

IAN NEIL'S STYLE GUIDE

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A. THE IMPORTANCE OF STYLE

Style is critical. Without it, meaning is obscured or lost altogether. Writing with style means writing clearly, concisely and persuasively.

Recommended texts

If you are interested in reading more widely into the subject of writing with style then I recommend 3 texts: E Gowers, *Plain Words*, revised by R Gowers (2014); HW Fowler, *A Dictionary of Modern English Usage: The Classic First Edition*, edited in 2009 by D Crystal (be careful not to get any other edition, particularly the one produced in 2005, which is rubbish), and EB White and W Strunk, *The Elements of Style* (any edition). They are available from any online bookseller, such as The Book Depository. I also recommend the writing of David Garner, which is directed to a legal audience. Try *Garner on Language and Writing* and, with A Scalia, *Making Your Case: The Art of Persuading Judges. Writing for the Court*, by JC Raymond (2010), is the most insightful work on preparing written submissions that I have read, and the structure and style of written submissions that we will follow draws heavily on its precepts. If we are going to write submissions together, I recommend that you get your own copy, or borrow mine, and read at least Chapter 2.

The golden rules

‘Be short, be simple, be human.’ (Gowers) ‘The surest way to arouse and hold the reader’s attention is by being specific, definite and concrete.’ (Strunk) ‘Broadly speaking, the short words are the best, and old words are even better.’ (Churchill) ‘I didn’t have time to write a short letter, so I wrote a long one instead.’ (Twain) ‘Value clarity above all other elements of style.’ (Scalia and Garner) These are golden rules that should guide all of your written work. No one is perfect in this, but we should all try, always. To this I add: ‘Avoid jargon, including legal jargon.’ There are some legal concepts that can only be expressed using specific and recognised legal words. The use of those words is unavoidable. But subject to that one qualification, even difficult legal concepts should be expressed according to the golden rules.

B. EXPRESSION AND VOCABULARY

Active voice

Always use the active voice. So, for example, ‘I will always write clearly’, rather than ‘My writing will always be clear’. In the final version, we may occasionally revert to the passive voice, but only for good reason. A related rule is to prefer positive to negative forms, whenever the sense and the meaning you want to convey allows it: for example, ‘dishonest’ is usually better than ‘not honest’, or ‘forgot’ instead of ‘did not remember’.

Adjectives and adverbs

In a submission, do not use them at all, unless they describe quantities or relativities, in which case you can use them carefully. For example, it is acceptable to say that something was a ‘small’, ‘large’ or ‘substantial’ amount – although actual amounts would be better. Or, if you are describing a particular factor influencing a decision, ‘incidental’, ‘significant’ or ‘decisive’ are examples of acceptable terms to describe the degree of influence. On the other hand, for example, if the submission is addressing a judge’s error, or an error in our opponent’s argument, it does not add anything to describe that error as, for example, ‘serious’, ‘inexplicable’, or ‘gross’. If you are working on an affidavit, you can use adjectives or adverbs only if you truly think that the accuracy and sense of the witness’ evidence will be compromised without them. That will hardly ever be the case. If you have to use an adverb, place it with the verb, not at the beginning or end of the sentence: for example, ‘He decided (*verb*) quickly (*adverb*)’, rather than ‘Quickly, he decided’.

‘Around’ and ‘about’

When identifying a date or time in an affidavit, use ‘on or about 9 July’ rather than ‘around 9 July’.

Capitalising

Use initial capitals to begin sentences and for proper nouns. Job and position titles are not proper nouns.

Colloquial language

Never use colloquial or shorthand language, unless quoting the language of a witness in an affidavit or statement. For example, people do not ‘phone’, they ‘telephone’, and ‘was not’, ‘cannot’ and ‘did not’ should always be used rather than ‘wasn’t’, ‘can’t’ and ‘didn’t’. However, use modern spellings for modern words, like ‘email’ and ‘text’. Use common words in a common-sense and natural way, as Churchill advised: for example, we now drive ‘cars’ and ‘trucks’ rather than ‘motor vehicles’, we ‘walk’ rather than ‘proceed’, and we ‘begin’ rather than ‘commence’. For some reason, the drafters of affidavits often describe cafés (where, oddly, legally significant events often occur) as ‘coffee shops’. Use the former expression.

