

23 CIRCUIT, PROBATE, & DISTRICT COURT JUDGES

We are very sensitive to the issue that the proposed amendment of MCR 1.109 seeks to address. Gender dysphoria is a serious issue. In fact, if a litigant, party, juror, or witness in good faith requested that the individual be referred to a particular fashion, judges should respectfully consider the request and accommodate any such reasonable request - especially if the person legally changed the individual's name and appearance.

However, under the current draft, having the Supreme Court (1) encourage litigants and parties to in essence register their pronouns and (2) compel judges to follow such registered preferences, is another matter altogether.

Upon considerable reflection, we concur with the position taken by the MJA and other judicial associations. The current draft is a well intended proposal but will have serious unintended consequences for the effective and efficient administration of justice. It also raises serious constitutional questions, which will likely embroil the judiciary in litigation for years to come.

The following elaborates these concerns:

Belittling Gender Dysphoria. Gender dysphoria is a serious mental health challenge. Those who have the wherewithal to make a transition do not do so lightly, and certainly not as an entitlement or to cause mischief in court. Trans persons who go through the process of changing their name and appearance, taking puberty blockers, undergoing hormone treatment, and/or surgery, have taken considerable steps to address their genuine condition.

But none of that is required here - all one has to do is check a box. Those with serious issues will be equated - and treated

similarly - as those who claim new pronouns for malicious or frivolous reasons. Lumping in the truly dysphoric with frauds will cause anguish to those who are already burdened enough. Meanwhile, the insensitive will use this overly broad policy as another excuse to attack and mock the truly dysphoric and their supporters. The proposal completely belittles those who truly have gender dysphoria.

Necessity. Judicial canon 3A.(3) already requires judges to be “courteous” to litigants and attorneys. If a person is genuinely suffering gender dysphoria and changed the person’s name and appearance, the refusal to use a traditional pronoun of the gender chosen by the person would likely be considered discourteous. Non-mandatory guidance to this effect would likely eliminate 99.9% percent of the abuse and perhaps all non-religious objections to the proposal.

Limitless Possibilities. As the Court is aware, pronouns are no longer restrained to he, she, and they. In fact, a 5 second google search revealed this list of 762 pronouns:

Name	Subject	Object	Determiner	Pronoun	Reflexive
he/him	he	him	his	his	himself
she/her	she	her	hers	hers	herself
ae/aer	ae	aer	aer	aers	aerself
ay/em	ey	em	eir	eirs	emself
fae/faer	fae	faer	faer	faers	faerself
xe/xem	xe	xem	xyr	xyrs	xemself
ze/hir	ze	hir	hir	hirs	hirself
ze/zir	ze	zir	zir	zirs	zirsself
co/cos	co	co	cos	co's	coself
e/em	e	em	eir	eirs	emself

Name	Subject	Object	Determiner	Pronoun	Reflexive
e/em/es	e	em	es	ems	emself
hu/hum	hu	hum	hus	hus	huself
ne/nem	ne	nem	nir	nirs	nemself
ne/nir	ne	nir	nir	nirs	nirself
per/per	per	per	per	pers	perself
s/he	s/he	hir	hir	hirs	hirself
thon/thons	thon	thon	thons	thon's	thonsself
ve/ver	ve	ver	vis	vers	verself
vi/ver	vi	ver	vis	vir	verself
vi/vim	vi	vim	vis	vims	vimself
zhe/zher	zhe	zher	zher	zhers	zherself
bun/bun	bun	bun	buns	buns	bunself
tei/ter	tei	ter	ter	ters	terself
e/hem	e	hem	hes	hes	hemself
they/them	they	them	theirs	theirs	theirsself
er/ero	er	ero	eros	eros	eroself
thou/thee	thou	thee	thy	thine	thyself
pi/pika	pi	pika	pika	pikas	piself
fai/fairy	fai	fairy	fair	fairys	fairysself
Hy/hym	Hy	hym	hys	Hys	Hymself
Poison/Poison	Poison	Poison	Poisons	Poisons	Poisons elf
Cer/Cerise	Cer	Cerise	Cerise	Cerises	Cerises lf
mao/mao	mao	mao	maos	maos	maoself
mrr/mrrp	mrr	mrrp	mrrps	mrrps	mrrpsself
pitter/patter	pitter	patter	pitters	patters	pittersself
deity/deity	deity	deity	deitys	deitys	deityself

Name	Subject	Object	Determiner	Pronoun	Reflexive
xey/xem	xey	xem	xyr	xyrs	xemself
hy/hyp	hy	hyp	hyper	hypers	hypself
Honk/Honk	Honk	Honk	honks	honks	Honkself
puppy/puppy	puppy	puppy	pups	pups	pupself
cloud/cloud	cloud	cloud	clouds	clouds	cloudself
bat/bat	bat	bat	bats	bats	batsself
fox/fox	fox	fox	foxs	foxs	foxself
nya/nyan	nya	nyan	nyans	nyans	nyanself
kitty/kitty	kitty	kitty	kittys	kittys	kitself
pup/purr	pup	purr	pups	pups	purrself
star/star	star	star	stars	stars	starself
Pup/Pup	Pup	Pup	Pups	Pups	Pupself
zhe/her	zhe	her	her	herz	herzelf
ro/rose	ro	rose	roses	roses	roseself
Dex/Dex	Dex	Dex	dexz	dexz	Dexself
Gi/Gir	Gi	Gir	Gir	girs	Girself
Be/Berry	Be	Berry	berrys	Berrys	Berryself
Ci/Cipher	Ci	Cipher	ciphers	ciphers	Cipherse lf
Deu/Deu	Deu	Deu	Deus	deus	Deuself
Ser/Sera	Ser	Sera	Seras	seras	Seraphs elf
in/indo	in	indo	indols	indols	indolents elf
slo/sloth	slo	sloth	sloths	sloths	slothself
a/arro	a	arro	arrogas	arrogas	arrogant self
pri/pride	pri	pride	prides	prides	prideself

Name	Subject	Object	Determiner	Pronoun	Reflexive
glu/glutto	glu	glutto	gluttony	gluttonys	gluttony self
vo/vor	vo	vor	voraci	voracis	voraciou sself
wra/wrath	wra	wrath	wraths	wraths	wrathself
fu/fury	fu	fury	furio	furious	furiouse lf
en/envy	en	envy	envys	envys	envyself
je/jeal	je	jeal	jeal	jealous	jealouse lf
lu/lust	lu	lust	lusts	lusts	lustself
rep/tile	rep	tile	reps	reps	reptilese lf
lasci/lasciv	lasci	lasciv	lascivious	lascivious	lasciviou self
gre/greed	gre	greed	greed	greeds	greedsel f
li/liz	li	liz	lizards	lizards	lizardself
abey/abem	abey	abem	abir	abirs	abemself
aby/abm	aby	abm	abeir	abeirs	abmself
yo/yom	yo	yom	yor	yors	yomself
jun/junt	jun	junt	juntos	juntos	juntoself
mach/machi	mach	machi	machin	machines	machine self
ca/care	ca	care	cares	cares	careself
bea/beam	bea	beam	beams	beams	beamself
Mura/Murasa	Mura	Murasa	Muras	Muras	Murasaki noself
vjo/vjol	vjo	vjol	vjolas	vjolas	vjolaself
ro/rox	ro	rox	roxos	roxos	roxoself

