The Pesky Serial Comma

Douglas E. Abrams

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THE PESKY SERIAL COMMA

Douglas E. Abrams

On March 13, the United States Court of Appeals for the 1st Circuit decided O'Connor v. Oakhurst Dairy. The decision, born of statutory ambiguity, might be dubbed “The Case of the Missing Ten-Million-Dollar Serial Comma.”

The “serial comma” – sometimes called the “Oxford comma” or the “Harvard comma” – comes immediately before a conjunction that separates the last of three or more elements in a series. For example, consider the trio “ready, willing, and able.” Consider too “win, lose, or draw.” The serial comma is the one immediately before the “and” or the “or.”

In statutes or private arrangements, a comma’s presence (or, as in O’Connor, its absence) may hold high stakes for litigants. In an age dominated by news of national and international crises and discord, however, commas ordinarily do not attract widespread attention in the popular media. O’Connor was different because, according to the Associated Press, media coverage of the 1st Circuit decision “reignited a longstanding debate over whether the punctuation is necessary.”

In O’Connor’s immediate wake, The New Yorker said that “[p]eople love [the serial comma] or hate it, and they are equally ferocious on both sides of the debate.” The New York Times called the serial comma “perhaps the most polarizing of punctuation marks.”

Lay writers and their readers have reached no consensus about the serial comma, though weighty authority favors its general use. The Chicago Manual of Style, for example, “strongly recommends [the] widely practiced” use of the serial comma because “it prevents ambiguity.” The New Oxford Style Manual concurs that “the [serial] comma can serve to resolve ambiguity, particularly when any of the items are compound terms joined by a conjunction.”

On the other hand, the New York Times explains that “news writing has traditionally omitted the serial comma – perhaps seeking a more rapid feeling in the prose, or perhaps to save time and effort in the old days of manual typesetting.”

Journalists have embraced rules of reason that depend on context. The Times generally omits the serial comma, but uses it “where a sentence would be awkward or confusing without it.” The Associated Press Stylebook includes these standards for avoiding ambiguity: “Use commas to separate elements in a series, but do not put a comma before the conjunction in most simple series. Include a final comma in a simple series if omitting it could make the meaning unclear.”

In a 2014 poll, Nate Silver’s FiveThirtyEight found Americans closely divided. Fifty-seven percent of respondents favored use of the serial comma and 43 percent were opposed.

Distinctive Missions

National disagreement about whether to use the serial comma – perhaps sometimes driven by partisans’ habits, academic interest, or personal preferences – should not sway lawyers and legislative drafters. To enhance precision and clarity by diminishing the prospect of ambiguity, the serial comma belongs in legal writing.

My recent book, Effective Legal Writing: A Guide for Students and Practitioners, proceeds from the foundation that “the English language knows only two types of writing – good writing and bad writing. Good legal writing is good writing about a legal subject.” Like other writers, lawyers should strive for concise, precise, simple, and clear expression.

No writer, lay or legally trained, should be satisfied with anything less than pursuit of this quartet. But legal writing’s distinctive missions tolerate even less potential for unclear, imprecise expression than might be passable in much lay writing in newspapers and elsewhere. Drafters of legislation (and of accompanying administrative rules and regulations) establish standards of lawful conduct, and frequently prescribe civil or criminal sanctions for failing to heed these standards. In the private or public sector, lawyers serve as guardians of their clients’ status, rights, and obligations.

Establishment and guardianship confer responsibility to take reasonable measures to avoid foreseeable written ambiguity. One reasonable measure is to use the serial comma. Debates about the comma’s use or non-use might energize lay grammarians and other purists on both sides of the fence, but O’Connor demonstrates that non-use in legal writing can exact substantial costs.

O’Connor v. Oakhurst Dairy

O’Connor was a class action brought by delivery drivers who sought four years of back overtime pay, totaling about $10 million dollars, from their employer Oakhurst, a Portland, Maine dairy company. Maine’s wage and hour law provides for overtime pay (the familiar time-and-a-half per hour) for employees who work more than 40 hours in a week.

The drivers’ class action turned on a statutory exception that
denies overtime pay to employees who are engaged in this work: “The canning, processing, preserving, freezing, drying, marketing, storing, packing for shipment or distribution of: (1) Agricultural produce; (2) Meat and fish products; and (3) Perishable foods.”

The phrase “packing for shipment or distribution” carried no serial comma between “shipment” and “or.” The plaintiff delivery drivers concededly did not “pack” the perishable foods, but did “deliver” them. Does Maine’s wage and hour law exempt workers who only pack or workers who only distribute, as the employer Oakhurst contended? Or does the law exempt only workers who pack (whether for shipping or for distribution), as the delivery drivers successfully contended?

