

The Legal Writer

Know Your Nouns:

Perplexing plurals and possessives

By Suzanne E. Rowe

A few years ago, a British writer named Lynne Truss became famous for a little book subtitled "The Zero Tolerance Approach to Punctuation." On the back flap, she's seen surreptitiously adding an apostrophe to a movie billboard for "Two Weeks Notice." Ms. Truss knew that the two weeks hadn't noticed anything, so the plural "weeks" was incorrect. The title should have been "Two Weeks' Notice," though Ms. Truss and I were surely the only movie-goers who boycotted on grammatical grounds.

To avoid having Ms. Truss mark up your documents for faulty plurals and possessives, just review this short column. If you're an English whiz, skip the next section and pick up with the hard stuff.

English 101

This column is essentially about nouns in their various forms, some of which need apostrophes and some of which don't. Folks of my generation remember from "Grammar Rock" that a noun is "a person, place or thing." When a noun refers to one person, place or thing, we call it "singular." When a noun refers to more than one person, place or thing, we call it "plural." So *lawyer* is singular, and *lawyers* are plural. The *office* is singular, and the *offices* are plural.

As shown in the two examples above, English typically forms the plural by adding *-s*. As another example, the plural of *statute* is *statutes*. If the noun ends in a sound that doesn't readily combine with an *s* sound, English forms the plural by adding *-es*. So words that end in *s*, *sh*, *x*, *z* or *ch* typically take *-es*. Examples include *boxes* and *witches*.

In addition to the many words that follow these simple rules, English is filled with words that have irregular plurals. The plural of "child" is "children." A single "crisis" can become a series of "crises." A dictionary will generally list plurals for nouns that do not follow the basic forms.

Nouns are lucky because they get to have stuff. We call that fortunate state of affairs "possession." The lawyer may have a new car. We call it the "lawyer's car."

The possessive form is easy to form in the simplest cases. A singular noun becomes possessive with the addition of *-'s*. Thus, in the example above, the possessive of *lawyer* is *lawyer's*. Similarly, if a *witch* has a favorite broom, we would call it the *witch's* favorite broom.

Note that journalists get away with cutting corners. While the papers announce "Kansas' primary" and "Congress' recess" (a pattern, incidentally, adhered to by the *Bulletin*), the rule followed by curmudgeons like me is still to add an *-'s* to those singular forms, not just an apostrophe. In formal documents, please use "Kansas's primary" and "Congress's recess."

The plural noun generally ends in *-s* already, so we add just an apostrophe. The broom preferred by many *witches* is the *witches'* favorite broom. For irregular plurals that do not end in *-s*, we add *-'s*, e.g. a *children's* game.

Welcome back, English whizzes. This is where things get tricky.

Apostrophes and plurals

To be safe, avoid using an apostrophe to make a word plural.

WRONG: Orange's — \$1.00 each!

The rest of the world may assume that *oranges* are for sale and that each one costs a dollar. A grammar curmudgeon like me wonders what that singular orange possesses that's worth a dollar. Or maybe the orange has a one-dollar bill?

Don't be tempted to use apostrophes to create plurals, even with less common nouns:

The 1980s were difficult years. (No apostrophe needed in 1980s.)

Distributions from the IRAs will begin in three years. (No apostrophe needed in IRAs.)

The rare situations where apostrophes are used to create plurals include words made of lowercase letters (x's and y's) and interior periods (Ph.D.'s).

The many x's and y's of algebra confused him.

The interview room was filled with Ph.D.'s looking for jobs.

Difficult family names

Devilish details show up with our clients whose names end in –s, especially the Adams family and the Jones clan. Remember the basic rule: don't try to make a plural with an apostrophe. Everyone is trying to keep up with the *Joneses* (add –es to form the plural). The form *Jones's* (with an apostrophe) refers to something that one of the Jones family members owns.

