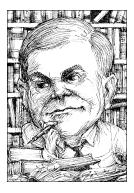
THE YEAR 2015 IN GRAMMAR, LANGUAGE, AND WRITING

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Bryan A. Garner⁺

JANUARY

A pricey typo (one plural -s) cost a 124-year-old Welsh company its future and the British Government a small fortune. In 2009, the U.K. Department of Business incorrectly recorded that the Cardiff engineering firm Taylor & Sons Ltd. had been wound up. In fact, it was the wholly unrelated Taylor & Son (singular) Ltd. that had dissolved. Taylor & Sons discovered the mistake only after its clients and suppliers, based on information sold by the government to credit-reference agencies, insisted that the company was in liquidation. The error cost the company its credibility, and two months later it was forced to close its doors. The English High Court found the Department of Business liable for £9 million (\$17 million). \bullet In a lexicographic kerfuffle, Margaret Atwood and other authors objected to the *Oxford Junior Dictionary*'s replacement of some 50 nature-related

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words such as hamster, chestnut, and lobster with tech terms such as analogue, broadband, and cut-and-paste. Warning in an open letter that "there is a shocking, proven connection between the decline in natural play and the decline in children's well-being," Atwood and her 27 cosignatories implored Oxford University Press to reinstate the nature words in the next edition of the children's dictionary. "As a symptom of a widely acknowledged problem that is ruining lives, this omission becomes a major issue." • Tired of having fellow students mock his pronunciation of Cool Whip, Princeton University freshman Newby Parton decried such "microaggressions" in a column for The Daily Princetonian. In 2013, Princeton had launched a site to publish student reports of microaggressions, which it refers to as "papercuts of oppression." Parton, who hails from a part of Tennessee where natives commonly pronounce their *wh*- sounds as /hw/, found this pronunciation a source of ridicule upon reaching New Jersey. "Making fun of regional speech is a microaggression," he wrote. "Microaggressions aren't harmless – there's research to show that they cause anxiety and binge drinking." It wasn't clear whether that last bit was a public confession. • CNN reported that a \$500 typo netted \$9,650 for charity. The Pinellas County Sheriff's Office of Florida ordered a rug that contained the phrase "In God We Trust." When it arrived they found the word God replaced with Dog. The Sheriff's profitable idea? Don't return the rug, but instead auction it off for charity. Proceeds went to a local animal-rescue group. • In a decision issued by the Second District Court of Appeal in Florida, an extra comma led to the reversal of an aggravatedbattery conviction. The case hinged on a jury charge stating that the defendant "had the right to stand his ground and meet force with force, including deadly force, if he reasonably believed that it was necessary to do so to prevent death or great bodily harm to himself or to prevent the commission of a *forcible felony."* The court concluded that the comma after *deadly force* was erroneous, leading to the mistaken notion by the jury that nondeadly force could be used only to prevent death, great bodily harm, or the commission of a felony. The charge was remanded for further proceedings. • Marking the first time a Twitter hashtag has been given such an honor, #blacklivesmatter was named the American Dialect Society's 2014 Word of the Year. "Language scholars are paying attention to the innovative linguistic force of hashtags, and #blacklivesmatter was certainly a forceful example of this in 2014," said the chair of the New Words Committee. The "word" handily won over other terms such as *manspreading* (for a man

to sit with his legs spread wide on public transit) and *bae* (a sweetheart or romantic partner). • Ysenda Maxtone Graham of The Spectator (U.K.) lamented the breathless sentences of today's texters, who commonly perpetrate comma splices. For example: "Thanks so much for helping out yesterday, Jamie had a great time with you all, thanks also for bringing his games kit home, let me know if you need help tomorrow...xx". Graham speculated that the fear of the period subconsciously stems from the juggling act of our multitasking lives or perhaps from a desire never to reach finality. • According to AL.com, many if not most Americans recite the Pledge of Allegiance incorrectly. Although the pledge was written in 1892, the words "under God" weren't added until 1954. Many people recite the pledge as "one nation (pause) under God," but Alabama state senator John Valentine insisted that a pause is unwarranted because there's no comma before under. The problem has been much noted since the insertion of the unmetrical phrase in 1954. • The Guardian (U.K.) reported that British Lord Chancellor Michael Gove had cracked down on faulty grammar and word usage by the country's civil servants. Gove ordered the Ministry of Justice staff to stop using *impact* as a verb, to stop using contractions altogether, to stop hyphenating phrasal adjectives except in best-placed and *high-quality*, to cease beginning sentences with Yet, and to change all instances of *ensure* to *make sure*. Yet Gove was much derided in the press for his idiosyncratic crotchets: "We want to ensure that a government minister can't impact us with ill-considered linguistic fiats," said a waggish source.

