



TIPS FOR EFFECTIVE PUNCTUATION IN LEGAL WRITING*

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Punctuation can be either your friend or your enemy. Proper punctuation improves clarity and makes the reader's job easier.¹ In contrast, problematic punctuation stands out and ultimately damages your credibility as a writer. The tips below are intended to help you reap the benefits of sophisticated punctuation while avoiding common pitfalls. But remember, if a sentence presents a particularly thorny punctuation problem, you may want to consider rephrasing for greater clarity.

This handout addresses the following punctuation marks and how to use them:

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¹ RICHARD K. NEUMANN, JR. & KRISTEN KONRAD TISCIONE, *LEGAL REASONING AND LEGAL WRITING* 447 (7th. ed. 2013).

THE COMMA (,)

The **comma** is the most commonly used punctuation mark. When used properly, commas can improve readability by separating distinct ideas and clarify meaning by showing the reader how extra information has been added to a sentence. **Commas are used in the following ways:**²

1) Use a comma to set off **introductory phrases from the main, or independent, clause.**

- **To prevail in this matter**, the plaintiff must satisfy four elements.
- **Evaluating the credibility of the witnesses**, the judge gave greater weight to the plaintiff's expert.

A comma is almost always used with **short introductory phrases** or **transitional expressions** (such as "for example" or "therefore") which can be moved elsewhere in the sentence without requiring a comma.³ The comma adds **greater clarity**.

- **In the present case**, the defendant chose not to testify.
- **First**, the plaintiff must demonstrate that the defendant's statement was false.
- **Unfortunately**, he did not make it to the train station in time.

Subordinating conjunctions, including "although" and "because," should **not** be set off by a comma.

- **Although** the attorney missed the filing deadline, the court still allowed the motion to be heard.

2) Use a comma to indicate that more information follows a **complete sentence.**

- The court held for the plaintiff, **finding that the defendant's explanation was not credible**.
- The defendant entered the building, **violating the terms of the restraining order**.

3) Use commas both before and after a **nonrestrictive clause or phrase, which provides additional information but does not restrict or limit the object it modifies. Commas in nonrestrictive clauses or phrases "set off" the interrupting information (operating similarly to parentheses).**

Do not use commas to set off a **restrictive clause or phrase**, which restricts or limits the words it modifies by adding essential information.

Nonrestrictive clauses and phrases

- The complainant, **a local homeowner**, has contacted police nine times.
- The witness claimed that he, **not the defendant**, was driving the car.
- The judge, **however**, focused on the policy implications of the decision.

² The information in this section has been adapted from LAUREL CURRIE OATES ET AL., THE LEGAL WRITING HANDBOOK: ANALYSIS, RESEARCH AND WRITING 697–715 (7th. ed. 2018), and MARY BARNARD RAY & JILL J. RAMSFIELD, LEGAL WRITING: GETTING IT RIGHT AND GETTING IT WRITTEN 98-103 (6th ed. 2018). See also NEUMANN & TISCIONE, *supra* note 1, at 449–51.

³ OATES, *supra* note 2, at 702.

- The child’s father, **who is six months behind on child support payments**, fled the state.⁴

Restrictive clauses and phrases

- My uncle **who lives in Alaska** will be the legal guardian of my children if I die.
 - *Note:* Unlike the above examples of nonrestrictive clauses, this sentence suggests that the author has more than one uncle. The phrase “who lives in Alaska” restricts or limits the meaning of “my uncle” to the one that lives in Alaska.
- The woman **who lives next door** is a city council member.
 - *Note:* The phrase “who lives next door” identifies *which* specific woman.

Commas should generally be used with “**which**” clauses but not with “**that**” clauses.

- The word “**which**” usually indicates a **nonrestrictive clause**.
 - The officer pushed on the door, **which was in a state of disrepair**, and it opened.
 - The plaintiff filed his reply brief, **which was longer than court rules permitted**.
- The word “**that**” usually indicates a **restrictive clause**.
 - The book **that I borrowed from the library** is due back today.
 - The car **that was used as the getaway vehicle** is currently impounded.

4) Use a comma before a coordinating conjunction (*for, and, nor, but, or, yet, so*)⁵ that **joins two independent clauses (or two complete sentences, each with its own subject and verb).**

- The Court declined the appeal, **but** the Governor is considering clemency.

Do **not** use a comma between a subject and its verb. For example, do not use a comma between two subjects that share a verb or between two verbs that share a subject.