First, second, third and so on

Sometimes these words are used at the start of a sentence to enumerate the points being made: for example, ‘There are two things I must do today. First, draft the submission. Second, proof read and check it.’ I like this style. However, when it is used, never use ‘ly’ at the end of the word in question, as in ‘first~~ly~~’ or ‘second~~ly~~’.

Judges and judgment

In any text, refer to a judge by name as ‘Smith J’, and never ‘Justice Smith’ or ‘his Honour Justice Smith’. Two or more judges together are referred to as ‘Smith and Jones JJ’. Judges of appeal are called ‘Smith JA’, or, if two or more, ‘Smith and Jones JJA’. If the name of the judge is understood, you may use his or her

Honour instead: for example, 'It was in this context that his Honour said ...'. Note that in such instances the pronoun is always lower case.

In appeal submissions

In submissions in an appeal, never refer to the judge whose decision is being appealed by name. Use 'the primary judge'. However, on the first occasion in any submission in which the primary judge is referred to, use 'the learned primary judge'. The judgment from which the appeal is taken is referred to as 'the primary judgment'. Note that courts deliver 'judgment', and never 'judgement'. The latter is used in every other case.

Names

People are to be referred to for the first time using both their given and family names, and thereafter as 'Mr X' or 'Ms Y', unless the family or personal relationship between the maker of an affidavit and the person in question makes the use of the latter's given name more appropriate and natural. Never refer to any person using only their family name – for example, 'Smith' – as it is disrespectful. Do not insert a full stop after the first initial of a person's name or title, so 'Mr R Gowers' rather than 'Mr. R. Gowers'. Avoid acronyms, unless they are familiar and conventional (for example, 'ASIC', 'CFMEU', or 'ICAC'), in which case use the full name for the first mention, and the acronym thereafter.

Pronouns

Use 'who' for people, and 'that' for everything else.

'Which' and 'that'

Use 'that' for a defining relative clause, and 'which' for a non-defining relative clause.

Words to avoid

'And/or'

Never use this expression. Say instead, for example, 'one or both of' or 'any one or more of'.

Approximations

Expressions like 'almost' and 'nearly' are imprecise. Use something specific.

Intensifiers

Do not use words like 'very', 'really', 'quite', 'basically', 'really', or any other intensifier.

Other words to avoid

These include ‘contact’ (as in ‘contacting’ people, when you mean something other than touching them), ‘range’, ‘outcome’ or ‘outcomes’, ‘various’, ‘literally’, ‘necessitate’, ‘point in time’, ‘utilise’, ‘things’, ‘due to’, ‘in due course’ or ‘in order to’. I encourage you to think about other words that annoy you, and to avoid using them.

Overstatement

Please be especially alert to this vice. For example, ‘I was shocked when I saw my child run over’ is one thing, and perfectly acceptable, but ‘I was shocked to find that the dishes had not been washed’ is another, and is not acceptable. Always tone down rather than up.

‘Respectfully’ and ‘with respect’

Do not use them, ever.

‘Would’

Judges are unimpressed when witnesses say in an affidavit, for example, ‘I would meet him each Friday’. The correct way is to say, ‘My usual practice was to meet him each Friday’.

C. SPELLING, PUNCTUATION AND GRAMMAR

These should be perfect. If time permits, the document will be proof read and edited by a professional editor who I will engage for that purpose. However, you should make every effort to get it right before you give any draft to me to settle. I will not take up much space here talking about spelling and punctuation, because their importance is obvious. The books I have recommended will help, as will a good dictionary. As to the latter, I prefer any Oxford Dictionary to the Macquarie.

The only point I will make about **spelling** is that I always use Australian spelling, rather than American: thus, ‘labour’ rather than ‘labor’, and ‘authorise’ rather than ‘authorize’. This will infuriate your computerised spell checker, so you will have to educate it, or be forever annoyed. An easy way to do this is to use the ‘Add’ function whenever your spellchecker insists on an American spelling.

As to **punctuation**, never use a comma when a full stop is correct. Ensure that colons and semi-colons are used correctly. All the recommended textbooks discuss this problem. And I prefer to use the Oxford comma in lists: thus ‘red, white, and blue’, rather than ‘red, white and blue’. I think it is usually clearer, even if it is a bit old fashioned.

Grammar is more difficult. The only points I will make here are that, if you want to split an infinitive, or end a sentence with a preposition, then do so consciously and for a good reason: for example, sometimes they can make a sentence sound more natural. Confusion between ‘which’ and ‘that’ is always unacceptable. Avoid misplaced modifiers. You can start a sentence with ‘And’, ‘But’, ‘Or’, or any other conjunction, as

long as the conjunction precedes a complete sentence. There are useful articles about all these problems in Gowers, Fowler, and Raymond.

