

HARVARD LAW REVIEW

**WRITING COMPETITION
TIPS PACKET**

April 2026

HARVARD LAW REVIEW

© 2026 Harvard Law Review Association

April 20, 2026

Dear Student:

Thank you for your interest in the *Harvard Law Review* Writing Competition!

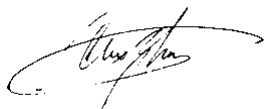
The enclosed information packet is designed to provide some specific guidance about approaching the Subcite and Case Comment portions of the Competition. Together with our recent tips presentation, these materials should give you a complete picture of the Competition.

The following materials are included in this packet:

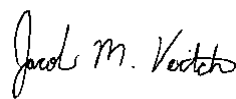
- I. WRITING COMPETITION LOGISTICS
 - A. GENERAL TIMELINE
 - B. ACCOMMODATIONS
- II. WRITING COMPETITION HONOR CODE
- III. WRITING COMPETITION COMPONENTS
 - A. SUBCITE
 - B. CASE COMMENT
 - C. HOLISTIC REVIEW STATEMENT
 - D. GRADE WAIVER
- IV. ADDITIONAL SUBCITE INFORMATION
 - A. GENERAL TIPS
 - B. EXAMPLE CATEGORIES OF SUBCITE ERRORS
- V. ADDITIONAL CASE COMMENT INFORMATION

We hope that you find this information helpful. If you have any questions about the Competition after reviewing this document, please feel free to email lawrev@harvardlawreview.org.


Sincerely yours,



Alexander Zhao
President,
Vol. 140



Jacob M. Veitch
Vice President &
Treasurer,
Vol. 140



Cindy Guo
Vice President of
Coordination,
Diversity &
Outreach,
Vol. 140



Jake Stoffel
Managing Editor
of Operations,
Vol. 140



Allen Litvak
Managing Editor of
Publication,
Vol. 140

WRITING COMPETITION LOGISTICS

General Timeline

Registration for the 2026 *Harvard Law Review* Writing Competition will open on Wednesday, April 22 and will close on Monday, May 11 at 11:59 p.m. EDT. We will post the registration link on our website and email it to HLS students who are eligible to take the Competition.

The 2026 Writing Competition will begin on **Sunday, May 17**. You will receive an email with instructions for accessing the Competition on Sunday, May 17, between 10:00 and 11:00 a.m. ET. You will be able to access the Competition materials from the time you receive that email until 12:00 p.m. ET (noon) on Saturday, May 23.

The email you receive on May 17 will also include information on how to submit the Competition. Students will be able to submit their materials beginning Friday, May 22, from 10:00 a.m. ET until Saturday, May 23 at 12:00 p.m. (noon) ET. Any student who submits their materials after 12:00 p.m. (noon) ET will be disqualified from the Competition.

If you have an accommodation, we will provide you individualized information regarding download and submission windows.

All participants will be notified of the Competition results over the course of an offer weekend in mid-July. New editors will be required to participate in a virtual orientation in late July. Immediately following this virtual orientation, all new editors will begin work on *Law Review* assignments, which will also be completed virtually and can be completed simultaneously with other commitments (e.g., internships, events, travel, etc.). Finally, new editors will also be required to attend an in-person orientation on campus on Saturday, September 5 and Sunday, September 6.

If you have any questions at all, please feel free to email lawrev@harvardlawreview.org.

WRITING COMPETITION LOGISTICS

Accommodations

The *Law Review* is firmly committed to providing accommodations for students with disabilities and handles requests on a case-by-case basis. The *Law Review* is an independent entity and thus has its own accommodations system separate from Harvard Law School's Dean of Students Office. **We are accepting requests until Friday, April 24**, and we will process them on a rolling basis. If you think that you may need accommodations on our six-day competition, please consider submitting to us as soon as possible so that we can provide you with the support that you need.

Accommodations decisions happen separately from Competition registration. Nothing about your accommodations application or your receipt of accommodations will be part of the Competition entry that is considered in the selection process. All Competition grading is doubly anonymized. Accommodations recommendations to *HLR* are made by our consultant, Dr. Loring Brinckerhoff. Jennifer Heath, a non-student permanent staff member, manages all requests, inquiries, and logistics related to accommodations for the Competition.