- The witness testified that he was with the defendant at the time the crime was committed, **and** he presented evidence to prove they were in a different town at that time.
 - **NOT:** The witness testified that he was with the defendant at the time the crime was committed, **and** presented evidence to prove they were in a different town at that time.
 - **NOT:** The witness testified that he was with the defendant at the time the crime was committed **and** he presented evidence to prove they were in a different town at that time.
- The lawyer objected to the statement and moved to strike it from the record.
 - **NOT:** The lawyer objected to the statement, and moved to strike it from the record.
- The leaders of the union and the owners of the team met to begin negotiations.
 - **NOT:** The leaders of the union, and the owners of the team met to begin negotiations.

⁴ OATES, *supra* note 2, at 703.

⁵ The seven coordinating conjunctions create the acronym FANBOYS. OATES, *supra* note 2, at 697.

5) Commas are also used to separate items in a list. Use a comma, otherwise known as the **Oxford comma**, before the last item in a series. Though sometimes considered optional, the use of this comma in legal writing is **recommended** to avoid any possible confusion.

- My estate will be divided equally among my son, my daughter, **and** my son-in-law.⁶
- The suspect had no wallet, weapons, **or** stolen goods on his person.

6) Use a comma to punctuate dates, addresses, and names of geographical locations.

When a **full date (month, day, year)** is written out, use a comma after the day. Do **not** use a comma if the day is omitted.⁷

- The U.S. Congress adopted the Declaration of Independence on **July 4, 1776**.
- The U.S. Congress adopted the Declaration of Independence in **July 1776**.
 - **NOT:** The U.S. Congress adopted the Declaration of Independence in **July, 1776**.

Use commas to set off elements in **addresses** and the **names of geographical locations**. For addresses, state and zip code are considered one element and should **not** be separated by a comma.⁸

- I was born in **Irvine, California**, but I consider **Boston, Massachusetts** home.
- Georgetown University Law Center is located at 600 New Jersey Avenue, N.W., **Washington, DC 20001**.
 - **NOT:** Georgetown University Law Center is located at 600 New Jersey Avenue, NW, **Washington, DC, 20001**.

7) The “pause” rule is imperfect. Do not add a comma just because a reader may pause to breathe if reading aloud.

- “Many fairly good legal writers . . . rely on the ‘rule’ that one should use a comma whenever the reader should pause—advice that works only about 70 percent of the time.”⁹
- However, when polishing a piece of writing, the “pause” rule can help you find and fix problem areas, especially if reading the piece aloud.

For more information on the use of commas with quotations, see *infra* on “**Quotations**.”

⁶ RAY & RAMSFIELD, *supra* note 2, at 97.

⁷ OATES, *supra* note 2, at 711.

⁸ OATES, *supra* note 2, at 712.

⁹ OATES, *supra* note 2, at 797.

THE SEMICOLON (;)

Semicolons have two uses: (1) as an **end mark** between two closely related clauses; and (2) as a **super comma**.¹⁰

Semicolons can **highlight connections** between ideas that will help the reader understand your meaning.¹¹ Like any sentence structure, semicolons can be over-used.

1) Use a semi colon *instead of a period* between two sentences if those sentences are closely related logically but could each stand as complete sentences. Also, use a semi colon *instead of a comma* between two sentences when there is no coordinating conjunction (FANBOYS).¹²

- “Officer Thompson administered the breathalyzer test; the results showed that the defendant’s blood alcohol level was over the maximum allowed by the state.”¹³
- “The plaintiff is a Nevada resident; the defendant is a California resident.”¹⁴

To avoid charges of imprecise thinking, make sure that the **logical connection** between phrases joined by a semicolon is clear. For example, you can use a **conjunctive adverb** (such as *also*, *furthermore*, *nevertheless*, *thus*, or *however*) after the semicolon to more precisely describe the relation between ideas.¹⁵

- He did not provide the correct address to his attorney; **therefore**, the package was not delivered to his home.
- The court proceedings were moved to zoom; **nevertheless**, you should still dress in formal business attire to show respect for the proceedings.

2) Semicolons also *separate items in a list* when the individual items are long or if any one item contains a comma.

You ***must* use a semicolon** instead of a comma at the end of each item in a list when a comma occurs within any one element because a comma is no longer sufficient to show the reader where each item in the list begins and ends.

