a debatable point,”<sup>110</sup> although it has been strongly endorsed by some authorities, particularly in the legal field.<sup>111</sup> Moreover, as discussed above, outdated rules appear in the book’s list of misused words.

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<sup>104</sup> Strunk & White, *supra* n. 1, at 58; *but see id.* at 78 (modulating the book’s earlier pronouncement).

<sup>105</sup> *Id.* at 48–49.

<sup>106</sup> *Id.* at 59.

<sup>107</sup> Pullum, *supra* n. 6, at B15.

<sup>108</sup> E.g., Garner, *supra* n. 82, at 143 (calling the supposed rule against splitting infinitives “baseless nonsense”); Cheryl Glenn & Loretta Gray, *The Hodges Harbrace Handbook* 24–25 (18th ed., Wadsworth Cengage Learning 2013) (stating that a single word may appropriately split an infinitive).

<sup>109</sup> Enquist & Oates, *supra* n. 82, at 23.

<sup>110</sup> Douglas Laycock, *That and Which*, 2 *Scribes J. Legal Writing* 37, 37–38 (1991); *see* Williams, *supra* n. 71, at 183–84 (showing that the supposed rules about using *that* and *which* have “no historical force”); Garner, *supra* n. 82, at 157 (saying that although *which* is traditionally “reserved for introducing a nonrestrictive clause,” *which* may, with certain sentence constructions, be used to introduce a restrictive clause).

<sup>111</sup> Laycock, *supra* n. 110, at 38 (saying that the distinction between *that* and *which* is worth observing in order to aid communication with “a small group of legal writers who are careful to observe the usage”); Garner, *supra* n. 82, at 157 (instructing legal writers to “[u]se *which* or *who* to introduce a nonrestrictive clause”).

*Criticism that the book is internally inconsistent*

Pullum objected that “the grammatical advice proffered by *Elements* is so misplaced and inaccurate that counterexamples often show up in the authors’ own prose on the very same page.”<sup>112</sup> The recommendation to use the active voice, for example, includes a passive verb: “can be made.”<sup>113</sup> While the book does state in the next few lines that the passive voice is “frequently convenient and sometimes necessary,”<sup>114</sup> this nuance may escape inexperienced writers.

Further, while the book counsels against overwriting,<sup>115</sup> it contains overwritten passages. For example, White mixed his metaphors in denouncing jargon words that may “at first glance seem freighted with delicious meaning but that soon burst in the air, leaving nothing but a memory of a bright sound.”<sup>116</sup> This mixing of a silent bubble with a bright sound is overwritten — and confusing. If White meant the sentence as a playful example, that point may likewise be lost for inexperienced writers.

*Criticism that the book is inappropriate for unsophisticated writers*

Some less sophisticated readers may have difficulty with *The Elements of Style*, as an English professor and early critic of the 1959 edition discovered. G.S. McCaughey asked his students to evaluate examples of White’s intentional irony — for example, his use of the adverbs *little*, *pretty*, and *very* in a section advising against

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<sup>112</sup> Pullum, *supra* n. 6, at B15.

<sup>113</sup> Strunk & White, *supra* n. 1, at 18.

<sup>114</sup> *Id.*

<sup>115</sup> *Id.* at 72.

<sup>116</sup> *Id.* at 83.

qualifiers.<sup>117</sup> McCaughey called the results “disastrous”: one-third of his students missed the irony and concluded that White was insincere and unreliable.<sup>118</sup> McCaughey got similar results with a group of teachers.<sup>119</sup> He concluded that the “ironic intricacies” in some of White’s playful passages would elude many students and some professors.<sup>120</sup>

Moreover, readers who never learned or have forgotten grammatical terms may find some of the book’s vocabulary daunting. The advice to place a comma before an independent clause<sup>121</sup> may perplex a reader who is not sure what an independent clause is. Similarly, “Use the proper case of pronouns”<sup>122</sup> can mystify someone who does not know the meaning of *case* in the field of grammar. These problems led linguist Stanley Fish to deem the book unsuitable for readers who “aren’t quite sure what a sentence is” or what *number* means in the context of grammar.<sup>123</sup> Strunk probably thought it unnecessary to define such terms as *independent clause* and *case* because he assumed that his students had a basic knowledge of grammar.<sup>124</sup> But legal writers who lack the background or inclination to sift through such terms may find that they detract from the book’s usefulness.