Name	Subject	Object	Determiner	Pronoun	Reflexive
lanu/viole	lanu	viole	lanus	violes	lanu violeself
phe/phere	phe	phere	pher	phers	phereses elf
Fia/Fialo	Fia	Fialo	Fialovs	Fialovs	Fialovás elf
wun/wung	wun	wung	wungus	wungus	wunguse lf
zamb/zamba	zamb	zamba	zambar	zambars	zambara usef
li/lil	li	lil	lilas	lilas	lilself
mor/mor	mor	mor	mors	mors	morsel self
siyo/siyoh	siyo	siyoh	siyohr	siyohrs	siyohran gself
por/for	por	for	porffors	porffors	porfforse lf
mfu/mfus	mfu	mfus	mfusas	mfusas	mfusasel f
el/eles	el	eles	eleses	eleses	eleseself
ons/onsom	ons	onsom	onsomis	onsomis	onsomis elf
shi/shiy	shi	shiy	shiyas	shiyas	shiyaself
kwa/kwam	kwa	kwam	kwamis	kwamis	kwamise lf
tic/tic	tic	tic	tics	tics	ticself
tour/toure	tour	toure	tourettes	tourettes	tourettes elf
Knu/Knul	Knu	Knul	Knullas	Knullas	Knullasel f
Vio/Viole	Vio	Viole	Violetti	Violetti	Violetti self
cotton/candy	cotton	candy	candies	candies	cottonse lf

Name	Subject	Object	Determiner	Pronoun	Reflexive
ly/lyc	ly	lyc	lycans	lycans	lycanself
bite/bite	bite	bite	bites	bites	biteself
pop/bop	pop	bop	bops	pops	bopself
vi/vik	vi	vik	vikins	viking	vikingself
chem/chemic	chem	chemic	chemical	chemicals	chemicself
t/t	t	t	t's	t's	tself
iv/iv	iv	iv	ivs	ivs	ivself
z/z	z	z	z's	z's	zself
se/hir	se	hir	hir	hirs	hirself
phi/phim	phi	phim	phir	phirs	phirself
ye/yem	ye	yem	yer	yers	yemself
we/wem	we	wem	wer	wers	wemself
ve/vem	ve	vem	ver	vers	vemself
ue/uem	ue	uem	uer	uers	uemself
te/tem	te	tem	ter	ters	temself
se/sem	se	sem	ser	sers	semself
re/rem	re	rem	rer	rers	remself
qe/qem	qe	qem	qer	qers	qemself
pe/pem	pe	pem	per	pers	pemself
oe/oem	oe	oem	oer	oers	oemself
de/dem	de	dem	demo	demos	demoself
fi/fien	fi	fien	fiend	fiends	fiendself
de/dim	de	dim	dis	dis	dimself
eel/eel	eel	eel	eels	eels	eelf
lamprey/ lamprey	lamprey	lamprey	lampreys	lampreys	lampreyself

Name	Subject	Object	Determiner	Pronoun	Reflexive
fae/faen	fae	faen	faer	faers	faenself
fla/flae	fla	flae	flaem	flaes	flaeself
exe/exe	exe	exe	exe	exes	txtself
nyc/nycto	nyc	nycto	nyctos	nyctos	nyctoself
cry/cryp	cry	cryp	crys	crys	crypself
me/mem	me	mem	mer	mers	memself
le/lem	le	lem	ler	lers	lemself
ke/kem	ke	kem	ker	kers	kemself
je/jem	je	jem	jer	jers	jemself
ie/iem	ie	iem	ier	iers	iemself
he/hem	he	hem	her	hers	hemself
ge/gem	ge	gem	ger	gers	gemself
fe/fem	fe	fem	fer	fers	femself
ee/eem	ee	eem	eer	eers	eemself
ce/cem	ce	cem	cer	cers	cemself
Be/Bem	Be	Bem	Bir	Birs	Bemself
Ae/Aem	Ae	Aem	Aeir	Aeirs	Aemself
bri/brigh	bri	brigh	brigh	brighs	brightself
Kie/Kym	Kie	Kym	Kir	Kirs	Kymself
Nie/Nym	Nie	Nym	Nyr	Nyrs	Nymself
Sie/Sym	Sie	Sym	Ser	Sers	Symself
Xe/Xym	Xe	Xym	Xyr	Xyrs	Xymself
Mie/Mim	Mie	Mim	Mir	Mirs	Mimself
idol/idol	idol	idol	idols	idols	idolself
ce/cer	ce	cer	cem	cers	cerself
3/3	3	3	3s	3s	3self
vi/vir	vi	vir	virus	virus	viruself

Name	Subject	Object	Determiner	Pronoun	Reflexive
han/ham	han	ham	hans	hans	han selv
king/king	king	king	kings	king's	kingself
ix/ix	ix	ix	ixs	ixs	ixself
sly/slim	sly	slim	sleir	sleirs	slimself
sli/slime	sli	slime	slimes	slimes	slimeself
sly/sly	sly	sly	sly's	sly's	slyself
doll/doll	doll	doll	doll's	doll's	dollself
xe/xet	xe	xet	xet	xets	xetself
ith/ith	ith	ith	iths	iths	ithself
baby/baby	baby	baby	baby's	baby's	babyself
Miku/Miku	Miku	Miku	Mikur	Mikurs	Mikuself
wol/wolf	wol	wolf	wolf	wolfs	wolfself
hor/horse	hor	horse	horse	horses	horseself
boom/boomer	boom	boomer	booms	boomers	boomers elf
go/goth	go	goth	goths	goths	gothself
vir/virg	vir	virg	vir	virgs	virgoself
le/les	le	les	lesb	lesbians	lesbians elf
catboy/catboy	catboy	catboy	catboys	catboys	catboys elf
radio/radium	radio	radium	radios	radioactives	radioacti veself
car/caru	car	caru	cariad	cariads	cariadsel f
ef/fe	ef	fe	ei	ei	ei hun
angel/angel	angel	angel	angels	angels	angelf
Ze/zim	Ze	zim	zir	zirs	zimself
mi/mim	mi	mim	mimicks	mimicks	mimicks elf

Name	Subject	Object	Determiner	Pronoun	Reflexive
you/you	you	you	your	yours	yourself
hx/hxm	hx	hxm	hxs	hxs	hxmself
bug/bug	bug	bug	bugs	bugs	bugself
pocket/pocket	pocket	pocket	pockets	pockets	pockets elf
li/lim	li	lim	liz	liz	lizelf
h*/h*m	h*	h*m	h*s	h*s	h*mself
dae/daem	dae	daem	daer	daer	daemself
Xe/Xim	Xe	Xim	Xe's	Xis	Ximself
fla/flare	fla	flare	flares	flares	flareself
spark/spark	spark	spark	sparks	sparks	sparkself
lul/lul	lul	lul	lulz	lulz	lulself
were/were	were	were	wolf	wolfs	wereself
Medi/Medical	Medi	Medical	Medical	Medicals	Mediself
ai/ai	ai	ai	ais	ais	aisself
mi/mis	mi	mis	mis	mist	mistself
Fa/Faun	Fa	Faun	Faun	Fauns	Faunself
py/pyl	py	pyl	pylx	pylx	pylxself
tee/tee	tee	tee	tees	tees	teeself
fe/fea	fe	fea	feas	feas	feathers elf
coo/coo	coo	coo	coos	coos	cooself
zi/zip	zi	zip	zips	zipps	zipperse lf
cryp/crypt	cryp	crypt	crypt	cryptis	cryptids elf
pey/pen	pey	pen	pens	pens	penself
ce/cev	ce	cev	cevs	cevs	cevself