- I have lived in New York, New York; Washington, D.C.; and Bismarck, North Dakota.
- The development team included Tara, the project manager; Sadie, the communications director; and John and Mike, two programmers.

¹⁰ RAY & RAMSFIELD, *supra* note 2, at 492.

¹¹ See LYNNE TRUSS, EATS, SHOOT, & LEAVES: THE ZERO TOLERANCE APPROACH TO PUNCTUATION 124 (2003) (citing Paul Robinson, *The Philosophy of Punctuation*, THE NEW REPUBLIC, April 26, 1980, available at <http://www.press.uchicago.edu/Misc/Chicago/721833.html>).

¹² See *supra* on “Commas.”

¹³ OATES, *supra* note 2, at 713.

¹⁴ *Id.*

¹⁵ *Id.* Other conjunctive adverbs include *accordingly*, *besides*, *consequently*, *hence*, *however*, *indeed*, *instead*, *likewise*, *meanwhile*, *moreover*, *still*, *then*, and *therefore*.

If the **individual items in a list are numbered**, they must be separated by semicolons (even if only a two-item list).¹⁶

- “The defendant claims to reside in Maryland, even though (1) his car is registered in California; (2) he is registered to vote in California; and (3) all of his financial assets, including stocks, bonds, and a savings and checking account, are in a California bank.”¹⁷

THE COLON (:)

Colons can be used to (1) **introduce quotations and lists**; or (2) to **set up explanations and elaborations**.¹⁸

No matter the use, a colon must be **preceded by a complete sentence**.¹⁹ What follows the colon may or may not be a complete sentence. You may choose to capitalize the first word of the sentence if a complete sentence follows the colon, but it is not required.²⁰

1) Colons introduce lists or quotations that are not integrated into the writer’s sentence.

- The court applied the following four factors to the facts at issue: . . .
- The sections that apply are as follows: 21a, 23b, 24a, and 27c.
 - **NOT:** The sections that apply are: 21a, 23b, 24a, and 27c.²¹
- The court explained that location can also contribute to reasonable suspicion: “[O]fficers are not required to ignore the relevant characteristics of a location”²²

2) Colons can also set up explanations and elaborations or create anticipation that what follows is **surprising, important, or especially interesting**.²³

While colons can highlight crucial information by adding emphasis to what follows, colons can lose emphasis and credibility if over-used.²⁴ Generally, use colons when no other punctuation can create the desired effect.

- The police report detailed multiple injuries: the victim had three broken bones and multiple lacerations.
- Days later the plaintiff received a reply to her harassment complaint: a pink slip.
- The court’s decision is not likely to eliminate controversy: Environmentalists say they will continue the debate in the legislature.

¹⁶ OATES, *supra* note 2, at 715.

¹⁷ *Id.* at 714.

¹⁸ *Id.* at 715.

¹⁹ *Id.*

²⁰ *Id.*

²¹ *Id.*

²² *Illinois v. Wardlow*, 528 U.S. 119, 124 (2000).

²³ RAY & RAMSFIELD, *supra* note 2, at 94–96.

²⁴ *Id.*

THE APOSTROPHE²⁵ (')

Apostrophes are used to (1) **create possessive forms of nouns** (which show ownership); (2) **form contractions** (which indicate letters missing from words); and (3) **indicate the plural form of certain nouns**.

1) A primary function of apostrophes is **designating ownership** through **possessive forms** of nouns. Depending on whether the noun is **singular or plural** and **what letter the noun ends with**, the rules vary.²⁶

- **For singular and plural nouns that do not end with “s,” add an apostrophe and “s” (’s)**
 - defendant’s alibi, family’s income, children’s guardian, everyone’s concern
- **For singular nouns that end with “s” . . .**
 - **Add an apostrophe plus “s” (’s)** if the resulting word is not difficult to pronounce.
 - Congress’s authority, witness’s testimony, James’s contract
 - **Add only an apostrophe** if the possessive word is followed by a word beginning with an “s” sound (creating three “s” sounds together). Drop the “s” after the apostrophe for ease in pronunciation.²⁷
 - business’ sales, witness’ signature
 - **NOT:** business’s sales, witness’s signature
- **For plural nouns that end with “s,” add an apostrophe but not an “s”**
 - framers’ intent, workers’ rights, thirty days’ notice
- **To show possession for two or more nouns . . .**
 - Add an apostrophe plus “s” (’s) after the last name only to indicate joint possession.
 - John and Mary’s stocks (stocks jointly owned by John and Mary)
 - Add an apostrophe plus “s” (’s) after each name to indicate individual possession.
 - John’s and Mary’s stocks (some stocks owned by John, some owned by Mary)
- **Do not use an apostrophe to form possessives of pronouns.**
 - Possessives: his, hers, its, theirs, ours, yours, whose
 - **NOT:** it’s or who’s (*See infra* on “contractions.”)