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<sup>117</sup> G.S. McCaughey, *A Multi-Million Dollar Hoax?* 15 *Humanities Assn. Bull.* 31, 34 (1964); Strunk & White, *supra* n. 1, at 73 (advising against the use of qualifiers).

<sup>118</sup> McCaughey, *supra* n. 117, at 35.

<sup>119</sup> *Id.* at 34.

<sup>120</sup> *Id.* at 36.

<sup>121</sup> Strunk & White, *supra* n. 1, at 5.

<sup>122</sup> *Id.* at 11.

<sup>123</sup> Fish, *supra* n. 90, at 13–14.

<sup>124</sup> Garvey, *supra* n. 5, at 14.

## Recommendations for legal writers

In light of its flaws, what accounts for the continued veneration of *The Elements of Style* in the legal profession? The answer probably lies in the three traits that Strunk hoped the book would promote: clarity, brevity, and boldness.<sup>125</sup> Those traits are highly prized in legal writing.<sup>126</sup> Lawyers whose writing lacks them may be told that they should read *The Elements of Style* and that if they heed its advice, their writing is likely to improve.<sup>127</sup> They may not even notice the book's less cogent passages.

For knowledgeable lawyers willing to distinguish between the book's good advice and its idiosyncrasies, *The Elements of Style* is still worth reading. The authors' better-known chestnuts remain good reminders, and their style and occasional subtle wit are entertaining. But the book's limitations make it neither the best style and grammar guide for lawyers nor an appropriate textbook for law students. Better sources offer more current and comprehensive guidelines to foster the traits that Strunk so loved.

### *Resources for grammar and usage*

Many books on grammar and usage are targeted for the general audience. Two of the most respected are *The Hodges Harbrace Handbook*<sup>128</sup> and *A Writer's Reference*.<sup>129</sup> The hardbound *Hodges*

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<sup>125</sup> White, *supra* n. 8, at xviii.

<sup>126</sup> See Kimble, *supra* n. 91, at 9, 10 (advocating "simple, direct, economical" expression with an occasional "rhetorical flourish"); Scalia & Garner, *supra* n. 84, at 37–38 (advising that a brief should end with "forceful and vivid" language).

<sup>127</sup> See Garvey, *supra* n. 5, at xviii (stating that when Garvey edits books by inexperienced writers, it is usually helpful to refer them to Strunk and White).

<sup>128</sup> Glenn & Gray, *supra* n. 108.

<sup>129</sup> Diana Hacker & Nancy Sommers, *A Writer's Reference* (7th ed., Bedford/St. Martin's 2010).

*Harbrace Handbook* has been around for a while — it had its 70th anniversary in 2011 — but it has been regularly updated.<sup>130</sup> Its latest edition remains an accessible, comprehensive resource on grammar and usage. The spiral-bound *A Writer's Reference* also presents thorough coverage of those topics. A similarly thorough online resource is Purdue University's Online Writing Lab (OWL).<sup>131</sup>

Other grammar and usage books are aimed specifically at legal writers. For example, a recent book published by the American Bar Association presents generally sound grammar advice, but its breezy style, including chapter subtitles like “One lump or two?” and “Let's get along,” can be intrusive.<sup>132</sup>

A better choice is Bryan Garner's *Redbook*, a professional and comprehensive reference.<sup>133</sup> Formatted as a manual, it covers general grammar and usage points, such as how to choose between *whoever* and *whomever*.<sup>134</sup> *The Redbook* also contains guidelines specific to legal writing, including a caution against legalese.<sup>135</sup> Other sections cover editing and proofreading. The 509-page book is clear and readable, and its detailed table of contents and index enhance its accessibility. It's an invaluable reference for lawyers, law-review editors, and others who want an authoritative resource.

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<sup>130</sup> Brooks Clark & Cari Wade Gervin, *How the 'Harbrace Handbook of English' Changed the Way Americans Learn About Writing*, <http://www.metropulse.com/news/2011/jun/15/how-harbrace-handbook-english-changed-way-american/?print=1> (posted June 15, 2011 at 10:56 a.m.).

<sup>131</sup> <http://owl.english.purdue.edu/>.

<sup>132</sup> Lenné Eidson Espenscheid, *The Grammar and Writing Handbook for Lawyers* (ABA 2011).

