"The Uncitable: Linguistic and Social Liminalities of Plagiarism"

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In his play *A Woman of No Importance*, Oscar Wilde famously describes the tradition of English foxhunting as: "the unspeakable in full pursuit of the uneatable" (Wilde 1893, 471). In his characteristic style that relies on the reversal of expectations, Wilde's epigram glibly exposes the absurdity of a well-worn tradition that is taken for granted as proper among the upper crust. Of course, such nonsensical social conventions exist in every facet of life, including in Wilde's own profession of writing. While there are many ways in which textual genres break form and upend or resist tradition, conventions of citation and plagiarism are often as stridently accepted as tradition and in some ways just as incongruous.

One particular difficulty arises from the fact that plagiarism, like Wilde's foxhunting, is not defined by what it *does* but by what it *does not* do. The most recent edition of the MLA Handbook defines plagiarism as "Paraphrasing someone's ideas or arguments or copying someone's unique wording *without giving proper credit*" (MLA 2021, 96, emphasis mine). Many other similar handbooks follow suit and typically define plagiarism as lacking attribution or acknowledgement of sources. However, definitions of plagiarism that rely on this negative quality of lacking proper credit are subject to an ambiguity common to negations in English: whether or not this attribute is even possible to possess. In his dissertation work on linguistic negation in affixes like the un- in "uneatable," Karl Zimmer notes the confusing contrast between the two seemingly similar claims that "triangles are *not* intelligent," which anyone might agree is a true statement, and "triangles are *unintelligent*," which seems nonsensical to many English speakers, since we do not conceptualise triangles as capable of possessing intelligence (Zimmer 1964, 24). In a similar manner, saying that any instance of plagiarism is copying "without giving proper credit" or in calling the use of a source "unattributed" or "unacknowledged" often seems to imply not just a lack but a lack of a quality that it is capable of possessing.

However, there are some situations where citation is not expected or even possible, and definitions like the one in the MLA handbook do not take this inability into account. These situations occupy a liminal space in textual ethics: situations where citation is considered ethically necessary, but also, for whatever reason, cannot be fully ethically acknowledged. These situations are frequently labelled or mislabeled plagiarism despite the fact that there may not be a stylistically-accepted and ethically sound way to acknowledge sources without fundamentally changing the text. In this essay, I will demonstrate several general factors that can create what I will refer to as "uncitable" conditions, or situations where it is clear that copying has occurred but there is not an accepted practice of proper citation or acknowledgement. Whereas "plagiarism" is generally understood to be always unethical, the label of "uncitable" recognizes the added difficulty of an inability to cite conventionally or properly which may further complicate or even absolve the ethical situation. Furthermore, I will show some ways in which ambiguity caused by misleading expectations in what plagiarism really means can result in improper understanding of the situation.

Varying Genre Expectations
One problem in applying the standard definition of plagiarism to all forms of writing and text is that not all genres have formalised conventions of citation. While research papers have highly formalised documentation methods, other genres have informal or not generally decided methods of citation. This lack or ambiguity regarding formalised convention has led to highly

disputed plagiarism accusations, particularly regarding cases where a secondary source is not fully cited.

For example, the *New York Times* has recently come under fire for not adequately citing scholarly work in its series on Haitian debt. The *NYT* framed the story in such a way that strongly suggested that they were the first to uncover this research, leading the article with the hook saying that the amount Haiti has had to pay France "has remained a mystery, until now. The Times scoured centuries-old documents to find the answer" (Porter et al. 2022). However, the reality is that, among some scholarly communities, this information was not a mystery at all and much of the actual scouring of documents had already been done by academics.

Though no verbatim passages can be said to be plagiarised and many sources were included in a concluding bibliography, in the introduction to this bibliography the *NYT* admitted that: "We cannot cite them all. But we do want to offer readers an idea of how we researched this series and came to the conclusions we did, as well as to give credit to historians and researchers whose work formed essential building blocks for our stories" (Porter et al. 2022). One such source whose work was not cited was historian Mary Lewis. On Twitter, Lewis claimed that she "told [one lead reporter, Catherine Porter] about sources…connected her with my research assistant in France. She presumably contacted me b/c she'd read my work. No acknowledgement" (Lewis 2022). Though many academics agreed that not citing historians like Lewis was egregious, some, particularly in the journalism community, disagreed, arguing that the scrupulous citation of sources was the purview of academic writing, not journalism. Journalist Adam Davidson came to the defence of the *NYT* and tweeted: "Dear Academia, I understand that citing others' work is crucial to you. But writing clearly, powerfully, for a broad audience is, also, crucial. It is very hard to write compellingly while also constantly citing research" (Davidson 2022). In a nutshell, Davidson is saying that such source use is uncitable, at least without fundamentally changing the genre or quality of the writing.

