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Getting Facts Straight (and Writing Well Too)*

Mary Whisner**

Librarians who provide information need to ensure that they are providing the best information and that they are communicating it as accurately as possible. Ms. Whisner reviews some situations where things can go wrong and ways to make sure that they don't.

¶1 Sometimes after you look up an unfamiliar word, you come across it again in unrelated contexts—a political story on NPR, a novel you pick up, a magazine article. Or you hear a song on the radio and soon hear a different rendition in a movie soundtrack; not long after, some guy is whistling it at your bus stop. These remarkable coincidences are at least partly attributable to your newfound sensitivity to the word or song. And you don't even notice all the non-coincidences—for instance, all the songs you hear that aren't in the next movie you watch.

¶2 Noticing the coincidences can enrich your experience. Seeing the new word or hearing the song in different contexts gives you a greater appreciation of it—you understand more of the word's nuances and cement it in your vocabulary; you learn how one song can be interpreted by different performers, emphasizing different phrases, using different tempos, evoking different emotions. Unless the song is really drippy or the word becomes a pet peeve (e.g., “incented”¹), the repetition is cool.

¶3 Recently I hit a stretch like this, but instead of one word or song, it was a theme that recurred. After encountering it a few times, I came to think of it as “getting it right.”

¶4 Here are a few of the instances that led to “getting it right” getting stuck in my head: I read John McPhee's praise for the fact-checkers of the *New Yorker*, people who toil diligently and creatively to assure that published nonfiction is accurate.² I read about and was amazed by the proofreading and editing Bryan Garner insists on before even a letter goes out from his office.³ When I attended a symposium in honor of Judge Betty Binns Fletcher of the Ninth Circuit, I heard

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1. For a discussion of the verb “incent,” see Jan Freeman, *Dissent on Incent*, BOST. GLOBE, Apr. 3, 2005, at D3.

2. John McPhee, *Checkpoints*, NEW YORKER, Feb. 9 & 16, 2009, at 56.

3. BRYAN A. GARNER, *The Importance of Other Eyes*, in GARNER ON LANGUAGE AND WRITING 415, 416 (2009). Garner asks two or three colleagues to proofread each letter and insists that each make at least two suggestions for improvement.

about her probing questions and painstaking review of the record of each case. And after hearing a radio interview with a professor of sociology and criminal justice, I picked up his book, which provides general readers with tools for evaluating statistical claims intelligently.⁴

¶5 If you hear a song this much, you start humming it yourself. So in this column I join the chorus singing about getting it right. You'll notice that the examples I gave aren't about getting it right in carpentry, fashion design, engineering, medicine, or plumbing. It's not because getting it right isn't important in those fields—clearly, it is. But here I want to focus, as the examples do, on getting facts right and getting writing right—two tasks close to a reference librarian's heart.

Fact Checking

¶6 The *New Yorker* fact checkers are naturally attractive to librarians. They're working with some of the best writers in America, they get to see pieces before the rest of the world does, they're expected to have very high standards, and they're committed and clever. (They are also widely respected for what they do, and what librarian doesn't like the idea of careful researchers being respected?) I found it interesting that many of McPhee's examples were of contacting experts, rather than using published sources. To confirm some odd bit of geology or physics in McPhee's manuscript, a fact-checker would call a prominent geologist or physicist.⁵ I suspect that the fact-checkers don't start with the phone calls—they probably know their way around basic reference sources and databases and do some looking before making the calls. But calling experts is certainly part of research.

¶7 Deciding whose expertise you'll trust is trickier, because there can be significant disagreements even among people with comparable scholarly credentials. Consider all the jurors who hear conflicting testimony from experts for the plaintiff and experts for the defense. For example, one expert might say that "taking Vioxx caused . . . and/or contributed to [the plaintiff's] heart attack"⁶ only to be followed later in the trial by an expert who says that the plaintiff died of a ventricular arrhythmia and Vioxx does not "cause ventricular arrhythmias."⁷ If a fact-checker was working on a claim about Vioxx and this man's heart attack, which expert should she call?

Mistakes of Fact

¶8 A challenge of fact checking—and any research—is knowing which source to believe or how many sources to check to make sure what you have is right. Sometimes sources that are generally reliable can be mistaken. For example, there are published sources saying that one dean of our law school (Judson Falknor) was the son-in-law of the first dean (John T. Condon). It would be easy to repeat that.