FEBRUARY

Fabulous news: as reported by Sci-News.com, a group of scientists led by Dr. Peter Dodds from the University of Vermont applied a big-data approach to the Pollyanna Hypothesis — the idea that all human languages skew toward the use of happy, positive words. This hypothesis was originally proposed in 1969 by Dr. Jerry Boucher and Dr. Charles E. Osgood of the University of Illinois. Dodds and his team gathered billions of words from 10 languages using 24 types of sources including books, news outlets, social media, websites, television, movies, and song lyrics. They added another 100 billion or so words written in Tweets. The current research confirmed the hypothesis: people use more positive words than negative ones. The findings showed variation among languages and sources. English-language song lyrics are among the most morose. Only

Korean movie subtitles and Chinese books contained more misery than English-language song lyrics. Spanish was found to be the happiest of languages. • The Telegraph (U.K.) reported on a Wikipedia editor's tireless campaign to extirpate a single solecism from the site. Since 2007, Bryan Henderson, a 51-year-old software engineer, has edited over 47,000 instances of the poor phrasing *comprised of*. By 2010, he had removed them all and had designed a software program to track down new instances of the offending phrase. While many have lauded Henderson's efforts, he is not without his detractors. In a 6,000-word defense of his project, he explains his motivation: "[Comprised of] triggers the same 'what an idiot' neurons in us as 'could of' and 'could care less.' If I can spare any readers that discomfort without hurting anyone else, why wouldn't I?" • According to The Washington Times, the University of Michigan has spent \$16,000 on an "Inclusive Language Campaign." The program is aimed at getting students to remove from their vocabulary words that could be offensive to others, such as *crazy*, *insane*, *retarded*, and *gay*. The university has defended the program against those who object to it on free-speech and fiscal grounds. • The Daily News and Analysis (India) reported that an Australian schoolteacher had disallowed the use of awesome by her students in an effort to build their vocabularies - not necessarily to counteract the Pollyanna Hypothesis. According to one student, the teacher said that the word didn't mean much and that students should instead use words such as fantastic and wonderful. Not helping the teacher's crusade is the recent release of the children's film The Lego Movie, the theme song of which is "Everything Is Awesome." • The Scotsman announced that a rare firstedition Edinburgh Dictionary (1763), the first dictionary to be published in Scotland, surfaced at auction. Only three copies of the first edition are known to exist in the United Kingdom. Four more reside in the United States at Columbia University, Indiana State University, Trinity College, and Yale University. • Recording artist Drake had his fans up in arms over missing punctuation, according to the Metro. In a message posted to his 20.7 million Twitter followers, Drake announced the release of his new album, If Youre Reading This Its Too Late. Drake's fans rebelled en masse at the missing apostrophes. An editor at *The Washington Post* found the title unprintable and inserted apostrophes in an article about the album's release, declaring "It's never too late!"

MARCH

The Telegraph (U.K.) reported that France's culture minister wants France to end its age-old blockade of the English language. Although laws dating back to 1635 have been intended to squash the English invasion, a 1994 law specifically mandates that all public advertising be in French and that English words sneaking into the language should be replaced with homegrown Gallicisms. Calling the attempt to stop the adoption of foreign words absurd, French linguists hailed the new retrenchment. • A typo by jail officials left an Albuquerque family in fear for their safety, according to KOB 4 News. A man was in jail on \$150,000 bond for threatening to kill his parents, carjacking, and then crashing into another vehicle at a busy intersection. Jail officials accidentally entered the bond amount at \$15,000, meaning he could be released for just \$1,500. Jail officials hastily rectified the mistake before the detainee could leave. • In Quito, Ecuador, United Press International reported that grammar-minded vigilantes have been patrolling the streets using red paint to add correct punctuation in every errant graffito they can find. The group, called Quito Orthographic Action, calls their work orthographic vandalism. One vigilante emphasized the agitation caused by mispunctuated graffiti: "Grammatical errors cause stress . . . we are promoting the correct use of language, [and] it is also an excuse for a bit of fun." • The Boston Globe reported on a research study by a Boston College marketing professor finding that punctuation in advertisements affects how buyers perceive products. One example is the battle between the period in "Just do it." and the question mark in "Got milk?" The study found that statements (with periods) work best in intense environments where potential buyers are bombarded with loud music and multiple images. Question marks, however, were found to be more effective in calmer situations in which consumers are more contemplative.