Colons and semicolons

Colons are used after an independent clause (that is, a clause that can stand by itself) to introduce a list of particulars, an amplification, or an illustration: for example, just as it is being used in this sentence. Semicolons are used in two ways: to avoid ambiguity in long lists that already contain commas, as in this example; and to join two independent clauses. The latter usage is for connecting the ideas expressed in the two independent clauses more closely than could be achieved with a full stop (as in the next sentence), while avoiding the direct connection made by a conjunction. Colons and semicolons are frequently misused but they each have a specific role; do not use a semicolon to do a colon's work.

Commas

A comma is used to separate items in a list (see [Spelling, punctuation and grammar](#) above for the Oxford comma); before and after words in apposition; with a coordinating conjunction to join two independent (main) clauses; and where it is needed to avoid ambiguity. It is not used to join two independent clauses – that is a job for a semi-colon. For example, this is correct: 'I knew I should not use a comma; however, I did so anyway.' This is incorrect: 'I knew I should not use a comma, however I did so anyway.' If you find yourself writing 'however' immediately after a comma, you will know you are making a mistake.

Hyphens

Hyphens are used to create compound words, such as 'decision-making', to mark common prefixes, as in 'semi-colon' and 'sub-paragraph', and to join modifiers (adjective and adverbs). Examples of the latter include 'full-time employment' and 'used-car salesman'. Hyphens are not always necessary, but they should be used in cases of ambiguity to clarify meaning. For example, 'The officer searched the high school students for drugs' is ambiguous. Different application of the hyphen changes the meaning: 'The officer searched the high school-students for drugs'; 'The officer searched the high-school students for drugs'.

Tense

Never use the present tense. Always use the past tense for something that has happened in the past, and the future tense for something that will happen in the future. Do not change from one tense to another.

D. REFERENCES

Affidavits

If an affidavit is referred to in the main body of any text it should be, for example, 'the affidavit made by Ms X on 1 July 2014', and, in a footnote, 'Affidavit, X, 01.07.14'.

Annexures

Annexures are documents that are attached to an affidavit. They should always be referred to in the main body of the text of the affidavit or any other document as, for example, ‘Annexure 1’, but in footnotes in a submission as ‘Ann 1’. Note that there is an initial capital in both versions, but no full stop after the ‘Ann’. In an affidavit, use ‘Annexed and marked “A” ’; the word ‘hereto’ after ‘annexed’ is redundant.

Authorities

Unless there is a good reason not to do so, include the name of any authority in the main text, and put the citation or other bibliographic information in a footnote. Always use the full name of any authority when you refer to it for the first time. If you mention the same authority again, use your judgement as to how you refer to it. If the references are close together, you can use a distinctive word or words (usually the first) from the name of the case to take the place of the whole name, but in that case still give the full citation in the footnote. If the references are far apart, revert to the full name. Never define an authority (see [Defined expressions](#) below). The name of the authority, but not the citation, should be italicised: for example, *Smith v Jones* (2014) 210 CLR 321. The accuracy of the citation is critical, so check and double check. When referring to a passage in older cases, where the paragraphs were not numbered, cite the passage as, for example, *Smith v Jones* (2014) 210 CLR 321, 324. If the passage extends over two pages, it should be cited as *Smith v Jones* (2014) 210 CLR 321, 324-325. Note that the final page number is given in full, not ‘324-5’. In more recent cases in which passages are given paragraph numbers, the citation is *Smith v Jones* (2014) 210 CLR 321 at [32]. Note, the word ‘at’ is used instead of a comma. If the passage extends over more than one paragraph, then the formulation is: *Smith v Jones* (2014) 210 CLR 321 at [32]-[45]. Add the name of the judge only if there is a particular forensic reason to do so. In such a case, put the name of the judge in parenthesis: *Smith v Jones* (2014) 210 CLR 321, 324 (Smith J) – omitting the old formulation of ‘per’: (*per* Smith J). Use italics for the title of a book or journal.