You can find the necessary forms and procedures on our website under the section titled, "Disabilities & Accommodations." Our [FAQs on Accommodations](#) describes the process of applying in detail. You can find the accommodations sign-up form linked on the website. Please review the documentation guidelines carefully, and if you have any questions about requesting accommodations, please contact Jennifer Heath at hlr-accommodations@harvardlawreview.org.

Additionally, students may request accommodations for religious observances. Students with religious conflicts during the Competition, including the Sabbath, Shavuot, or other observances, should email hlr-accommodations@harvardlawreview.org as soon as possible.

WRITING COMPETITION HONOR CODE

(The Competition packet distributed at the start of the Competition will contain more details.)

1. Your entry must reflect your work only. **You may not consult or collaborate with anyone in any way regarding any part of the Writing Competition.** The *Law Review* takes very seriously allegations of student dishonesty. Information regarding improprieties should be reported immediately by contacting the *Law Review*.
2. All entries are graded anonymously under a doubly anonymized system. We have taken every precaution to ensure that no grader will learn your identity. **Do not put your name or other identifying information on any of the entry materials, except where you are specifically requested to do so.**
3. **Do not distribute, share, or discuss Competition materials with anyone.** The materials shared with you will be individualized and can be traced back to you. If the *Law Review* determines that Competition materials have been shared in any way, your entry will be disqualified.
4. You may **NOT** conduct outside research of any kind. **Use of materials outside of the packet — including, but not limited to, Lexis, Westlaw, or blog postings — is strictly prohibited.** Thus, you may not do any outside research of any kind, including general background reading, and you may not refer to any other materials that you own or to which you may have access. This includes your first-year course texts and notes. Note that citing or referring to authorities outside the Competition packet is **strictly prohibited** and will result in disqualification from the Competition. You may make use of a dictionary, thesaurus, grammar manual, and/or style guide.
5. You may **NOT use the online Bluebook website** or cite to *Bluebook* rules that are not included in the Competition packet.
6. **Any and all use of generative artificial intelligence (AI) tools to prepare your submission is strictly prohibited.** This prohibition includes, but is not limited to, the use of ChatGPT, Clause, and other LLM-based tools to generate, edit, revise, summarize, or otherwise assist in preparing your submission. For more information, please reference the Competition Policy on AI Use, available on HLR's Writing Competition website. The consequence for violation of the Competition's Policy on AI Use is disqualification.
7. **We will enforce our Honor Code with file-tracking, anti-cheating tools, and other internal measures. Violations of this Honor Code may affect your eligibility for admission to the bar after graduation**

WRITING COMPETITION COMPONENTS

The *Harvard Law Review* is comprised of students in their second and third year of law school who are selected via a six-day writing competition at the end of each academic year.

The Competition consists of two parts:

- 1. Subcite. [50% of Competition Score]** This exercise is meant to mirror the student editing experience on the *Law Review*. The primary task is to identify and correct both **technical** and **substantive** errors in a *Law Review* piece. In this exercise, you will receive a portion of text from a yet-to-be-published article with errors and the sources relied upon in the excerpt. In proposing edits to the author, you will need to: (1) identify the error, (2) explain the nature of the error, and (3) suggest a correction. The greater the number of correctly identified and properly explained errors, the more points you will receive.
- 2. Case Comment. [50% of Competition Score]** This exercise is meant to mirror the student writing experience on the *Law Review*. The Case Comment involves reporting on a particular case and constructing a narrow argument regarding the case. In the reporting section, you will summarize the factual and procedural background of the case, along with the main arguments made by each opinion. In the analytical section, you will make an argument about the case (the guidance offered in this memo should give you a sense of the parameters of a strong argument section). You will receive the case on which you will be writing and secondary sources from which you can draw for your argument.

The entire Competition consists of a closed universe of materials; **outside research is strictly prohibited, as is the use of any reference materials (e.g., outlines from 1L courses)**. The following page includes some helpful strategies and rules for the Competition. We have also included sample schedules that show how actual *HLLR* Editors have previously budgeted their time throughout the Competition. As you will see, there is no one right way to budget your time during the Competition!