April

The Daily Express (U.K.) reported that the BBC committed a boner when covering the restart of the Large Hadron Collider. A news graphic included this innuendo: Large Hardon Collider Restart. Twitter users quickly mocked the priapic typo, which lasted less than four hours. • The least literate football fans are apparently those of the Washington Redskins, and the most literate are those of the Detroit Lions, according

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to a study by The Wall Street Journal's sports blog, The Count. The blog used the algorithms at Grammarly – which claims to detect up to 400 different kinds of spelling, grammar, and punctuation errors - to sift through comments on team websites. Fans of the Redskins had an average of 16.5 mistakes per 100 words, while Lions fans had only 4.2 errors per 100 words. Redskins fans had around 30% more errors than fans of the New Orleans Saints — the second-most blunder-prone fan base. • Police finally arrested and charged a man suspected of being the "Good Grammar Bandit," who robbed a string of banks in 2014 around Brighton, Colorado. Once listed as one of the FBI's top 10 bank thieves along the Front Range of Colorado, the robber received his moniker because of the impeccable spelling, punctuation, and grammar in his demand notes. • The Economist noted that April 15 marked the 260th anniversary of the publication of Samuel Johnson's great Dictionary of the English Language (1755). Celebrated as a seminal work of scholarship, Johnson's Dictionary included several definitions noted for their wit: a lexicographer is "a harmless drudge" and *oats* is a type of grain that "in England is generally given to the horses, but in Scotland supports the people." • According to CBS Minnesota, Governor Mark Dayton issued an executive order to restore the umlaut - two small dots above an o - on all road signs outside Lindström, a city northeast of the Twin Cities. Known as "America's Little Sweden," Lindström has been frustrated by vanishing umlauts. Changes in federal guidance for signage caused the removal. The Governor said he instructed the Department of Transportation to replace the signs adding that if necessary, he would grab a can of white paint and apply the dots himself.

MAY

Bigthink.com reported on a new smartphone application inspired by Noam Chomsky, the famous American linguist. *Sleep Furiously* challenges players to create wildly nonsensical sentences that are grammatically correct. The name comes from the sentence that Chomsky wrote to demonstrate that concept 60 years ago: *Colorless green ideas sleep furiously*. The app's silently stentorian sales inched frenetically. • For the second year in a row, the Scripps National Spelling Bee ended in a tie, with two eighth-graders as cochampions. Vanya Shivashankar, 13, of Olathe, Kansas, and Gokul Venkatachalam, 14, of Chesterfield, Missouri, shared the trophy after the 25-word championship round. Shivashankar's winning word was *sche*-

renschnitte (= the art of cutting paper into decorative designs); Venkatachalam's was *nunatak* (= a hill or mountain completely surrounded by glacial ice). For Vanya, it's becoming a family tradition: her sister, Kavya, was the 2009 champion. • Slate's Culturebox investigated why Indian-American students are so dominant at the Scripps National Spelling Bee - having won top honors now for eight straight years. It turns out that they have their own bush leagues. An Indian-American educational foundation's 75 chapters host scholarship-fundraising competitions in many academic fields, including spelling. So successful are they that Indian-Americans students, just 1% of the U.S. student population, make up 11% of the Spelling Bee competitors. • The Daily Mail (U.K.) reported that the English language is changing more rapidly because mobile phones and social media are causing new generational barriers to emerge. Professor emeritus John Sutherland at University College London found that a stunning 86% of parents don't understand the terms their children use. Society is now moving toward a more pictographic form of communication through the use of emoticons, which, Professor Sutherland comments, "hark back to a caveman-form of communication where a single picture can convey a full range of messages." • Snoots have gained a higher profile in pop culture, according to Vanity Fair. The TV shows Mad Men and Game of Thrones have each introduced characters who correct others' grammar. Mad Men character Don Draper corrected a con-man's statement "You don't have to work no more?" to "anymore," and Stannis Baratheon on Game of Thrones insisted on the distinction between less and fewer. What's depressing is that this was thought noteworthy. • The once-prevalent middle class is quickly vanishing — at least from the vocabulary of potential 2016 presidential candidates, The New York Times reported. Candidates such as Hillary Clinton and Rand Paul have dropped the term in favor of phrases such as "everyday Americans" and "people who work for the people who own businesses." The shift in rhetoric is said to demonstrate the economic setback that people experienced during the recession: middle-class status is now viewed as unachievable for more and more Americans. • The lexicographer Adam Kilgarriff died on May 16, 2015, at the age of 55. His notable contributions to the field of lexicography include Word Sketches, which are one-page summaries of a word's combinatorial behavior, and the software program Sketch Engine, which became the de facto standard software for developing dictionaries through corpus linguistics. • PBS

