WRITING TIP #10

Misplaced Modifiers

Rule 1
PLACE LIMITING MODIFIERS DIRECTLY IN FRONT OF OR BEHIND WHAT THEY ARE LIMITING.

“Almost,” “also,” “even,” “ever,” “exactly,” “hardly,” “just,” “merely,” “only” – commonly misplaced limiting modifiers - can easily change the meaning of the sentence.

Only the defendant thought that the car was rented.
(No one but the defendant thought that the car was rented.)

The defendant only thought that the car was rented.
(He did not know for sure whether the car was rented.)

Rule 2
PLACE MODIFYING PHRASES AND CLAUSES WHERE READERS CAN RECOGNIZE WHAT THEY MODIFY.

MISPLACED: He described the robber as a six-foot tall man with a heavy mustache weighing 150 pounds.

REVISED: He described the robber as a 150-pound, six-foot tall man with a heavy mustache.

MISPLACED: Grace Keeley learned about the death of Philip Ramirez by telephone.

REVISED: Grace Keeley learned about the death of Philip Ramirez when Ramirez’s company telephoned her.

RULE 3
AVOID SPLITTING INFINITIVES WITH MODIFIERS.

MISPLACED – The plaintiff should try to, if possible, avoid going up and down stairs.

REVISED – If possible, the plaintiff should try to avoid going up and down stairs.

¹ These Writing Tips are adapted in part from Laurel Currie Oates and Ann Enquist, The Legal Writing Handbook (5th ed. 2010); Diana Hacker, The Bedford Handbook (8th ed. 2009); and Gertrude Block, Effective Legal Writing (5th ed. 1999).