Editor Selection: Based on the Competition, fifty-four second-year students will be invited to join the *Law Review* each year, including:

- Twenty students selected based solely on Competition scores
- Seven students (one from each 1L section) selected based on an equally weighted combination of Competition scores and first-year grades
- Three students (from any section) selected based on an equally weighted combination of Competition scores and first-year grades
- Twenty-four students selected through an anonymous holistic review (see “Writing Competition Logistics — Holistic Review” below for details)

The *Law Review* is committed to a diverse and inclusive membership and encourages all students to participate in the Writing Competition. Harvard Law School students who are interested in joining the *Law Review* must write the Competition at the end of their first year, even if they plan to take time off during law school or are pursuing a joint degree at another graduate school.

WRITING COMPETITION COMPONENTS

Subcite

Subcite: Your score on the Subcite is based on the number of errors that you have correctly identified in a provided excerpt. This packet includes a list of the different types of errors that may be found in the Subcite excerpt. Points are assigned to each error based on the level of difficulty of each error. You will **not** be penalized for incorrectly suggesting edits for things that are not wrong in the first place, as long as you are not doing egregious overcorrection.

Technical Errors: You will be asked to apply a subset of basic Bluebook rules and internal *Law Review* style guidelines. These will all be provided in the Competition materials. The Competition is meant to test your overall editing quality and attention to detail, **not** mastery of the *Bluebook*. **You are not responsible for *Bluebook* rules that are not included in the actual Competition materials.** Studying the full *Bluebook* would likely prove to be a poor use of time.

Substantive Errors: You will be asked to validate that there is support for each factual assertions made throughout the piece and to ensure that each assertion accurately characterizes the cited source. **Please remember to check sources.** This is a critical part of the Subcite.

Please remember that, to receive credit for a correction, your comment must do all of the following:

1. **Identify** an error (highlighting the exact text to be replaced);
2. Briefly **explain why** it is an error (citing to a specific rule or source if applicable);
3. Suggest a **correction** of the error in <angle brackets>.

Please use a polite tone in your comments, as we work extensively with outside authors such as professors and judges. Applicants who use a rude or offensive tone will be penalized. Comments that do not offer any explanation of the error will be severely penalized.

Finally, remember — no one catches all the errors in the Subcite excerpt (seriously)!

WRITING COMPETITION COMPONENTS

Case Comment

Case Comment: Your score on the Case Comment is based on the legal analysis, argumentation, structure, and clarity of your written piece based on a provided “Recent Case” (i.e., a recent U.S. Court of Appeals or state supreme court case). **Please review and follow the suggested format;** most successful Case Comments adhere to that format.

A successful Case Comment will have two components:

- **Reporting:** You will summarize the facts of the case and the court’s opinion(s). Please do not neglect the facts in your argument section – show why the court’s principles apply, or fail to apply, to the facts of the case. **Do not shortchange the reporting section – it is a precondition to a compelling argument.** The reporting section should typically take up about half the length of your Case Comment.
- **Analysis:** You will offer an argument based on the provided case. You should offer an analysis that does not simply repeat arguments offered by either the majority or the dissent. **The most powerful Case Comments are often internal critiques,** but arguments can range from the court misapplying procedure or precedent to the court facilitating bad policy outcomes. **However, there is no need to reinvent the law. A less ambitious but well supported argument is better than an ambitious but poorly supported one.** It is important for your argument to relate back to the case, instead of solely the doctrinal issues raised by the case. Several sample thesis statements are included later in this packet. The analysis section should typically take up about half the length of your Case Comment.

Note, we do **not** necessarily expect you to be well-versed in the issues raised in the Recent Case. One of the skills tested by the Case Comment is the ability to consider legal issues with which you have had little experience. Scan the sources for helpful introductory and background material.

However, you will receive *many* more sources than you need. You should choose a potential topic early (to help you narrow down the available sources), but you do not need a thesis early. **It may be helpful to choose an approach early on and then selectively read the materials. We strongly recommend that you do not attempt to read every single source in detail.**

In terms of your writing, please write clear, declarative sentences. Use active voice and topic sentences. It should be easy for the grader to follow the logical progression of your argument.