4. JOEL BEST, *STAT-SPOTTING: A FIELD GUIDE TO IDENTIFYING DUBIOUS DATA* (2008).

5. McPhee, *supra* note 2, at 56–58.

6. Michael E. Tigar, *The Vioxx Litigation: Two Case Studies*, in *TRIAL STORIES* 399, 423 (Michael E. Tigar & Angela J. Davis eds., 2008).

7. *Id.* at 441.

Yet there are other published sources that say he was the first dean's nephew-in-law, the version supported by surviving relatives and thus the one I believe.

¶9 Another layer of fact-checking comes into play once the professional fact-checker's work is done:

After an error gets into *The New Yorker*, heat-seeking missiles rise off the earth and home in on the author, the fact-checker, the editor, and even the shade of the founder. As the checking department summarizes it, "No mistakes go unnoticed by readers." . . .

On the scattered occasions when such a message has come to me, I have written to the reader a note of thanks (unless the letter is somewhere on the continuum between mean-spirited and nasty, which is rarely the case). "You're right!" I say. "And I am very grateful to you, because that mistake will not be present when the piece appears in book form."⁸

¶10 Even with small, in-house projects, I've had readers question my facts, too, although I thought my sources were reliable. For instance, trying to track down University of Washington School of Law alumni who have held public office, I came across Marion Anthony Zioncheck, who immigrated from Poland as a child in 1901 and became a U.S. representative in 1933. The *Biographical Directory of the United States Congress* said that Zioncheck "attended the University of Washington at Seattle from 1919 until graduated from the law department in 1929; was admitted to the bar the same year and commenced practice in Seattle, Wash. . . .,"⁹ so I included him on my list.¹⁰ But a staff member in the law school's development office said he wasn't in the law school's records. The staff member wasn't convinced by the two newspaper articles we located that also said he had a law degree from the University of Washington.

¶11 I contacted the manuscripts division of the University Libraries, which has his papers, and a librarian there got to the bottom of it. According to a 1936 article in the student newspaper, he attended the law school for eleven quarters but never received a degree. "At that time the State Bar only required certain law courses as prerequisites for taking the test."¹¹ He wasn't a graduate, but he was a former student, so I think we could include him on the list, perhaps with an asterisk indicating he didn't receive a degree. There's precedent for this. For instance, our school has always been proud of its former student William L. Dwyer, who was a successful practitioner and well-respected district court judge, although he got his J.D. at New York University after beginning his studies at the University of Washington. And Harvard refers to Bill Gates as "a member of the Harvard College Class of 1977," even though he left during his junior year.¹²

8. McPhee, *supra* note 2, at 59.

9. BIOGRAPHICAL DIRECTORY OF THE UNITED STATES CONGRESS 1774–2005, at 2217 (2005).

10. After Zioncheck committed suicide in 1936, Warren G. Magnuson was elected to his seat. Magnuson, who was definitely a graduate of our law school (class of 1929), later became a powerful senator. *Id.* at 1490; SHELBY SCATES, WARREN G. MAGNUSON AND THE SHAPING OF TWENTIETH-CENTURY AMERICA 57–58 (1997).

11. E-mail from Hepzibah Schenkelberg, Reference Specialist, Special Collections Division, University of Washington Libraries, to Mary Whisner, Mar. 20, 2009 (quoting *Memories of a Prankster: Zioncheck Once Student Prexy*, UNIV. WASH. DAILY, June 4, 1936) (on file with author).

12. Ken Gewertz, *Bill Gates to Speak at Commencement*, HARV. UNIV. GAZETTE ONLINE, Mar. 21, 2007, <http://www.news.harvard.edu/gazette/2007/03.22/99-gates.html>.

Lies and “Lies”

¶12 Not every publisher has a fact-checking staff as vigilant as the *New Yorker's*. And no matter how hard editors work to confirm stories, things can go wrong. Things went wildly wrong with a story in the *New York Times Magazine* some years ago.¹³ Michael Finkel gathered information on child labor in West Africa. When he returned to New York, his editor suggested he write his piece focusing on just one child. Rather than tell his editor that he didn't have the material to do that, he made it up, creating a composite character based on various interviews.¹⁴ The paper's fact-checkers could not check most of the story:

