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ARTICLES & ESSAYS

Hawking Hyphens in Compound Modifiers

Joan Ames Magat

Hawking Hyphens in Compound Modifiers

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Joseph Kimble once remarked that, for legal writers, hyphenating compound modifiers (“phrasal adjectives”) that precede the noun they modify “is . . . a hard sell.”¹ How right he was. I’ve been trying to hawk that hyphen for years. Still, convinced as I am that the practice is “never incorrect”² and driven by the certainty that such hyphens inevitably clarify³—which, for legal writing in particular, is paramount—I make the pitch once again here in the hopes of making a few more sales.

Sure, some compound nouns functioning as modifiers are so familiar they might slip by unhyphenated: *high school* student, *business judgment* rule, *sales tax* increases, *criminal defense* lawyer. Yet even a dictionary of general use—*Webster’s* here—recognizes the shift of noun to adjective with a hyphen: “common law *n.*” is listed as “common-law . . . *adj.*,”⁴ as is “common-law marriage.”⁵ Hyphenated. And *Black’s Law Dictionary*, which defines legal terms of art, does the same.⁶ *Business record* (n.) is listed adjectivally as “business-records exception”;⁷ *dispute resolution* (n.), as “dispute-resolution procedure.”⁸ Hyphenated.

The “rule,” such as it is, is easy enough to apply consistently; one can craft exceptions for visually obvious compounds—phrases in italics or quotes or that are proper nouns, for example. Yet the facility of the rule’s application evidently does nothing to recommend its consistent use. A handful of legal authors whose work I have edited have balked at

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1 Joseph Kimble, *Lifting the Fog of Legalese* 157 (2006).

2 *The Chicago Manual of Style* 373 (16th ed. 2010).

3 Kimble, *supra* n. 1, at 156.

4 *Merriam-Webster’s Collegiate Dictionary* 250 (11th ed. 2008).

5 *Id.* at 251.

6 *Black’s Law Dictionary* 294 (Bryan A. Garner ed., 8th ed. 2004).

7 *Id.* at 212.

8 *Id.* at 505.

hyphenation edits, citing alternate practices of the *New York Times*, the *Atlantic* magazine, law journals, and so forth, for those who publish respectable pieces and don't bother to follow such a rule. But the punctuation habits of law-journal articles aren't persuasive: they simply reflect the practices of generations of legal authors and student law-review editors who've never given the matter much, if any, thought. As for the *Atlantic* and the *Times*, those legal authors are mistaken, at least regarding whether either periodical follows a consistent rule one way or the other.⁹ A legal-writing colleague has similarly resisted a consistent practice, opining that the majority of style guides recommend the hyphen only when its absence would invite ambiguity. This would be what *The Economist Style Guide* calls the "subjective view"—i.e., dropping the hyphen "when . . . there is no risk of ambiguity or hesitation in understanding on the part of the reader."¹⁰ In contrast to this practice of "American English," "British English usually uses the hyphen in compound adjectives . . . that precede the noun, which promotes consistency."¹¹

The *Economist Guide* appears to be right in recognizing the "subjective view" as the American practice, at least as recommended by a handful of respectable American style guides.¹² The *MLA Style Manual and Guide to Scholarly Publishing* is one of these: "Use hyphens in . . . compound adjectives before nouns to prevent misreading. . . . Do not use hyphens in familiar unhyphenated compound terms such as *social security*, *high school*, and *liberal arts*, when they appear before nouns as

9 A random perusal of just a couple of front-page articles in the *Times* unearthed a host of hyphenated compound modifiers, among them "violence-racked border town," "drug-gang violence," "military-led crackdown," "a California-based nonprofit organization," "low-income areas," "upper-middle-class township," "a waste-to-energy plant," "reduced-price lunches," and "a fast-paced version." Marc Lacey & Ginger Thompson, *Drug Slayings in Mexico Rock U.S. Consulate*, N.Y. Times A1 (Mar. 15, 2010); Winnie Hu, *Forget Goofing Around: Recess Has a New Boss*, N.Y. Times A1 (Mar. 15, 2010). But see the *Times'* "rule" for hyphenating compounds in the Appendix, which would deem most of these hyphens unnecessary.

An equally serendipitous search of one issue of the *Atlantic* brought up "high-school diploma," "second-class citizens," "centuries-old preference," "26-year-old granddaughter," "a take-no-prisoners personality," "elementary-school reunion," "sex-change operation," "war-torn states," "more-nurturing and more-flexible behavior," "worst-hit industries," "upper-class women," "the real-estate crisis," "child-support payments," "social-welfare program," "working-class America," "a hard-science background," "gender-neutral *flex time*." Hanna Rosin, *The End of Men*, *The Atlantic* (July/Aug. 2010) (available at <http://www.theatlantic.com/magazine/archive/2010/07/the-end-of-men/8135>). To be fair, though, the author's practice in this article was inconsistent: "commercial driver's permit" and "home health assistance" went hyphenless.

Could it be that we legal readers simply don't see the hyphens when they're there (nor miss them when they're not), being as familiar as brothers with "business judgment rule" or "home mortgage deduction"?

As for the absence of hyphenated compound modifiers in law journals, well, legal writers are not in the habit of using them and legal-writing professors are not in the habit of teaching them to would-be law-review editors and authors. This perpetuates their nonuse. Still, some legal-writing texts advise otherwise. See *infra* App.

10 *The Economist Style Guide* 145 (2005).

11 *Id.* A more-recent edition does away with national distinctions and seems to recommend the subjective approach: "[I]f the adverb is one of two words together being used adjectivally, a hyphen *may* be needed; [t]he hyphen is *especially likely* to be needed if the adverb is short and common Less common adverbs, including all those that end in *-ly*, are *less likely* to need hyphens." *The Economist Style Guide* 78 (2012) (emphasis added).

12 See *infra* App.

modifiers.”¹³ *The New York Times Manual on Style and Usage* is another: “Do not use hyphens in compound modifiers when the meaning is clear without them.”¹⁴ The *Manual of Style* published by the U.S. Government Printing Office likewise advises, when “meaning is clear and readability is not aided, it is not necessary to use a hyphen to form a temporary or made compound.”¹⁵

“[N]ot necessary,” though, does not mean “pointless.” Not necessary, perhaps—but helpful. Unlike an audience who relishes the rhythms of punctuation (or those of its absence) enabled by liberal poetic license (think Faulkner; think Joyce), anyone writing for a *legal* audience must first be clear. Clarity is critical: time, for the legal reader, is at a premium. Legal writing should never cause the reader to puzzle and pause over skids punctuation can grease. Even if the pause is occasion for a chuckle (a *criminal* defense attorney, a *lame* duck president, a *high* school student), it is also occasion for distraction from the message, which is far from what the legal writer wants.