We will grade based on following the provided instructions. **Please do NOT exceed the allowed amount of words.** If you do, you will be severely penalized.

We will **not** grade based on *Bluebook*-ing, as long as the applicant has made a good faith effort to cite their sources.

We will **not** grade based on ideological disagreements. Graders’ agreement or disagreement with an argument is not a criterion used to grade Case Comments.

WRITING COMPETITION COMPONENTS
Holistic Review Statement [OPTIONAL]

As part of the Competition, you may submit an **optional** Holistic Review statement so that you may be eligible for selection to the *Law Review* under the Holistic Review procedure. Twenty-four editors shall be selected through a holistic but anonymous review that considers all available information, including students' Competition scores, 1L grades (if authorized by the provided grade waiver), and Holistic Review Statements.

Applicants are welcome to draft their expository statements before the Competition week begins, and the prompt for the 200-word statement is as follows:

“You are strongly encouraged to use the space below to submit a typed expository statement of no more than 200 words. This statement may identify and describe aspects of your perspectives, experiences, and viewpoints, and the ways in which those attributes or experiences will enhance your contributions to the Law Review. You also may use this statement to identify and describe areas of academic or scholarly interest, career goals, or anything that you would bring to your work on the Law Review. Statements will be considered only after grading of the Subcite and Case Comment sections of the Competition has been completed. Statements will not be evaluated for quality of writing or editing, nor will they be assigned a numerical score. No applicant will be penalized in any way for not submitting an optional statement, and all optional statements are completely confidential.”

You may write this statement at any point before or during the Competition. All Competition takers are encouraged to write a Holistic Review statement.

WRITING COMPETITION COMPONENTS
Grade Waiver [OPTIONAL]

As part of the Competition, you may **optionally** authorize HLS to share your 1L grades with *HLR* so that you may be eligible for selection to the *Law Review* under the 50% grades / 50% Writing Competition procedure and that your grades may be considered during Holistic Review.

The grades waiver form is provided as a PDF, and students must sign this form with their written signature. You may print, sign, and scan the PDF; import your signature into the document; or use a program like Adobe to draw your signature. **Typed signatures will not be accepted.**

ADDITIONAL SUBCITE INFORMATION
(50% of Competition Score)

The basic task of a Subcite is to identify and correct both **technical** and **substantive** errors in a written piece. As part of the Competition, you will receive a portion of text suffering from such errors. You will create a series of comments to the author of the piece, suggesting corrections. We encourage you to not neglect the Subcite portion, as it is generally an opportunity to gain points.

This packet contains a non-exhaustive list of the types of errors that may appear in the Subcite.

In addition to editing for general substantive and technical quality, you will also be asked to apply a subset of basic *Bluebook* rules and internal *Law Review* style guidelines. These will all be provided in the Competition materials. Keep in mind, however, that the purpose of the Subcite is to measure overall editing quality and attention to detail, *not* mastery of the *Bluebook*. **You are not responsible for *Bluebook* rules that are not included in the actual Competition materials.**

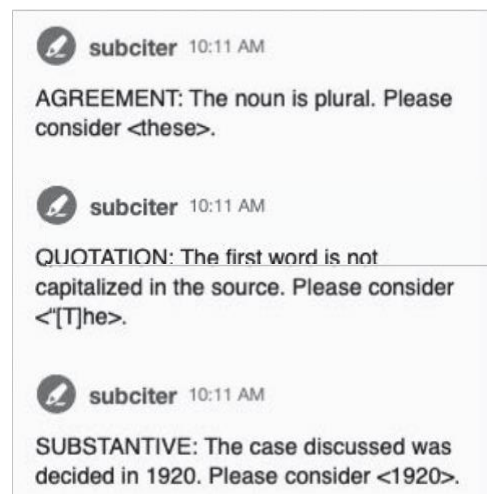
To receive credit for a correction, each comment you add to the document must: 1) identify the type of error using a heading in all caps, 2) explain the error by pointing to a particular quotation from the text and/or a particular *Bluebook* or stylistic rule, and 3) offer a suggested correction in polite language, set off by angle brackets (“Please consider < . . . >”). You must highlight the **exact text** that your proposed correction would replace; you will receive no credit if replacing the highlighted text with your proposed correction would introduce a new error.