Articles in *The Times Magazine* are examined by fact checkers. When principal sources cannot be reached by telephone or e-mail, as was the case here, the magazine relies heavily on the author's account. The checker questioned the author's French-language translator, who confirmed some facts in the article but left other questions unanswered. The checker also approached the psychologist, who replied by e-mail that he was no longer working at Save the Children and could not answer her questions. The telephone number for the Malian Association, a welfare group mentioned in the article, was not working at the time.¹⁵

The article was published, but here's another situation where readers provide an extra check. Save the Children Canada, which had been mentioned in the article, sent staff into the Malian countryside and found significant differences between Finkel's report and the story told by the boy he'd named in the article.¹⁶ Eventually Finkel told his editor enough to lead to an investigation. Unable to show notebooks supporting his report, he admitted what he had done. The *Times* dismissed him.¹⁷

¶13 I read Finkel's saga in a book he wrote that was a true-crime story as well as a memoir. He recounts how, in a remarkable coincidence, a suspected murderer was discovered hiding in Mexico claiming to be a *New York Times* reporter—Michael Finkel, in fact—just as Finkel was losing his job because of journalistic dishonesty. The real Finkel took as his next writing project a portrayal of this man, his crime, and his trial. The account of a liar and schemer who eventually killed his wife and children when his lies were about to catch up to him is an interesting story in itself, made more interesting by Finkel's reflections on the themes of honesty and deceit.

¶14 It might seem odd that I believed Finkel's book despite his confession in the first chapter about lying in the *New York Times* article. Oddly, Finkel's past may have made the book more credible. He wanted the book to resuscitate his career as a journalist, so I thought he was likely to have been particularly careful in his reporting. And, given the false article, surely the publisher would have been careful

13. The story was Michael Finkel, *Is Youssouf Male A Slave?*, N.Y. TIMES, Nov. 18, 2001, § 6 (Magazine), at 43. How things went badly wrong is recounted in MICHAEL FINKEL, TRUE STORY: MURDER, MEMOIR, MEA CULPA (2005).

14. See FINKEL, *supra* note 13, at 35, 36.

15. *Editor's Note*, N.Y. TIMES, Feb. 21, 2002, at A3.

16. FINKEL, *supra* note 13, at 90.

17. *Id.* at 91–95.

in accepting and editing the manuscript. In any event, I did believe it, so I present the facts above as facts, without any other verification.¹⁸

¶15 I recently heard another journalist talk about a story later regretted because it wasn't true. In 1987, Jack Hamann created a television documentary about the 1944 riot of African American soldiers, the lynching of an Italian prisoner of war, and the court-martial of the soldiers—all at Fort Lawton, in Seattle. Now he says that the documentary “mostly” was a “lie”—although “[n]ot an intentional lie, mind you, but the continuance of a falsehood that the army had foisted on the press in 1944, and the press had all too willingly passed along to the public.”¹⁹

¶16 Later he returned to the story and, with his wife, interviewed survivors and dug through thousands of pages of transcripts and reports. The court-martial was the largest in Army history—forty-three men tried together—and was the longest trial of World War II. The Army prosecutor became one of the most prominent trial lawyers in America—Leon Jaworski. In *On American Soil* Hamann details the many ways that the cards were stacked against the defendants—notably by denying their counsel access to an exhaustive investigative report that Jaworski was able to use. And Hamann believes that the black soldiers did not lynch the Italian prisoner.

¶17 Hamann's book drew the attention of members of Congress, who asked the Army to review the case. The Army Board for Correction of Military Records concluded that the trial was “fundamentally unfair and improper.”²⁰ The convictions were overturned, the dishonorable discharges erased. And Congress appropriated funds for back pay, with interest.²¹

¶18 Hamann has not convinced everyone, though. When he gave a lecture recently, a protester distributed a flyer saying that his argument that the black soldiers did not commit the murder was “a laughably far-fetched, politically motivated revision of the story.”²²

18. Memoirs present special challenges for people who want to sort fact from fiction. See, e.g., Jessica Lewis, *Truthiness: Law, Literature & the Problem with Memoirs*, 31 RUTGERS L. RECORD 1 (2007), http://lawrecord.typepad.com/rutgers_law_record/files/Truthiness_article_Spring2007.pdf.

19. JACK HAMANN, *ON AMERICAN SOIL: HOW JUSTICE BECAME A CASUALTY OF WORLD WAR II*, at xiv (2005). As I was working on this piece, I came across a similar statement: “Commercial television, in the view of some, provides mostly ‘highly engineered lies’ for the benefit of the sponsors and a docile audience.” HOWARD GARDNER ET AL., *GOOD WORK: WHEN EXCELLENCE AND ETHICS MEET* 50 (2001). Hamann, though, was trying to get it right and tell an important piece of history, not merely entertain his audience.

