

Dear Committees on Appellate, Bankruptcy, Criminal, and Civil Rules —

I respectfully make 4 primary rules suggestions:

1. [style names in normal case and diacritics](#);
2. [adopt common local rules into federal rules](#);
3. [extract common rules](#); and
4. [standardize page equivalents for words and lines](#).

I also make several simplification suggestions along the way, but those are only incidental. Likewise, I am sure that the Committees can improve on my proposed language and examples. Please consider the underlying substance and intent, not just the examples given.

Sincerely,
Sai¹
President, Fiat Fiendum
August 22, 2024

¹ Sai is my full legal name; please use gender-neutral language and no title. I am partially blind; please send all communications, in § 508 accessible format, by email.

1. Name styling

a. Avoidable trigger for OPCA litigants; low level waste

All-caps names are one of the main bugbears of sovereign citizen / organized pseudolegal commercial argument (OPCA)² type litigants, who think that e.g. ALICE SMITH refers to a quasi-corporate entity created by the government³, whereas Alice Smith refers to an actual human.

This is of course utterly without merit. However, as a pragmatic, descriptive statement: the use of all-caps names causes easily avoidable vexatious litigation. This is burdensome for everyone — and this common distraction for OPCA litigants obscures their potential legitimate claims. It harms nothing to put “Alice Smith” on a summons, subpoena, case caption, etc. — rather than “ALICE SMITH” — and would avoid triggering this particular hang-up.

b. Inaccuracy and insult

Capitalization and diacritics are an inherent part of names, just as much as spacing and letters. Changes to them will often be culturally insulting.

Putting all names in all caps is inaccurate, and obscures actual differences in names.⁴ For example:

- Shauna MacDonald, [Canadian actress](#)
- Shauna Macdonald, [Scottish actress](#)
- Leroy Van Dyke, [American singer](#)
- Lawrence VanDyke, [9th Cir. judge](#)
- Cornelius Vanderbilt, [American businessman](#)

² See e.g. [Meads v Meads 2012 ABOB 571](#) (exhaustively documenting OPCA), cited by e.g. [U.S. Bank N.A. v Janelle, No. 20-cv-337 \(D. Me. Oct. 15, 2021\)](#)

³ See *Meads* at [7], [75]–[76], [211]–[212], [323]–[324] (collecting cases), & [417]–[446] (“strawman”).

⁴ Names vary to an extent that you may not be aware of; for background, I suggest reading e.g. Patrick McKenzie & tony rogers’ [Falsehoods Programmers Believe About Names – With Examples](#) and W3C’s [Personal names around the world](#). In short, leaving a name in its original form is the only accurate practice.

[This extensive compilation of explainers](#) includes many which are likely of interest and relevance, e.g. about Bitcoin, email, video, postal addresses, and typography (e.g., particularly relevant here, [one about case](#)).

- Laura van den Berg, [American novelist](#)
- Ed Vande Berg, [American baseball player](#)
- Jeff Vandeberg, [American architect](#)
- Ana de Alba, [9th Cir. judge](#)

Many fonts lack diacritics on capitals, so e.g. 1st Cir. judges Myrna PÉrez & José A. Carbanes would often have their names be rendered PEREZ & JOSE rather than PÉREZ & JOSÉ. Although rare, these can be minimal pairs — e.g. Chris Perez and Chris Pérez are different people ([baseball player](#) and [guitarist](#), respectively), as are John van Dyke ([canoeist](#)) and John Van Dyke ([politician](#)).

c. Annoyance and time waste

When drafting, party and case names set in all-caps⁵ waste time, since copying citations and quotes often requires resetting them into normal case. This is minor, sure — but a couple minutes routinely wasted, added over the whole system, collectively wastes substantial time, annoyance, and expense.

d. Bad style

Using all-caps is bad typography and more difficult to read.⁶

Example: USING ALL-CAPS IS BAD TYPOGRAPHY AND MORE DIFFICULT TO READ.

⁵ E.g. *Janelle, supra*.

⁶ See e.g. Matthew Butterick, *Typography for Lawyers*, regarding [all caps](#) & [caption pages](#).

e. *Suggestion*

There is no reason to have names in all caps, and good reasons — simple respect, accuracy, pragmatic avoidance of OPCA, avoidance of waste, and legibility — to style them in their normal fashion.

I therefore suggest that the FRAP, FRBP, FRCrP, & FRCvP be amended to add a style⁷ requirement for names to always be set in their normal case and diacritics.