Apart from habit, I can think of a number of reasons why hyphenating compound modifiers has not caught on for anyone other than the rare law-review editor, punctuation nerds, or plain-English mavens. First, reading fluency. Resisters insist that unexpected hyphens distract. But hyphens are not scare quotes; they are not exclamation marks; they are not semicolons or em dashes used to excess. Punctuation used for emphatic effect or overused in the guise of style is bound to distract: the former is intended to startle or slow the reader down and so make her dwell on a thought or a turn of phrase; the latter puts a drag on the read simply in being noticed, over and over again. The hyphen’s role (and that of well-placed commas, for example) is, by contrast, to smooth the way, to let the reader slip through a multiply modified noun and on to its verb. If hyphens distract, they do so in the manner of footnote numbers. When we’re unused to seeing them, we notice them. That¾eventually¾we will notice them less and internalize their import more does little to sway the diehards. Still, if used consistently in the short term, in the long term, hyphens in compounds will distract no more than the hyphen at a line break: not at all.

13 *MLA Style Manual and Guide to Scholarly Publishing* 94 (3d ed. 2008).

14 *The New York Times Manual of Style and Usage* 163 (Allan M. Siegal & William G. Connolly eds. 1999).

15 U.S. Government Printing Office, *Style Manual* 99 (2008) (available at <http://www.gpo.gov/fdsys/pkg/GPO-STYLE-MANUAL-2008/pdf/GPO-STYLEMANUAL-2008.pdf>). The *Manual’s* examples of the latter include compounds familiar to readers of legal documents: “child welfare plan,” “civil rights case,” “interstate commerce law,” “income tax form,” real estate tax.” *Id.*

A second reason for hyphen resistance is that it's sometimes hard to tell what's noun and what's modifier. Since I urged this convention on student law-journal editors, I can count on one, maybe two, fingers those who sank their teeth into it. Here's one difficulty: The editor must determine which modifier modifies what. If it modifies the next word in the modifying phrase, it should take a hyphen:

common → law rule = common-law rule

legal → writing curriculum = legal-writing curriculum

If the word or phrase modifies not the next word in the phrase but the last one, it should not:



common → law **practices** = law practices that are common



legal → drug **distribution** = legal distribution of drugs (cf. legal-drug distribution à distribution of legal drugs)

The question these phrases raise is, What's the noun? Compound nouns ordinarily sport no hyphens.¹⁶ This is one reason why hyphenating compound modifiers that precede compound nouns is so helpful. It can be slow going for the editor, but it keeps the reader rolling. For example,

- *international regulatory regime*: “International” does not modify “regulatory.” So no hyphen. Nor, strictly speaking, does it modify only “regime.” If it did, it would be followed by a comma. Commas are for sequential modifiers of the noun (the little, red wagon—i.e., the wagon that is little and red). But what comprises a compound noun is a loose rule, if a rule it even is. Some adjectives that stack up in front of the final noun are “independent” adjectives, as in “little, red, three-wheeled wagon.” (The last adjective before the noun is comma-free.) The current trend seems to be to treat much of the end of a modified phrase as a compound noun, thus avoiding comma conundrums.¹⁷ So we seem

¹⁶ See *Chicago Manual of Style*, *supra* n. 2, at 374–84 (§ 7.85—Hyphenation Guide for compounds and words formed with prefixes).

¹⁷ Commas after sequential adjectives seem to be dying out. One reason is that what to do requires a moment of reflection. One prose-style handbook (now out of print) states the rule but acknowledges its demise:

When two adjectives precede a noun, use a comma if they modify the noun independently, that is, if their relationship is an *and* relationship. A *little, funny-looking dog* is a dog that is both little and funny-looking. If the first adjective modifies the unit composed of the second adjective and the noun, omit the comma. A *wild young man* is a young man who is wild; we read *young man* as a single unit. Most people find this distinction hard to apply, and it is accordingly breaking down, with the no-comma form increasingly favored.

Wilfred Stone & J.G. Bell, *Stone & Bell Prose Style: A Handbook for Writers* 198 (2d ed. 1972).

perfectly content with dropping the comma for “three-wheeled little red wagon,” treating “little red wagon” as a compound noun. Likewise, “effective international regulatory regime”—an international regulatory regime that is effective.

- *hospital price discrimination*: “Hospital” modifies the compound noun “price discrimination.” The absence of the hyphen clarifies. If hyphens aren’t used regularly (and helpfully) in compound modifiers, then their *absence* is of no help, either.

Third, those who are far past a nodding acquaintanceship with their fields need no such reading aids. Lawyers don’t need the hyphen in *criminal-justice system*, psychologists don’t need it in *offspring-behavior genetic design*; economists don’t need it in *opportunity-cost losses*; legal-writing profs don’t need it for *legal-writing* syllabus. One author said that she had never seen “victim-impact statement”—a term of relatively recent vintage—hyphenated, and she wasn’t going to be the first in her field to start. This was akin to the remark of a business-law prof who insisted that if he hyphenated *business-judgment rule*, he would be ridiculed by his colleagues. For such authors, the hyphen will remain a hard sell, and nothing this editor can say will sway them in their belief that a subjective approach to hyphenating compounds should trump a convention whose pedigree is clarity for *all* readers. The general reader, the scholar stretching beyond her field, the student of whatever age—all benefit by that hyphen. Even if it doesn’t dispel ambiguity, it speeds the read. If one objective of clear writing is to keep the reader moving ahead and not stubbing her mental toe, then these hyphens are beyond cavil.

Punctuation marks are signals. Carefully placed hyphens will not give false signals; their absence from where they might logically belong, though, may well. When, for example, a modifier can be read as applying either to the neighboring modifier (as an adverb) or to the noun (as an adjective), hyphens obviate the mental toe stub. Take a couple of phrases with “less” and “more.”

less meaningful attention: Does less modify “meaningful” or “attention”?

less-meaningful attention clarifies.

more rigorous investigation:¹⁸ Does one get more [rigorous investigation] or [more rigorous] investigation?

more-rigorous investigation clarifies.