reported that the *Oxford English Dictionary* is considering adding "Mx." as a gender-neutral alternative to "Mr.," "Mrs.," and "Ms." Pronounced "mux" or "mix," the honorific provides an option for those who don't consider themselves a specific gender. Some banks and universities in the United Kingdom have already adopted the term. • *Time* reported that an architect pursuing a doctoral degree at the University of British Columbia wrote a 149-page, 52,438-word dissertation without any periods, commas, or other punctuation. Examiners at the university unanimously accepted his work. The student, Patrick Stewart, belongs to the Nisga'a, an indigenous group of people in British Columbia. He claimed his dissertation "Indigenous Architecture Through Indigenous Knowledge," was designed to raise awareness about "the blind acceptance of English-language conventions in academia" and to make a statement about aboriginal culture and colonialism.

JUNE

The Associated Press reported that Taco Bell executives are learning a new term every week to stay in touch with the company's main client base -Millennials. Developed by younger employees in their 20s, the "Millennial Word of the Week" has contained recent trendy terms such as lit and throwing shade. The words are distributed via e-mail and featured around the office in Irvine, California. Whatevs. • In his spare time, Russian Alexei Pavlovsky became a local coordinator at Total Dictation, a Russian grammar school. His mission was to teach Russians to track down and eradicate errors of spelling, grammar, and usage. One day, investigators from the Kremlin contacted Pavlovsky after a period of surveillance. According to The Wall Street Journal, they asked what he knew about "grammar nazis," and "what feelings he had toward people who make grammatical mistakes and whether he had a desire to destroy them." In what was apparently a simple misunderstanding of the Western phrase grammar nazi, Kremlin authorities didn't file formal charges. • Justice Antonin Scalia deployed four delicious turns of phrase in his dissent to the Supreme Court's decision upholding the subsidy portion of the Affordable Care Act. 1. Jiggery-pokery: "The Court's next bit of interpretive jiggerypokery involves other parts of the Act that purportedly presuppose the availability of tax credits on both federal and state Exchanges." 2. Pure applesauce: "Otherwise, the Court says, there would be no qualified individuals on federal Exchanges, contradicting ... the provision requiring every Exchange to take 'interests of qualified individuals' into account when selecting health plans. Pure applesauce." 3. *SCOTUScare*: "We should start calling this law SCOTUScare." 4. *Impossible possibility*: "Impossible possibility, thy name is an opinion on the Affordable Care Act!" • The Associated Press reported that the definition of the word *twerking* (= dancing in a sexually provocative manner, using thrusting movements of the bottom and hips while in a low, squatting stance) has been revised in the *Oxford English Dictionary*. Popularized globally by Miley Cyrus, the word had previously been defined as a mere twisting or jerking movement. Lexicographers say its origin goes back almost 200 years to the noun *twirk*. It became a verb in 1848, and the spelling changed to *twerk* in 1901. The dance move itself changed in the 21st century — doubtless in ways that would shock those alive in 1848 or 1901.