Whether or to what degree the writers of this *NYT* article were engaging in plagiarism is a matter of debate that centres around a conflict in the understanding of what the genre of journalism requires in terms of source citation, and variations of this same controversy have hit genres such as podcasting as well (Taylor and Hauser, 2019). While some like Davidson see a bibliography list perhaps posted afterwards on an accompanying website as fulfilling due diligence, others have different expectations that require more transparency. However, there are other genres that simply lack the convention of citation altogether due to the often tacit expectation that the work is not original. For example, it is often expected that judges and lawyers will have law clerks write important briefs and draft decisions for them and not receive any sort of credit on the work itself. Ordinary everyday paperwork is often not original either: form letters, reused memos, scripted telemarketing, boilerplate legalese on disclaimers and greeting cards involve the appropriation of others' words within a genre where citation would be out of the ordinary.

These uncitable genres do not typically grapple with the ethical expectation of citation. However, their existence is sometimes evoked in order to try to point out the irony. For instance, Reddit user u/imamuffin18 wryly observed: "Your teacher or professor most likely copy and pasted the 'No Plagiarism' clause in your class syllabus" (2019). However, as most commenters responded in some form, syllabus writing falls into a genre more akin to technical writing or boilerplate than academic research writing. While recognizing that different genres have different standards of citation is not inherently problematic, there is a potential hypocrisy when the course definition of plagiarism is so broad that it would include itself or academic

work expected in that course. In a teaching case study, Michelle O'Brien Louch writes about the problem of requiring wholly original work in a technical writing course when the industry would generally accept or even expect a certain amount of copying: "In the professional world, where the majority of writing will be technical, students will find themselves creating content based on already-existing texts, a direct contradiction of their academic training" (Louch 2016, 27). Failing a technical writing student for what would be considered a good technical writing practice in the industry would seemingly be poor career preparation. This is not to say that technical writing has fewer expectations regarding textual reuse than academic writing. Despite the fact that citation is generally not expected, technical writing has a number of ethical expectations regarding competition and copyright that are just as nuanced and as high-stakes as academic writing, and which would be just as awkward if applied to other genres. Overall, different genres can be said to have very different ethical expectations regarding citation to the extent that some are either ambiguously or effectively uncitable.

Competition and Credibility

While genre is a major factor regarding the form citation is expected to take, other factors regarding where, how and what is reused also dictate citation convention. As a recent example, Amy Schumer was accused of stealing a joke from Twitter during the 2022 Oscars. In reference to his film, *Don't Look Up*, during her opening monologue, Schumer quipped that: "And Leonardo DiCaprio, what can I even say about him? He has done so much to fight climate change and leave behind a cleaner, greener planet for his girlfriends" (2022). Twitter users recognized this joke from a 2021 Tweet by former writer for the *The Late Show With Stephen Colbert* Nicole Conlan under the Twitter handle "Pjörk." On Dec. 23, 2021, the podcaster and writer tweeted: "Leonardo DiCaprio is so passionate about climate change because he wants to leave a better word [sic] for his girlfriends." While this seems like a clearcut case of plagiarism, the fact that Schumer's reuse was in an oral performance complicates this issue.

In his foundational work on oral culture, Walter Ong claims that, much like the argument about citability in other genres like technical writing, oral cultures have very different conceptions of what constitutes literary property and thus different conventions of what constitutes unsanctioned reuse. In an oral culture: "Originality consists not in the introduction of new materials but in fitting the traditional materials effectively into each individual, unique situation and/or audience" (Ong 2007, 59). Though Ong is speaking more about oral cultures rather than oral mediums, there seem to be some ways that oral performance still carries ambivalent expectations about citation that would be much more expected in many genres of print. In general, even when a source is cited in oral performance, we tend to be looser with these formalities, often failing to fully or clearly differentiate quotation from paraphrase, and not including the source details that we would in print such as in-text citation material. By the same token, there are fewer formal methods used to cite speeches. Though MLA documentation has methods to cite a lecture or interview, these lack the sort of detail that print citations do, and, though many ideas come from informal conversations and social brainstorming sessions such as in a collaborative discussion, these are not generally expected to entail a formal citation if ideas are used in later print works.

However, this cannot be the only explanation for a lack of conventional citation in Schumer's case. During a stand-up performance, it might be somewhat awkward to cite someone else, but it is still possible: a performer might say that they heard a joke from a friend or neighbour or child, and this might sound natural or even give further context to the joke. However, quoting a fellow comedian without transforming or significantly commenting on that quotation is not generally considered ethically acceptable. As legal scholar Richard Posner claims, the

"principle victims" of plagiarism are "competitors" (Posner 2007, 106). Even if fully credited, in our highly litigious culture and copyright-centred notions of textual ownership, including such a citation mid-performance would open up questions of remuneration that performers and artists would likely prefer to elide. Thus, when it comes to true joke theft, comedians reusing the work of other comedians, it is not the lack of acknowledgement that is most unethical, but the reuse of work by competitors that makes such work "uncitable."