I suggest, for example, the following:⁸

- FRAP 32(a)(*new* 8): *Names*.

All⁹ names must be set in their normal case and diacritics. In headings, lower-case letters may be set in small caps.

Committee note: E.g. William McKinley, not WILLIAM MCKINLEY; Johannes van der Waals, not JOHANNES VAN DER WAALS; João da Silva Feijó, not JOAO DA SILVA FEIJO; Michael French-O'Carroll, not MICHAEL FFRENCH-O'CARROLL; JPMorgan Chase, not JPMORGAN CHASE. In a heading (but not a caption), e.g. AFFIDAVIT OF WILLIAM MCKINLEY is also permissible.

Errors due to mistake or technical inability¹⁰ should be corrected where feasible, but not rejected.

- FRAP 32(*new* h): *Use by court*.

Every document created by the court or clerk must comply with Rules 32(a)(1), (4), (5), (6), and (8).

- FRAP 27(d): *amend to add* “, and the name styling requirements of Rule 32(a)(8)”.

⁷ I note that FRAP 32 & FRBP 8015 require particular typefaces and other typography requirements, as do many LCvR and LCrR. This suggestion is more substantive, since it is for fidelity to actual differences, not just presentation.

⁸ My intent with this suggestion is only to add a name style rule into existing style rules, and have courts follow the same style (so that e.g. subpoenas & summons are captured, and court-issued documents' & forms' style can be copied by filers). FRCrP & FRCvP lack style rules (though they are in local rules), so I gave illustrative examples to cover all four Rules sets; that is only incidental, and is a distinct suggestion (see [suggestion 2](#)). I list them as separate rules only to make this suggestion self-sufficient; I believe that these should all be moved to common rules (together with all or nearly all of e.g. FRAP 32 & FRBP 8014), instead of creating substantive new rules or cross-citing FRAP (see [suggestion 3](#)).

⁹ This is intended to cover humans in particular, but all other names also. The example of JPMorgan Chase for the notes is meant to demonstrate that “all” means all, without having to state it explicitly.

¹⁰ My intent here is to make this a “best effort” type rule — e.g. many people don't know how to type ò (or more difficult diacritics like Vietnamese, e.g. [Nguyễn Ngọc Trường Sơn](#)); one may not know if a name should have diacritics or internal capitalization (e.g. where prior records didn't reflect them, as is common), etc. Reasonable attempts that don't comply shouldn't be taken as grounds for rejection, but one should at least make a reasonable attempt.

- FRBP 8015(a)(new 8) & note: *add* identical to FRAP 32(a)(8)
- FRBP 8015(new i): *Use by court.*

Every document created by the court or clerk must comply with Rules 8015(a)(1), (4), (5), (6), and (8).

- FRBP 8014(f)(2) *amend to add* “and name styling” *after* “type style”
- FRCvP new 5.3: *Form of Papers.*

(a) *Format.*

All papers, except exhibits in their original form¹¹, must comply with Fed. R. App. P. 32(a)(1), (4), (5), (6), and (8).

(b) *Nonconforming documents.*¹²

If a document does not conform to the requirements of this Rule and Rule 10(a), the Clerk will notify the filing party of the identified deficiency and request that the deficiency be corrected by the end of the next business day. If a deficiency is not corrected by the end of the next business day, the Clerk will forward the pleading to the assigned judge with notice of the identified deficiency and a recommendation, if appropriate, that the pleading be stricken for failure to comply with applicable rules.

(c) *Use by court.*

Every document created by the court or clerk must comply with Rule 5.3(a).

- FRCrP 49(new e)(1–3), *Form of Papers: add* identical to FRCvP 5.3(a–c)

¹¹ My intent here is to exempt documents that were not created under the Rules, and are from some prior or external source that the filer doesn't control — i.e. to *not* impose a re-formatting requirement like [Sup. Ct. R. 33.1](#) — while capturing all documents created under the Rules, i.e. which the filer does control.

¹² This is verbatim [D.D.C. LCvR 5.1\(g\)](#) (other than substituting “Fed. R. Civ. P.” with “Rule”), simply because that's the first one I looked at. I have no comment on its merit relative to other courts' local rules on handling nonconforming documents, but I think some such provision is worthwhile. Again, this is distinct and incidental; see suggestion 2.