JULY

A "bias-free language guide" plunged the University of New Hampshire into a state of paralytic periphrasis, according to The Guardian (U.K.). The guide, written in 2013, was intended to "encourage critical thinking about terms commonly used in conversation and writing." Appearing on the university's website, the guide recommends such circumlocutions as "person of material wealth" instead of rich and "persons of advanced age" over elders or seniors. Showcased on a conservative website, it caught the attention of a Republican state senator who suggested that the university might try to change the New Hampshire state motto from "Live Free or Die" to "Live Free but Upset No One." • According to CNN, a study of the vocabulary used in popular music purports to show that rappers have the largest vocabularies of all popular musicians. The study, put together by the site MusixMatch, determined that the four artists who used the most unusual words were rappers. Keep an eye out for a new subgenre: "Sesquipedalian Rap." • Linguistic researchers in Virginia and West Virginia have been trying to understand and reverse the stigma often associated with heavy Appalachian dialects. The Columbus Dispatch (Ohio) reported on a wave of scholars publishing books seeking to reverse negative perceptions of how Appalachians speak. • Time reported evidence that the popular Southern contraction for *you all* - namely *y'all* - was used much earlier than previously thought. The Oxford English Dictionary currently lists the earliest use of the word as 1856 in the Alfred Arrington novel *Life Among the Lawless*. But with the help of online databases, researchers found that the first known use of *y'all* was 225 years earlier, in William Lisle's *The Faire Ethiopian* (1631). • BBC News reported that people are getting tattoos of semicolons to highlight mental-health issues. The semicolon is most commonly used where a sentence could come to an end but instead continues. This movement, Project Semicolon, has appropriated the punctuation mark as a metaphor for the moment when a person contemplating suicide decides to live on instead.

August

CBS News reported on a survey by Dictionary.com purporting to answer the question: "Which generation is most annoyed by bad grammar?" In a Harris poll of 2,052 people, 74% of respondents aged 18 to 34 said they were bothered by spelling mistakes on social media - more than any other age group. As the Los Angeles Times headline put it: "Millennials are annoyed when your grammar's not on fleek." Despite growing up with technology and even inventing much "textspeak," Millennials are said to have higher standards. This may be because, as the Pew Research Center found, the under-30 set is more likely to read books than their Generation X or Baby Boomer counterparts. But could the results be skewed because Millennials use social media more than any other age group? Across all age groups, 59% said improper grammar is their biggest annoyance with language. Women (75%) notice grammar and spelling mistakes more than men (66%). • Facebook released data from a study it conducted on the forms of "laughter" used during a random week of posts. Some 15% of posts or comments used some expression of laughter. Young people and women prefer to use emojis; men prefer to use hehe. A bit more than half the laughter posts used haha, while the once-prevalent lol was used only 1.9% of the time. • Amnesty was the most "relevant" word in the first GOP presidential debate, according to Vocabulary.com, a website that compiles lists of unusually high incidences of words in given contexts. The site searches a given text for words that are used more often than one would expect when compared to language use as a whole. The site also compiled lists of the most relevant words by particular candidates, notable results being destabilize for Donald Trump, tithe for Ben Carson, and eviscerate for Marco Rubio. • The Philadelphia Spanish news organization Al Dia published a piece calling for English news media to adopt more diacritical

marks — especially the tilde. In Spanish, \tilde{N} is a letter in its own right, which (among some readers) may cause confusion when printed without the tilde. Names such as "Michael Peña" and Mexican President "Enrique Peña Nieto" reportedly become confusing and get "mispronounced" in English.

September

Highlighting the vastness of the body of synonyms, The Scotsman (U.K.) reported that researchers at the University of Glasgow have identified an avalanche of 421 words in the Scots language meaning "snow." The study was done as a project to compile the first Historical Thesaurus of Scots. • Entertainment Weekly reported that snoots in the audience of the band One Direction swooned when the singer of the band, Harry Styles, stopped a concert to fix a fan's grammar. The singer spotted what seemed like an emergency when he saw a sign in the audience that read "Hi Harry, your so nice." Styles used a marker to add the apostrophe and -e to correct the grammar, he autographed the sign, and then the show went on. • New York Magazine published the results of a study by a group of Dutch researchers who discovered that the word huh might have a universal meaning. Although the team didn't set out to track the word, it consistently appeared in their research. "Everywhere they went, there was a word that sounded pretty much the same: 'a simple syllable with a low-front central vowel, glottal onset consonant if any, and questioning intonation." The team recorded conversations in French, Spanish, English, Icelandic, and even obscure languages such as Cha'palaa (a minority language in Ecuador) and an Australian Aboriginal language. • In an interview with Stephen Colbert, Time reported that when the comedian was a child, his father let him pick the way his last name would be pronounced. The family name, it turns out, was originally pronounced /kohl-buhrt/. But thinking it had a more satirical ring, Mr. Colbert opted for the Frenchified /kohl-bair/. • BBC celebrated the great lexicographer Francis Grose on the 230th anniversary of the publication of his famous dictionary, A Classical Dictionary of the Vulgar Tongue (1785). Grose was the first to record phrases like fly-bynight and birds of a feather. He was the first lexicographer to collect slang words from all corners of society, not just pickpockets and bandits. He claims to have overheard the terms included in his Classical Dictionary of the Vulgar Tongue from "soldiers on the long march, seamen at the capstern, ladies disposing of their fish, and the colloquies of Gravesend boat."