18 See Debra Cassens Weiss, *ABA Weighs Required Disclosure of Law[-]School Job Stats, More[-]Rigorous Reporting*, ABA J. (Oct. 19, 2010) (available at http://www.abajournal.com/news/article/aba_weighs_required_disclosure_of_law_school_job_stats_more_rigorous_report/).

With “more,” of course, if the noun modified is unambiguously singular, the absence of the hyphen will not signify: *a more rigorous investigation is called for here* (cf., *a more-rigorous investigation is called for here*). Likewise, if “more” modifies an obvious adverb, such as one ending in *-ly*, no hyphen is needed to signal that the “more” applies to the adverb (e.g., *more nearly symmetrical*). Or syntax might preclude misreading and obviate the need for a hyphen: “less” in *less functional paperclips* must be an adverb and *less functional* a compound modifier; otherwise, it would be *fewer functional paperclips*. But even here, when grammatical rules free a phrase from the necessity of a hyphen, why wrestle with the options the “subjective” rule offers when sticking the hyphen in is clearer in the first place? The hyphen in *less-functional paperclips* clarifies without further complication or grammatical cogitation.

As for *most* and *least* and other superlatives or comparatives, the U.S. Government Printing Office says to drop the hyphen.¹⁹ But such advice is hardly dependable. Take “most valuable elephant ivory.” *Most* valuable elephant ivory finds a market in China; *most-valuable* elephant ivory is that from African elephants. Other manuals suggest hyphenating, with good reason.²⁰ The examples of one illustrate why comparative or superlative adverbs do not, by virtue of their apparent function, escape ambiguity in a compounded role: “better-paid job,” “best-liked teacher,” “ill-advised step,” “little-expected aid,” “well-intentioned man,” “lesser-known evil.”²¹

But a hyphen is superfluous in any compound whose first word is invariably an adverb, as are words ending in *-ly* that initiate the modifying phrase (internationally traded products). Using a hyphen for *-ly* adverbs has been dubbed “incompetent,”²² an epithet sufficiently searing to brand the brain of any legal writer. And because the hyphen is a signal to read a phrase as a whole, it is likewise superfluous when the cluster of words has

19 U.S. Government Printing Office, *supra* n. 15, at 100. See also Texas Law Review, *Manual on Usage & Style* 14 (10th ed. 2002) (“larger sized cities,” “lower income group,” “highest priced cars,” but “most-favored-nation status”).

20 *MLA Style Manual*, *supra* n. 12, at 93 (advising to regularly hyphenate a compound modifier “beginning with an adverb such as *better*, *best*, *ill*, *lower*, *little*, or *well*”); Kate L. Turabian, *Manual for Writers of Term Papers, Theses, and Dissertations* 44 (6th ed. 1996).

21 Turabian, *supra* n. 19, at 44.

22 Wilson Follett, *Modern American Usage* 146 (Erik Wensberg, rev., 1998) (“Prose is . . . incompetent when the hyphen turns up where it does not belong. It never belongs between an adjective and an *-ly* adverb that together modify a following noun: *a serenely unconscious man / a verbally incompetent proposal / a remarkably pleasant day*.”); see also H.W. Fowler, *Modern English Usage* 256 (2d ed., Sir Ernest Gowers, rev., 1965) (“When the first word of the compound is an adverb no hyphen is ordinarily needed, though one may often be found there. It is the business of an adverb to qualify the word next to it; there should be no risk of misunderstanding. To quote Sir Winston again, ‘*Richly embroidered* seems to me two words, and it is terrible to think of linking every adverb to a verb by a hyphen.’ But this will have to be done when the adverb might be mistaken for an adjective. *A little used car* is not necessarily the same as *a little-used car* or *a hard working man* as a *hard-working man* or *extra judicial duties* as *extra-judicial duties*.”).

its own signal of its phrasal integrity—proper nouns (Nobel Prize winner Al Gore, African American²³ population), foreign phrases (*fois gras* production, *ex ante* rule), phrases in quotes (the “health flexible spending arrangement” model) or with other internal signals that the words function as a single, integrated expression (arm’s length transaction). Arguably, too, phrases with the internal glue of conjunctions or prepositions can do without hyphens—*joint and several liability* or *health and safety regulations* or *conflict of laws issues*. Very arguably. Without hyphens, such phrases “cause a slow style, full of double takes.”²⁴

Rather than puzzle and debate why here and not there, a consistent practice will facilitate the task for both the editor and the reader. And this particular consistent practice is what the usage gurus have been advocating for a long, long time. The venerable Brit, H.W. Fowler, whose *Modern English Usage* was first published in 1926, so advised:

Composite adjectives when used attributively are usually given hyphens, mostly with good reason. They may be adjective + adjective (*red-hot*, *dark-blue*) or noun + adjective (*pitch-dark*, *sky-high*) [] or adjective + participle (*easy-going*, *nice-mannered*) [] or noun + participle (*weight-carrying*, *battle-scarred*) or verb + adverb (*made-up*, *fly-over*) or phrases such as *door-to-door*, *up-to-date*. Noun and participle compounds are especially likely to need clarifying hyphens. *The tailor-made dresses*, / *He was surprised to come across a man-eating tiger . . .*

It is true that combinations of two or more words needing hyphens when used attributively can usually do without them as predicates. An *ill educated man* is ambiguous but *the man is ill educated* is not.²⁵

The Grammar and Writing Handbook published more recently by the American Bar Association says the same, despite others’ recognition of the “subjective” American approach: “Two adjectives used as a unit are hyphenated especially when they precede the noun, although this use of a hyphen is less reliably correct if the two adjectives used as a unit *follow* the noun . . .”²⁶ Another, more-opinionated American, Wilson Follett, wrote in 1966,

The first and by far the greatest help to reading is the compulsory hyphenating that makes a single adjective out of two words before a

23 This phrase is (unnecessarily) hyphenated in *Webster’s*. See *Merriam-Webster’s*, *supra* n. 4, at 22.

24 Bryan A. Garner, *The Winning Brief: 100 Tips for Persuasive Briefing in Trial and Appellate Courts* 278 (2d ed. 2004).