2. Adopting common local rules into federal rules

a. Context

There are many local rules that are universal (or near universal), yet are not in the federal rules. Adopting a common baseline would simplify local rules, ensure that their provisions are in fact deliberate variations rather than oversights in the federal rules, simplify matters for people who practice in multiple courts, and simplify case law on the rules.

For example:¹³

- no ex parte communication, e.g. D.D.C. LCvR 5.1(a), 9th Cir. R. 25-2
- fax & email require permission, e.g. D.D.C. LCvR 5.1(b), 9th Cir. R. 25-3
- first filing should include name & contact info, e.g. FRAP 32(a)(2)(F), D.D.C. LCvR 5.1(c), 9th Cir. R. 3-2(b), 21-2(a), 27-3(c)(i)
- filing format, e.g. D.D.C. LCvR 5.1(d), 9th Cir. R. 25-5(d)
- exhibits on complaints etc should be essential, e.g. D.D.C. LCvR 5.1(e)
- 28 USC 1746 declaration, e.g. FRAP 25(a)(2)(A)(3), D.D.C. LCvR 5.1(f), 9th Cir. R. 4-1(c)(1), (c)(2), (e)
- handling of nonconforming documents, e.g. D.D.C. LCvR 5.1(g)
- filing sealed documents, e.g. D.D.C. LCvR 5.1(h), 9th Cir. R. 27-13

b. Suggestion

I suggest that the Committees:

- systematically survey the local rules,
- identify types¹⁴ of provisions that are frequent in local rules but are not covered by the federal rules, and

¹³ Again, using D.D.C. LCvR & 9th Cir. R. merely by way of example. As best I can recall, similar provisions are in nearly all local rules I've personally read:

¹⁴ By "type" I mean the minimal synopsis form, as I gave above — virtually all courts will have filing format requirements, procedure for filing under seal, etc., even if their details differ.

- adopt the most common¹⁵ version¹⁶ as the baseline default in the federal rules, so as to most simplify the most local rules.

Where feasible, these should be merged into common rules (as proposed below), or at least be concordant with them (e.g. having consistent words per page provisions¹⁷).

Local rules can of course still vary. I explicitly do *not* here suggest any override of local rules, à la FRAP 32.1(a). Although I think that standardization would be beneficial for rules that don't have a genuine reason for local differences, here I am only proposing system-level simplification and collection, not substantial substantive change (other than to apply defaults when an unusual court's local rules haven't spoken to it).

I believe that the vast majority of local rules cover issues the federal rules simply fail to address, or have merely incidental differences between local rules — rather than expressing a genuine difference of opinion and decision to have a procedural “circuit split” (as it were). Those common rules are ripe for simplification, and the federal rules would benefit from covering the issues they address.

By way of metric, consider the combined page length of the entire set of federal rules — including all local rules. My suggestion is to reduce system-wide complexity, i.e. that combined page length, by turning local rules into federal ones that most courts would adopt with relatively little substantive variation. The simpler, the better.¹⁸

¹⁵ “Common” can be a functionally identical majority, or an approximate middle ground that would work as a consensus baseline (e.g. for page length limits).

¹⁶ By “version” I mean the particular choice of rule for a given type, i.e. the details.

¹⁷ n.b. FRAP & FRBP's words per page conversions are not currently consistent; see [suggestion 4](#)

¹⁸ To recapitulate [Pascal](#): if I'd had more time and energy, I would've made these suggestions more concise too. I have tried to at least be clear, so the Rules can be more concise than I am here.

3. Extracting a new Federal Common Rules and deduplicating extant Rules

a. Suggestion

A substantial amount of the Rules are needlessly duplicative, not just between courts but between Rules sets — for example, FRBP 8015 & FRAP 32. This adds needless complexity, creates potential for issues of surplusage, and makes the Rules harder to maintain.

I therefore suggest:

- create a new Rules set — the Federal Common Rules — which is to include only matters which are shared between the specific Rules sets
- move to the FCR all
 - duplicative FRAP, FRBP, FRCrP, & FRCvP rules, and
 - rules substantively applicable to all or nearly all courts (e.g. FRCvP 11)
- replace the moved rules with a very short application of the FCR, and — only if there is a difference that the Committees actually want to keep — an override statement.¹⁹

Not everything in the FCR has to be applicable to *all* courts. For example, I would expect that rules for service, summons, e-discovery, CM/ECF, FRCvP 11 type sanctions, form and format, handling sealed filings, correction of technical errors, etc. should generally be identical — but appellate courts don't tend to issue summons or have discovery (except in some rare cases of original appellate jurisdiction). That doesn't prevent them from being in the FCR.