Name	Subject	Object	Determiner	Pronoun	Reflexive
se/sev	se	sev	sevs	sevs	sevenself
the/then	the	then	thens	thens	thenself
Ze/Zer	Ze	Zer	Zer	Zers	Zerself
Brai/Brain	Brai	Brain	Brains	Brains	Brainself
leo/leo	leo	leo	leos	leos	leoself
Ti/Tiel	Ti	Tiel	Tiels	Tiels	Tielself
Chi/Chit	Chi	Chit	Chits	Chits	Chitterself
ciph/ciph	ciph	ciph	ciphs	ciphs	cipherself
dae/daer	dae	daer	daer	daers	daerself
ciph/cipher	ciph	cipher	ciphz	ciphz	cipherself
moon/moon	moon	moon	moons	moons	moonself
mew/mew	mew	mew	mews	mews	mewself
sno/snow	sno	snow	snows	snows	snowself
pos/sum	pos	sum	poss	summ	possumself
meow/meow	meow	meow	meows	meows	meowself
nyan/nyan	nyan	nyan	nyans	nyans	nyanself
0/0	0	0	0s	0s	0self
lin/linen	lin	linen	linens	linens	linenself
xe/xen	xe	xen	xeno	xenos	xenoself
li/lum	li	lum	lumi	lumis	lumiself
zie/zier	zie	zier	zier	ziers	zierself
Abyss/Abyss	Abyss	Abyss	Abyssal	Abyssals	Abyssself
ruler/rule	ruler	rule	rulers	rulers	rulerself

Name	Subject	Object	Determiner	Pronoun	Reflexive
zie/vaer	zie	vaer	vaer	vaers	vaerself
yo/yor	yo	yor	yors	yors	yordleself
glock/glocken	glock	glocken	glockenspiels	glockenspiels	glockself
wick/wick	wick	wick	wicks	wicks	wickself
3rr0r/3rr0r	3rr0r	3rr0r	3rr0rs	3rr0rs	3rr0r\$3lf
90/90	90	90	90r	90s	9self0
ehs/reh	ehs	reh	reh	sreh	flesreh
eh/mih	eh	mih	sih	sih	flesmih
yeht/meht	yeht	meht	rieht	srieht	flemeht
poppy/seed	poppy	seed	poppyseeds	poppys	poppyseedself
poppyseed/ poppyseed	poppyseed	poppyseed	poppyseeds	poppyseeds	poppyseedself
of/of	of	of	ofs	ofs	ofself
choke/choke	choke	choke	choke	chokes	chokeself
mon/ster	mon	ster	monsters	monsters	monstelf
that thing/it	that thing	it	its	that thing's	itself
obje/ctum	obje	ctum	objectum	objectums	objectuself
xhee/xhim	xhee	xhim	xhir	xheis	xeeself
stim/stim	stim	stim	stims	stims	stimself
price/princes	price	princes	prince's	prince's	princeself
ze/zem	ze	zem	zer	zers	zemsself
k9/k9	k9	k9	k9s	k9s	k9self
co/co	co	co	cos	cos	coself
ne/nym	ne	nym	nir	nir	nymself

Name	Subject	Object	Determiner	Pronoun	Reflexive
shae/shade	shae	shade	shade	shades	shadeself
aw/warm	aw	warm	warms	warms	warmself
lea/leaf	lea	leaf	leaves	leafs	leafself
shey/shem	shey	shem	sheir	sheirs	shemself
hal/hallo	hal	hallo	hallos	hallos	hallowee nself
pu/pum	pu	pum	pums	pums	pumpkin self
Xi/Xem	Xi	Xem	Xer	Xers	Ximself
lux/lucif	lux	lucif	lucifs	lucifs	luxself
h3/h1m	h3	h1m	h15	h15	h1553lf
raw beef/raw beef	raw beef	raw beef	raw beef's	raw beef's	raw beef'ssel f
e/e	e	e	e	e	e
N/N	N	N	Ns	N's	Nself
bun/bun	bun	bun	bun's	bun's	bunself
Che/Chev	Che	Chev	Chevs	Chevs	Chevself
anti/anti	anti	anti	antis	antis	antiself
Witch/Witch's	Witch	Witch's	Witch's	Witches	Witchsel f
cor/corpse	cor	corpse	corpse	corpses	corpself
ang/angel	ang	angel	anges	angels	angelf
6/6	6	6	6s	6s	6self
ne/nim	ne	nim	nier	niers	nierself
ci/her	ci	her	her	hers	herself
v/v	v	v	vs	vs	vself
vee/vee	vee	vee	vees	vees	veeself

Name	Subject	Object	Determiner	Pronoun	Reflexive
pen/pent	pen	pent	pentas	pentas	pentagramself
hann/hans	hann	hans	hánum	sín	hann
ci/cir	ci	cir	cir	cirs	cirself
auti/auti	auti	auti	autis	autis	autiself
ci/hir	ci	hir	hir	hirs	hirself
dae/dem	dae	dem	deir	deirs	demself
fur/fren	fur	fren	friends	friends	friendself
zi/zim	zi	zim	ziz	ziz	zizelf
pika/pika	pika	pika	pikas	pikas	pikaself
Dey/Dem	Dey	Dem	Der	Ders	Demself
Sh3/H3r	Sh3	H3r	H3r	H3rs	H3rself
9/9	9	9	9s	9's	9self
Drop/Drip	Drop	Drip	Drops	Drips	Dropself
note/note	note	note	notes	notes	noteself
ghost/ghost	ghost	ghost	ghost	ghosts	ghostself
Co/Coin	Co	Coin	Coins	Coins	Coinself
wing/wing	wing	wing	wings	wings	wingself
fin/fin	fin	fin	fins	fins	finself
ceph/ cephalopod	ceph	cephalopod	cephas	cephas	cephaself
squid/squid	squid	squid	squids	squids	squidself
eye strain/eye strain	eye strain	eye strain	eye strains	eye strains	eye strainsself
th*y/th*m	th*y	th*m	th*ir	th*irs	th*mself
plu/plur	plu	plur	plural	plurals	pluralself
sy/sys	sy	sys	sys	systems	systemsself