20. In re Townsell, No. AR20060015002 (Dep't of Army Bd. for Correction of Military Records, Oct. 18, 2007), at 8, available at http://www.jackhamann.com/pdf/Fort_Lawton_decision.pdf. A redacted version of the case is available at United States Dep't of the Army, Army Board for the Correction of Military Records (BCMR) CY2006, http://boards.law.af.mil/ARMY_BCMR_CY2006.htm (last visited Apr. 20, 2009). Other opinions concerning the Fort Lawton defendants are No. AR20070009496 (Oct. 18, 2007); AR20060015000 (Oct. 18, 2007); AR20070002462 (Oct. 18, 2007).

The Board's web site has this FAQ: “Question: Who will know about my case? Answer: Submission of an application is a private matter between the applicant and the Board/Board staff and Privacy Act provisions apply.” Army Board for Correction of Military Records, Frequently Asked Questions, <http://arba.army.pentagon.mil/abcmr-faq.cfm> (last visited Apr. 20, 2009).

21. Duncan Hunter National Defense Authorization Act for Fiscal Year 2009, Pub. L. No. 110-417, § 592, 122 Stat. 4355, 4474 (Oct. 14, 2008). See Martin E. Comas, *Army Pays for Old Injustice*, ORLANDO SENTINEL, Oct. 16, 2008, at B2.

22. Fort Lawton Rioters “EXONERATED?” (unsigned flyer distributed Mar. 6, 2009, Suzzallo Library, University of Washington) (on file with author).

¶19 From hearing him speak and reading his book, I believed Hamann. And that belief was bolstered by the Army's decision exonerating the soldiers. Nothing I've heard about the Army suggests that it is an institution that lightly says, "we made a whopping mistake," least of all for reasons of "political correctness." But when I actually read the Army decision, I saw that it did not say the defendants did not commit the offenses. What it did say—strongly—was that they were denied due process. So from the opinion alone, one can continue to believe that the soldiers committed the crimes, as the protester suggested. But even without the Army totally exonerating the men, I still have Hamann's thorough and careful journalism, and I still believe that his account is much more likely to be true than that of the anonymous protester.

¶20 One lesson to draw from Hamann's story is that news reports may later prove to be false. This is so even when they are widely repeated and become part of a community's shared "knowledge." For instance, the oft-repeated story that Kitty Genovese's murder was witnessed by thirty-eight people is not supported by the evidence presented at her killer's trial.²³ And the centrality of "the Twinkie defense" in the trial of Dan White for the murder of Harvey Milk has been greatly exaggerated.²⁴

Care with Statistics

¶21 Because statistics are often used to support an argument, Joel Best's *Stat-Spotting*²⁵ is devoted to showing ways to sort fact from falsehood. It encourages critical thinking about statistical claims of the sort that are commonly in the news—people living in poverty, ownership of guns, prevalence of methamphetamine use, women killed by domestic violence, inequalities between races, extent of wetlands, and so on. Because the author teaches legal studies, it should be no surprise that his examples are in areas that could well come up in a law school seminar, a brief, or a law review article. And so the book's lessons could be helpful for legal researchers.

¶22 I've heard law students joke that if they were any good at math they'd be in business school. The book is aimed at just this sort of person. And the book offers lots of sound advice without making the mathphobe revisit even junior-high-level algebra: there's not a Greek letter or an exponent in it. But it will help readers spot "dubious data": for instance, statistics that are inconsistent with figures you already know (and Best encourages us to learn a few such figures, such as the approximate population of the United States); numbers that are too high or low because of a misplaced decimal point or other arithmetic blunder; or estimates that are presented as fact.

23. See Rachel Manning et al., *The Kitty Genovese Murder and the Social Psychology of Helping: The Parable of the 38 Witnesses*, 62 AM. PSYCHOLOGIST 555, 557–58 (2007).

24. See "Twinkie Defense" an Urban Legend?, Posting of Mary Whisner to Trial Ad (and Other) Notes, Jan. 16, 2006, <http://trialadnotes.blogspot.com/2006/01/twinkie-defense-urban-legend.html>.