BRYAN A. GARNER

October

The Wall Street Journal reported on a survey by the online dating service Match, which asked 5,000 single people what criteria they used most when sizing up their dates. Second only to personal hygiene was grammar. An error-free message "definitely adds hotness points," dater Grace Gold told the paper. Grammarly analyzed messages on eHarmony and found that just two spelling errors can make the sender 14% less likely to get a good response. • The Guardian (U.K.) reported that a J.R.R. Tolkienannotated map of his fictional land, Middle-earth, was discovered in a book acquired by Blackwell's Rare Books. The copy was owned by the renowned illustrator Pauline Baynes, to be used for reference as she worked on a color map for a later version of the book. Tolkien (1892–1973), a professor at Oxford University, provided corrections to place names, new names, and suggestions for flora and fauna in his handwritten annotations. Though the map was referred to in correspondence between the two, few others had seen it until now. Blackwell's is selling the map together with other of Baynes's works. • The Telegraph (U.K.) reported that supporters of Republican presidential candidate Donald Trump have the worst grammar and spelling. The proofreading-software company Grammarly looked at the Facebook profiles of supporters of 19 presidential candidates. Their results showed that supporters of Republican candidates made twice as many mistakes as their Democratic counterparts. Democrats are said to have a broader vocabulary than Republicans. On the individual side, supporters of candidate Lincoln Chafee made the fewest errors, while backers of Trump made the most. • Texas Monthly released an article about how the word *texas* means *crazy* in Norwegian. The word is said to stem from the association of the "wild west" and all the related thrills and chaos associated with the State of Texas. The Norwegian phrase is not used to describe a person but instead a condition - as in "That game last night was totally texas!" • The Globe and Mail reported that the Canadian news media company Transcontinental had decided to close its last two English-only newspapers in Quebec because the companies were no longer profitable. Although some 65% of all Canadians say that English is the primary language at home, the number falls to about 10% for Quebecers. • The Center for Immigration Studies announced that a whopping 21% of Americans don't speak English as their primary language at home. According to The Washington Post, while many of those

homes are bilingual, as many as 25 million residents assessed themselves as less than "very good" in English-language proficiency. The issue spilled over into the Republican presidential race when former Florida Governor Jeb Bush responded to a question in Spanish. Donald Trump criticized Bush by saying that using English is how we in America help Mexicans assimilate. Bush responded by saying "Muchas gracias," adding that he would continue to use Spanish whenever he thought it appropriate. The Guardian (U.K.) reported that a Cambridge academic identified one of the earliest uses of ellipsis dots in a 1588 edition of the Roman Terence's play, Andria. Hyphens, rather than dots, mark incomplete utterances by the play's characters. Although there are instances of ellipsis dots in letters around the same time, this is the earliest printed version found. • Politico reported on the National Press Club's "Politicians vs. Press" spelling bee, in which Rep. Don Beyer (R-Va.) defeated The Washington Post's Karoun Demirjian to give pols the title. The first such Bee was held in 1913, when President Woodrow Wilson attended. That event was reprised 100 years later. Scripps National Spelling Bee cosponsored the event, with the bell wielded by this year's cochampions, Gokul Venkatachalam and Vanya Shivashankar.

NOVEMBER

The Oxford English Dictionary chose an emoji – not a word – as its "Word of the Year." As reported in *Time*, the "Face with Tears of Joy" emoji was determined by SwiftKey (a keyboard-app company) to be the most popular emoji in the world (accounting for nearly 20% of all emoji use in the U.S. and U.K.). Casper Grathwohl, president of Oxford Dictionaries, explained that emoji are becoming "an increasingly rich form of communication, one that transcends linguistic borders." He added that the choice for the word of the year embodies the "playfulness and intimacy" of our emoji-using culture. ;-) • According to the Daily Mail (U.K.), the Supreme Court of the United Kingdom called for the Home Office to lower its English-language standards for immigrants or else face possible charges of human-rights violations. The rules, instituted by Home Secretary Theresa May five years ago, require that the wife, husband, or partner of someone living in Britain who comes from a non-English-speaking country pass a proficiency test before entry. The guidance issued with the rules allegedly violates the European Convention on Human Rights. • The

