

### Writing Tips for D&N Appellate Briefs

1. Identify the party in the caption of the brief. E.g., “Mother’s Opening Brief” or “Mother A.B.’s Opening Brief.”
2. Use descriptors instead of names or initials. E.g., the child, mother, father, the maternal grandmother, the caseworker.
3. Use meaningful headings. E.g., “The juvenile court improperly rejected allocation of parental responsibilities to the paternal aunt as a less drastic alternative to termination.” Not “Issue 1.”
4. Frame each issue consistently in the table of contents, statement of issues, summary of argument, and argument.
5. Identify specific allegations of error as separate issues for appeal.  
  
E.g., “The juvenile court erred when it found the Department made reasonable efforts to rehabilitate father where no mental health services were provided.”  
  
NOT “The juvenile court erred when it found the criteria for termination were met.”
6. Describe how the parent was or was not prejudiced by an alleged error. What would have been different if the error had not occurred? How would that have led to a different outcome?
7. Don’t give a detailed play-by-play of the case in the factual statement. Do use the factual statement to orient the reader and highlight facts that are relevant to the issues raised on appeal. Write and/or review the factual statement after you have written the rest of the brief so you know what to include.
8. Use the standard of review as a guide for your analysis. E.g., if an evidentiary error is alleged, discuss whether the juvenile court abused its discretion. Discuss why error is or is not reversible under the applicable standard of reversal.
9. Tailor legal authority to the issues in your case. Don’t cite broad legal propositions unless they are pertinent to your specific arguments.
10. Omit needless words. The word limit is not a target.