Name	Subject	Object	Determiner	Pronoun	Reflexive
ti/mul	ti	mul	multi	multis	multiself
ti/multi	ti	multi	multi	multis	multiself
rad/radi	rad	radi	radis	radis	radiself
Sae/Saer	Sae	Saer	Saers	Saers	Saerself
Sae/Sae	Sae	Sae	Saer	Saer	Saerself
7/7	7	7	7s	7s	7self
ei/eim	ei	eim	heir	heirs	heimself
zhey/zhem	zhey	zhem	zheir	zheirs	zhemself
hug/hug	hug	hug	hugs	hugs	hugself
bey/bem	bey	bem	beir	beirs	beeself
that/that	that	that	it's	it's	itself
vae/vaem	vae	vaem	vaeir	vaeirs	vaemself
th3y/th3m	th3y	th3m	th31r	th31rz	th31mz5 3lf
cub/cub	cub	cub	cubs	cubs	cubself
lor/lord	lor	lord	lords	lords	lordself
cor/corps	cor	corps	corpses	corpses	corpself
bon/bone	bon	bone	bone	bones	boneself
sal/sal	sal	sal	sals	sals	salself
bin/binn	bin	binn	binns	binns	binnselp h
prox/proxi	prox	proxi	proxis	proxis	proxiser
an/anim	an	anim	animal	animals	animalse lf
nine/nine	nine	nine	nine	nines	nineself
ae/aeth	ae	aeth	aethe	aethes	aeself
ti/ger	ti	ger	tigers	tigers	tigerself
a/aro	a	aro	aro	aros	aroself
a/ace	a	ace	aces	aces	aceself

Name	Subject	Object	Determiner	Pronoun	Reflexive
vi/vil	vi	vil	vila	vilas	villainself
di/div	di	div	divis	divis	divineself
cie/cir	cie	cir	cir	cirs	cirself
Mage/Magi	Mage	Magi	Mages	Mages	Mageself
she/hyr	she	hyr	hyr	hyrz	hyrzelf
z3/z1m	z3	z1m	z1r	z1rz	z1rzelf
azu/azur	azu	azur	azur	azurs	azurself
fool/fool	fool	fool	fools	fools	foolself
che/chem	che	chem	chems	chems	chemiself
gho/ghost	gho	ghost	ghost	ghosts	ghostself
min/mino	min	mino	mino	mino	minself
mush/mushs	mush	mushs	mushs	mushs	mushself
diz/dizs	diz	dizs	dizs	dizs	dizself
sun/suns	sun	suns	suns	suns	sunself
sun/sun	sun	sun	suns	suns	sunself
heir/heir	heir	heir	heir	heirs	heirself
multiple/multiple	multiple	multiple	multiples	multiples	multipleself
bork/bork	bork	bork	bark	barks	borkself
bork/borks	bork	borks	bark	barks	borkself
mad/mad	mad	mad	mads	mads	madself
ram/ram	ram	ram	rams	rams	ramself
necro/necrom	necro	necrom	necrom	necrom	necself
ce/cet	ce	cet	cets	cets	cetself
plural/plural	plural	plural	plurals	plurals	pluralself
multi/multi	multi	multi	multis	multis	multiself
dy/dyke	dy	dyke	dykes	dykes	dykeself

Name	Subject	Object	Determiner	Pronoun	Reflexive
ma/smart	ma	smart	smarts	smarts	smartsel f
wa/watt	wa	watt	waterm	watermelon	waterme lonself
thin/thim	thin	thim	thir	thirs	thimself
patch/patch	patch	patch	patchx	patchxs	patchsxlf
vut/vut	vut	vut	vuts	vuts	vutself
vut/vuts	vut	vuts	vuts	vuts	vutself
chey/chem	chey	chem	cheir	cheirs	chemself
be/ber	be	ber	bis	bis	bissel f
hex/hex	hex	hex	hex'	hex'	hexxel f
le/lim	le	lim	lis	lir	limself
vxy/vxm	vxy	vxm	vxr	vxrs	vxmself
straw/berry	straw	berry	strawberrys	strawberrys	strawber ryself
meh/meh	meh	meh	mehs	mehs	mehsel f
ani/anim	ani	anim	animals	animals	animasel f
mo/gai	mo	gai	mogai	mogais	mogaisel f
kya/kya	kya	kya	kyas	kyas	kyasel f
mu/musi	mu	musi	music	musics	musicsel f
fix/fix	fix	fix	fixs	fixs	fixsel f
mii/miir	mii	miir	miir	miirs	miirsel f
woo/wool	woo	wool	wools	wools	woolself
sheep/sheep	sheep	sheep	sheeps	sheeps	sheepsel f
ring/ring	ring	ring	rings	rings	ringself

Name	Subject	Object	Determiner	Pronoun	Reflexive
pol/polyb	pol	polyb	polybi	polybius	polybius elf
amp/amper	amp	amper	sand	sands	ampersa ndself
and/and	and	and	ands	ands	andself
tey/tem	tey	tem	teir	teirs	temself
.mi/.mid	.mi	.mid	.midi	.midis	.midiself
eye/strain	eye	strain	eyes	strains	eyestrain self
ca/cav	ca	cav	cadav	cadavers	cadavers elf
bee/beep	bee	beep	dee	dees	bpdself
arcade/arcem	arcade	arcem	arcades	arcades	arcades elf
syl/sylv	syl	sylv	sylvs	sylvs	sylvself
fel/feli	fel	feli	felis	felis	feliself
lt/lt	lt	lt	lt	lts	ltself
fae/faem	fae	faem	faer	faers	faeself
shy/hyr	shy	hyr	hyr	hyrs	hyrself
vhe/vher	vhe	vher	vheir	vheirs	vherself
0/0r	0	0r	0r	0rs	0self
pup/pups	pup	pups	pups	pups	pupself
po/pom	po	pom	pos	pos	poself
hie/hir	hie	hir	hier	hiers	hirself
va/vaem	va	vaem	vare	vares	vabself
to/toad	to	toad	toads	toads	toadself
fre/fir	fre	fir	feir	feirs	ferself
ea/er	ea	er	erre	erres	erself
the/thim	the	thim	thir	thirs	thimself

Name	Subject	Object	Determiner	Pronoun	Reflexive
cat/cats	cat	cats	cats	cats	catself
ax/axo	ax	axo	axol	axols	axotlse lf
Sy/Syx	Sy	Syx	Syxx	Syxxs	Syxself
rat/rat	rat	rat	rats	rats	ratself
rat/rats	rat	rats	rats	rats	ratself
Mew/Meow	Mew	Meow	Mews	Meows	Meowse lf
Comrade/ Comrade	Comrade	Comrade	Comrades	Comrade's	Comrad eself
for/forest	for	forest	forests	forests	forestsel f
fi/fire	fi	fire	fires	fires	fireself
wy/wyv	wy	wyv	wyvern	wyverns	wyverns elf
euph/ euphonium	euph	euphoni um	euphs	euphoniums	euphoni umself
bar/bari	bar	bari	baritone	baritones	baritone self
tromb/ trombone	tromb	trombone	trombones	trombones	trombon eself
pyr/pyro	pyr	pyro	pyrs	pyros	pyroself
kni/knight	kni	knight	knights	knights	knightsel f
fli/flight	fli	flight	flights	flights	flightself
pubby/pubby	pubby	pubby	pubbys	pubbys	pubbyse lf
dead/dead	dead	dead	deads	deads	deadself
grime/grime	grime	grime	grimes	grimes	grimeself
survivor/ survivor	survivor	survivor	survivors	survivors	survivors elf