By the same token, some oral genres such as sermons, lectures and political speeches may certainly quote primary sources like the gospels, Aristotle or Winston Churchill, but will rarely cite secondary source blog posts, textbooks and Youtube videos that are responsible for the structure of the oral performance. In these cases, the credibility of these sources seem to relegate them as "uncitable." For instance, Michigan-based pastor Zach Stewart at Twin Oaks Christian Church was recently accused of repeatedly plagiarising celebrity pastor, Mark Driscoll, whose sermons and videos are widely distributed. However, Mike Driscoll himself is the subject of controversy due to plagiarism on his own part as well as paying money to fabricate statistics for a bestseller list and writing homophobic and sexist screed under a pseudonym. *Religious News Service*, which broke the story, treats this instance of plagiarism as "mind-boggling" since: "Pastors often cite other preachers or books they've read during sermons, and no one bats an eye" (*RHS* 2021). Stewart might have cited many other sources, but to imply that Stewart might have just as easily cited Driscoll is not correct. Citing Driscoll was not only a matter of citing a competitor, but citing one that would link his reputation with his source's. Citation is not just a matter of inoculation against plagiarism accusations but is a social act that can ally the speaker to the source.

Amount or Degree of Copying

While uncited source use is not only accepted but expected in many genres of writing, there are often explicit or implicit expectations on how much source use is appropriate. The use of a block quote that goes on for pages, for instance, would generally be seen as inappropriately long in research essays. Similarly, in hip-hop music, sampling is generally only seen as such when the portion of repetition is fairly brief or fragmentary. Borrowing lengthier portions of another's song might be better labelled as a mash-up or remix and have different expectations regarding transformation, not to mention legal implications regarding the length of the sample used (Boone, 2013, 2).

Length of use is, in fact, one of the four major factors in the determination of whether unlicensed copying is legally permitted in the United States: "Amount and substantiality of the portion used in relation to the copyrighted work as a whole" (United States Code, 1992). Even this guideline, however, admits that there is no hard and fast rule to determine the portion permitted, and the U.S. Copyright Office clarifies that: "some courts have found use of an entire work to be fair under certain circumstances. And in other contexts, using even a small amount of a copyrighted work was determined not to be fair because the selection was an important part—or the 'heart'—of the work" ("More Information on Fair Use," 2021). What counts as significant or substantial borrowing might be determined partly by the genre of the resulting work as well as by exactly from what the original work is borrowed.

Though not a candidate for a case of copyright infringement due to the age of its source, Damion Searls' *; or The Whale* is an interesting demonstration of the extent of permissible borrowing. Searls' textual experiment is a response to the abridgment *Moby-Dick in Half the Time* published by Orion Books, which, according to reviewer Adam Gopnik: "dispenses with Melville's digressions and showy knowledge" in order to transform "a hysterical, half-mad

masterpiece into a sound, sane book" by cutting elements deemed irrelevant to plot such as Melville's lengthy "Extracts" that begin the novel (Gopnik 2007). While Gopnik's review called the abridgement an "improvement", Searls was critical, responding that: "I felt that what makes Melville Melville, in particular, is digression, texture, and weirdness" (Searls 2015). Like a photographic negative, Searls' *; or The Whale* is completely constructed from the material that had been cut from the Orion Books edition. While no word of *; or the Whale* is Searls' and he does not claim to be the author or even editor of the work, it is an interesting demonstration of the limits of any definition of infringement or plagiarism based purely on the amount borrowed. Much like Marcel Duchamp's Readymades or countless other pieces of modern and postmodern appropriation art, the artist's copying is intrinsic to the purpose of the artwork and, like some genres of text that are uncitable, such as those mentioned above, technical writing, length or extent of copying in these cases is rendered irrelevant to the determination of plagiarism (though not, necessarily, copyright).

On the other hand, there is clearly work that violates expectations of the extent of borrowing in such an extreme way that it is not merely plagiarism, but uncitable plagiarism. "Contract cheating" is one such species of uncitable plagiarism in academic work. Termed by researchers Thomas Lancaster and Robert Clarke, contract cheating is student use of a third party in order to complete assigned academic work (2016, 640). This might consist of a formal contract such as with an online essay-writing service that charges per page, or it might be an informal contract such as a roommate completing a term paper as a favour. In all cases, the result is that the student submits the work of another under their own name. Clarke and Lancaster call contract cheating a form of plagiarism but also note that it is crucially different. They observe that, unlike most other types of plagiarism, contract cheating typically cannot be traced back to its source since the work has been completed for that assignment (2016, 642). Also, they suggest that the prevention of this form of plagiarism requires different methods of instruction.