If a cited **source** reads:

“In 1920, the Court decided a key case.”

The following **corrections** would be appropriate:

A key development in **this** areas came in **1921**. **The** Court decided a key case.”



ADDITIONAL SUBCITE INFORMATION

General Tips

- **Carefully read the instructions for how to leave comments in the Subcite excerpt.**
- **Review the list of typical subcite errors in this packet.** Remember that some of the errors will be substantive; to find them, you will need to check that the statement in the text is supported by the source it cites.
- **You will not need to know any Bluebook rules beyond what is included** in the Competition packet itself. Bluebook rules and internal style guidelines included in the competition may be different from those that have appeared in previous years. You may find it helpful to familiarize yourself with Bluebook rules that appeared frequently in your LRW course.
- **Make sure that you suggest corrections for any errors you identify**, even for simple misspellings. Set off your suggested fix with <angle brackets>. Comments that don't include a correction will not receive points.
- You must also **label the general error type** before identifying the specific error (see next page for a non-exhaustive list). The exact label you choose to use is not important, as long as the nature of the error is clear to the grader.
- You must **explain** why the error you have identified is wrong, with a citation to a specific rule if applicable. **Comments with an inadequate explanation may not receive points.**
- **Highlight the exact text to be replaced.** For example, if a punctuation mark or accompanying word is highlighted, it should also be included in your <suggested correction>.
- **Only clear errors will receive points; borderline errors or matters of stylistic preference will not be rewarded with points.** If you find yourself consistently flagging errors without being certain whether the error was "clear," you may be over-editing. Excessive editing may be penalized, but only in egregious cases.
- **Please use a polite tone in your comments.** Comments that use a rude or offensive tone may not receive points. Using phrases like "On my read, . . ." and "Please consider <. . .>" is strongly encouraged.
- In the subcite text you are given, text that would be in SMALL CAPS in print (such as journal names and book titles) will be **bold** and text that would be in *italics* in print (such as article titles and textual references to case names) will be underlined. Your suggested corrections should follow the adjusted typeface.
- **For nested errors, it is recommended that you highlight and leave a comment for the smaller correction first**, before proceeding to the longer correction. Then, highlight over it for the longer correction, and leave a separate comment for the longer correction.

ADDITIONAL SUBCITE INFORMATION

Example Categories of Subcite Errors

(This list is not exhaustive. Not all listed errors will necessarily be represented in the Subcite.)

- ABBREVIATION
- ACRONYM
- BLUEBOOK
- CAPITALIZATION
- CHARACTERIZATION
- COLLOQUIALISM
- CONSISTENCY
- CROSS-REFERENCE
- DANGLING MODIFIER
- FOOTNOTE CALL
- FRAGMENT / RUN-ON
- HEADING
- HYPHENATION
- INTERNAL *HLR* RULE
- ORDER OF AUTHORITIES
- PARALLELISM
- PINCITE
- PUNCTUATION
- QUOTATION
- REDUNDANCY
- SIGNAL
- SINGULAR/PLURAL
- SOURCE
- SPACING
- SPELLING
- SPLIT INFINITIVE
- STRUCTURE
- SUBJECT/VERB AGREEMENT
- SUBSTANCE
- SUPPORT
- THAT/WHICH
- TYPEFACE
- VERB TENSE
- WORD CHOICE

ADDITIONAL CASE COMMENT INFORMATION
(50% of Competition Score)

The **Case Comment** is a distinctive genre of legal writing. It involves reporting on a particular case and constructing a narrow argument regarding the case. For the Writing Competition, we will provide you with a Recent Case that you will write about as well as sources you can draw from in building your argument. **Absolutely no outside research is allowed.** We expect you to give a good-faith effort to follow the *Bluebook* for the Case Comment, but **we do not expect perfect adherence to the *Bluebook* for the Case Comment.**

The **Suggested Format** included in this section offers a template for designing your own Case Comment. Although there is no single format for a strong Case Comment, you should seriously consider this guidance as you begin your writing.