Here's a quick summary of examples:

Ms. Williams has been in practice for 10 years. (singular)

Ms. Williams's practice is flourishing. (singular possessive)

The Williamses are going on vacation for two weeks. (plural)

The Williamses' house will be vacant for that period. (plural possessive)

Confused? When you've asked your secretary and two colleagues and read through a style manual and still do not know what to do with a challenging noun, consider rewriting the sentence to use "of" to show possession. Instead of stressing over "the Davises' anniversary," just write "the anniversary of Mr. and Mrs. Davis."

Its v. it's

One of the most common mistakes in the possessive form concerns the little word "its." The possessive form of the pronoun "it" is "its." For example: The dog hid *its* bone behind the barn. Or for a more legal example: The court announced *its* ruling.

In contrast, the contraction "it's" is a substitute for the two words "it is." For example: *It's* important to understand the alternate meanings of the statute.

Many of us who know these rules well still misuse them in legal documents. One easy way to check is to read every sentence containing "it's" as though "it is" were written instead. If you don't mean "it is," take out the apostrophe. (Remember that you can use your word processor's "find" function to locate every instance of "it's" in your document.)

Here's another way to check your use of "its" versus "it's." A contraction always has an apostrophe; the apostrophe indicates that at least one letter has been omitted. Examples of other contractions include "don't" (for "do not") and "can't" (for "cannot").

Some possessives have apostrophes (the *lawyer's* winning argument), but others don't (the argument was *hers*, not *his*). See if memorizing this jingle helps:

Don't leave out bits
of *his*, *hers* and *its*.

The contraction at the beginning should remind you that "don't" is a substitute for "do not," just as "it's" is a substitute for "it is." The apostrophe takes the place of a bit of those words. The list of possessive words at the end of the jingle should help you remember that "its" is similar to other possessives that don't use apostrophes, namely "his" and "hers."

Note that a combination of those letters ending with an apostrophe — *its'* — is not a word, although it is a frequent typo.

Italicized words

Generally, do not make the –s or the apostrophe italicized, even when they connect with italicized words like newspaper titles. Look closely at the examples below; those last letters are not italicized.

The Register-Guard's editorial page covered the matter in depth. (singular possessive)

Five *Oregonians* were sitting on the front steps, suggesting the occupants of the apartment were away. (plural)

How many?

One more hint about nouns, possessives and the importance of the apostrophe. Sometimes nouns share possession; sometimes

they don't. The form "Jay and Sam's office" contains one apostrophe, which means that the two men share the office. By contrast, the form "Jay's and Sam's offices" shows that they each have a different office. Two apostrophes, two offices.

This form can be more challenging when the noun possessed is plural in both instances, as in "Lee and Lyn's letters." This example with one apostrophe refers to the letters Lee and Lyn wrote to each other. If both were possessive (i.e. two apostrophes), as in "Lee's and Lyn's letters," we would assume both had letters, not necessarily written to each other.

Compound words

When using a compound term like "attorney general," make the plural with the noun. Thus, more than one "attorney general" is a group of "attorneys general," not "attorney generals" (they're not in the military) and certainly not "attorney general's" (no apostrophes in plurals, remember).

The possessive of this example is the "attorney general's opinion." While this seems an exception to the rule above, consider the confusion created by the "attorney's general opinion." (Is her general opinion different from the A.G.'s specific one?) To make the plural possessive, opt for an alternate form using "of," e.g. the "opinions of several attorneys general."

Conclusion

Even if your clients, Mr. and Mrs. Jones, aren't curmudgeons about other points of grammar, they may expect their name to appear — in plural and possessive forms — the way they're accustomed to seeing it. As the *Chicago Manual of Style* admits, "feelings on these matters sometimes run high." Sensitivity to the reader is advised.

Sources: *Chicago Manual of Style: The Essential Guide for Writers, Editors, and Publishers* (15th ed. 2003); Bryan A. Garner, *A Dictionary of Modern Legal Usage* (2d ed. 2001).

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