Name	Subject	Object	Determiner	Pronoun	Reflexive
officer/officer	officer	officer	officers	officers	officerself
giggle/giggle	giggle	giggle	giggles	giggles	giggleself
lol/lol	lol	lol	lols	lols	lolself
joke/joke	joke	joke	jokes	jokes	jokeself
Adorbz/Adorbz	Adorbz	Adorbz	Aborbz'	Adorbz'	Adorbzself
NY4/NY4	NY4	NY4	NY4Z	NY4Z	NY4ZELF
theri/ther	theri	ther	ther	theria	therianself
pro/proc	pro	proc	yons	cyons	procyself
pra/pras	pra	pras	pras	praseos	praseoself
voi/void	voi	void	voids	voids	voidself
lo/loo	lo	loo	loops	loops	loopself
jo/jot	jo	jot	jotunns	jotunns	jotunnsself
red/red	red	red	redr	redrs	redself
bee/bem	bee	bem	bee	bees	beeself
x9/x9	x9	x9	x9s	x9s	x9self
sy/sky	sy	sky	skys	skys	skyself
xo/xox	xo	xox	xox	xoxs	xoxself
sol/sun	sol	sun	suns	suns	sunself
wy/wir	wy	wir	wire	wires	wirself
lan/tern	lan	tern	terns	terns	lanternself
kan/kandi	kan	kandi	kandi	kandis	kandiself
fleur/fleur	fleur	fleur	fleurs	fleurs	fleurself

Name	Subject	Object	Determiner	Pronoun	Reflexive
ae/ae	ae	ae	aes	aes	aeself
sie/sier	sie	sier	sier	siers	sierself
fei/fein	fei	fein	feir	feirs	feinself
pri/prin	pri	prin	prin	prin	prinself
Four/Four	Four	Four	Fourth	Fourths	Fourthself
fang/fang	fang	fang	fangs	fangs	fangself
zae/zaer	zae	zaer	zaer	zaers	zaerself
zom/zom	zom	zom	zoms	zoms	zomself
gir/gir	gir	gir	girs	girs	girself
wir/worm	wir	worm	worms	worms	wormself
teddy/teddy	teddy	teddy	teddybear	teddybears	teddybearself
rot/rot	rot	rot	rots	rots	rotself
la/lace	la	lace	laces	laces	laceself
au/aur	au	aur	auras	auras	auraself
xe/xir	xe	xir	xirz	xirz	xirself
en/by	en	by	enbys	enbys	enbyself
spi/spin	spi	spin	spinel	spinel	spinselself
quee/queer	quee	queer	queers	queers	queerself
geo/geode	geo	geode	geodes	geodes	geodeself
fie/fire	fie	fire	fires	fires	fireself
rae/ren	rae	ren	rae	raes	renself
xei/xev	xei	xev	xeis	xeis	xevself
phy/phym	phy	phym	phym	phyms	phymself
punk/punk	punk	punk	punk's	punks	punkself

Name	Subject	Object	Determiner	Pronoun	Reflexive
ve/ven	ve	ven	vens	vens	venself
xe/xer	xe	xer	xer	xers	xerself
se/ser	se	ser	ser	sers	serself
whisp/whisp	whisp	whisp	whisps	whisps	whispers elf
hum/hum	hum	hum	hums	hums	humself
lae/lace	lae	lace	lais	lais	laceself
fuz/fuzz	fuz	fuzz	fuzzes	fuzzes	fuzzself
ny/nym	ny	nym	nym	nyms	nymself
Stag/Stags	Stag	Stags	Stag	Stag's	Stagsself
si/sin	si	sin	sin	sins	sinsself
de/dev	de	dev	devil	devils	devilself
rawr/rawr	rawr	rawr	rawrz	rawr's	rawrself
trick/treat	trick	treat	tricks	treats	trickself/ treatself
Hop/Lop	Hop	Lop	Bun	Rens	Hopself
Foe/Foe	Foe	Foe	Foe's	Foe's	Foeself
fi/fizzy	fi	fizzy	fizz	fizz	fizzself
fi/fizz	fi	fizz	fizz	fizz	fizzself
irk/irk	irk	irk	irks	irks	irkself
py/pyr	py	pyr	pyr	pyrs	pyreself
gli/glitch	gli	glitch	glitches	glitches	glitchself
la/stel	la	stel	stels	stels	stellaself
zy/zyn	zy	zyn	zyns	zyns	zynself
ae/av	ae	av	aer	aers	avself
co/com	co	com	cor	cors	corpself
vo/vome	vo	vome	vome	vos	vomeself
vo/void	vo	void	voir	voirs	voidself

Name	Subject	Object	Determiner	Pronoun	Reflexive
Ber/Berry	Ber	Berry	Berrys	Berrys	Berryself
Char/Char	Char	Char	Char's	Charlie's	Charlieself
sqid/squid	sqid	squid	squids	squids	squidself
oct/oct	oct	oct	octs	octs	octoself
vee/veem	vee	veem	veemo	veemos	veemoself
splats/splat	splats	splat	splats	splats	splatself
Ceph/Ceph	Ceph	Ceph	Cephs	Cephs	Cephself
neb/nebula	neb	nebula	nebus	nebus	nebulaself
fluff/fluff	fluff	fluff	fluffs	fluffs	fluffself
dis/disease	dis	disease	diseases	diseases	dseaself
ay/am	ay	am	ayr	ayrs	ayrself
No/Non	No	Non	Nons	Nons	Nonsself
Bun/Bunny	Bun	Bunny	Bunnys	Bunnys	Bunself
woom/woomy	woom	woomy	woomys	woomy's	woomyself
Avi/Avian	Avi	Avian	Avians	Avians	Avianself
Dra/Drag	Dra	Drag	Dragons	Dragons	Dragonself
oce/ocem	oce	ocem	oces	oces	oceanself
hae/hae	hae	hae	haes	haes	haloself
dia/diam	dia	diam	dias	dias	diaself
Stag/Stag	Stag	Stag	Stag's	Stag's	Stagself
Ree/Ree	Ree	Ree	Ree's	Ree's	Reeself
Scree/Scree	Scree	Scree	Scree's	Scree's	Screeself
E/Eem	E	Eem	Eem's	Eem's	Eemself

Name	Subject	Object	Determiner	Pronoun	Reflexive
core/core	core	core	cores	cores	coreself
kandi/kandi	kandi	kandi	kandis	kandis	kandiself
rave/rave	rave	rave	raves	raves	raveself
emo/emo	emo	emo	emos	emos	emoself
ke/chem	ke	chem	chems	chems	chemical self
in/inv	in	inv	invas	invas	invaders elf
pon/zi	pon	zi	pons	zis	ponziself
rofl/rofl	rofl	rofl	rofls	rofls	roflself
ka/kan	ka	kan	kans	kans	kandiself
Pan/Pand	Pan	Pand	Panda	Pandas	Pandase lf
Cass/Cass	Cass	Cass	Cassi	Cassis	Cassiuss elf
c/Cass	c	Cass	Cassi	Cassis	Cassiuse lf
sta/static	sta	static	stas	statics	staticself
cryp/cryp	cryp	cryp	crypts	crypts	cryptids elf
Cas/Cas	Cas	Cas	Casi	Casis	Cassiuse lf
gut/gut	gut	gut	guts	guts	gutself
rai/rai	rai	rai	rains	rains	rainself
.exe/.exe	.exe	.exe	.exes	.exes	.exeself
et/ete	et	ete	etes	etes	eteself
eche/veria	eche	veria	ver	veries	echeself
Jul/Jul	Jul	Jul	Juli	Juli	Julietself
sie/sie	sie	sie	ihr	ihrs	sich
hen/hen	hen	hen	hens	hens	henself