In particular, this information should be helpful as you construct the first half of your Case Comment — the **reporting section**, in which you will discuss the facts of the case and what the courts have said. The case for your Competition may be from either a U.S. Court of Appeals or a state supreme court. Because the structure of a Case Comment differs slightly depending upon which level of court decided the case, pay particular attention to these differences as they are described in the following pages.

The second half of the Case Comment — the **argument section** — permits more creativity. Included in this packet is a page of general tips that may help you as you think through your argument. Additionally, this packet also includes a list of sample theses that represent a range of the types of arguments a Case Comment might make.

In order to get a better sense of the distinctive form that Case Comments take, it may be worthwhile to skim a few of the **full-length Case Comments** (“Recent Cases”) in the Harvard Law Review, which are available at <https://harvardlawreview.org/category/recent-things/recent-case/>.

To be clear, the quality of a successful Competition Case Comment is *not* like that of a piece ultimately published in the *Review*. Published work has been through multiple rounds of intensive editing. The Competition does not require anything approaching a publication-quality submission

ADDITIONAL CASE COMMENT INFORMATION

General Tips

Formal and Stylistic Tips:

- Most successful Case Comments adhere roughly to the suggested Case Comment format. **Leave originality for the substance of your argument** rather than the format of the piece.
- **DO NOT exceed the word limit provided in the Competition instructions.** If you do, you will be severely penalized.
- Write clear, declarative sentences. Use active voice. Most published Case Comments do not use elaborate literary flair. **Most readers look for a straightforward argument, not soaring prose.**
- **Use clear topic sentences.** When read together, your topic sentences should provide the complete logical progression of your argument.

Substantive Tips:

- **Do not neglect the facts in your argument section.** Show why the court's principles apply, or fail to apply, to these facts.
- **Do not shortchange the reporting section of the comment.** It is a precondition to a compelling argument. While you should attempt to cover all of the main issues in the opinion, it may not be necessary to devote the same amount of discussion to each factual issue. Similarly, although you should give every opinion the importance that you feel it is due, you need not spend the same amount of space discussing each opinion.
- **When in doubt, confine your discussion to the doctrine and you will not go wrong.** Be sure to have the cases before you at all times. Anchor yourself to the black-letter law.
- **Do not simply reiterate one of the arguments of the opinions** (e.g., the dissent).
- **The most powerful Case Comments are often internal critiques.** Published *Law Review* Case Comments most frequently argue within a limited scope. For example, a comment might argue that the court's conclusion does not follow from its premises, that the premises are at war with one another, or that the opinion failed to recognize certain implications.
- **Make sure that your argument relates back to the case** instead of commenting solely on the doctrinal issues raised by the case. It is, after all, a *Case Comment*.

Tips for Forming an Argument:

- **Try to choose an approach early on and then *selectively read the materials*.** Skim the source titles and text provided in order to get a sense of the themes that the case addresses. We strongly recommend that you do not attempt to read all of the sources. It is neither necessary nor practical to use all of the provided materials.
- **Try arranging precedents chronologically or thematically.** You may discover interesting connections across the materials.
- **Focus on developing a clear, succinct, and manageable thesis that you fully grasp.** The actual writing for the Competition Case Comment is quite short, especially considering the fact that roughly half of your piece will be footnotes. With half of the text a description of the facts and opinions, your argument section will be quite brief.’
- **Be cautious about changing your thesis as the Competition progresses.** It is important to have enough time to finish both portions of the Competition.
- **We do *not* expect you to be familiar with the issues raised in the case.** One of the skills tested by the Case Comment is the ability to consider legal issues with which you have little experience. Scan the sources for helpful introductory and background material.
- **A less ambitious but well supported argument is better than an ambitious but poorly supported argument.** The goal of the Case Comment is to clarify the legal issues. Don’t feel pressure to contribute to the advancement of legal scholarship. You will not be able to rewrite an area of the law with only a few days and very limited sources. Review whether each step of your argument is supported and follows logically from the previous step. Building an outline of your argument can help develop the flow of this section.