25 Fowler, *supra* n. 21, at 256.

26 Lenné Eidson Espenschied, *The Grammar and Writing Handbook for Lawyers* 95 (2011).

noun: *eighteenth-century painting / fleet-footed Achilles / tumbled-down shack / Morse-code noises / single-stick expert*. Nothing gives away an incompetent amateur more quickly than the typescript that neglects this mark of punctuation or that employs it where it is not wanted.²⁷

Bryan Garner has recognized both the better practice and lawyerly resistance to it in 1995:

When a phrase functions as an adjective—an increasingly frequent phenomenon in late-20th-century English—the phrase should ordinarily be hyphenated. Seemingly everyone in the literary world knows this except lawyers. For some unfathomable reason—perhaps because they are accustomed to slow, dull, heavy reading—lawyers resist these hyphens.

But professional editors regularly supply them, and rightly so. The primary reason for them is that they prevent MISCUES and make reading easier and faster.²⁸

And in 2004:

Invariably, lawyers are skeptical of this point, as if it were something newfangled or alien. But professional editors learn this lesson early and learn it well. . . . Unhyphenated, these phrases cause a slow style, full of double takes. And we lawyers ought to be doing better.²⁹

The notable exception to lawyerly intransigence is Justice Antonin Scalia, who, so rightly, associates the hyphenated compound with clarity. Recalling the “unit-modifier rule” from his days on the *Harvard Law Review*, Scalia explains that hyphenating compound modifiers preceding the noun modified

really does make a lot of sense, and the example that we always used to use was the “purple people eater.” If it’s a purple eater of people, you

27 Kimble, *supra* n. 1, at 157 (quoting Wilson Follett, *Modern American Usage* 428 (1966)); see also Wilson Follett, *Modern American Usage* 146 (Erik Wensberg, rev., 1998):

[The hyphen] joins almost all two- and three-word adjectives that come before a noun: *stick-shift convertible* (but *Her convertible has a stick shift*) / *single-bed sheets* (but *Put sheets on the single beds*) / *eighteenth-century music*. . . . Prose is often ambiguous without this aid (*I can't find a single bed sheet*) and is incompetent when the hyphen turns up where it does not belong. It never belongs between an adjective and an *-ly* adverb that together modify a following noun: *a serenely unconscious man*

Hyphenating ahead of a noun warns the reader that he must fuse two ideas before he understands how they apply to the subject, whereas ordinary adverbs signal that fusion by means of *-ly*

In general, two-word modifiers that are capitalized do not have hyphens: *Air Force general*

28 Bryan A. Garner, *A Dictionary of Modern Legal Usage* 657–58 (2d ed. 1995).

29 Kimble, *supra* n. 1, at 157 (quoting Garner, *supra* n. 24, at 277–78).

would write it “purple people, hyphen, eater,” right? And you would understand that: a purple people-eater. On the other hand, if it was an eater of purple people, the hyphen would be moved over: “purple-people eater.” It helps comprehension, and anything that helps comprehension should be embraced.³⁰

For those who think we hyphen nerds are off on a planet our own, speaking in some other tongue, this last comes from the *Chicago Manual of Style*:

Compound modifiers before or after a noun. When compound modifiers (also called phrasal adjectives) such as *open-mouthed* or *full-length* precede a noun, hyphenation usually lends clarity. With the exception of proper nouns (such as *United States*) and compounds formed by an adverb ending in *ly* plus and adjective, it is never incorrect to hyphenate adjectival compounds before a noun. When such compounds *follow* the noun they modify, hyphenation is usually unnecessary, even for adjectival compounds that are hyphenated in *Webster’s* (such as *well-read* or *ill-humored*).³¹

There are limits, of course, to how far a compound stitched with hyphens can stretch. Brian Garner dubs such hyperextension “snakelike compounds,” and suggests “rework[ing] the sentence.”³² Exceptions are compounds crafted tongue in cheek, such as Fred Rodell’s typology of footnotes: “There is the explanatory or if-you-didn’t-understand-what-I-said-in-the-text-this-may-help-you type. And there is the probative or if-you’re-from-Missouri-just-take-a-look-at-all-this type.”³³

Extremes and exceptions aside, the point is this: Hyphenating two or more words that precede the noun they modify facilitates the read and is the approved practice by a majority of those who weigh in on the subject.³⁴ It is “never incorrect.”³⁵

30 Interviews with United States Supreme Court Justices, *Justice Antonin Scalia*, 13 *Scribes J. of Leg. Writing* 51, 63 (2010).

31 *Chicago Manual*, *supra* n. 2, at 373–74 (internal cross-reference omitted). To be fair to the subjective-use school, this appears to be contradicted by the preceding section, “*Hyphens and readability*”: “Where no ambiguity could result, as in *public welfare administration* or *graduate student housing*, hyphenation is unnecessary.” *Id.* at 373. Again, though, “unnecessary” is in tension with “lends clarity.” The legal writer, as opposed to the novelist, must, necessarily, care more about the latter than the former.

32 Garner, *supra* n. 27 at 659. The 15th edition of the *Chicago Manual* likewise advises, “If a phrasal adjective becomes awkward, the sentence should probably be recast.” *The Chicago Manual of Style* 171 (15th ed. 2003).

33 Fred Rodell, *Goodbye to Law Reviews—Revisited*, 48 *Va. L. Rev.* 279, 281 (1962).

34 See *infra* App.

35 *Chicago Manual*, *supra* n. 2, at 373.

Still, despite the authority of writing gurus—from those preaching Plain English to respected usage experts—many legal writers dig in their heels at the sight of the editor’s hyphen in their drafts’ compound modifiers. We converts meet such reactive irrationality with dismay. Make the case as strongly as we can, and still it will not sell. Why not? Chiefly because of authors’ familiarity with writing patterns they’ve come to recognize, practice, and—yes, since they are an expression of the authors themselves—own, if not love. It’s unsettling to change what we’re used to. Yet we should. Hyphens in, and sometimes their absence from, modifying compounds aid not only the reader’s comprehension, but the speed and ease of the task. That’s a selling point for any reader who values her time. And what reader of legal writing does not?

APPENDIX

STYLE-MANUAL ADVICE ON HYPHENATING COMPOUND MODIFIERS

Consistent = with some exceptions, consistently hyphenate compound modifiers preceding the noun.

Subjective = apart from similar exceptions, hyphenate only when not doing so leads to ambiguity or misreading

ADVICE**Consistent**

"A hyphen is used . . . [i]n all unit modifiers."

Alice M. Ball, *The Compounding and Hyphenation of English Words* 11(1951) (internal cross references omitted).

EXAMPLE

"above-cited law"

"export-import bank"

"old-age pensions"

"two-party system"

"most-favored-nation clause"

ADVICE**Consistent**

"When a compound word acts as a single modifier or adjective before a noun, hyphenate the words so that it is clear they are acting as a unit."