²⁵ See generally RAY & RAMSFIELD, *supra* note 2, at 374, 381–382; OATES, *supra* note 2, at 717–719; NEUMANN & TISCIONE, *supra* note 1, at 447–48.

²⁶ These rules have been adapted from OATES, *supra* note 2, at 717–719.

²⁷ *Id.* at 717.

2) An apostrophe can be used with a pronoun to create contractions. To form a contraction, use an apostrophe to substitute one or more omitted letters or numbers. Do not use informal contractions (e.g., “shouldn’t”) in formal legal writing; use them only in informal writing.

- it’s (*it is* or *is has*), they’re (*they are* or *they were*)
- Ma’am (*madam*), class of ’26 (*class of 2026*)

3) Apostrophes are used to abbreviate words in citation sentences (e.g., “Nat’l” for “National” in case citations). Always consult the Bluebook rule for a particular source. Cases and a few other sources utilize the abbreviations in Table T.6 of the Bluebook.

4) Apostrophes are also used to create the plural versions of certain nouns or letters.

- Use an apostrophe in legal writing to form the plural of a **letter, figure, or symbol**.²⁸
 - twelve 7’s, the 1960’s,
 - two Boeing 767’s²⁹
 - C’s, M’s, and’s, and or’s
- Do **not** use an apostrophe to create a **plural form of a name** that ends with an “s.” Instead, **add “es”** to the word.
 - two Robertses on the Court, four Joneses at the reunion

THE HYPHEN (-),³⁰ THE EM DASH (—), AND THE EN DASH (–)

THE HYPHEN (-)

A **hyphen (-)** is short and connects words. Hyphens can be **used between two words** that function together to modify a subsequent word in the sentence, as in “well-pled complaint.” Hyphens can also be used to **connect some prefixes to words**.

Hyphenated words can assist with conciseness by eliminating the need for additional adverbial phrases. However, be aware that emphasis or meaning may change when replacing a descriptive phrase with hyphenated words.

²⁸ Some modern style guides disagree and omit the apostrophe, but the Bluebook and Government Printing Office Style Manual still require this apostrophe when expressing plural forms. See RAY & RAMSFIELD, *supra* note 2, at 374.

²⁹ OATES, *supra* note 2, at 719.

³⁰ See generally RAY & RAMSFIELD, *supra* note 2, at 222–225; OATES, *supra* note 2, at 728–733.

1) Hyphenate modifiers that work together when they appear *before* the word they modify, but **not** when they appear *after*. Because language is constantly evolving, **consult a dictionary** with a recent publication date if you are unsure whether to hyphenate.³¹

- **Hyphenate:** The brief contained **well-developed** policy arguments.
- **Do not hyphenate:** The brief contained policy arguments that were **well developed**.

2) Do not hyphenate proper names.

- the Supreme Court building, the South American trade embargo

3) A hyphen can be used to connect some prefixes to words.³²

- Use a hyphen when adding a prefix to a proper name: *un-American*.
- Use a hyphen when the prefix ends with the same vowel that begins the main word: *re-examine*, *semi-independent*.
- Use a hyphen with the prefixes “all,” “ex,” and “self”:
 - *all-purpose*, *all-American*.
 - *ex-wife*, *ex-employee*.
 - *self-employed*, *self-sufficient*.
- Generally, do **not** use a hyphen with other prefixes:
 - *Antifreeze*
 - *Coparent*
 - *Degenerate*
 - *Interstate*
 - *Intrastate*
 - *Nonstarter*
 - *Parasocial*
 - *Prolapse*
 - *Reinvigorate*
 - *Semiannual*
 - *Supersede*
- Use a hyphen whenever omitting it will confuse readers: *He wanted to re-lease the apartment*.
 - Or reword the sentence to avoid the problem: *He wanted to lease the apartment again*.

4) Use a hyphen to combine two parties into one modifier.

- Attorney-client privilege

³¹ OATES, *supra* note 2, at 729.

³² RAY & RAMSFIELD, *supra* note 2, at 146–147; OATES, *supra* note 2, at 730.