In a 29-page opinion by Judge David J. Barron, the 1st Circuit in O’Connor held for the plaintiff delivery drivers, but only after a judicial trek through precedents, statutory language, legislative history, and statutory context.

Because none of these sources resolved the case, the court of appeals applied liberal construction. “[A]mbiguities in the state’s wage and hour laws must be construed liberally in order to accomplish their remedial purpose” of assuring that workers “receive wages sufficient to provide adequate maintenance and to protect their health, and to be fairly commensurate with the value of the services rendered.” The panel remanded for further proceedings, including possible trial, on the delivery drivers’ multimillion-dollar claims.

“**For Want of a Comma**”

Leading legal writing experts are right that when drafting legislation or when writing for clients, lawyers should use the serial comma. “When a sentence contains a series of three or more items joined with one conjunction, put commas after each item except the last,” instructs Professor Richard C. Wydick. Bryan A. Garner’s advice? “Always use the serial comma.” Garner explains that “[o]mitting it may cause ambiguities, while including it never will.”

Careful editing and rewriting may also overcome ambiguity left by the absence of a serial comma. Reporting on O’Connor, the New York Times provided this example: “I’d like to thank my parents, Mother Teresa and the Pope.” A serial comma could enhance clarity and precision: “I’d like to thank my parents, Mother Teresa, and the Pope.” So could the addition of just a few words. “I’d like to thank my parents, and also thank Mother Teresa and the Pope.”

The Bar Association of San Francisco observes that “[o]f all punctuation marks, the comma is the one most often debated in courtrooms; its presence or absence in statutes and other legal texts has determined the outcome of cases” for more than a century. O’Connor demonstrates that unlike typical lay debates in blogs, social media, or the popular press, “debates in courtrooms” has determined the outcome of cases for more than a decade. “For Want of a Comma” can impose expensive legal consequences.

Sign on to Westlaw, Lexis, or another legal search engine, engage the “Cases” file, and search for “serial comma,” “Oxford comma,” or “Harvard comma.” Examine the reported federal and state decisions that, like O’Connor, grapple with ambiguities that legislative drafters or clients’ lawyers might have avoided with foresight after careful deliberation. The decisions chronicle legal fees wasted, docket time consumed, and judicial ink spilled, all (as the O’Connor panel put it) “for want of a comma.”

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**Endnotes**

1 Douglas E. Abrams, a University of Missouri law professor, has written or co-written six books. Four U.S. Supreme Court decisions have cited his law review articles. His latest book is EFFECTIVE LEGAL WRITING: A GUIDE FOR STUDENTS AND PRACTITIONERS (West Academic Publishing 2016).

2 Thank you to Ellen M. Henrich, MU Law Class of 2017, for her valuable research on this article.

3 285 F.3d 69 (1st Cir. 2017).


7 BRYAN A. GARNER, THE WINNING BRIEF 368 (2014) (citing authorities; WILLIAM STRUNK & E.B. WHITE, THE ELEMENTS OF STYLE 2 (4th ed. 1999); THE NEW FOWLER’S MODERN ENGLISH USAGE 162 (3d ed. by R. W. Burchfield ed.) (“The ‘Oxford comma’ is frequently, but in my view unwisely, omitted by many other publishers.”); Their preference is to omit it as a general rule . . . but to insert it if “there is a danger of misunderstanding.”).

8 THE CHICAGO MANUAL OF STYLE § 6.18 at 312 (16th ed. 2010).

9 See also, e.g., ROBERT B. CORBETT, ELITEIN STYpLE 4, 8-104 (West 2d ed. 1980) (discussing these four fundamentals).

10 See also, e.g., MARY NOBIS, FAQs ON STYLE, § 6, 18 at 70. (2017).

11 Id. Id. at 664(3)(F).

12 Id. Id. at 70, 79 (quoting 26 M.R.S.A. § 661).


14 HENRY WEINHOFEN, LEGAL WRITING STYLE 4, 8-104 (West 2d ed. 1980) (discussing these four fundamentals).

15 O’Connor, 851 F.3d at 70 (quoting 26 M.R.S.A. § 664(3)(F)).

16 Id.

17 Id. at 70, 79 (quoting 26 M.R.S.A. § 661).

18 HENRY WEINHOFEN, LEGAL WRITING STYLE, supra note 15, at 8-104 (West 2d ed. 1980).


20 BRYAN A. GARNER, THE ELEMENTS OF LEGAL STYtLE, supra note 19, § 2.1, at 15. See also MARK PAINTER, supra note 19, at 90 (“Using the serial comma never creates ambiguity, leaving it out sometimes does.”). See also, e.g., MARK PAINTER, supra note 19, at 90 (“Using the serial comma never creates ambiguity, leaving it out sometimes does.”).

