

APPELLATE WRITING TIP

Punctuation in Connection with Quotations

We see a lot of wacky punctuation in connection with quotation marks, and that's understandable – it's difficult (and the English do it differently). Does the comma go inside or outside the quotation mark? When do you use a comma before a quote? Does a question mark go inside or outside the quotation marks? Here are some good tips on American-style punctuation from The Writing Center at Georgetown University Law Center. A few of our own examples are thrown in.

- 1) Use a comma before a quote when a phrase introduces the quote, but do not use a comma if the quote is integrated into a larger sentence.
 - He replied, "I think the car was blue."
 - He replied that the car was "blue with white racing stripes."
 - Mother told the DCF social worker, "If you come into my house again, I'll kill you with an axe."
 - Mother told the DCF social worker that she would "kill [her] with an axe" if she ever came into her house again.
- 2) Commas and periods always go inside of the closing quotation mark.
 - Paternal grandmother thanked the social worker and said, "Getting my granddaughter was the best thing that ever happened to me."
 - Paternal grandmother told the social worker, "You are a terrible liar," and then kicked her out of the house.
- 3) All other marks go inside the closing quotation mark only if the mark is part of the quote.
 - He asked, "What time is lunch?"
 - Mother told the social worker, "You are the best social worker in the world!"
- 4) All other marks go outside the closing quotation mark if the mark is part of the larger sentence.
 - Did he really call his classmate an "obsequious sycophant"?
 - She said "next Sunday"; however, I think she meant tomorrow.
 - Did Mother really mean it when she told the social worker that she was "the best social worker in the world"?
 - These are the services DCF demanded that Mother do after Mother called him "a huge moron": (1) an anger management class; (2) . . .
- 5) Don't use punctuation in parenthetical explanations if there isn't any punctuation in the quote:
 - Johnson, 489 Mass. at 4 (holding that the defendant waived counsel by "being unruly").

But do include punctuation if that punctuation is in the quote, or if your parenthetical is a complete sentence:

- Johnson, 489 Mass. at 4 ("The defendant was unruly and therefore waived counsel.").

For additional information, see Tips for Effective Punctuation in Legal Writing, The Writing Center at Georgetown University Law Center (2005), available at: <https://www.law.georgetown.edu/wp-content/uploads/2018/11/Tips-for-effective-punctuation.Suther.Roberts.2006.revised.pdf>