Cross referencing

If you are referring back or forward to an earlier or later paragraph or sub-paragraph of the same document, then, subject to one exception, always identify the relevant paragraph or sub-paragraph in full, as in this example: ‘The same point is made in paragraph 3(a)(i).’ In such a case, always use the word ‘paragraph’, rather than, for example, ‘sub-paragraph’. The one exception applies when the cross-reference is to something in the same paragraph, in which case you can say, for example, ‘sub-paragraph (a)’. ‘Sub-paragraph’ is always hyphenated.

Defined expressions

Some drafters like to define an expression in parentheses following its first appearance in the text. This is often overdone. For example, do not define statutes or authorities. And, I do not think that it is ever necessary to define people. If you see, for example, ‘I met Mr Peter Smith (*Smith*)’, delete the definition and just use ‘Mr Smith’ thereafter (see the [Names](#) section for more about referring to people). Otherwise, if a

definition is used, then it should appear as in the following example: 'He recommended several textbooks (*Recommended texts*).'⁷ Note that the definition appears immediately after the concept being defined, it is in parentheses, is set out in bold and italics, does not have inverted commas around it, and always has an initial capital. The latter allows the reader who sees a capitalised word later in the document to know that it is a defined expression. Once you have defined an expression, do not use another term to describe the same thing; in other words, be consistent.

Exhibits

Refer to exhibits in the main body of any text as, for example, 'Exhibit 1', but in footnotes as 'Ex 1'. Note that there is an initial capital in both versions, and that in the second there is no full stop after the 'Ex'.

Statutes

The first time you refer to a statute in any document, use this formula: *Name* Year (Jurisdiction): so, for example, the *Fair Work Act* 2009 (Cth). Always italicise the name of the statute, but never the year or jurisdiction. The jurisdictions are always referred to in shorthand: 'Cth' for Commonwealth, 'Vic' for Victoria, 'Qld' for Queensland, and 'Tas' for Tasmania; the rest are obvious. Do not give statutes an acronym: for example, 'FWA' for the *Fair Work Act*. After the first reference to any statute in a document, just use the name: for example, refer to 'the *Fair Work Act*'. When referring to sections of a statute, use the formulation 's.100'. Two sections referred to together are 'ss.100 and 101'. When referring to a subsection or paragraph, set it out in full, as follows: 's.100(1)(a)'. However, if you want to refer to a provision as a noun, use (in descending order) 'section', 'subsection', 'paragraph', and 'clause'.

Transcript

Refer to transcript in the main body of any text as, for example, 'page 100 of the transcript at lines 3 to 22', but in footnotes as 'T100.03-22'.

E. DATES AND NUMBERS

Dates

Always follow the Australian convention of date, month, year – thus, 26 October 1983. Always use the full formula, even if you think that the context makes it clear what month or year is being discussed. If the day is identified, say, 'Tuesday, 12 October 1983'. In that case there should always be a comma between the day and the date. Do not put 'th' after any date.

Numbers

My preference is to use words up to and including 'ten', and figures thereafter. However, whenever a number appears as the first word in a sentence, always use a word instead of a figure: for example, 'Twenty minutes after that conversation, I left the office for about 5 minutes.'

Ordinals: 1st, 2nd, 3rd

When using ordinals such as 1st, 2nd or 3rd to modify another word, do not use superscript after the number (1st, 2nd); instead use ordinary text as in these examples: ‘the 2nd time I saw him’ or ‘this was the 5th phone call made on that day’. (For ordinals used to enumerate points in an argument, see [First, second, third and so on](#)).

F. DRAFTING

Checking

There are three matters to which you should give particular attention when checking your written work.

First, absolute consistency of expression: people and things should be described in the same way throughout the document, and, in the case of a defined expression (see [Defined expressions](#)), then it must be used consistently and uniformly. It is confusing to define an expression, and then sometimes use something else to describe the same thing.

Second, re-check the accuracy of references to the evidence.

Third, re-check the accuracy of citations to cases. Make sure that you are using the authorised report if that is available.

Concision

When you review your finished written work, the last step is to omit all needless words. This step is vital. ‘A sentence should contain no unnecessary words, a paragraph no unnecessary sentences ...’ (Strunk)

Conversations in affidavits

If you edit an affidavit, you will see many ways of dealing with conversations. It is a vexed issue in practice. My approach is to include a paragraph to the following effect at the beginning of every affidavit:

These are the conventions that I will follow when I refer in this affidavit to words that I have spoken or heard:

- (a) If I recall actual words or expressions, I will indicate this by stating that I have a ‘specific recollection’ of those words or expressions.
- (b) If I can only recall the understanding or impression that I was given by something that I said or heard, but not the effect of those words, then I will describe that recollection as an ‘understanding’ or ‘impression’.
- (c) Otherwise I will set out the effect of words that I said or heard to the best of my recollection.