¹⁹ In programming jargon: be DRY — [Don't Repeat Yourself](#). Put the shared rules in one place, point to them, and only state overrides.

Likewise, some things may be different in certain Rules sets. E.g. for motions, length limits are:

- FRAP 27(d)(2) & FRBP 8013(f)(3): 20p motion & opposition, 10p reply
- FRCrP & FRCvP: none in the federal rules²⁰
 - e.g. D.D.C. LCrR 47(e) & LCvR 7(e): 45p motion & opposition, 25p reply

*b. Worked example*²¹

For instance, FRAP, FRBP, LCrR, & LCvR format & length rules could be extracted as follows:

FCR 5²² Form of papers

(... *et cetera* ...)

(d) *Format*

Unless otherwise ordered by the court, all filings must:

- (1) be on 8½×11 inch paper or electronic equivalent
- (2) be double spaced, except that single spaced is allowed for
 - (i) quotations more than two lines long and indented
 - (ii) headings
 - (iii) footnotes
- (3) have 1 inch margins on all sides
- (4) have no text in the margins, except pagination
- (5) be submitted in native electronic PDF format, if electronically produced
- (6) be in 12 point font or larger, except that
 - (i) 10 point font or larger is allowed in footnotes

(e) *Length limits*

(1) *Generally*²³

Unless otherwise ordered by the court, filings are length limited as follows. Items in FCR 5(e)(3) are excluded from the length limits.

- (i) Handwritten or typewritten filings must follow the page-based limit.
- (ii) Electronically produced filings must follow either:
 - (A) the word-based limit; or
 - (B) if monospaced, and if a line-based limit is listed, the

²⁰ The federal rules probably should create a default, as this is likely in all local rules; see suggestion 2 above.

²¹ I have tried to combine and simplify the various rules into a single, clear statement.

²² The FCR numbering is made up arbitrarily just to illustrate the example.

²³ I think that the absence of a page based limit only for supplemental authorities and for amicus briefs on rehearing is so nonsensical that I have added those in, following the same ratios as the other rules — it seems to me clear that e.g. a handwritten statement of authorities is not intended to be required to count words when handwritten filings in general are not, nor that there is intended to be a difference between amicus briefs on merits and rehearing as to whether they can/must use a page, line, or word based limit equivalence. I have no idea why line based limits are only sometimes present, nor why the word based limits have different ratios, so have left them as-is. On both points, see [suggestion 4](#).

line-based limit.

(2) *Limits*

- (i) *Motion*:
 - (A) *FRAP & FRBP*: 20 pages or 5,200 words, except
 - (i) *Motion for rehearing*: 15 pages or 3,900 words
 - (B) *FRCrP & FRCvP*: 45 pages or 11,700 words²⁴
- (ii) *Opposition to motion*:
 - (A) *FRAP & FRBP*: 20 pages or 5,200 words
 - (B) *FRCrP & FRCvP*: 45 pages or 11,700 words
- (iii) *Reply to motion*:
 - (A) *FRAP & FRBP*: 10 pages or 2,600 words
 - (B) *FRCrP & FRCvP*: 25 pages or 6,500 words
- (iv) *Principal brief*: 30 pages, 13,000 words, or 1,300 lines
- (v) *Reply brief*: 15 pages, 6,500 words, or 650 lines
- (vi) *Combined principal and reply brief*: 35 pages, 15,300 words, or 1,500 lines
- (vii) *Supplemental authorities*: 2 pages or 350 words
- (viii) *Amicus brief on merits*: 15 pages, 6,500 words, or 650 lines
- (ix) *Amicus brief on rehearing*: 10 pages or 2,600 words

(3) *Items excluded from length limits*:²⁵

- (i) factual exhibits, including
 - (A) affidavits not containing legal argument
 - (B) copies of record
 - (C) addenda of statutes, rules or regulations
- (ii) cover pages
- (iii) disclosure statements
- (iv) indexes, including
 - (A) tables of contents
 - (B) tables of citations
 - (C) indexes of record
- (v) certificates of compliance with any rule
- (vi) signature blocks
- (vii) proofs of service

(4) *Certificate of compliance with length limits*

(... *et cetera* ...)

