

# Some Particularly Useless Words

Of the many words in our language that have dubious value, two particular words stand out: *particular* and *particularly*.

*Particular* means “of or belonging to a single, definite person, part, group, or thing; not general; distinct.”<sup>1</sup> So *particular*—or its ugly adverbial partner *particularly*—is used to signal that whatever is being written applies only to the person, part, group, or thing modified by *particular* or *particularly*. But when you write in the *singular* about a person, part, group, or thing, it is unnecessary to use a modifier, in addition to the singular, to specify that what you have written applies to only one person, part, group, or thing.

Consider these examples, all taken from Michigan appellate opinions:

*“For ease of reference, we will also include the page number in citing a particular subsection.”*

Why must this courtesy be extended only for a *particular* subsection? Does *particular* limit the courtesy to just one subsection? How about this: “For ease of reference, when we cite a subsection, we will include the page number?”

*“With respect to this assertion, it seems evident that whether a hospital’s negligence must be shown by expert testimony depends on the circumstances of the particular case.”*

The court is clearly talking about one case. The context and the use of a singular noun make *particular* unnecessary: “It depends on the circumstances of the case.”

*“It would, for example, be inappropriate to conclude in a retrospective fashion that merely because a particular plaintiff, in fact, suffered harm or even severe harm, the condition at issue in a case posed a uniquely high risk of severe harm.”*

If we’re talking about one plaintiff—and the singular noun *plaintiff* means that we are—

then why not just say *plaintiff*? Why must it be the *particular* plaintiff? Is there some other nonparticular plaintiff?

*Particular* is especially troubling when used after *any*. Look at these examples:

*“The trial court has discretion in determining the number of points to be scored on any particular variable provided there is evidence on the record that adequately supports the score.”*

*“Defendant does not challenge the lack of evidence with respect to any particular elements of the charged crimes, but only the evidence identifying him as the person who committed them.”*

*“Our review of the record reveals there is a lack of evidence regarding the public necessity of the drain, especially due to the fact that plaintiff failed to provide any particular evidence leading to a conclusion that the drain was for public benefit.”* [This is a bad sentence to boot.]

Would it not have been enough to say that the plaintiff did not produce any evidence? What is the difference between evidence and *particular* evidence? How does an element differ from a *particular* element?

According to R. W. Burchfield, *particular* is

*“[f]requently used for emphasis, esp. after demonstrative pronouns this and that (he didn’t like that particular tax; in this partic-*

*ular instance) to the point that it has attracted adverse comment (an unnecessary reinforcement, ‘can often be left out, to the benefit of the sentence’). Up to a point such criticism is just, but it should be borne in mind that there are some contexts, esp. (but not only) after a negative, when the adjective supplies legitimate emphasis (e.g. He had no particular reason for being there as far as I could tell; She didn’t write that particular essay but many others just as good).<sup>2</sup>*

But in the two examples Burchfield gave, what about the negatives justifies any emphasis? By writing that “he had no particular reason for being there,” the writer is saying that not only did he not have a reason for being there, but there was also not any single reason for him being there. Why isn’t it enough simply to say that he had no reason to be there? And by writing that “[s]he didn’t write that particular essay,” the writer is emphasizing that the essay the writer is referring to really is the same essay that the writer is referring to: “See,” the writer says, “this one! This essay!” But we already know that *that* is the essay the writer refers to because the writer wrote “*that* essay.” What about *that* is so difficult to understand that it must be underscored and emphasized with *particular*?

*That* in the Burchfield example is a demonstrative adjective; it differs from *the* in that it *points out* something rather than just *singling out* something.<sup>3</sup> So when one uses *that particular*, one is pointing out that one has pointed something out. Is this necessary? One commentator said, “*Particular* intrudes (though perhaps more in a certain type of oratory than in writing) as an unnecessary reinforcement of a demonstrative pronoun.”<sup>4</sup> It seems to make little difference whether *that particular* follows a negative; with all due respect to Mr. Burchfield, the reference to a negative seems arbitrary. An unnecessary word is always unnecessary, regardless of whether it follows a negative.

The adverbial form—*particularly*—can be just as sloppy. It suffers the additional infirmity of being an adverb in the first place. (Stephen King has said, “I believe the road to hell is paved in adverbs, and I will shout it from the rooftops.”<sup>5</sup>) More examples from the Michigan courts:

*“Further, plaintiff claimed that defendant misrepresented that the subject property would not be transferred to the Tigers (the Ilitch family), who apparently were particularly objectionable to plaintiff.”*

*“Olsen has never been particularly clear about what major life activity his back injury affected during his employment with Toyota.”*

*“Courts should be particularly skeptical of business plaintiffs who—having negotiated an elaborate contract or having signed a form when they wish they had not—claim to have a right in tort whether the tort theory is negligent misrepresentation, strict tort, or negligence.”*

In each of these examples, *particularly* is used as a qualifier or intensifier to affect the meaning of the adjective it precedes. What does it mean to be “particularly objectionable” or “particularly clear” or “particularly skeptical”? It seems that by using *particularly*, writers often intend to signal some sense of degree; the word might be replaced with *very*: the family was *very* objectionable; the witness was not *very* clear; courts should be *very* skeptical. But these qualifiers add little to our understanding: “*Rather, very, little, pretty*—these are the leeches that infest the pond of prose, sucking the blood out of words.”<sup>6</sup> To the extent that *particularly* means *very*, it shares the same infirmity, only with more syllables to muddy the pond. If a qualifier is needed, *very* or *especially* would be better than *particularly*; they’re clearer and shorter.

*Particular* has other meanings, too. One might say that a person is particular, meaning that the person is picky. Or one might

say that one objects to a proposed order only in some of its particulars. *Particular* is not always to be avoided, but when used as an adjective or adverb, it often signals the overprecision of imprecise writing. ♦

*Brendan T. Beery is an assistant professor at the Thomas M. Cooley Law School, where he teaches Research & Writing and Advanced Writing. He graduated from Cooley in 1998, summa cum laude. He then served as a research attorney with the Michigan Court of Appeals and spent three years in private practice.*

#### FOOTNOTES

1. Webster’s New World Collegiate Dictionary (4th ed. 1999).
2. R. W. Burchfield, Fowler’s Modern English Usage 574–575 (3d ed. 1996).
3. *Id.* at 772.
4. Ernest Gowers, The Complete Plain Words 54 (Sidney Greenbaum and Janet Whitcut eds., 3d ed. 1986).
5. Stephen King, On Writing 125 (2000).
6. William Strunk, Jr. and E. B. White, The Elements of Style 73 (4th ed. 2000).