Name	Subject	Object	Determiner	Pronoun	Reflexive
vam/vamp	vam	vamp	vamps	vamps	vampself
er/eri	er	eri	eris	eris	eriself
purr/purr	purr	purr	purrs	purrs	purrself
byte/byte	byte	byte	bytes	bytes	byteself
ic/ice	ic	ice	icy	icy	iceself
thy/thyn	thy	thyn	thy	thy	thyself
x3/x3	x3	x3	x3s	x3s	x3self
dei/dei	dei	dei	deis	deis	deiself
au/auti	au	auti	autis	autis	autiself
owo/owo	owo	owo	owos	owos	owoself
ne/nep	ne	nep	nept	neps	nepself
faun/faun	faun	faun	fauns	fauns	faunself
plum/plum	plum	plum	plums	plums	plumself
fun/fun	fun	fun	funs	funs	funself
xae/xaem	xae	xaem	xaes	xaes	xaeself
vo/voi	vo	voi	voix	voix	voiself
hu/hush	hu	hush	hushs	hushs	hushself
ce/cir	ce	cir	cirs	cirs	cirself
su/sucre	su	sucre	cres	cres	sucreself
lu/luna	lu	luna	luns	lunas	lunaself
ga/gal	ga	gal	gala	galax	galaself
pi/pi	pi	pi	piscs	piscs	pisceself
umb/umber	umb	umber	umber	umbers	umberse lf
mye/myr	mye	myr	myr	myrs	myrself
goo/goo	goo	goo	goos	goos	gooself
sof/soft	sof	soft	softs	softs	softself
ae/em	ae	em	aes	aes	aemself

Name	Subject	Object	Determiner	Pronoun	Reflexive
ci/ciph	ci	ciph	cipher	ciphers	cipherself
uwu/uwu	uwu	uwu	uwus	uwus	uwuself
Fae/Fem	Fae	Fem	Faer	Faers	Faerself
am/amo	am	amo	amor	amors	amorself
lo/love	lo	love	loves	loves	loveself
lo/lov	lo	lov	love	loves	loveself
mo/mem	mo	mem	moth	moths	mothself
mo/moth	mo	moth	moths	moths	mothself
XD/XD	XD	XD	XDs	XDs	XDself
scene/scene	scene	scene	scenes	scenes	sceneself
aer/aer	aer	aer	aer	aers	aerself
ae/aes	ae	aes	aes	aes	aeself
paw/paw	paw	paw	paws	paws	pawself
fe/ler	fe	ler	ler	lers	lerself
sh*/h*r	sh*	h*r	h*r	h*rs	h*rself
kai/kaim	kai	kaim	kais	kais	kaiself
hy/hymn	hy	hymn	hymns	hymns	hymnself
hen/henom	hen	henom	hens	hens	hen själv
he/hel	he	hel	hells	hells	hellself
fri/fer	fri	fer	frid	frida	fridayself
flutter/shy	flutter	shy	flutters	flutters	flutterself
fla/flag	fla	flag	flags	flags	flagself
fi/fidge	fi	fidge	fidges	fidges	fidgetself
fern/fern	fern	fern	ferns	ferns	fernsself
eu/euro	eu	euro	euros	euros	euroself

Name	Subject	Object	Determiner	Pronoun	Reflexive
ember/ember	ember	ember	embers	embers	emberself
dem/demon	dem	demon	demons	demons	demonself
de/dea	de	dea	death	deaths	deathself
dan/dango	dan	dango	dans	dans	dangoself
da/dan	da	dan	dance	dances	danceself
cute/cute	cute	cute	cutes	cutes	cuteself
ci/cin	ci	cin	cinns	cinns	cinnsself
bloo/blook	bloo	blook	blocks	blocks	blookself
ab/abba	ab	abba	abbas	abbas	abbaself
tric/trick	tric	trick	tricks	tricks	trickself
sheri/sheriff	sheri	sheriff	sheriffs	sheriffs	sheriffself
pip/pip	pip	pip	pips	pips	pipself
pix/pixel	pix	pixel	pixels	pixels	pixelself
Shad/Shade	Shad	Shade	Shader	Shaders	Shadeself
Ni/Nigh	Ni	Nigh	Night	Nights	Nightself
ls/lm	ls	lm	lir	lirs	lmmel
caw/crow	caw	crow	caws	caws	crowself
corrupt/corrupt	corrupt	corrupt	corrupts	corrupts	corruptself
deca/decay	deca	decay	decays	decays	decayself
hunt/hunt	hunt	hunt	hunts	hunts	huntself
ey/eye	ey	eye	eyes	eyes	eyeself

Name	Subject	Object	Determiner	Pronoun	Reflexive
dea/death	dea	death	deaths	deaths	deathself
haun/haunt	haun	haunt	haunts	haunts	hauntself
gun/gun	gun	gun	guns	guns	gunself
claw/claw	claw	claw	claws	claws	clawself
blee/bleed	blee	bleed	bleeds	bleeds	bleedself
bloo/blood	bloo	blood	bloods	bloods	bloodself
god/god	god	god	gods	gods	godself
clown/clown	clown	clown	clowns	clowns	clownself
disc/discord	disc	discord	discords	discords	discordself
chao/chaos	chao	chaos	chaos	chaos	chaoself
gore/gore	gore	gore	gores	gores	goreself
end/ender	end	ender	enders	enders	enderself
trick/trick	trick	trick	tricks	tricks	trickself
crypt/cryptid	crypt	cryptid	cryptids	cryptids	cryptidself
freak/freak	freak	freak	freaks	freaks	freakself
wolf/wolf	wolf	wolf	wolfs	wolfs	wolfself
bow/bow	bow	bow	bows	bows	bowself
end/end	end	end	ends	ends	endself
e/hir	e	hir	hir	hirs	hirself
:3/:3	:3	:3	:3s	:3s	:3self
mob/mob	mob	mob	mobs	mobs	mobself
rabbi/rabbit	rabbi	rabbit	rabbits	rabbits	rabbitself
hab/habit	hab	habit	habits	habits	habitself

Name	Subject	Object	Determiner	Pronoun	Reflexive
rodent/rodent	rodent	rodent	rodents	rodents	rodentself
rod/rodent	rod	rodent	rodents	rodents	rodentself
fur/fur	fur	fur	furs	furs	furself
racc/raccoon	racc	raccoon	raccoons	raccoons	raccoonself
racc/raccoons	racc	raccoons	racc	raccoons	raccoonself
nya/nya	nya	nya	nya	nyas	nyaself
cy/cyb	cy	cyb	cyber	cybers	cyberself
vix/vixen	vix	vixen	vixens	vixens	vixenself
rabi/rabid	rabi	rabid	rabids	rabids	rabidself
rab/rabie	rab	rabie	rabies	rabies	rabieself
cu/cubu	cu	cubu	cubu	cubus	cubusself
Fa/Falle	Fa	Falle	Falle	Falles	Fallenself
vy/vym	vy	vym	vyr	vyrs	vyself
.doc/.doc	.doc	.doc	.docs	.docs	.docself
squi/squish	squi	squish	squishes	squishes	squishself
kin/kin	kin	kin	kins	kins	kinself
ko/ik	ko	ik	ki	kos	koiself
he/her	he	her	her	his	herself
she/him	she	him	his	hers	himself
ba/bat	ba	bat	bats	bats	batself
walk/walk	walk	walk	walkers	walkers	walkerself
zomb/zomb	zomb	zomb	zombs	zombies	zombself