Deborah E. Bouchoux, *Aspen Handbook for Legal Writers: A Practical Reference* 59 (2d ed. 2009).

EXAMPLE

"She is a well-respected judge."

"We will prepare a follow-up brief."

"The corporation's short-term profits are at risk."

Exceptions and Comments

"When a compound word follows a noun, omit the hyphen (because it no longer functions as an adjective). Similarly, words need not be hyphenated if they are not acting as a single modifier or adjective before the noun."

"The judge is well respected."

"We will follow up with a brief."

"In the short term, the corporation's profits are at risk."

ADVICE**Consistent (British)****Subjective (American)**

"British English usually uses the hyphen in compound adjectives or adjectival phrases that precede the noun, which promotes consistency, whereas American English omits it when the writer or publisher thinks that there is no risk of ambiguity or hesitation in understanding on the part of the reader, a subjective view."

The Economist Style Guide 145 (2005).

EXAMPLE

"Thus, American English accepts *emerald green paint* but expects *blue-green algae*; British English employs the hyphen in both cases."

ADVICE**Consistent**

"Two adjectives used as a unit are hyphenated especially when they precede the noun, although this use of a hyphen is less reliably correct if the two adjectives used as a unit *follow* the noun."

Lenné Eidson Espenschied, *The Grammar and Writing Handbook for Lawyers* 95 (2011).

EXAMPLE

"tax-exempt bonds" [but]
 "bonds that are tax exempt"
 "recently decided case" [but]
 "case that was recently decided" [but]
 "out-of-the-way place" [but]
 "place that was out of the way"
 "eighteenth-century music" [but] "music of the eighteenth century"

ADVICE**Consistent**

"[The hyphen] joins almost all two- and three-word adjectives that come before a noun[.]"

"Prose is often ambiguous without this aid (*I can't find a single bed sheet*) . . ."

"Hyphenating ahead of a noun warns the reader that he must fuse two ideas before he understands how they apply to the subject . . ."

Wilson Follett, *Modern American Usage* 146 (Erik Wensberg, rev., 1998).

EXAMPLE

"*stick-shift convertible* (but *Her convertible has a stick shift*) / *single-bed sheets* (but *Put sheets on the single beds*) / *eighteenth-century music*"

Exceptions and Comments

"[Prose] is incompetent when the hyphen turns up where it does not belong. It never belongs between an adjective and an *-ly* adverb that together modify a following noun: *a serenely unconscious man* . . ."

"In general, two-word modifiers that are capitalized do not have hyphens: *Air Force general* . . ."

ADVICE**Consistent**

"When two or more words serve together as a single modifier before a noun, a hyphen or hyphens form the modifying words clearly into a unit . . ."

H. Ramsey Fowler & Jane E. Aaron, *The Little, Brown Handbook* 602–03 (9th ed. 2004).

EXAMPLE

"She is a well-known actor."
 "The conclusions are based on out-of-date statistics."
 "Some Spanish-speaking students work as translators."

Exceptions and Comments

"When the same compound adjectives follow the noun, hyphens are unnecessary and are usually left out. Hyphens are also unnecessary in compound modifiers containing an *-ly* adverb . . ."

ADVICE**Consistent**

"Composite adjectives when used attributively are usually given hyphens . . ."

H.W. Fowler, *Modern English Usage* 256 (2d ed., Sir Ernest Gowers, rev., 1965).

EXAMPLE

"*red-hot* [noun]"

"*dark-blue* [noun]"

"*pitch-dark* [noun]"

"*sky-high* [noun]"

"*easy-going* [noun],

"*nice-mannered* [noun], *weight-carrying* [noun], *battle-scarred* [noun] . . ."

Exceptions and Comments

"[C]ombinations of two or more words needing hyphens when used attributively can usually do without them as predicates."

ADVICE**Both**

There is a "need for basic consistency in the use of hyphens."

"[Use hyphens] to prevent misconceptions."

The New Fowler's Modern English Usage 370 (R.W. Burchfield, ed. 1996).

EXAMPLE

"*thirty-odd people*"

"*extra-territorial rights*"

"*more-important people*"

ADVICE**Consistent**

"When a phrase functions as an adjective—an increasingly frequent phenomenon in late-20th-century English—the phrase should ordinarily be hyphenated."

Brian A. Garner, *A Dictionary of Modern Legal Usage* 657 (2d ed. 1995).

ADVICE**Consistent**

"Hyphenate your phrasal adjectives."
 "[I]f two or more consecutive words make sense only when understood together as an adjective modifying a noun that follows, those words (excluding the noun) should be hyphenated. For example, you should hyphenate *summary-judgment hearing*, but only because *hearing* is a part of the phrase; if you were referring merely to *summary judgment*, a hyphen would be wrong."

Brian A. Garner, *The Winning Brief* 234–35 (2d ed. 2004).

Exceptions and Comments

"[Y]ou should not hyphenate when one of three exceptions applies:

- (1) when a two-word phrasal adjective contains an adverb ending in *-ly* followed by a past-participial adjective (*firmly held opinion*);
- (2) when the phrase follows, rather than precedes, whatever it's modifying (*he was well trained*); and
- (3) when the phrase consists of a proper noun . . . (*several United States officers*)."

EXAMPLE

"bench-trial strategy"

"joint-venture issues"

"law-of-the-case doctrine"

"legal writing-instructor"

"mutual-mistake doctrine"

See also Garner's long lists of examples drawn from *The New York Times* and the *Wall Street Journal* (278) and examples of common phrasal adjectives used in legal writing (279–83).

ADVICE**Consistent**

"Use a hyphen to connect two or more words functioning together as an adjective before a noun."

Diana Hacker, *A Writer's Reference* 279 (6th ed. 2007).

Exceptions and Comments

"Do not use a hyphen to connect *-ly* adverbs to the words they modify."

"A slowly moving truck"

EXAMPLE

". . . some newspaper-wrapped fish"

". . . a well-known candidate"

ADVICE**Consistent**

"*Hyphens* should be used in the following situations: Between words that act as a single adjective modifier preceding the word being modified[.]"

Gordon Loberger & Kate Shoup, *Webster's New World English Grammar Handbook* 166 (2d ed. 2009).

Exceptions and Comments

"Similar words used in the predicate to modify the subject are not hyphenated."

"The hyphen should be omitted from compounds when the first word is an adverb form ending in *-ly*."