25. Best, *supra*, note 4.

¶23 Some of Best's points have to do with how information is presented and what counts as newsworthy. Advocates may describe shocking cases as if they are more common than they really are,²⁶ and journalists "look for things to report that can be packaged as novel, as happening or being discovered for the first time."²⁷

Preliminary Results

¶24 I was particularly struck by Best's discussion of scientific discoveries, which make news most when they are quite new and hence not fully tested. Here's the rub: "as scientists check the reported findings and conduct further research, some of those discoveries will prove to be wrong."²⁸ He cites a study in *JAMA* that found that almost one-third of a sample of frequently cited clinical research reports (reports cited at least 1,000 times) were later found to be wrong: either a treatment was not effective or was less effective than was originally reported.²⁹

¶25 We legal researchers know that in legal research it is always important to update, checking for amendments to statutes and subsequent history of cases, for instance. But when we dabble in unfamiliar areas like medicine or science it might be tempting to use an article (or newspaper story about an article) for our facts without further investigation. The *JAMA* study is a good reminder that updating is important in other fields, too. It also shows the value of the advice that when using medical or science databases it is best to look for a review article—an article where an expert in the field reviews a number of studies—so that the researcher doesn't rely on a small-scale study that was later discredited.

Getting Writing Right

¶26 Matters of English usage and style are not factual, but they do relate to getting things right. And the two feel intertwined in my own experience. I bought *Stat-Spotting* and *Garner on Language and Writing* at the same time, and read them together (while also going to a lecture by Jack Hamann). They are intertwined in less contingent ways as well: some of the same habits—critical thinking, double-checking, and proofreading—that can help get facts straight also are important for writing.

¶27 I once heard a law professor say that students should take their legal research and writing course seriously because "looking it up and writing it down" is how they'll make their living.³⁰ We reference librarians might specialize in "looking it up," and we aren't responsible for the brief that will persuade the court of the merits of a client's cause, but it's still good for us to pay some attention to "writing

26. *See id.* at 36.

27. *Id.* at 76.

28. *Id.* at 84.

29. *Id.* at 85 (citing John P. A. Ioannidis, *Contradicted and Initially Stronger Effects in Highly Cited Clinical Research*, 294 *JAMA: J. AM. MED. ASS'N* 218 (2005)).

30. A journalist expressed the relationship between investigative reporting and writing or producing the news this way: "It's not just the knowing, and it's not just the telling, it's a Siamese-twin relationship between the two. The finding out *and* the telling." GARDNER ET AL., *supra* note 19, at 188.

it down.” Good writing can communicate our ideas better—whether in a research memo or a blog post. And bad writing can hurt our credibility. So I’ll add to this discussion of getting facts right a few remarks about getting writing right.

¶28 *Garner on Language and Writing* contains a variety of short articles, including advice for law students, advice for lawyers, commentary on judicial writing, essays on different usage topics, and tributes and autobiographical essays. One could dip into it here and there to find useful bits of advice or an amusing book review or portrait. But I started in on page xiii and read all the way through to the end. Because the individual chapters are drawn from a couple of decades of Garner’s output and once stood alone, there’s a bit of repetition, but not as much as you might expect.

¶29 One thing I gained from this immersion was the overwhelming sense that improving one’s writing is worthwhile. No matter what the particular topic Garner is discussing, that is the underlying value: writing is important; it’s good to take care.

¶30 Another underlying theme that becomes clear in the course of the book is that writing well is the work of a lifetime. Garner has plenty of self-confidence when it comes to matters of style and usage (deservedly so), but even he has colleagues proofread his work and suggest improvements.³¹ Since he does, no one among us should be too proud to ask someone to look over our work to point out ambiguities and tangled syntax.³²

¶31 Although some of Garner’s book focuses on legal writing, much of his advice can profit even those who never will write a brief or draft a contract. For instance, keeping a journal can help it seem natural to put words on paper (or a computer screen).³³ That was one reason I started a journal in college: I wanted writing to be less of an effort. Garner also suggests forming a writing group.³⁴ And he suggests that lawyers “read at least one book each quarter on language and writing.”³⁵ Although that advice is aimed at lawyers, anyone can take it! And Garner’s book is a good selection to put on your reading list.³⁶

31. See note 3, *supra*.

32. Taking Garner’s advice to heart, I had four friends read this before sending it to *Law Library Journal’s* editor. Each of them—Mary Hotchkiss, Nancy McMurrer, Cheryl Nyberg, and Nancy Unger—had helpful suggestions that improved my writing. And of course the editor did too.