Name	Subject	Object	Determiner	Pronoun	Reflexive
corp/corpse	corp	corpse	corpse	corpses	corpself
corps/corps	corps	corps	corpses	corpses	corpself
hei/heim	hei	heim	heir	heirs	heimself
rot/rots	rot	rots	rots	rots	rotself
si/sidhe	si	sidhe	sidhes	sidhes	sidheself
cor/corv	cor	corv	corvs	corvs	corvidself
ri/ribb	ri	ribb	ribbits	ribbits	ribbitself
vi/viv	vi	viv	vivs	vivs	viviself
li/lumi	li	lumi	lumis	lis	lumiself
♂/♂	♂	♂	♂s	♂s	♂self
♀/♀	♀	♀	♀s	♀s	♀self
dai/dai	dai	dai	daiz	daiz	daizelf
see/seer	see	seer	seers	seers	seerself
hop/hop	hop	hop	hops	hops	hopself
n3/n1m	n3	n1m	n15	n15	n1m531f
3hey/3hem	3hey	3hem	3heir	3heirs	3hemself
bit/bit	bit	bit	bits	bits	bitself
flor/flora	flor	flora	floras	flors	floraself
]]]]]]]s]s]self
bai/bai	bai	bai	bayou's	youns	bayouen self
jo/joi	jo	joi	jois	jois	joiself
pep/pip	pep	pip	pips	peps	pepsself
ay/air	ay	air	arei	dose	areiadōs elf
splash/splish	splash	splish	splosh	splish	splishsel f

Name	Subject	Object	Determiner	Pronoun	Reflexive
gi/grr	gi	grr	grr	grrs	grrself
kyuu/kyuu	kyuu	kyuu	kyuus	kyuus	kyuusef
ai/ain	ai	ain	ains	ains	ainself
et/et	et	et	ets	ets	etself
e/im	e	im	is	is	isself
ce/cim	ce	cim	cys	cys	cimself
mae/maer	mae	maer	maer	maers	maerself
Stick/Stickers	Stick	Stickers	Sticks	Sticks	Stickself
Sea/Sear	Sea	Sear	Seas	Seas	Seaself
Ra/Rat	Ra	Rat	Rats	Rats	Ratself
cri/cryp	cri	cryp	cryps	cryptis	cryptids elf
be/beo	be	beo	wulf	wulfs	beowulfs elf
sy/syn	sy	syn	synth	synths	synthself
poss/possum	poss	possum	possums	possums	opossu mself
fo/for	fo	for	fores	forest	forestsel f
ey/em	ey	em	eir	eir	emself
ee/im	ee	im	is	is	imself
✨/✨	✨	✨	✨s	✨s	✨self
gli/glim	gli	glim	glims	glims	glimself
mint/mint	mint	mint	mints	mints	mintself
myu/myur	myu	myur	myur	myurs	myurself
mo/moch	mo	moch	mochi	mochis	mochisel f
Sak/Ura	Sak	Ura	Ura	Uras	Sakuras elf

Name	Subject	Object	Determiner	Pronoun	Reflexive
fawn/fawn	fawn	fawn	fawn	fawns	fawnself
hi/hime	hi	hime	hime	himes	himeself
nov/nova	nov	nova	nova	novas	novaself
sta/star	sta	star	star	stars	starself
ne/neon	ne	neon	neons	neons	neonself
mi/mist	mi	mist	mists	mists	mistself
se/sym	se	sym	syr	syrs	symself
ve/vir	ve	vir	vir	vir	virself
an/xi	an	xi	ety	etys	xiself
Alo/One	Alo	One	Alon	Alons	Aloneself
fae/fae	fae	fae	faer	faers	faeself
meo/meow	meo	meow	meow	meows	meowself
Bell/Bell	Bell	Bell	Bells	Bells	Bellself
Dulce/Dulce	Dulce	Dulce	Dulces	Dulces	Dulceself
Moo/Moo	Moo	Moo	Moos	Moos	Mooself
Pep/Pep	Pep	Pep	Peps	Peps	Pepself
div/div	div	div	divs	divs	divself
✨/✨s	✨	✨s	✨s	✨s	✨self
woof/woofs	woof	woofs	woofs	woofs	woofself
bi/birch	bi	birch	bir	bir	birchself
rev/rever	rev	rever	rie	ries	reverself
rau/aur	rau	aur	ror	rora	aurorase lf
rai/rain	rai	rain	rains	rains	rainself
so/sol	so	sol	sols	sols	solair self

Name	Subject	Object	Determiner	Pronoun	Reflexive
lav/laven	lav	laven	lavend	lavends	lavendself
pi/pin	pi	pin	pine	pin	pinself
hyt/yim	hyt	yim	yis	yis	yimself
ath/athyr	ath	athyr	athyrs	athyrs	athyrself
ith/imth	ith	imth	irth	irth	imthself
be/bet	be	bet	geu	geuse	betelgeuseself
kei/kem	kei	kem	keir	keirs	kemself
ve/vym	ve	vym	vyr	vyr	vymself
dea/deam	dea	deam	deas	deams	deaself
gol/gold	gol	gold	golds	golds	goldself
plur/plur	plur	plur	plurs	plurs	plurself
hi/hem	hi	hem	hes	hes	hemself
ci/cen	ci	cen	cen	cens	cenself
en/en	en	en	ens	ens	enself
sol/sol	sol	sol	sols	sols	solself
hey/hem	hey	hem	heir	heirs	hemself
vie/vyr	vie	vyr	vem	vers	vemself
ve/vim	ve	vim	vis	vis	vimself
thone/thone	thone	thone	thones	thones	thoneself
caet/caet	caet	caet	caets	caets	caetself
cae/caem	cae	caem	caer	caers	caemself
cae/caer	cae	caer	caer	caers	caerself
vae/vaer	vae	vaer	vaer	vaers	vaerself
Ci/Cem	Ci	Cem	Cen	Cens	Cenself
one/one	one	one	one's	one's	oneself
eth/eth	eth	eth	eths	eths	ethself

Name	Subject	Object	Determiner	Pronoun	Reflexive
cele/cele	cele	cele	celes	celes	celeself
Vul/Vulp	Vul	Vulp	Vulps	Vulps	Vulpself
xie/xer	xie	xer	xer	xers	xerself
fey/feym	fey	feym	feir	feirs	feirself
kit/kit	kit	kit	kits	kits	kitself
si/hyr	si	hyr	hyr	hyrs	hyrself
zie/hir	zie	hir	hir	hirs	hirself
zee/zed	zee	zed	zeta	zetas	zedself
zme/zmyr	zme	zmyr	zmyr	zmyrs	zmyrself
se/sim	se	sim	ser	sers	serself
ze/mer	ze	mer	zer	zers	zemsself
zie/zem	zie	zem	zes	zes	zirself
zie/zir	zie	zir	zir	zirs	zirself
jee/jem	jee	jem	jeir	jeirs	jemsself
peh/pehm	peh	pehm	peh's	peh's	pehsself
sie/hir	sie	hir	hir	hirs	hirself
thon/thon	thon	thon	thons	thons	thonsself
ip/ip	ip	ip	ips	ips	ipsself

We resisted the temptation to just site the link or attach the list as an appendix because judges will not have that option. Any one of these (or combination) could be chosen by a litigant at any time.