THE EM DASH (—)

Similarly to commas, em dashes can be used to **(1) set off additional information; (2) set off an introductory list containing commas; and (3) connect related ideas.** As opposed to parentheses or commas, dashes **create emphasis** and give the impression that the added information is important, surprising, or abrupt.

Do **not** use a space on either side of the em dash.

1) Em dashes set off additional information—such as a list or a modifying clause.

- One crucial witness—the defendant’s mother—refused to corroborate the alibi.

2) An em dash can also be used after an introductory list containing commas.

- Name-calling, threats, and repeated beatings—these were a few of the allegations included in the complaint.³³

3) Dashes can also connect related clauses or ideas. However, when used to connect clauses, dashes can be too vague and informal for legal writing.³⁴ Dashes indicate that what follows is a marginally related afterthought. The following example does not tell the reader how the ideas are connected. It is not clear to the reader whether the writer was actually expecting a plumber to come or why the writer stayed home today.

- I stayed home from work today—the plumber didn’t come.

Using a **colon or semicolon** instead of a dash can indicate a more precise logical relation between ideas. *See supra* on “The Semicolon” and “The Colon.” The following example more strongly conveys the idea that the writer stayed home from work to wait for the plumber and is a bit annoyed about being stood up.

- I stayed home from work today: the plumber didn’t come.

Please note, however, that the preceding example still requires the reader to use logical inferences to make assumptions about the writer’s meaning. As a legal writer, you should strive to avoid any ambiguity by explicitly providing all of the information the reader needs.

- I stayed home from work today to wait for the plumber, yet the plumber never came.

THE EN DASH (–)

En dashes (–) connect ranges of numbers or dates and occasionally words.

Note that you should **not** use the en dash if the word “from” or “between” precedes the first number or word.³⁵

³³ OATES, *supra* note 2, at 732.

³⁴ *Id.* You will nevertheless find that many respectable legal writers use dashes prolifically. Use your best judgment.

³⁵ *Id.* at 733; *see also* RAY & RAMSFIELD, *supra* note 2, at 147.

Use an en dash:

- “The advertised salary, \$120,000–\$140,000, was significantly more than her previous salary.”³⁶
- “The **Dallas–Chicago** flight was cancelled.”³⁷

Do not use an en dash:

- “The advertised salary range **from \$120,00 to \$140,000** was significantly more than her previous salary.”³⁸

PARENTHESES ()

Parentheses are punctuation marks used to “set off” **nonessential or additional information, define acronyms, and list items.**³⁹

1) Parentheses are often used to **add additional information** that is of lesser importance or a **qualification of information** previously stated.⁴⁰ The text inside the parentheses should be able to be removed without ruining the sentence’s structure.

- The officer found one-eighth ounce of marijuana (**worth \$40**) in the defendant’s car.⁴¹

2) Parentheses are also used to **introduce acronyms or abbreviations** the first time a term is used in a document.⁴²

- The United States Environmental Protection Agency (**EPA**) is the federal agency responsible for enforcing environmental regulations.

3) Parentheses should be used for **enumeration** in legal writing. When numbering items in a list, such as the elements or factors in a rule of law, enclose each number completely in parentheses.

- “At common law, a person committed burglary by **(1)** breaking; and **(2)** entering”⁴³

³⁶ OATES, *supra* note 2, at 733.

³⁷ *Id.*

³⁸ *Id.*

³⁹ See RAY & RAMSFIELD, *supra* note 2, at 357–358.

⁴⁰ OATES, *supra* note 2, at 727.

⁴¹ *Id.*

⁴² RAY & RAMSFIELD, *supra* note 2, at 357.

⁴³ NEUMANN & TISCIONE, *supra* note 1, at 452.

QUOTATIONS (“”)

Quotation marks denote text that was originally written by another author. Some special considerations apply to punctuation used in conjunction with quotation marks. This section first discusses when you should use quotation marks before addressing how various punctuation marks should be used in conjunction with quotation marks.

When to Use Quotation Marks

1) Use quotation marks to indicate that a word **refers to the word itself** (such as a term of art) rather than to the meaning of the word. Also, text that follows the words “signed,” “endorsed,” or “entitled” should appear in quotation marks.⁴⁴

- The Court found that the attorney intended to imply the defendant was a “hired gun.”⁴⁵
- The deed was signed “Dr. Andy Kim,” not “Mr. Andy Kim.”