<sup>133</sup> Bryan A. Garner, *The Redbook: A Manual on Legal Style* (3d ed., West Academic 2013).

<sup>134</sup> *Id.* at 184.

<sup>135</sup> *Id.* at 222.

The shorter *Just Writing*, by law professors Anne Enquist and Laurel Oates, covers similar points in a book intended primarily for law students.<sup>136</sup> Its 322 pages are formatted in readable prose chapters that provide thorough coverage of grammar and usage as well as points of interest to legal writers — for example, the importance of avoiding ambiguity in legal documents by using consistent terminology.<sup>137</sup>

Legal writers would do well to keep at least one of these books nearby and to bookmark OWL in their computer's browser.

### *Resources covering style*

Both *The Redbook* and *Just Writing* include suggestions about style. But other books that focus exclusively on style will complete a lawyer's basic references on writing.

As a substitute for Strunk and White, Pullum recommended a book on style by Joseph Williams.<sup>138</sup> But that book is more a treatise than an accessible reference.<sup>139</sup> Williams himself recognized that it "is not an easy afternoon read," but rather "a more analytical account of writing."<sup>140</sup> It will not fill Strunk and White's role as a writer's reference book.

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<sup>136</sup> Enquist & Oates, *supra* n. 82.

<sup>137</sup> *Id.* at 102.

<sup>138</sup> Geoffrey K. Pullum, *Geoffrey K. Pullum Replies*, in Ltrs. to the Ed., *Who's Afraid of Strunk and White?* 55 Chron. Higher Educ. B19 (May 22, 2009) (recommending Joseph M. Williams, *Style: Toward Clarity and Grace* (U. of Chi. Press 1990)).

<sup>139</sup> See David E. Sorkin, *The Legal Writer's Bookshelf*, 83 Ill. B.J. 97, 96 (Feb. 1995) (stating that Williams's books *Style: Toward Clarity and Grace* and *Style: Ten Lessons in Clarity and Grace* are neither "quick read[s]" nor "rapid-access reference book[s]").

<sup>140</sup> Williams, *supra* n. 71, at xiii–xiv.

A better substitute is William Zinsser's *On Writing Well*, written for a general audience.<sup>141</sup> Zinsser, an admirer of *The Elements of Style*, included in his longer but still manageable book "bits and pieces" of advice similar to Strunk and White's: prune unnecessary adverbs,<sup>142</sup> prefer active verbs,<sup>145</sup> and avoid overstatement.<sup>144</sup> The book also encourages its readers through examples and descriptions of writers' struggles.<sup>145</sup> Its generally prescriptive advice will not pacify those who find Strunk and White bossy, but his book remains a good reference on style.

Taking a less prescriptive approach, Arthur Plotnik's *Spunk & Bite* rejects much of what "E.B. Whitewashed" said.<sup>146</sup> Plotnik recognizes that *The Elements of Style* has aided "millions of confused students and sloppy communicators," but he argues that today's writers must free themselves from the book's "gulag" and hook readers with fresh, engaging writing.<sup>147</sup> He even contends that deviating from the correctness peddled by Strunk and White can "jolt readers awake" and "rocket words off the page."<sup>148</sup> Plotnik offers plentiful examples of lively writing, although some of them may be too extreme for formal legal writing. For example, the phrase "a counter spread with hams as brown as violins"<sup>149</sup> would be too showy —

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<sup>141</sup> Zinsser, *supra* n. 21.

<sup>142</sup> *Id.* at 69; *cf.* Strunk & White, *supra* n. 1, at 71.

<sup>143</sup> Zinsser, *supra* n. 21, at 68; *cf.* Strunk & White, *supra* n. 1, at 18.

<sup>144</sup> Zinsser, *supra* n. 21, at 78; *cf.* Strunk & White, *supra* n. 1, at 73.

<sup>145</sup> *See, e.g., id.* at 78 (describing how a writer might choose an ineffective figure of speech).

<sup>146</sup> Plotnik, *supra* n. 38, at 2.

<sup>147</sup> *Id.* at 2, 5, 6.

<sup>148</sup> *Id.* at 5.

<sup>149</sup> *Id.* at 32.

and mystifying — in a legal brief. The value of Plotnik’s book for lawyers, then, is not as a standard reference but as a catalyst for developing a vibrant style.