²⁴ My example FRCvP & FRCrP limits just copy from D.D.C. local rules — namely LCvR 7(e) & (o), LCvR 84.6(a), LCrR 47(e), and DCtLBR 9033-1(f) — and apply the 260 words per page equivalent used in FRAP & FRBP for motions. See suggestion 2 regarding a substantive FRCrP & FRCvP length limit rule.

²⁵ I have omitted FRAP 32(f)'s “any item specifically excluded” item because that's tautological. I have also incidentally simplified, combined, & organized a few items from FRAP 32(f) & FRBP 8013(a)(2)(C).

Then replace the extant rules as follows:

- FRAP 32(a)(4), FRBP 8015(a)(4): *Common format*. The brief must comply with FCR 5(d).
- FRAP 21(d) (last sentence & subparagraphs):
Non-common length limit. A petition must comply with FCR 5(e), with a limit of 7,800 words or 30 pages.
- FRAP 5(c) (last sentence & subparagraphs): A paper must comply with FCR 5(e)
- FRAP 27(d)(2), FRBP 8013(f)(3), 8022(b) (last sentence & subparagraphs): *Common length limit*. A motion, response, or reply must comply with FCR 5(e).
- FRAP 28.1(e), 29(a)(5), 29(b)(4), 32(a)(7), FRBP 8015(a)(7), 8016(d), 8017(a)(5), 8017(b)(4): *Common length limit*. A brief must comply with FCR 5(e).
- FRAP 35(b)(2), 40(b) (last sentence & subparagraphs): *Common length limit*. The petition must comply with FCR 5(e).
- FRAP 28(j) (second to last sentence): The letter must comply with FCR 5(e).
- FRBP 8014(f) (second to last sentence): The submission²⁶ must comply with FCR 5(e).

Or, better, delete all of those, and replace with:

FRAP 32(*new h*) Common format and length

(1) *Common format*

All filings must comply with FCR 5(d) except as specified in this rule or its local rule counterpart.

(2) *Override of common format*

FCR 5(d)(6): all text must be in 14 point font or larger.²⁷

(3) *Common length limit*

All filings must comply with FCR 5(e) except as specified in this rule or its local rule counterpart.

(4) *Non-common length limits*

- (i) petitions under FRAP 21 (extraordinary writs): 7,800 words or 30 pages

FRBP 8015(*new i*) Common format and length

(a) *Common format*

All filings must comply with FCR 5(d) except as specified in this rule or its local rule counterpart.

(b) *Common length limit*

All filings must comply with FCR 5(e) except as specified in this rule or its local rule counterpart.

²⁶ I have kept these with their current terminology. I suggest that the FRAP 28(j) & 8014(f) be conformed to use the same term — perhaps one of “letter” or “submission”, perhaps a more descriptive one like “update” or “notification”.

²⁷ Current FRAP 39(a)(5)(A).

For parallelism, add:²⁸

FRCvP *new* 7.2 Common format and length

(a) *Common format*

All filings must comply with FCR 5(d) except as specified in this rule or its local rule counterpart.

(b) *Common length limit*

All filings must comply with FCR 5(e) except as specified in this rule or its local rule counterpart.

(c) *Non-common length limits*

(1) *Mediation statement*: 2,600 words or 10 pages²⁹

FRCrP *new* 47.1 Common format and length

(a) *Common format*

All filings must comply with FCR 5(d) except as specified in this rule or its local rule counterpart.

(b) *Common length limit*

All filings must comply with FCR 5(e) except as specified in this rule or its local rule counterpart.

Example revised local rule merger and override:

W.D. Mo. LCvR 7.o(d) Length Limits

1. *Common length limit*

All filings must comply with FCR 5(e) except as specified in this rule.

2. *Override of common length limits:*

A. *Motion*: 780 words or 3 pages³⁰

B. *Opposition to motion*: 780 words or 3 pages

C. *Reply to motion*: 780 words or 3 pages

3. *Non-common length limits:*

A. *Suggestions on motion*: 3,900 words or 15 pages

B. *Suggestions on opposition to motion*: 3,900 words or 15 pages

C. *Suggestions on reply to motion*: 2,600 words or 10 pages

²⁸ This is just for illustration, supposing that these are adopted per [suggestion 2](#).

²⁹ D.D.C. LCvR 84.6 says 10 pages; I've added the 260 words per page equivalent used in most of FRAP & FRBP. This is just an illustration of how a given Rules set might have additions to the Common Rules, supposing for the sake of example that FRCvP were to adopt rules about mediation under suggestion 2.