33. BRYAN A. GARNER, *The Benefits of Keeping a Daily Journal*, in GARNER ON LANGUAGE AND WRITING, *supra* note 3, at 27, 27.

34. BRYAN A. GARNER, *Why You Should Start a Writing Group*, in GARNER ON LANGUAGE AND WRITING, *supra* note 3, at 31.

35. BRYAN A. GARNER, *From The Record*, in GARNER ON LANGUAGE AND WRITING, *supra* note 3, at 593, 597; see also BRYAN A. GARNER, *A Lifetime Reading Program*, in GARNER ON LANGUAGE AND WRITING, *supra* note 3, at 609, 610.

36. I greatly respect Garner’s work and agree with most of his positions. However, we part ways at the bottom of the page. He dislikes footnotes with anything but citations. See, e.g., BRYAN A. GARNER, *Clearing the Cobwebs from Judicial Opinions*, in GARNER ON LANGUAGE AND WRITING, *supra* note 3, at 448, 448. And I can’t resist going off on an occasional tangent. Garner is usually discussing briefs and judicial opinions, two very special genres (although he also foreswore footnotes when he edited the *Scribes Journal of Legal Writing*. *Id.*) I think a tangent like this one is more appropriate in writing like this column. For a celebration of footnotes, see OLIVER SACKS, *UNCLE TUNGSTEN* 195 n.2 (2001):

In his very first footnote [in *The Principles of Chemistry*], in the preface, [Dmitri] Mendeleev spoke of “how contented, free, and joyous is life in the realm of science”—and one could see, in

¶32 Perhaps because it plays to my own passion for reading, I do really like Garner’s advice to “read widely and attentively.”³⁷ And it doesn’t have to be stacks of legal treatises—in fact, it should include plenty of good writing from outside law. He quotes Judge Frank Easterbrook:

The best way to become a good legal writer is to spend more time reading good prose. And legal prose ain’t that! So read *good* prose. And then when you come back and start writing legal documents, see if you can write your document like a good article in *The Atlantic*, addressing a generalist audience. That’s how you do it: get your nose out of the lawbooks and go read some more.³⁸

In a final chapter, Garner offers an eclectic list of good reading—“examples of first-rate writers at work.”³⁹ If you like to read, this is a great excuse to indulge your habit, knowing that you’re not just reading: you’re working on your writing!

Conclusion

¶33 There is value in getting things right. Striving to get things right is part of what makes us professionals. And it’s part of what makes our work satisfying. In this essay, I have visited a number of problem areas—places where getting it right can be challenging.

¶34 In several of the problem areas, what appeared to be reliable—published newspaper accounts, published medical studies—turned out to be wrong. But we can’t do our jobs if we believe nothing that’s published. (Imagine answering every reference question: “I really can’t say. I found some articles, but they might be wrong, so who knows?”) We can’t view each article in the *New York Times* as one that’s written by a journalist who’s making it up—but it’s good to be aware that some stories do turn out not to be true. Not every medical study is later discredited, but some are, so we need to be alert to that possibility.

¶35 There are ways to increase the odds of getting it right. If we find one news story, we can check for others to see whether they’re consistent. We should welcome the patrons or readers who say, “I don’t think the information you found is right,” and explore further. If we find one medical study, we can see whether there are later studies criticizing it—or a review article explaining how it fits into the body of research in its field. We can learn to read statistical claims critically. To improve our writing, we can get colleagues to proofread and make suggestions, we can read usage books, and we can read writers whose work shines.

¶36 Getting it right isn’t always easy—or even possible—but it is worth trying.

every sentence, how true this was for him. The *Principles* grew like a living thing in Mendeleev’s lifetime, each edition larger, fuller, more mature than its predecessors, each filled with exuberating and spreading footnotes (footnotes which became so enormous that in the last editions they filled more pages than the text; indeed, some occupied nine-tenths of the page—I think my own love of footnotes, the excursions they allow, was partly determined by reading the *Principles*).

37. BRYAN A. GARNER, *The Importance of Attentive Reading*, in GARNER ON LANGUAGE AND WRITING, *supra* note 3, at 15, 17.

38. *Id.* at 16–17.

39. BRYAN A. GARNER, *Recommended Sources on Language and Writing*, in GARNER ON LANGUAGE AND WRITING, *supra* note 3, at 709, 740–44.