EXAMPLE

"40-yard line"

"poverty-stricken children"

"holier-than-thou attitude"

"up-to-date accounts"

ADVICE

"Sir John Murray, editor of the *Oxford English Dictionary* (unofficial grandmother of every subsequent English dictionary) gave examples of meaning confirmed by the hyphen: [see next column]"

Included in a list of common compounds, most of which are compound nouns, from *Hart's Rules: The Oxford Writer's Dictionary* (1990),

"[c]ompound adjectives"

and

"[p]art-word or suspension hyphens":

Ronald McIntosh, *Hyphenation* 67 (1990).

Exceptions and Comments

Wilson Follett advises (and I agree) that the hyphen "never belongs between an adjective and an *-ly* adverb that together modify a following noun: *a serenely unconscious man . . .*" Wilson Follett, *Modern American Usage* 146 (Erik Wensberg, rev., 1998).

And post- prefixed words have fused unless the second term is capitalized or a numeral (post-Darwinian, post-2001) or is itself a compound (post-traumatic stress disorder) or when the terminal sound of "post" is the initial sound in the second term (post-structuralism). *Merriam-Webster's Collegiate Dictionary* 969–71 (11th ed. 2005). See also the list of words formed with prefixes in *The Chicago Manual of Style*, which advises that "[c]ompounds formed with prefixes are normally closed, whether they are nouns, verbs, adjectives, or adverbs." *The Chicago Manual of Style* 383 (16th ed. 2010). So, McIntosh's second example would be /pre- and postwar Britain/.

EXAMPLE

"a day well remembered" but "a well-remembered day"

"a sea of deep green" but "a deep-green sea"

"/green-eyed monster/ amply-stocked/"

"/pre- and post-war Britain/ gas- and oil-fired boilers/"

ADVICE

Generally Consistent

"[A] hyphen . . . [i]s used in most compound modifiers when placed before the noun."

Merriam-Webster's Collegiate Dictionary 1606–07 (11th ed. 2008).

EXAMPLE

"the fresh-cut grass"

"a made-up excuse"

"her gray-green eyes"

"the well-worded statement"

ADVICE**Generally Consistent**

"Most two-word permanent or temporary compound adjectives are hyphenated when placed before the noun."

"Compound adjectives of three or more words are hyphenated when they precede the noun."

"Temporary compounds formed of an adverb (as *well, more, less, still*) followed by a participle (or sometimes an adjective) are usually hyphenated when placed before a noun."

"[T]emporary compound adjectives are formed by using a compound noun . . . to modify another noun. Open compound nouns "are usually hyphenated . . ."

Subjective Permissible

"Some open compound nouns are considered so readily recognizable that they are frequently placed before a noun without a hyphen."

Merriam-Webster's Standard American Style Manual 87–88 (1985).

Exceptions and Comments

"Some open compound nouns are considered so readily recognizable that they are frequently placed before a noun without a hyphen."

"a high school diploma *or* a high-school diploma"

"a data processing course *or* a data-processing course"

"a dry goods store *or* a dry-goods store"

"Temporary compounds formed of an adverb (as *well, more, less, still*) followed by a participle (or sometimes an adjective) are usually hyphenated when placed before a noun."

"more-specialized controls"

"a still-growing company"

"these fast-moving times"

"The combination of *very* + an adjective is not a unit modifier."

"a very satisfied smile"

Other exceptions: proper nouns, foreign words, chemical names, modifiers following the noun, *-ly* adverbs followed by a participle "may sometimes be hyphenated but are more commonly open." 88–89

EXAMPLE

"tree-lined streets"

"an iron-clad guarantee"

"class-conscious persons"

"spur-of-the-moment decisions"

"higher-than-anticipated costs"

"more-specialized controls"

"a still-growing company" . . .

"a now-vulnerable politician"

"the farm-bloc vote"

"a short-run printing press"

"a tax-law case"

"a high school diploma *or* a high-school diploma"

"a data processing course *or* a data-processing course"

"a dry goods store *or* a dry-goods store"

ADVICE**Subjective**

1. "Use a hyphen in a compound adjective beginning with an adverb such as *better*, *best*, *ill*, *lower*, *little*, or *well* when the adjective precedes a noun."
2. "Use a hyphen in a compound adjective ending with the present participle (e.g., *loving*) or the past participle (e.g., *inspired*) of a verb when the adjective precedes a noun."
3. "Use a hyphen in a compound adjective formed by a number and a noun when the adjective precedes a noun."
4. "Use hyphens in other compound adjectives before nouns to prevent misreading."

MLA Style Manual and Guide to Scholarly Publishing
93–94 (3d ed. 2008).

Exceptions and Comments

"[D]o not use a hyphen when the compound adjective comes after the noun it modifies."

"[D]o not use a hyphen in a compound adjective beginning with an adverb ending in *-ly* or with *too*, *very*, or *much*."

"Do not use hyphens in familiar unhyphenated compound terms such as *social security*, *high school*, and *liberal arts*, when they appear before nouns as modifiers."

EXAMPLE

1. "better-prepared ambassador"
"best-known work"
"ill-informed reporter"
"lower-priced tickets"
"well-dressed announcer"
2. "hate-filled speech"
"sports-loving throng"
"fear-inspired loyalty"
3. "twelfth-floor apartment"
"second-semester courses"
"early-thirteenth-century architecture"
4. "children's-book library"
"Portuguese-language student"
"social security tax"
"high school reunion"
"liberal arts curriculum"

ADVICE**Subjective**

"Use the hyphen in constructions like *three-mile hike* and *30-car train* . . ."

"Do not use hyphens in compound modifiers when the meaning is clear without them[.]"

"In some compounds, the hyphen should be used to avoid ambiguity or absurdity: *unfair-practices charge* . . ."

"Hyphens inserted hastily or automatically can be misleading, since the first word may relate at least as much to the third word as to the second. For example: *airport departure lounge*; *fast breeder reactor*; *national health insurance*."

The New York Times Manual of Style and Usage 163–64
(Allan M. Siegal & William G. Connolly eds. 1999).

EXAMPLE

"*sales tax bill*"

"*foreign aid plan*"

"*C minor concerto*"

"But: *pay-as-you-go plan* and *earned-income tax credit*"

Exceptions (and Comments)

"Never use a hyphen after an adverb ending in *-ly* . . . But an adjective ending in *-ly* may take the hyphen if it is useful: *gravelly-voiced*; *grizzly-maned*." [These are both adverbs, not adjectives: they modify the participle that follows them. Neither needs or should be followed by a hyphen.]