And truly, the list is infinite.

Perhaps we are wrong, but we seriously doubt that those who refer to themselves as Puppy, honk, Mew, Ci, n3, and splash harbor a deeply seated belief that is their authentic *gender*. I

suspect that there are other factors at play well beyond gender dysphoria when these fanciful pronouns are selected.

Confusion of the Record. Requiring the selection of pronouns can confuse the record, especially in family cases; business disputes involving closely held, family owned businesses; and similar circumstances. Likewise, jurors may face confusion when a defendant accused of sexual penetration is referred to as a woman (or Moo, Dulce, or Birch).

Abuse. As any seasoned trial judge can attest, as currently drafted, this proposal *will* be abused. Instead of ameliorating the genuine concerns of a small population who deserve respect and sensitivity, this will almost certainly open the floodgates to gamesmanship. Trial judges have had their fair share of litigants declaring themselves exempt from the jurisdiction of the court because they (1) have filed their names as secured parties under the UCC, (2) claim they are members of the Moorish Nation, (3) assert they are sovereign nations, and (4) have used Prince like symbols in lieu of their legal names.

One need not contemplate long to think what mischievous parties - especially criminal defendants serving life sentences - will do with their new found power to compel judges to speak or write one of the infinite number of pronouns. As but one example, when the University of Michigan enforced a similar protocol with students, one student simply declared his pronouns “Your Majesty.”¹ Others were even more innovative, referring to their pronouns as “Her Lordship” and “Apache Attack Helicopter.”²

¹ Students were told to select gender pronouns. One chose ‘His Majesty’ to protest ‘absurdity.’ Lindsey Bever October 7, 2016 at 11:59 a.m. EDT <https://www.washingtonpost.com/news/education/wp/2016/10/07/a-university-told-students-to-select-their-gender-pronouns-one-chose-his-majesty/>

²Op-Ed: An open letter to His Majesty
by Conor Thompson October 13, 2016
Conor Thompson October 13, 2016 <https://www.michigandaily.com/viewpoints/op-ed-open-letter-grant-strobl/>

Clearly these Wolverines were creative and disingenuous, using the policy of the university to score political points.

Although “Your Majesty” might on its face seem absurd, the rule does not allow the Judge to point out the absurdity. Judges are not allowed to challenge whether a person holds a genuine desire to be referred to by any particular pronoun.

In addition, we are all aware of gender fluidity - there is little doubt that genders will be changed many times by nefarious actors.

Likewise, those who oppose this policy will use it against itself. Just like the students at UM who made fun of its policy by invoking ridiculous pronouns, this policy will likewise invoke a similar backlash. This backlash will exacerbate the belittling of the truly dysphoric.

Our experience confirms that lawyers, witnesses, defendants, and others will use similar tactics. There is little doubt that parties in PPO hearings, divorce proceedings, and criminal trials will mock their adversaries - and the Court - by using this new weapon.

Worse, do not be surprised if clever litigants begin to use hate speech as their pronouns. We will not stain this memorandum with specific examples, but again, there is good cause to believe that misogynists, racists, anti-semites, Islamophobes, Satanists, anti-Catholics, and others will choose offensive pronouns. Those shamelessly seeking publicity and disruption of the courts will not be deterred by rationality. We shudder to think of what will happen when the KKK is hauled into court. Again, the judge cannot refuse to use such despicable pronouns.

True, under the current language of the proposal, a judge can clarify the record and refer to the mischief maker by name. But

that is the only reason. No one will doubt who Apache Attack Helicopter is or who is referring to oneself as a racial slur.

Moreover, the judge's choice to refer to names will always be grounds for an appeal and a grievance - even if frivolous. Sanctions do not deter such bad actors. Sanctions are already exceedingly difficult to enforce in general circumstances. Judges will be powerless to call out such behavior without risking their careers and undermining the effective administration of justice.

Religious Liberty. Some judges consider using pronouns divorced from biological sex at birth as a violation of their religious convictions. In light of the United States Supreme Court's recent jurisprudence strongly protecting religious liberty, the application of this proposal to religious dissenters could be considered a violation of the free exercise of religion under the First Amendment.

Compelled Speech. Compelling a judge to use words of any kind is a dangerous precedent. Granted, judges are required to provide model jury instructions and advice of rights, but those are different in kind.

First, Judges can actually modify those instructions and advice so long as the legal requirements are met. They will not be reversed or grieved so long as they meet the substantive requirements.

Second, the law requires that the substance of jury instructions, advice of rights, and similar requirements be provided to protect the rights of the parties. The proposed rule cites no authority for the proposition that pronoun selection is part of the jurisprudence of Michigan. The State of Michigan was granted statehood on January 27, 1837. For 186 years, nothing like this proposal has existed.

Third, this proposal seems to fly into the teeth of *Board of Education v Barnette*, 319 US 624, 633-634 (1943) and *Wooley v Maynard*, 430 US 705 (1977). We must remember that the proposal literally requires the Judge to say and write words with which the judge vigorously disagrees. If the judge believes that “Zombies” or “Rodent” is a mockery, the judge should not be compelled to refer to the litigant in such a manner. If the judge refuses to call someone’s possessive “Apache Attack Helicopter,” that should not be a reason to grieve or appeal the judge.

A Dangerous Precedent. The power to do good is the power to do evil. Yes, today there is an enlightened Supreme Court majority that is sensitive to the dysphoric, but as recent history attests, those majorities can be quite fleeting.

Today, States across the nation are considering competing legislation. On one hand, some States want to criminalize parents who refuse to provide gender affirming care - on the other hand, some States want to criminalize those who provide it. Parents and children are caught in the middle.

Who is to say that tomorrow’s Supreme Court majority will not rescind this proposal and replace it with one that finds that affirming a litigant’s pronouns is a violation of judicial canons?

Trial judges are not perfect, but we should not be persecuted in the new “no man’s land” of the culture wars. Let the trial judges use the judgment the voters have entrusted to us.

Thank you in advance for your thoughtful consideration.

Very truly yours,

Hon. Michael Warren
Hon. Jon Van Allsburg
Hon. Deborah McNabb
Hon. Amy Clapp
Hon. Kathleen McCarthy
Hon. Kent D. Engle
Hon. Richard N. Lalamme
Hon. Cheryl Matthews
Hon. Jennifer E. Deegan
Hon. Brian Sullivan
Hon. Pamela Lightvoet
Hon. Susan Hubbard
Hon. Lisa Gorcyca
Hon. Christina Elmore
Hon. Linda Hallmark
Hon. Cynthia Lane
Hon. Christopher S. Ninomiya
Hon. Julie Nicholson
Hon. Kathleen Ann Ryan
Hon. Robert W. Bennett
Hon. Brian R. Kirkham
Hon. Mary Ellen Brennan
Hon. Julie McDonald