

# CAFL Appellate Practice Tip

CAFL Appellate Panel Support Unit  
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## PARALLELISM: WRITING LISTS AND SEQUENCES

What is parallelism? A sentence is parallel when items in a series share the same grammatical structure – for example, when all are nouns or verbs or gerund phrases. This sounds pretty gibberish-y, I know, but if the sentences in your brief lack parallelism, the reader can get confused. Here are some basic rules and examples to illustrate them:

### **Don't mix nouns and gerunds in a list**

How about this sentence?

To comfort the child, Mother tried pacifiers and patting the child's back.

This sentence isn't wrong, but it's awkward. The problem is that the two things the mother tried are a common noun and a gerund phrase (that is, an “-ing” verb acting as a noun). Pick one or the other, but don't mix them:

To comfort the child, Mother tried using a pacifier and patting the child's back. (Two gerunds – “using” and “patting”)

### **Use the same verb tense throughout the sentence**

What's wrong with this sentence?

The police officer testified that the father raised his voice, lunged toward him, and was yelling profanities.

The tenses are inconsistent. Using parallel tenses, it sounds much better:

The police officer testified that the father raised his voice, lunged toward him, and yelled profanities.

Or:

The police officer testified that the father was raising his voice, lunging at him, and yelling profanities.

**Each item in a series must be the same grammatically**

Problem sentence:

Mother shot heroin, Fentanyl, and snorted Percocet.

Instead, try this:

Mother shot heroin and Fentanyl, and she snorted Percocet.

(The first sentence would be parallel if it read: Mother shot heroin, shot Fentanyl, and snorted Percocet. But using the verb “shot” twice looks awkward, so we want to avoid it.)

In briefs, we often see discussions of service/action plan tasks that lack parallel structure:

In January 2018, DCF gave Mother a service plan that required that she attend counseling, AA/NA meetings, get a substance use and anger management evaluation, visit with her children monthly and with her DCF social worker.

Each item in this list is not the same grammatically, and it is very confusing. If we tweak it just a bit to make it parallel, it’s much better:

In January 2018, DCF gave Mother a service plan that required that she attend counseling and AA/NA meetings; obtain substance use and anger management evaluations; visit with her children monthly; and meet with her DCF social worker.

It’s easier to see whether your sentence is parallel if you put it in list form:

In January 2018, DCF gave Mother a service plan that required that she:

- Attend counseling and AA/NA meetings;
- Obtain substance use and anger management evaluations;
- Visit with her children monthly; and
- Meet with her DCF social worker.

By putting your list in this form with bullet points, you can see that each item begins with a verb (in the correct form and tense). In fact, it's also easier for the judges to see it in this format.

For more information, see:

The Writing Center at George Mason University  
(<https://writingcenter.gmu.edu/guides/parallel-structure>)

Purdue Online Writing Lab  
([https://owl.purdue.edu/owl/general\\_writing/mechanics/parallel\\_structure.html](https://owl.purdue.edu/owl/general_writing/mechanics/parallel_structure.html))