Daily Mail (U.K.) cited "semiliterate" teachers as holding students back. The National Literacy Trust surveyed 2,326 teachers from primary and secondary schools about the requirements in the national curriculum. More than 20% responded that they don't have the knowledge to teach the curriculum. • A research team at Binghamton University discovered that the placement of a period at the end of a text message can change the recipient's interpretation. In a paper published in *Computers in Human* Behavior, the team reported that college students feel that text messages without a period at the end are more sincere than those with one. The team found that this perception existed in text messages but not handwritten notes. "Our claim is not so much that the period is used to convey a lack of sincerity in text messages," the team wrote, "but that punctuation is one of the cues used by senders, and understood by receivers, to convey pragmatic and social information." • A British woman was sentenced to 15 years in prison after a failed attempt to poison her husband. The woman was apprehended by police after a forged nonresuscitation note, purporting to be from her husband, contained a misspelling of the word *dignity*. When police asked the woman to spell the word, she misspelled it, just as the note had. • Members of the Missouri Student Bar Association published a new social-media policy requiring students at the University of Missouri School of Law to communicate in a "respectful and friendly manner" and avoid commenting "despairingly [read disparagingly] on others." This ungrammatical (and probably unconstitutional) provision was said by one commentator to reflect the "weaponization of political correctness." • The U.S. Census Bureau released a list indicating that Hawaii has a new official language: Pidgin English. Joining an official list of over 100 languages - indicating the linguistic and cultural diversity of the Hawaiian islands – Pidgin is a combination of words and phrases recognizable to those who speak it. To nonspeakers, though, it sounds like a linguistic mishmash. • Dictionary.com officially recognized several slang words, including *fleek* (= flawlessly styled, groomed, etc.), *feels* (= strong, often positive feelings), and yaaas (used as a strong expression of excitement, approval, agreement, etc.). The online dictionary also updated the meaning of previously defined words to match their modified usage, including random (= unknown, unidentified, or suspiciously out of place).

DECEMBER

Washington Post style czar Bill Walsh announced that the paper's copy desk would allow the singular they (and its cousins them and their) to pass so that everyone can have their (not his or her) way. Walsh called it "the only sensible solution to English's lack of a gender-neutral thirdperson singular personal pronoun." Like the honorific Mx. (see May), the singular *they* also provides a comfortable solution when the person referred to doesn't identify himself or herself (you see the awkwardness?) as being of a particular gender. Walsh said that after some initial resistance from readers, "I suspect that the singular *they* will go largely unnoticed even by those who oppose it on principle." • The *Chicago Tribune* reported on a recently published usage guide: A Field Guide to the F Word. Written by a 94-year-old Navy veteran, it urges "trusting the serviceman's instincts rather than the grammarian's rules." "The Word," as it is often referred to in the book, is never spelled out: it maintains its omnipresence in the form of illustrations of the letter *F* in various fonts. • The U.S. Court of Appeals for the Federal Circuit struck down part of a federal law that prohibited trademarks on offensive or disparaging terms. The Court cited the First Amendment in deciding that the ban was unconstitutional. "Whatever our personal feelings about the mark at issue here, or other disparaging marks, the First Amendment forbids government regulators to deny registration because they find the speech likely to offend others," Judge Kimberly Moore wrote for the nine-judge majority. • The terrorist organization known by the acronym "ISIS" captured news headlines throughout the year for its atrocities against humanity and filmed beheadings of Western journalists. "ISIS" stands for the Islamic State of Iraq and Syria. But President Obama has insisted on using the acronym "ISIL," standing for Islamic State of Iraq and the Levant. The Levant refers to the region east of the Mediterranean between Egypt and Turkey. Rather than suggest that the threat of the extremist organization is limited to two countries, President Obama reportedly hopes to emphasize the geographically unlimited goals of the terrorist group. • The Detroit News reported that the word yooper (= a native or inhabitant of the Michigan Upper Peninsula) was finally included in the Merriam-Webster Collegiate Dictionary after 12 years of cajoling by Steve Parks, then county prosecutor and now a district judge. His blandishments included each year sending Merriam-Webster a parcel containing a keychain, magnet, and chocolate bar, all