ADDITIONAL CASE COMMENT INFORMATION

Suggested Format

	STATE SUPREME COURT CASE	U.S. COURT OF APPEALS CASE
¶ 1	Write a few sentences of background to the case and your argument.	
	Then write: “Recently, in [<i>insert case name</i>], the [<i>state name</i>] Supreme Court [<i>insert holding</i>].”	Then write: “Recently, in [<i>insert case name</i>], the [<i>insert circuit number</i>] Circuit [<i>insert holding</i>].”
	Finally, state your thesis succinctly.	
¶ 2	Set out the facts of the case, from the beginning.	
¶ 3	Describe the procedural posture in the trial court or, if there is no trial court opinion, state the legal issue.	Describe the procedural posture in the trial court and explain the trial court’s reasoning.
¶ 4	Consider the procedural posture in the inferior appellate courts. If there is a relevant dissent, mention it (maybe in a footnote).	Begin discussing the Appeals court opinion. The first sentence should read: “The [<i>insert circuit number</i>] Circuit [<i>insert “affirmed,” “reversed,” “vacated”</i>].” The second sentence should read: “Writing for the panel, Judge [<i>insert opinion author’s name</i>]”
¶ 5	Begin discussing the Supreme Court opinion. The first sentence should read: “The [<i>state name</i>] Supreme Court [<i>insert “affirmed,” “reversed,” “vacated,” etc.</i>].” The second sentence should read: “Writing for the Court, Justice [<i>insert opinion author’s name</i>]”	Continue giving an account of the opinion.
¶ 6 to 8	Continue discussing opinion; describe each concurring and dissenting opinion in a separate paragraph.	Describe each concurring and dissenting opinion in a separate paragraph.
¶ 9	State your thesis. There are several standard approaches editors have taken in the past, including: (a) good reasoning, unclear conclusion; (b) bad reasoning, bad conclusion; (c) good reasoning, bad conclusion; (d) bad reasoning, good conclusion; (e) good reasoning, but missed policy implication X; (f) bad reasoning that may lead to bad outcome Y, etc. You should choose any argument that you find interesting and that allows you to perform a thoughtful, engaging analysis, but make sure to choose a thesis that is <i>about the case</i> , not just general doctrinal or policy issues that are brought up in the case. Try to think creatively, while recognizing the realities of your time and length limitations. (Remember to look at previously published comments for a better sense of the variety of possible arguments.)	
¶ 10 to end	Flesh out your argument, drawing upon cases and source materials. For the final paragraph, create some form of a conclusion.	

ADDITIONAL CASE COMMENT INFORMATION
Sample Thesis Statements

“While *Bianchi* exemplifies the confusion among lower courts attempting to apply *Bruen*’s ‘text and history’ test, the Fourth Circuit’s interpretation of *Bruen* presents a potential path forward for other courts.”

- 138 Harv. L. Rev. 1153

“Although the *Eldridge* court argued that textualist concerns counseled in favor of disregarding the D.C. Circuit’s prior decision on this issue, it made two questionable analytical moves that limit the persuasiveness of the opinion.”

- 137 Harv. L. Rev. 1749

“The Nevada court could have embraced this reasoning — akin to the one underpinning *Bivens* — outright. Doing so would have produced a more coherent opinion and would have been justified because the doctrine animating the U.S. Supreme Court’s departure from *Bivens* is inapplicable in Nevada’s context.”

- 136 Harv. L. Rev. 2184

“In finding no search, the court missed a chance to clarify a murky area of Fourth Amendment law by building on recent Supreme Court rulings on prolonged tracking.”

- 135 Harv. L. Rev. 928

“The panel’s decision reaffirms established precedent protecting Indian tribes, confirms that last Term’s landmark ruling in *McGirt v. Oklahoma* applies in the civil context, and safeguards reservations with comparable allotment structures against diminishment and disestablishment.”

- 134 Harv. L. Rev. 1583

“In declining to apply the *Griffin* framework, the court assumed a questionable liberty-property dichotomy that impeded it from properly considering the importance of having a driver’s license in today’s society.”

- 133 Harv. L. Rev. 2411

“Although the court analyzed the transaction appropriately, its reasoning highlights several problems of theory and practice associated with distinguishing debt from equity. To ameliorate these problems, Congress should jettison the debt-equity distinction.”

- 132 Harv. L. Rev. 2378