While Zinsser and Plotnik wrote for the general reader, four other stylebooks show how to add punch to legal writing.

The renowned *Plain English for Lawyers*<sup>150</sup> echoes Strunk and White’s emphasis on clarity and brevity, but shapes its advice specifically for legal writers and presents it in a more organized and comprehensive format. Some of its chapter headings are “Omit Surplus Words,” “Prefer the Active Voice,” and “Choose Your Words with Care.” Its clearer structure and its focus on legal writing make it superior to Strunk and White as a reference for lawyers.

Bryan Garner’s *The Elements of Legal Style*<sup>151</sup> is patterned after Strunk and White’s book, but Garner’s book is better organized and more thorough. It includes maxims that would have pleased Strunk, like “strike out and avoid fancy words,” while adding points specifically for lawyers, such as how to handle citations gracefully.<sup>152</sup> An intriguing section presents Garner’s list of syntactic devices like anastrophe (changing a customary word order for emphasis), providing a nice brush-up on classic rhetorical techniques.<sup>153</sup> Like *The Elements of Style*, Garner’s book is interesting reading, but his thoroughness and exactness make his book a better contemporary reference.

Two recent books prod legal writers toward a vibrant style. Each shows that while the law still demands a certain level of formality,

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<sup>150</sup> Richard C. Wydick, *Plain English for Lawyers* (5th ed., Carolina Academic Press 2005).

<sup>151</sup> Garner, *supra* n. 82.

<sup>152</sup> *Id.* at vi–vii.

<sup>153</sup> *Id.* at 30, 89–92.

formality need not mean stiffness.<sup>154</sup> Justice Antonin Scalia, known for his lively prose,<sup>155</sup> and Bryan Garner make that point in *Making Your Case*.<sup>156</sup> The book recommends devices like metaphors, understatements, colorful wording, and the occasional “arrestingly short sentence” to add panache to legal writing.<sup>157</sup>

Ross Guberman’s book *Point Made* also urges lawyers to “liven up the language” and even include some “zingers.”<sup>158</sup> Guberman has collected examples of vivid prose crafted by 50 successful advocates. His mix includes punchy language from briefs written by current Supreme Court Justices when they were attorneys: examples are Ruth Bader Ginsburg’s “pigeonholes,”<sup>159</sup> instead of the tamer “classifies,” and three pithy words by John Roberts: “So too here.”<sup>160</sup> *Point Made* will help add spark to a lawyer’s writing.

Each of these books is a better reference for contemporary legal writers than the dusty Strunk and White.

## Conclusion

Strunk and White’s *The Elements of Style* has influenced many writers toward a more succinct, direct writing style. Legal writers who already know the basics and are willing to sift the good advice

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<sup>154</sup> *Id.* at 160.

<sup>155</sup> See Scalia & Garner, *supra* n. 84, at 118 (Justice Scalia recommending formality in legal writing because it “bespeaks dignity”).

<sup>156</sup> See Yury Kapgab, *Of Golf and Ghouls: The Prose Style of Justice Scalia*, 9 *Legal Writing* 70, 71 (2003) (extolling Justice Scalia’s “witty aphorisms and sharp turns of phrase”).

<sup>157</sup> Scalia & Garner, *supra* n. 84, at 112.

<sup>158</sup> Ross Guberman, *Point Made* 191 (2d ed., Oxford U. Press 2014).

<sup>159</sup> *Id.* at 158.

<sup>160</sup> *Id.* at 178.

from the bad can still profit from reading it. But it should no longer be treated as an oracle on grammar and style because it is not a comprehensive guide, it contains errors and inconsistencies, and some of its points are confusing for less secure writers.

As basic grammar and usage guides for lawyers, better sources are Bryan Garner's comprehensive *Redbook* and Enquist and Oates's *Just Writing*. To help elevate style beyond the tame, the cheeky *Spunk & Bite*, written for the general audience, is a good prod for legal writers, so long as they view its suggestions critically. Four other books aimed specifically at lawyers will help spruce up legal documents. *Plain English for Lawyers* and *The Elements of Legal Style* nudge legal writers to clear out the debris, while *Making Your Case* and *Point Made* promote pluck and flair.

It's time to move *The Elements of Style* from the top bookshelf and fill its former space with more current and effective resources.