

Dear 1L®
1L MEMO CHECKLIST 2025

1 "Court vs. "court" confusion.

—Do NOT capitalize “court” unless referring to (1) the U.S. Supreme Court, or (2) a court’s full, proper name, because a research memo isn’t addressed to a particular court.

2 Pronoun abuse.

—Your reader will read a pronoun to relate back to the closest preceding noun of the SAME number and gender.
—Double-check every “they,” “them,” “their,” “it,” “his,” “her,” etc., and make sure each works.
—Don’t forget that “court” and “company” take SINGULAR pronouns.

3 "Id." issues.

—Do not use “id.” after a preceding multi-source citation.
—The period after an Id is underlined; the comma after the period is NOT. ✓ Id., vs. ✗ Id.,

4 Citation issues.

—Missing decision dates in full case cites. Check each of your citations again.
—Miscapitalization of “at” in citations. Make sure the computer didn’t do it automatically.

5 Misformatted headings.

—Make sure your headnotes don’t float off-center!

6 Long-winded, clunky clauses.

✗ “Despite the fact that” → ✓ “Even though”
✗ “Due to the fact that” → ✓ “Because”

7 Unnecessary, throat-clearing clauses.

✗ “It should be noted that ___”
✗ “It is important to understand that ___”

8 The evil words “clear” and “clearly.”

—These words that should never appear. You’ve got contested issues! Nothing is “clear.”

9 The evil word “utilize.”

—Banish this word from your vocabulary. “Use” is preferred by readers!

10 “Surprise” facts.

—If it isn’t in your Facts section, it may NOT appear in your Discussion section.