

A doubting Thomas's dictum (re: possessives with sibilant endings)

BY MARK COONEY

This morning, a newsletter editor gently corrected my wife for creating this singular possessive: *Ellis's* (as in *Jane Ellis's house*). The self-assured editor instructed my wife to remove the offensive *s* after the apostrophe but added, in a supportive vein, that grammar is tricky.

I was tempted to commandeer my wife's email account and reply, "It is, indeed." After all, my wife's version was correct.

Suspicion about the post-apostrophe *s* for singular possessives is widespread. It's especially common among people who read newspapers that follow an AP-endorsed house style designed to save type/print space. That AP shortcut excuses the post-apostrophe *s* for singular proper nouns that end in *s*.

My wife acquiesced to the *s*-ectomy, even though her newsletter hasn't adopted AP style. And the debate was none of my business, so I just sighed, sipped my coffee, . . . and wrote a column decrying this editorial injustice.

SIMPLIFYING APOSTROPHE-S

Sibilant endings and apostrophes have always been a volatile mix. Much of the angst and debate can be traced to publishers' inconsistent house styles, not to mention conflicting grammar-school lessons.

My advice is to keep it simple: add an apostrophe-*s* to a singular possessive—even if it ends in *s*—unless an exception or publisher's house style requires otherwise:

- A witness is a single person. The **witness's** testimony may be credible or suspect.
- Bridget Jones is a single person. **Jones's** diary is a bit racy. (Google the book cover or movie poster.)

If you seek authority supporting my advice, consult the latest edition of *The Chicago Manual of Style*; Amy Einsohn's *The Copy-editor's Handbook*; Bryan Garner's *Redbook* or *Modern English Usage*; Strunk and White's *The Elements of Style*; or another reputable reference guide.

Given the experts' uniformity on this point, it's no surprise that we see the *s's* style in literate publications of every stripe, including prominent newspapers that reject the AP shortcut:

- *The Atlantic*: "Beneath **Ross's** claim of 'incredible' complication is a plea for context and nuance"1
- *National Review*: "In Tiger **Woods's** early career, there were many, many headlines about him that included the words 'burning bright.'"²
- *The New York Times*: "How Justice **Thomas's** 'Nearly Adopted Daughter' Became His Law Clerk"³
- *The New Yorker*: "But **Weiss's** arrival at the network also coincided with a long-simmering crisis in broadcast news"4
- *The Wall Street Journal*: "**Thomas's** defense came as the federal judiciary released his 2022 disclosure form"5

Most federal appellate judges are also scrupulous in following the general rule:

- *Fourth Circuit*: "Limiting our review of the record to the issues raised in **Jones's** informal brief, we discern no reversible error."⁶

- *Fifth Circuit*: “[I]n October 2018, Brooks’s probation officer filed a petition alleging multiple violations of Brooks’s terms of conditional release”⁷
- *Ninth Circuit*: “[T]he same cannot be said for Flores’s proposed distinction between nine gunshots and one.”⁸
- *Eleventh Circuit*: “Rule 703 deals with the proper bases of an expert witness’s opinion testimony.”⁹

AN IMPORTANT EXCEPTION FOR LAWYERS

A major exception concerns singular names based on plural common nouns. For instance, the Michigan Court of Appeals is a singular entity, but the last word in its name takes the plural form. So we treat this singular possessive as if it were a plural possessive, with just an apostrophe after the s:

- The Michigan Court of Appeals’ opinion was lengthy.

This exception often arises with business names:

- General Motors is a single manufacturer, but: General Motors’ sales sagged in March.

Back to the appellate courts:

- *Fourth Circuit*: “[H]e points to various statements made by American Airlines’ employees to the effect that the airline would not reemploy him as a pilot”¹⁰

You’ll find a helpful explanation of this exception in Rule 7.11 of Garner’s *Redbook*.

Another traditional exception concerns biblical or classical names (e.g., Moses’ words), though that exception isn’t consistently followed, as seen in *National Geographic*: “Moses’s life was defined by miracles.”¹¹

Other sources, such as the *Gregg* manual, allow writers to drop the post-apostrophe s if it makes the possessive unpronounceable. That guidance is a bit loose and could result in an inconsistent style.

TOWARD A LASTING PEACE . . .

I might or might not earn points at home for defending my wife’s punctuation. But perhaps I’ve helped solve a sticky punctuation question for some curious legal professionals.

The pessimist in me says that we’re unlikely to see uniformity on the s’s question, no matter how many usage guides offer uniform advice and examples. The best I can do is recommend that lawyers consult and follow the advice in Garner’s *Redbook*, as I do.



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ENDNOTES

1. Google “No Escape From History” from Feb. 10, 2015.
2. Google “Tigers of Different Stripes” from July 18, 2024.
3. Google article with that headline from Mar. 28, 2024.
4. Google “Inside Bari Weiss’s Hostile Takeover of CBS News” from Jan. 19, 2026.
5. Google “Clarence Thomas Fires Back at Allegations of Ethical Breaches” from Aug. 31, 2023.
6. *Jones v Phelan*, unpublished per curiam opinion of the U.S. Court of Appeals for the Fourth Circuit, issued Dec. 10, 2025 (Docket No. 24-1066), slip op at 2.
7. *United States v Brooks*, 33 F4th 734, 737 (CA 5, 2022).
8. *Hampton v Flores*, unpublished memorandum opinion of the U.S. Court of Appeals for the Ninth Circuit, issued Nov. 20, 2025 (Docket No. 3:21-cv-09407-SK), slip op at 8.
9. *United States v Keegan*, 161 F4th 1334, 1343 (CA 11, 2025).
10. *Harwood v American Airlines, Inc*, 963 F3d 408, 418 (CA 4, 2020).
11. Google “Ten Plagues and a Betrayal—How Moses Saved the Hebrew Slaves” from Jan. 22, 2019.

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