I believe that this way of categorising memories accords with human experience. If you follow these conventions, then you do not need to use expressions like, ‘to the effect of’, or ‘to the following effect’, each time you refer to words spoken or heard. However, you must apply each convention consistently: for

example, in relation to (b), ‘actual’ may be a synonym for ‘specific’ in ordinary life, but the word ‘specific’ must be used in the affidavit. Within that rule, some artistic variation is sensible: for example, ‘My specific recollection is that he used the word “black”’ is just as good as, ‘I specifically recall that he used the word “black”’.

A second aspect of dealing with conversations occurs whenever the drafter is trying to detail a conversation involving two or more people. Some drafters use something like this: Mr Jones said, ‘Always follow the standard format.’ Mr Smith replied, ‘It looks like too much trouble.’ Mr Brown said, ‘On the contrary, it will save you time in the end.’ I prefer a style that looks like the script of a play, which goes like this:

Mr Jones, Mr Smith and Mr Brown had the following conversation:

Jones: ‘Always follow the standard format.’

Smith: ‘It looks like too much trouble.’

Brown: ‘On the contrary, it will save you time in the end.’

If the maker of the affidavit is one of the participants in the conversation, replace their name in the ‘script’ with ‘Me’.

Written submissions

Work on any written submission should always proceed in this order, which is explained in Raymond’s *Writing for the Court*:

1. Start by identifying the issues, and crafting a ‘case-specific’ heading for each issue. Generic headings, like ‘Introduction’, ‘Background’ and ‘Conclusion’, can sometimes be useful, but they do not prepare the reader for the argument. A case-specific heading, like ‘Was the summary dismissal justified?’ or ‘Were the workers entitled to a penalty rate on Sunday?’ will focus the reader’s mind on the argument that follows. Note that these examples of ‘case-specific’ headings are questions. This is usually the best format.
2. Arrange the issues in a sequence that makes sense.
3. Write a beginning, which provides a synopsis of the facts and a brief statement of the issues.
4. Analyse and discuss each issue in turn. The ‘OPP/FLOPP’ technique is usually useful: state the opposing party’s position (OPP), and then identify the flaw in that position (FLOPP).
5. Last, write the ending.

In most cases, before work begins on any substantial draft written submission, I will work closely with my junior and my instructors on steps (1) and (2), and in identifying and articulating the OPP and FLOPP. Time must be allowed for this purpose, for discussion of the draft as it develops, and – importantly – for several revisions. Early revisions will concentrate on content: is the argument complete, or does it have

gaps or deficiencies in its logic? The last revision will be devoted to seeing whether the final draft can be compressed, or made more clear, vivid and crisp.

G. FORMATTING

Some solicitors have their own formats, from which their systems do not allow them to depart. In that case we will use their formats. In every other case, every document must be prepared **from its inception** using a standard format that has the features outlined in this section, from which there are to be no deviations in any circumstances. Please take time to set the format correctly before you begin writing, to avoid problems later.

Fonts

The font for all text is Garamond. The font size for all original text is 11 pt - unless a court relevantly requires otherwise, in which case we will follow the court's requirements. (For special font sizes, see each of [Footnotes](#), [Headings](#) and [Quotes](#), below.)

Footnotes

Do not put anything substantive in a footnote. Use footnotes for citations, to avoid cluttering your text (see [Authorities](#)). Never use endnotes. The footnote numbers should be inserted immediately after a full stop, but before any other punctuation mark, such as a comma or semi-colon, and always immediately after the footnoted passage. The font used for all footnote text is Arial Narrow. The font size is 9, again unless a court relevantly requires otherwise.

Full stops

There should be two spaces after each full stop.

Headings

The hierarchy of headings is illustrated and described as follows:

A. LEVEL ONE HEADING

(This is used only to introduce a major section of a document. The font is Garamond, bold, and the font size is 12 pt. Section headings are the only headings to be capitalised. They are the only ones to be identified by a distinctive letter, as in the above example. The gap between the letter and the heading is one centimetre.)

Level two heading

(Bold, Garamond, font size 11, and only the initial word is capitalised.)

Level three heading

(Not bold, Garamond, font size 11, underlined, and only the initial word is capitalised.)