³⁰ This part is not specified in W.D. Mo. LCvR 7.o, and I do not know W.D. Missouri practice, but it appears to be implied by the separation into motions (etc) plus separate suggestions (i.e. memorandum of facts & law). I looked at a few [filings of W.D. Mo. motions and suggestions in RECAP](#) in order to infer the implied rule for the main document length limit, just to give an example of a local rule override. Even with the override, FCR 5(e)(2), (3), & (4) are kept.

c. *Comments*

This is merely an *example* to illustrate how extracted and simplified Rules and Common Rules would look. Any extraction will have to simplify and standardize things, but the Committees may well choose differently than I did.

Please don't get hung up on the particular choices that I used here — particularly not the ones described in footnotes. None of them are essential parts of this suggestion, and they should be treated as distinct suggestions, not blocking this.

My choice of illustrating this with length limits is likewise just an example. Common Rules should address anything that is in scope. Please don't let perfect be the enemy of good; these can and should be done incrementally, one type of rule at a time — not all held off until a never-reached future where all of the Rules are wholesale revised at once.

To recapitulate: this suggestion is specifically about extracting rules that are currently in common across different sets of rules into a unified Common Rules, so that

- they're not specified redundantly in the FRAP, FRBP, FRCrP, & FRCvP, and
- the Rules remove distinctions without a difference that make things unnecessarily complex.

When there are actual differences — e.g. (currently only local) FRCrP & FRCvP have different motion page limits; FRAP alone has petitions for extraordinary writs, and gives them a distinct length limit; FRCrP and FRCvP both have discovery and preemptive disclosure obligations which substantially overlap, but FRCrP 16(a) & *Brady/Giglio* obligations differ from FRCvP 26(a) — only the difference should be stated in particular rules, with the shared parts moved to Common Rules.

4. Standardizing page equivalents for words and lines

I note that the extant FRAP & FRBP length limits have unexplained differences in lines and words per page equivalence. I've no idea why this is, so I flag it for the Committees to consider normalization (or at least explanation in notes). See:

- words per page:
 - none³¹: FRAP 28(j), 29(b)(4); FRBP 8014(f), 8017(b)(4)
 - 260: FRAP 5(c), 21(d), 27(d)(2), 35(b)(2), 40(b); FRBP 8013(f)(3), 8022(b)
 - ~433: FRAP 28.1(e) (principal, response), 32(a)(7); FRBP 8015(a)(7), 8016 (principal, reply)
 - ~437: FRAP 28.1(e) (combined); FRBP 8016(d) (combined)
- lines per page:
 - none: FRAP 5(c), 21(d), 27(d)(2), 28(j), 29(b)(4), 33(b)(2), 40(b); FRBP 8013(f)(3), 8014(f), 8017(b)(4), 8022(b)
 - ~43: FRAP 28.1(e), 32(a)(7); FRBP 8015(a)(7), 8016(d)

I suggest standardizing and simplifying the statement of whatever conversion rules are wanted. E.g.:

FCR 5(e) Length limits

(5) *Definition of 'pages'*

Length limits are generally stated in terms of pages (*p*). Filings are acceptable if they meet any of the following:

- (i) no more than *p* handwritten or typewritten pages;
- (ii) no more than $43 \times p^{32}$ lines of monospaced text, e.g. 1,290 lines if “30 pages”;³³
- (iii) no more than $260 \times p$ words, e.g. 7,800 words if “30 pages”; or
- (iv) in a brief, no more than $433 \times p$ words, e.g. 12,990 words if “30 pages”.

If this is adopted, then the various “*P* pages or *W* words or *L* lines” limits above, and in the current rules, could be simplified to just “*P* pages”, and the “if stated” caveat for line limits could be deleted.

³¹ These have word limits but not page limits. I believe this is due to oversight, not intention.

³² I realize that this formulation is unusual in US law. I have adopted it from UK law, where it is common; see e.g. [Working Time Regulations 1998 SI 1998/1822 part II](#). I believe it is an improvement to state the formula outright, rather than obfuscating it behind a disconnected set of parallel word, line, and page limits that create a trap for the unwary.

³³ I believe this is likely no longer in use, and monospace is bad typography, so suggest deleting it. It can be retained if the Committees think it still relevant. In any event, it should be changed to a clear, simple, consistent statement as here.