"Some other compound modifiers, typically those beginning with nouns, keep their hyphens regardless of position in a sentence: *They are health-conscious*; *The purchase was tax-free* . . ."

"When a modifier consisting of two or more words is bound together by quotation marks, the hyphen is redundant . . ."

ADVICE**Consistent**

"Hyphenate two or more modifiers preceding the noun when they form a unit modifying the noun:"

R. M. Ritter, *The Oxford Guide to Style* 134–35 (2002).

EXAMPLE

"a stainless-steel table"

"the well-drawn outline"

"a long-standing agreement"

"the blood-red hand"

"the up-to-date records"

"honey-blond curls"

Exceptions and Comments

"Compound modifiers that follow a noun usually do not need hyphens: . . ."

"Do not hyphenate two or more modifiers preceding a noun when the first adjective modifies the complete noun phrase that follows: . . . A white water lily is a water lily of white, while a white-water lily thrives in fast water."

"Do not hyphenate adjectival compounds beginning with adverbs ending in *-ly*."

"Do not hyphenate italic foreign phrases (unless hyphenated in the original language)."

"Do not hyphenate capitalized words."

"Scientific terms tend not to be hyphenated in technical contexts (liquid crystal display . . . sodium chloride solution) although some scientific terms require hyphens to convey specific meanings."

ADVICE**Subjective**

"The hyphen links multiple words into a single expression."

"Hyphens are often used to join compound adjectives, especially when they present the risk of ambiguity in a sentence."

Michael Strumpf & Auriel Douglas, *The Grammar Bible* 439–40 (2004).

EXAMPLE

"holier-than-thou expression"

"The show featured a fast-talking robot."

"[I]t was a well-planned meeting[.]"

"an eighth-floor apartment"

ADVICE**Consistent**

"When two or more words are combined to form a compound adjective, a hyphen is usually required."

William Strunk Jr. & E.B. White, *The Elements of Style* 34–35 (4th ed. 2000).

EXAMPLE

"leisure-class pursuits"

"round-the-island race"

ADVICE

**Consistent except
for comparative adverbs**

1. "Some compounds are used only as adjectives. In most cases, hyphenate such a compound when it precedes the noun it modifies; otherwise, leave it open."
2. "Comparative constructions beginning with such terms as *more/most*, *less/least*, and *better/best* should be hyphenated only when there may be confusion about whether the comparative term is modifying the adjective that follows within the compound or the noun after the compound."
3. "Compounds used as both nouns and adjectives[:] . . . In most cases, hyphenate such a compound when it precedes a noun that it modifies; otherwise, leave it open."
4. "If a compound includes a number, hyphenate it if it precedes a noun that it modifies; otherwise, leave it open." 291
5. "Always use a hyphen to spell a fraction with words." 291
6. "For a fraction beginning with *half* or *quarter*, use a hyphen when it precedes a noun that it modifies; otherwise leave it open."

Kate L. Turabian, *A Manual for Writers of Research Papers, Theses, and Dissertations* 288–91 (7th ed. 2007).

Exceptions and Comments

1. "If a compound that would normally be hyphenated is preceded and modified by an adverb (such as *very*), omit the hyphen, because the grouping of the words will be clear to the reader[:] a *very well known* author . . . a somewhat *ill advised* step."

"Leave open most compounds that include proper nouns, including names of ethnic groups. " *African American* culture" " *Korean War* veterans"

See also "otherwise leave open" exceptions in 1, 3 & 4.

EXAMPLE

1. " *open-ended* question"
" *full-length* treatment"
" *duty-free* goods"
" *thought-provoking* commentary"
" *over-the-counter* drug"
" a frequently *referred-to* book"
" *spelled-out* numbers"
2. "colleges produce *more-skilled* workers"
cf.
"We hired *more skilled* workers for the holidays."
3. "the *decision-making* process"
a " *continuing-education* course"
a " *middle-class* neighborhood"
4. " *fifty-year* project"
" *four-year-old* child"
" *twentieth-century* literature"
" *third-floor* apartment"
" *214-day* standoff"
5. "a *two-thirds* majority"
6. "a *half-hour* session"
" a *quarter-mile* run"

ADVICE**Consistent**

"Print a hyphen between words, or abbreviations and words, combined to form a unit modifier immediately preceding the word modified . . . particularly [when] one element is a present or past participle."

Subjective

"Where meaning is clear and readability is not aided, it is not necessary to use a hyphen to form a temporary or made compound. Restraint should be exercised in forming unnecessary combinations of words used in normal sequence."

U.S. Government Printing Office, *A Manual of Style* 98–102 (2008) (available at <http://www.gpo.gov/fdsys/pkg/GPO-STYLEMANUAL-2008/pdf/GPO-STYLEMANUAL-2008.pdf>).

Exceptions to "consistent" view

No hyphen "in a two-word unit modifier the first element of which is a comparative or superlative": "better drained soil" "lower income group" "higher level decision"

No hyphen "in a two-word unit modifier the first element of which is an adverb ending in *-ly*, nor . . . in a three-word unit modifier the first two elements of which are adverbs.

"very well defined usage" [but] "well-known lawyer" [and] "well-kept secret"

"Proper nouns used as unit modifiers, either in their basic or derived form, retain their original form; but the hyphen is printed when combining forms."

[Compare] "Latin American countries [*with*] Anglo-Saxon period [and] French-English descent."

No hyphen in "unit modifier[s] consisting of a foreign phrase."

Do not use a hyphen in a unit modifier "enclosed in quotation marks unless it is normally a hyphenated term."

No hyphen "between independent adjectives preceding a noun."

EXAMPLE

"agreed-upon standards"

"cost-of-living increase" "collective-bargaining talks"

"long-term loan"

"lump-sum payment"

"state-of-the-art technology"

"civil rights cases"

"high school student"

"real estate tax"

but "no-hyphen rule"

LEGAL-WRITING TEXTS' AND MANUALS' ADVICE ON HYPHENATING COMPOUND MODIFIERS

ADVICE**Subjective**

"Use a hyphen with a compound adjective when necessary to prevent ambiguity . . ."

"Use a hyphen to form compounds with numbers . . ."

Lynn Bahrych & Marjorie Dick Rombauer, *Legal Writing in Nutsell* 135–36 (3d ed. 2003)

EXAMPLE

"first-class," "well-written," "well-timed," "year-long," "decision-making," "job-related."

