



FLORIDA STATE UNIVERSITY COLLEGE OF LAW WRITING CENTER

Use Parallel Structure¹

Accomplished writers treat parallelism as both a grammatical imperative and a stylistic opportunity. Some sentences require parallel structure, like those with lists and correlative conjunctions. However, legal writers should look for additional opportunities to use parallelism because as a literary device, parallelism appeals to your reader’s emotions with repetition and euphony.

Use Parallelism in Lists

At its simplest, parallelism is a device for balancing lists:

Adverbs: The jury weighed the evidence thoughtfully, skillfully, and wisely.

Adjectives: The first draft was long, disorganized, and unpersuasive.

Nouns: The facilities are available to attorneys, law clerks, and paralegals.

Verbs: The tenant cleaned the property, locked the doors, and returned the key.

In lists, adverbs go with adverbs, adjectives go with adjectives, nouns go with nouns, and verbs go with verbs. Legal writers most often commit the error of a noun-noun-verb sequence:

POOR: She was a lawyer, activist, *and wrote novels*.

BETTER: She was a lawyer, activist, *and novelist*.

For the sake of parallelism, the writer should follow the noun sequence with the noun “novelist.”

Correlative Conjunctions Require Parallelism

Some grammatical constructions require parallelism. Among the most frequently used are correlative conjunctions, which must frame matching parts. Here are the most common pairs of correlative conjunctions:

Both . . . and

Either . . . or

¹ By Cecelia Smith, Writing Specialist, 2024.

Neither . . . nor
Not only . . . but also

Make sure the language following each conjunction is parallel. Legal writers frequently lose the parallelism in their sentences by misplacing one of the words in these pairs.

POOR: The purpose of the rule is to ensure that actual notice is provided either *by* personal or constructive service.

BETTER: The purpose of the rule is to ensure that actual notice is provided either *by* personal or *by* constructive service.

OR: The purpose of the rule is to ensure that actual notice is provided *by* either personal or constructive service.²

Use Parallelism to Persuade

Parallelism is one of the best devices to persuade your reader. First, you can use parallelism to test the cogency of your reasoning. Line up your similar ideas in a series, using similar grammatical structure. Now, ask yourself whether you have forced dissimilar ideas into the same framework. Parallelism can help you write clear and forceful arguments.³

Second, a repeated grammatical structure emphasizes important information. Parallelism can emphasize ideas through comparison, contrast, and repetition:

The First Amendment is *as simple* in its language *as it is majestic* in its purpose.⁴

as simple *as (it is) majestic*
in its language *in its purpose*

The first half of the sentence balances against the second half. This streamlined structure persuades the reader with symmetry.

Also common in legal writing is a rhetorical technique known as “antithesis.” Like balance, antithesis repeats similar parallel structures on both sides of the equation, but unlike balance, the ideas are in contrast:

The touchstone is not secularism, but pluralism.⁵

² ANNE M. ENQUIST ET AL., JUST WRITING: GRAMMER, PUNCTUATION, AND STYLE FOR THE LEGAL WRITER 191 (6th ed. 2022).

³ VEDA R. CHARROW ET AL., CLEAR AND EFFECTIVE LEGAL WRITING 187 (5th ed. 2013).

⁴ ENQUIST, *supra* note 2, at 143.

⁵ *Id.*

Parallel openers emphasize ideas at the beginning of clauses, phrases, or sentences. Notice the repetition in the following excerpt from the writing of Supreme Court Justice Louis Brandeis:

If the Government becomes a lawbreaker, it breeds contempt for law; **it invites** every man to become a law unto himself; **it invites** anarchy. **To declare that** in the administration of the criminal law the end justifies the means – **to declare that** the Government may commit crimes in order to secure the conviction of a private criminal – would bring terrible retribution.⁶

Justice Brandeis uses parallel openers to build a framework for his ideas. Parallelism builds his concepts to a climax.

Accomplished writers have long used parallelism as a literary device to achieve emotional impact. Shakespeare often uses the rhetorical device of *isocolon*. Isocolon groups together two or more clauses of equal length and parallel structure:

I'll give my jewels for a set of beads,
My gorgeous palace for a hermitage,
My gay apparel for an almsman's gown,
My figured goblets for a dish of wood,
My scepter for a palmer's walking staff
My subjects for a pair of carved saints
and my large kingdom for a little grave.⁷

Notice how isocolon allows a writer to omit verbs. Shakespeare uses a verb only once because the structurally similar phrases that follow imply the same verb. Virginia Woolf does the same:

In the garden where the trees stood thick over flower-beds, ponds, and greenhouses the birds sang in the hot sunshine, each alone. One sang under the bedroom window; another on the topmost twig of the lilac bush; another on the edge of the wall.⁸

Legal writers can similarly use isocolon. Chief Justice Roberts uses the device here:

Determining the “best” control technology is like asking different people to pick the “best” car. Mario Andretti may select a Ferrari; a college student may choose a Volkswagen Beetle; a family of six a mini-van. A Minnesotan’s choice will doubtless have four-wheel drive; a Floridian’s might well be a convertible.⁹

More than a mere grammatical requirement, parallelism emphasizes concepts, streamlines sentences, and appeals to your reader’s emotions. Lists and correlative conjunctions require parallel structure. Look for opportunities to use parallelism in your legal writing as an effective literary device.

⁶ *Id.*

⁷ WILLIAM SHAKESPEARE, RICHARD II, act 3, sc. 3, ll. 152-158.

⁸ VIRGINIA WOOLF, THE WAVES 108 (1931).

⁹ ROSS GUBERMAN, POINT MADE 212 (2d ed. 2014).