Level four heading

(Not bold or underlined, Garamond, font size 11, italicised, and only the initial word is capitalised.)

Margins and paper size

The Federal Court directs that, ‘A margin of at least 25 millimetres must be kept clear on the left side of each page of a document containing writing ... There shall be a space of not less than 20 mm between the last line of writing and the end of each page of a document.’ No other court has comparable directions, so we will apply this rule to every document created for any court or other purpose. Treat the Federal Court’s rule as though it is prescriptive, which means setting the left and right margins at 25 millimetres, and the bottom margin at 20 millimetres. The top margin should be 25 millimetres. Make sure that you always use the default paper size ‘A4’ from the beginning.

Page numbering

Put page numbers on the bottom right-hand side, and no page number on the first page. Do not change the size and font of page numbers from Word’s default settings.

Paragraph numbering

The hierarchy of paragraph numbering consists of only 3 levels, which will be, in descending order: numeral, letter, and Roman numeral: for example, **[1]**, (a), and (i). Do not use automatic numbering. They should be arranged as in this example:

- [1]** There are reasons why you must always follow the standard format, and never depart from it:
 - (a) The first is that we spend less time thinking about and correcting the formatting, which has two advantages:
 - (i) We can more time thinking about the content of the document, without being distracted by form.
 - (ii) We can produce the final version of the document more quickly.

There are 7 key features of this numbering system.

- [1]** The numeral is always shown in bold surrounded by square brackets.
- [2]** The number is never indented.
- [3]** The first line has a 1 centimetre tab, but the second and subsequent lines are not tabbed or indented, as this paragraph illustrates. You will be surprised how much space this saves. Judges are used to it, because it replicates the way in which law reports are published.
- [4]** Unlike the numbers, the letters and Roman numerals are always shown with round brackets around them.

[5] The letters are not indented, but have a 1 centimetre tab on the first line, and no tab or indent on the second or subsequent lines.

[6] Every line of the Roman numerals are indented 1 centimetre, and the first line also has a 1 centimetre tab.

[7] There is never anything below a Roman numeral. If you feel the need to do this, find some other way to organise the paragraphs. Otherwise, it is too hard to refer back to the paragraph: for example, ‘paragraph 1(a)(i)(1)’, is just too much for readers to follow. Never use dot points. You cannot tell a judge how to find them easily (‘Your Honour might see the 8th dot point on the 2nd page’).

Quotes

There are two ways of handling quotes: with the main text or set off as a stand-alone block of one or more paragraphs.

Quotes within main text

The first way applies where the quote is part of the main body of the text: thus, for example, John Smith says, ‘You must always use the standard format.’ In those cases, the font used in the quote is the same as that for the main text. Use single inverted commas in the first instance, and double inverted commas for internal quotes. Note that the full stop comes before the final inverted comma.

Block quotes

The second way of handling quotes applies if, for some reason, a block of text has been quoted, and the quote has been indented. Block quotes are often used in affidavits or statements, but should not be used in submissions without good reason. In the case of an indented block quote, use a font size of 10, with single line spacing. Do not italicise the quote, and do not use inverted commas at all. The spacing after a block quote is 12 point.

Ellipsis

Do not use three dots (ellipsis) at the start of any quote, but if you are omitting words from the end of a quoted sentence, put them at the end of the quoted passage, before the inverted comma if you are using one.

Spacing and justification

The line spacing for all original text is always 1.5. The only exception is for indented block quotes, where it is single (see [Quotes](#)). The spacing between paragraphs and sub-paragraphs, both before and after, is 6 point. In the case of a heading or sub-heading, the before and after spacing are both 12 point. (To do this manually, go to ‘Format’, ‘Paragraph’, ‘Indents and Spacing’, ‘Spacing’, and insert the correct ‘before’ and ‘after’ spacing. Make sure that you do not click ‘Don’t add space between paragraphs of the same style’.)

Do not insert additional returns to simulate the effect of proper paragraph spacing. They will only cause formatting problems later on. Text is always justified on both left and right.

Widowed headings and orphan paragraphs

I abhor these. A widowed heading is one that appears at the bottom of the page, and the text to which it relates begins on the next page. Make sure that the heading begins at the top of the second page. An orphaned paragraph is one in which the first one or two lines of text in the paragraph appear at the bottom of the page, and then most of the text is on the next page. This is a matter of judgement, but I would usually like to see at least four lines of text on the page, or else start the paragraph at the top of the following page.