"Two-week trial[,] thirty-five-year defendant[,] Five-year contract"

ADVICE

"Hyphens combine words to form compound modifiers or compound nouns."

Check the dictionary for compounds beginning with words other than "well."

"[U]se hyphens after each first element" for compound modifiers sharing the same second element.

Use hyphens "with fractions functioning as adjectives . . ."

Anne Enquist & Laurel Curry Oates, *Just Writing* 251–54 (2001)(discussion of hyphens in compound modifiers included in that of hyphen use generally).

EXAMPLE

"well-established rules of statutory construction."

- "price-fixing contract"
- "out-of-pocket expenses"
- "out-of-date curriculum"
- "take-home pay"
- "stop-limit order"

BUT

- "hit and run accident"
- "sudden emergency doctrine"
- "prima facie case"
- "family car doctrine"
- "high- and low-test gasoline"
- "nine- and ten-acre parcels"
- "twenty-year-old appellant"

Exceptions and Comments

Omit the hyphen when "the modifiers do not precede the noun they modify," as in "rules of statutory construction that are well established."

"Do not use a hyphen . . . when the first word in a two-word modifier is an adverb ending in '-ly' . . . or when the compound modifier contains a foreign phrase ('bona fide purchaser,' 'per se violation')."

ADVICE

Consistent

"Hyphenate a phrasal adjective that appears before a noun or pronoun unless it falls within one of several narrow exceptions."

Bryan Garner, *The Redbook A Manual on Legal Style* 33–35 (2002).

Exceptions and Comments

No hyphen for phrasal adjectives appearing:

- "[a]fter the noun."
- "[t]he defense of assumption of the risk"
- "[t]he rule of law . . . is well settled"
- "-ly adverbs"
- "badly needed boost"

BUT

- "[a] poorly-thought-out argument"
- "Proper nouns"
- "[t]he *State Street Bank* decision"
- "a Brooks Brothers suit"

EXAMPLE

- "failure-to-warn claim"
- "assumption-of-the-risk argument"
- "well-settled area of law"
- "likelihood-of-confusion test"

- "Foreign phrases"
- "in rem jurisdiction"
- "habeas corpus petition"
- "With multiple elements . . . use a suspension hyphen"
- "over- and underinclusive [statute]"
- "early- and mid-19th-century decisions"

ADVICE**Consistent**

"Hyphenate phrasal adjectives."

"Hyphens prevent reader miscues, even for half a second. *Michigan bar . . . and grill?* No. *Michigan bar-examination . . . performance.*"

Joseph Kimble, *Lifting the Fog of Legalese* 156–57 (2006).

EXAMPLE

"*new-class members*"

"*public-health education*"

"*elective-course studies*"

"*senior-year curriculum*"

"*Michigan bar-examination performance*"

Exceptions and Comments

"Do not use a hyphen, though, when one of these exceptions applies:

1. the phrasal adjective contains an adverb that ends in *ly* followed by a past participle (*highly regarded authority*);
2. the phrase follows the noun it modifies (*her paper was well written*);
3. the phrase consists of a proper noun (*several New York cases*); or
4. the phrase is a foreign phrase (*pro rata share*)."

ADVICE**Consistent**

"General rule: Hyphenate two or more words used as a single adjective (compound modifier)."

Successive hyphenated compound modifiers

Joan Ames Magat, *The Lawyer's Editing Manual* 39–43 (2009).

EXAMPLE

"*fair-trade + coffee*"

"*treaty-based + authorities*"

"*a states-rights + approach*"

"*sixty-five-year-old + males*"

"*antisocial-personality-disorder + patients*"

"*subject-matter + jurisdiction*"

"*law-review + article*"

"*intellectual-property + rights*"

"*common-law + marriage*"

"*Nobel Prize winner*"

"*African American population*"

"*fois gras production*"

"*sustainably harvested timber*"

"*a thirty- to forty-year period*"

"*fifty-eight- to sixty-eight-year-old judges*"

under- or overpaid "executives"

Exceptions and Comments

No hyphen for:

"a compound modifier consisting of proper nouns"

"a compound modifier whose terms include other signals to the cluster, such as apostrophes, quotation marks, en dashes, or foreign terms (even when these are not italicized)"

"unmistakable adverbs," including "-ly adverbs," "most," "least," "often," "very")

"[D]o not hyphenate a compound modifier **following** the term modified (because misreading is unlikely)."

The text also distinguishes compound modifiers from compound nouns, notes when an dash replaces a hyphen.

EXAMPLE

[Listing hyphenated compound nouns:]

"price-fixing contract"
 "out-of-pocket expenses,"
 "out-of-date certificate"
 "take-home pay"
 "stop-limit order"

but

"stop payment order"
 "profit and loss statement"
 "hit and run accident"
 "sudden emergency doctrine"
 "pyramid sales scheme"
 "lame duck session"
 "family car doctrine"

Laurel Curry Oates et al., *The Legal Writing Handbook*
 818–19 (2d ed. 1998).

ADVICE**Consistent**

"Use a hyphen to signal that the words hyphenated work together to modify a subsequent noun:

Mary B. Ray & Jill J. Ramsfield, *Legal Writing: Getting It Right and Getting It Written* 183 (1993).

Exceptions and Comments

"Proper names are not hyphenated: *Southeast Asian conflict*, *Supreme Court opinion*, *West Coast phenomenon*. Also, modifying words are not hyphenated when they follow a linking verb, rather than preceding the word they modify."

EXAMPLE

bone-jarring blow, high-pitched voice, work-related expenses, owner-occupied housing, thirty-seven-year-old male, or three- to five-year sentence."

Many legal-writing texts focus on the big picture and do not address punctuation of compound modifiers, e.g., Veda R. Charrow et al., *Clear & Effective Legal Writing* (4th ed. 2007); Linda H. Edwards, *Legal Writing: Process, Analysis, and Organization* (5th ed. 2010); Elizabeth Fajans et al., *Writing for Law Practice* (2d ed. 2010) (pages on punctuation do not include hyphens); Richard K. Neumann, Jr., *Legal Reasoning and Legal Writing: Structure, Strategy, and Style* (6th ed. 2009); Nancy L. Schultz & Louis J. Sirico, Jr., *Legal Writing and Other Lawyering Skills* (5th ed. 2010) (grammar and punctuation appendix does not include hyphens).