bearing the word Yooper. Parks's campaign for inclusion began when he tried unsuccessfully to use the word in a game of Scrabble. • During his presidential campaign, Donald Trump commented that the Democratic frontrunner and former first lady, Hillary Clinton, "got schlonged" in her 2008 primary run. The verb to schlong is not in any dictionary, and the meaning was hotly debated. One linguist thought Trump's use of the word may have been a malapropism in which he tried to use a Yiddish word for "defeat." Others argued that Trump was making a verb out of the indecent Yiddishism schlong (a reference to the male member). Verbing nouns, a common type of functional shift, is not new to the English language. In a 1789 letter to a lexicographer, Benjamin Franklin complained about "awkward and abominable" nouns-as-verbs: "If you should happen to be of my Opinion with respect to these Innovations you will use your Authority in reprobating them." Trump's indiscretion seemed for the short term not to matter: in the end, he seemed not to have schmeckeled himself.



THE DOZEN BIGGEST LINGUISTIC GAFFES IN 2015 LAW JOURNALS

- "There was little contact between *she* [read *her*] and her children." W. Dudley McCarter, *Trial Court Erred* [etc.], 71 J. Mo. B. 296, 297 (Nov.-Dec. 2015).
- "Originators *could care less* [read *could not care less*] about the long-term performance of these loans." June Rhee, *Getting Residential Mortgage-Backed Securities Right*, 20 Stan. J.L. Bus. & Fin. 273, 302 (2015).
- 3. "Google has made it a policy to send notices to content owners *anyways* [read *anyway*], citing transparency concerns." Ravi Antani, *The Resistance of Memory*, 30 Berkeley Tech. L.J. 1173, 1208 (2015) (with extra credit for using the dialectal *anyways* three times within the article).
- 4. "The court held that . . . the NYPD procedure was facially neutral *in regards to* [read *in regard to*] ethnicity." Shaunak Shah, *An Impaired State of the Law*, 80 Brook. L. Rev. 1611, 1623 (2015) (with extra credit for employing this nonstandard phrasing five times within the piece).

- "The new FSMA inspection rules take a more *preventative* [read *preventive*] approach." Alexia Brunet Marks, *The Risks We Are Willing to Eat*, 52 Harv. J. Legis. 125, 142 (2015) (with extra credit for using the epenthetic term eight times).
- 6. "If they *would have* [read *had*] thought of that outcome, they could have taken steps" Eric J. Shinabarger, *Back to the Future*, 90 Chi.-Kent L. Rev. 335, 344 (2015).
- "Individuals are naturally willing to do the right thing for the greatest amount [read number] of people" Luigi Russi & John D. Haskell, Heterodox Challenges to Consumption-Oriented Models of Legislation, 9 Harv. J. Legal Left 13, 58 (2015).
- "These individuals would have an elastic labor supply curve with *less people* [read *fewer people*] willing to enter or remain in the workforce." Kevin M. Walsh, *The Marriage Penalty*, 39 Seton Hall Legis. J. 83, 91 (2015) (with extra credit for not hyphenating the phrasal adjective).
- 9. "Criminal penalties include up to 30 days [read 30 days'] imprisonment." Tyler T. Hendry & Allison Zullo Gottlieb, Labor and Employment Law, 65 Syracuse L. Rev. 831, 839 (2015).
- 10. "The key is for a franchisor to engage in discussion . . . and then make decisions that work for them, their brand, and *where they are at* [delete *at*] in the growth and evolution of their franchise system" Brian B. Schnell & Ronald K. Gardner Jr., *Battle Over the Franchisor Business Judgment Rule and the Path to Peace*, 35 Franchise L.J. 167, 205 (2015) (with extra credit for the singular *them* and *their*).
- "Plaintiffs filed a complaint against Defendants in personum [read in personam]." Reid Miller & Lynette Komar, Survey: Recent Maritime Decisions Within the Ninth Circuit Region, 27 U.S.F. Mar. L.J. 267, 271 (2014-2015) (with extra credit for Ninth Circuit Region instead of the simpler Ninth Circuit).
- 12. "This 'redefinition' heightens the evidentiary burden for plaintiffs to make out their prima facie cases while simultaneously recasting the prima facie case as 'de minimus' [read 'de minimis']." Richard J. Perry Jr., Fisher and James Hijack the McDonnell Douglas Paradigm [etc.], 33 Buff. Pub. Int. L.J. 87, 89 (2014-2015) (with extra credit for dividing 4-3 between the misspelling and the correct spelling).