2) Use quotation marks to indicate any direct quotation that runs **for forty-nine words or less**. While the quotation should be enclosed in quotation marks, it should not be otherwise set off from the rest of the text.⁴⁶

- Massachusetts’s “Act Relative to Green Communities” requires utility companies to “enter into cost-effective long-term contracts” to finance renewable energy in state and adjacent federal waters.⁴⁷

3) Do **not** use quotation marks around quotations including **fifty or more words**. Instead, create a “**block quote**” that is single-spaced and indented on both the left and right.⁴⁸

- See *The Bluebook*, B5.2 for an example of formatting a block quote.

Rules for Punctuating Quotations

1) Use a **comma** before or after a quote when a phrase introduces, interrupts, or follows the quote.⁴⁹ Do **not** use a comma if the quote is integrated into a larger sentence.

Use a comma:

- He **replied**, “I think the car was blue.”
- “I think the car was blue,” **he replied**.
- “I think the car was blue,” **he replied**, “but it was dark outside.”

Do not use a comma:

- He replied that the car was “blue with white racing stripes.”

⁴⁴ OATES, *supra* note 2, at 723.

⁴⁵ *See id.*

⁴⁶ THE BLUEBOOK: A UNIFORM SYSTEM OF CITATION, B5.1 (Colum. L. Rev. et al. eds., 22d ed. 2025); RAY & RAMSFIELD, *supra* note 2, at 417.

⁴⁷ 2008 Mass. Acts ch. 169.

⁴⁸ *See* OATES, *supra* note 2, at 721; THE BLUEBOOK, *supra* note 51, at B5.2.

⁴⁹ OATES, *supra* note 2, at 707.

2) Commas and periods always go *inside* of the closing quotation mark in legal writing, even if not part of the original quote.⁵⁰

- “I think the car was blue,” **he replied**, “but it was dark outside.”
 - *Original quote*: “I think the car was blue, but it was dark outside, so the car could have been black. I am not sure.”
 - **NOTE**: Even though the original quote does not have a period after “outside,” the period must go inside of the closing quotation mark.

3) All other punctuation marks . . .

- **go *inside*** the closing quotation mark *only if* the mark is **part of the quote**.
- **go *outside*** the closing quotation mark if the mark is not a part of the original sentence but is instead **part of the larger sentence**.

Punctuate *inside* the closing quotation mark:

- He asked, “What time is lunch?”

Punctuate *outside* the closing quotation mark:

- Did he really call his classmate an “obsequious sycophant”?
- She said “next Sunday”; however, I think she meant tomorrow.

4) When quoting text that already uses quotation marks, use **single quotation marks to denote the quote within the quote.**

- “Police must discover incriminating evidence ‘inadvertently,’ which is to say, they may not ‘know in advance the location of [certain] evidence and intend to seize it.’”⁵¹

5) Use **curly quotes (sometimes referred to as “**smart quotes**”) instead of **straight quotes** (sometimes referred to as “**dumb quotes**”).**⁵²

6) It is important to cite a source’s words exactly. Use **brackets to indicate any **changes in capitalization** or **additions for clarity or readability**. For an example of this and for more information on how to indicate **omissions to wording**, see *infra* on “**Ellipses**.”**

⁵⁰ See THE BLUEBOOK, *supra* note 46, R. 5.1. But note that most countries (e.g. the United Kingdom, India, Australia, Canada, and South Africa) place the comma *outside* the quotation marks, unless it is part of the quote. See OATES, *supra* note 2, at 708 n.3.

⁵¹ OATES, *supra* note 2, at 722.

⁵² *Straight and Curly Quotes*, PRACTICAL TYPOGRAPHY, <https://practicaltypography.com/straight-and-curly-quotes.html> (last visited Apr. 11, 2026).

ELLIPSES (. . .)

An **ellipsis** (three periods separated by spaces) is used to **indicate the omission of one or more words from a quotation**.⁵³

Ellipses help writers retain conciseness in legal writing and draw clearer meaning out of quoted language by permitting the omission of text that is not necessary for the present discussion. However, the overuse of ellipses may suggest that you are manipulating the authority and thus may harm your credibility with the reader.

Use care not to omit material that is necessary to retain the original meaning of quote.⁵⁴

1) Include a space before and after each period in an ellipsis.⁵⁵ Note that some word processing autocorrect features automatically insert a special “ellipsis” character when you type three periods; this character does **not** conform to the Bluebook.