21 Daniel Victor, supra note 3.


23 O’Connor, 851 F.3d at 70.
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### Suspensions

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<td>David R. Deal</td>
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<td>Bruce A. Willey</td>
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### Reprimands

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<td>John L. Adamik, Jr.</td>
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<td>Robert P. Warden</td>
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<td>Alfred J. Rathert</td>
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<td>Joe B. Whisler</td>
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<td>Steve J. Wolf</td>
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<td>Kelsey G. O’Brien</td>
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VIDEO REPLAY DATES & LOCATIONS

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Sheraton Westport Plaza Tower Hotel

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CIVIL TRIAL & APPELLATE PRACTICE
REAL PROPERTY
WORKERS’ COMPENSATION
EMPLOYMENT LAW
BUSINESS LAW

PROGRAM DATES & LOCATIONS

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DoubleTree by Hilton

SEPT. 8 • ST. LOUIS
Holiday Inn Airport West (Earth City)

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The Missouri Bar

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HIGHLIGHTS

More than a Form: Drafting Basics
How Public Benefits Affect an Estate Plan: Public Benefits 101
How to Identify a Probate Case and Select a Proper Procedural Path – Moving Forward with the Basics
First Party? Third Party? How Do I Choose? Special Needs Trust 101
Counseling Clients for #DigitalDeath
You Can’t Hide Your Head in the Sand: New and Proposed Federal Statutory and Regulatory Changes That Can Affect the Elder Law Practice
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Drafting Pitfalls: Customizing the Durable Power of Attorney for Optimum Results
No More Wandrying in the Dark: Illuminating Defined Value Clauses
That is So 2015! Missouri Probate Case Update
Testifying is Not for Sissies: The Truth, the Whole Truth, and Nothing but the Truth
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  - $449 — Registrations rcd by 11/1/17
  - $599 — Registrations rcd after 11/1/17
  - $319 — Season Pass __Basic __Ltd __Unltd

**Season Pass**
- $1199 — Unlimited Season Pass
- $ 999 — Limited Season Pass
- $ 699 — Basic Season Pass

### September

**CLE Rewind**
- September 6, 2017 • Springfield
- September 8, 2017 • St. Louis
- September 27, 2017 • Independence
- September 28, 2017 • Jefferson City
  - $185 — Morning __ Afternoon
  - $275 — Entire program
  - Season Pass __Basic __Ltd __Unltd

**Annual Law Update Video Replay**
- September 7, 2017 • St. Louis
- September 8, 2017 • Blue Springs
- November 9, 2017 • St. Louis
- November 16, 2017 • Kansas City
  - $129 — Session I __ Session II __ Session III
  - $299 — Entire program
  - Season Pass __Basic __Ltd __Unltd

**Guidebook Series: Drafting the Basic Will and Trust**
- September 19, 2017 • Telephone Seminar
  - $139 — Registration
  - Season Pass __Basic __Ltd __Unltd
  - $ 89 — Audio recording & electronic materials

**Annual Estate, Trust & Elder Law Institute**
- September 27-29, 2017 • St. Louis
  - $299 — Registration Fee
  - $359 — On-Site Registration
  - Season Pass __Basic __Ltd __Unltd

**Anatomical Gifts**
- September 27, 2017 • Webinar
  - $129 — Registration
  - Season Pass __Basic __Ltd __Unltd
  - $ 69 — Audio recording & electronic materials

**Coffee & Core Concepts: Managing a Name Change**
- September 28, 2017 • Telephone Seminar
  - $115 — Registration
  - Season Pass __Basic __Ltd __Unltd
  - $ 69 — Audio recording & electronic materials

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**Order Information**

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<th>Bar Number</th>
<th>Street Address</th>
<th>City/State/Zip</th>
<th>Phone</th>
<th>Email</th>
<th>Special Dietary Needs (for programs that include meals)</th>
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**Payment Information**

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*The Missouri Bar does not accept cash*

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3. **Fax completed registration form and debit/credit card information to:**
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4. **Mail completed registration and check or debit/credit card information to:**
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   - Jefferson City, MO
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