Also, **include ending punctuation** after an ellipsis if the sentence ends with the quotation. In the following example, the second ellipsis (for an omission at the end of the sentence) is followed by the original ending punctuation (the fourth period in the sequence).

- “Congress shall make no law . . . abridging the freedom of speech”

2) Do not use an ellipsis to begin a quotation or indicate the **alteration** of an individual word. Use **brackets** to indicate **changes in capitalization** and **verb tense** or the **addition of words for clarity**.⁵⁶

- “In his *Roviaro* dissent, Justice Clark observed that “[e]xperience teaches that once this policy [of confidentiality] is relaxed . . . its effectiveness is destroyed.”⁵⁷

3) Do not use an ellipsis to begin or end a quotation when the quoted language is used only as a **phrase or clause** of the ultimate sentence.

- Congress, the drafters agreed, could “make no law” that abridges the fundamental democratic freedoms of speech and the press.
 - **NOT:** Congress, the drafters agreed, could “. . . make no law . . . ” that abridges the fundamental democratic freedoms of speech and the press.”

⁵³ For more information on omissions from quotations, see THE BLUEBOOK, *supra* note 46, at R. 5.3.

⁵⁴ Lawyers may be subjected to sanctions for misrepresenting the meaning of quoted language through selective omission. See *Precision Specialty Metals, Inc. v. United States*, 315 F. 3d 1346 (Fed. Cir. 2003) (affirming formal reprimand for government attorney whose omission broadened the original meaning of a quoted passage).

⁵⁵ THE BLUEBOOK, *supra* note 46, R. 5.3.

⁵⁶ For more information on alterations, see THE BLUEBOOK, *supra* note 46, R. 5.2; see also OATES, *supra* note 2, at 720, 726.

⁵⁷ OATES, *supra* note 2, at 720.

4) When omitting text after the end of a quoted sentence where the sentence is followed by further quotation, retain the original punctuation at the end of the sentence and then include an ellipsis before continuing. Do **not** add a space before the ending punctuation.

- **From:** “The Plaintiff met her burden. The Defendant has raised no affirmative defenses, and thus judgment is granted for the Plaintiff.”
- **To:** “The Plaintiff met her burden. . . . [J]udgment is granted for the Plaintiff.”

5) When a paragraph or more is omitted from a quotation, start a new line, indent, and **include four periods with spaces** in between (representing an ellipsis and a fourth period for the ending punctuation).

- *Example:*

Our opinions, like our building, have recognized the role the Decalogue plays in America’s heritage. The Executive and Legislative Branches have also acknowledged the historical role of the Ten Commandments. These displays and recognitions of the Ten Commandments bespeak the rich American tradition of religious acknowledgments.

. . . .

There are, of course, limits to the display of religious messages or symbols. For example, we held unconstitutional a Kentucky statute requiring the posting of the Ten Commandments in every public schoolroom. In the classroom context, we found that the Kentucky statute had an improper and plainly religious purpose.⁵⁸

6) Do not use an ellipsis to indicate the **omission of a footnote or citation**. Instead include a “(footnote omitted)” or “(citation omitted)” parenthetical explanation.⁵⁹

⁵⁸ Van Orden v. Perry, 125 S. Ct. 2854, 2863 (2005) (citations and footnotes omitted). The original passage included an additional paragraph:

Our opinions, like our building, have recognized the role the Decalogue plays in America’s heritage. The Executive and Legislative Branches have also acknowledged the historical role of the Ten Commandments. These displays and recognitions of the Ten Commandments bespeak the rich American tradition of religious acknowledgments.

Of course, the Ten Commandments are religious—they were so viewed at their inception and so remain. The monument, therefore, has religious significance. According to Judeo-Christian belief, the Ten Commandments were given to Moses by God on Mt. Sinai. But Moses was a lawgiver as well as a religious leader. And the Ten Commandments have an undeniable historical meaning, as the foregoing examples demonstrate. Simply having religious content or promoting a message consistent with a religious doctrine does not run afoul of the Establishment Clause.

There are, of course, limits to the display of religious messages or symbols. For example, we held unconstitutional a Kentucky statute requiring the posting of the Ten Commandments in every public schoolroom. In the classroom context, we found that the Kentucky statute had an improper and plainly religious purpose.

Id. (citations and footnotes omitted).

⁵⁹ THE BLUEBOOK, *supra* note 46, R. 5.2–5.3.