While Clarke and Lancaster differentiate contract cheating from other forms of plagiarism with the difference in cause and effect, it is also worth delving further into the reason for these differences, at least one main one being that contract cheating is uncitable. Whereas other types of plagiarism in academic research might be described as lacking citation, no degree or form of citation would be appropriate in the case of contract cheating. This could be demonstrated in the hypothetical case of the student who places quotation marks around the whole of the essay, or cites the actual essay writer's name in their Works Cited or even at the top of the page. These remedies would, at the least, render the essay unacceptable but also likely not excuse this student from academic honesty proceedings. Reliance merely on the production of "original work" or the use of "proper citation" methods for research, both features that the work resulting from contract cheating might arguably have, might avoid more typical forms of plagiarism, but would not be useful in accounting for contract cheating.

This mismatch in expectation and definition has caused some apparent confusion among some students. In a 2019 NPR interview about contract cheating, an anonymous student expressed doubts that buying an essay was "technically" cheating since, according to the student: "you're paying someone to write an essay, which they don't plagiarize, and they write everything on their own" ("Buying College Essays," 2019). How internalised or widespread this belief is among students is not fully known, but it is clear that students often have beliefs about plagiarism that are not in line with those of their instructors. In focus groups, interviews and a survey, researcher Lori Power found that students often had slightly but crucially different viewpoints about the need for citation in academic work, in particular when dealing with the degree of verbatim copying. Power found that only 14 of 61 students in one survey recognized

that "rewrit[ing] something you get from a book completely in your own words" required citation (Power 2009, 650).

Perhaps compounding this problem of overvaluing original expression over original thought is the prevalence of "plagiarism detection" software that often produces an "originality score," "similarity index" or other percentage which indicates the amount of detectable copied material regardless of whether or not correct citation conventions have been employed. The fact that the output of this software is often a number or rating based on quantity seems to suggest that the determining factor in a judgement of plagiarism is the amount of borrowed material over and above the appropriateness of the use of that material. As we have seen, amount of material borrowed may actually render a text either ethically or unethically uncitable which makes such a score unreliable in determining plagiarism without further interpretation (though it can have other pedagogical detection uses). On such types of plagiarism detection software, Searls' experimental satire *; or The Whale* would have a score of 100% reused material, while an essay created as a product of contract cheating may get a score of 0%. Overall, though amount of reuse is a factor in some of our ethical equations, it is not one that can reliably guide ethical decisions alone.

Lack of Citation Convention
Though amount of borrowed material might seem an important consideration in the determination of plagiarism, many guides and handbooks point out the fact that any amount of copied material can be plagiarism. According to the MLA handbook: "Copying a published or unpublished text of any length, whether deliberately or accidentally, is plagiarism if you do not give credit to the source" (MLA 2021, 96). However, "of any length" is hyperbole. In academic contexts (and if such copying were provable), even the strictest of instructors would not label the copying of a commonly-used word plagiarism. Not only would such minor reuse likely be unprovable, there is simply not a convention for doing so.

Additionally, common phrases and clichés are regularly reused without citation deemed necessary. In academic writing, phrases and sentences like "in this day and age," "for all intents and purposes," and maxims like "correlation does not imply causation" might result in weak writing if overused, but would not be called plagiarism. In fact, these sorts of clichés and conventions are used in academic and other genres writing precisely because they are reused so often. Composition researchers Gerald Graff and Cathy Birkenstein capitalise on this fact by providing templates for beginning college writers in their textbook *They Say/I Say* and acknowledge the question of plagiarism by calling their fill-in-the-blanks sentences "so commonly used and recycled that they are generic—community property that can be freely used without fear of committing plagiarism" (2021, 12-13). This statement gestures at the real definition of plagiarism not merely being unacknowledged reuse, but reuse of ideas or phrases we deem particularly characteristic or unique.

The very notion of "genre" requires at least some similarity or copying among texts that fulfil that category, but what sort of copying is permissible will depend on that genre. In academic writing, certain rhetorical moves characterised by the phrases used in guidebooks like *They Say* are standard, and there is also an understanding in most textual genres that "common knowledge" or factual material that is easily discovered—if expressed in a unique manner—is not only fair game for reuse, but improper if cited. In genres such as pulp romance novels, horror movies, or fairy tales, "common property" takes on other forms and the repeated elements might be tropes, character traits or plot elements that are expected to be used and reused without acknowledgement. These elements that some call "common knowledge,"

"cultural commons" or "common property" are so ubiquitous within particular genres that they may be said to be uncitable in such a way that absolves the reuse.

However, the matter of what counts as "common property" and what is unique is often difficult for beginning writers to discern and can result in the unintentional reuse of more unique ideas and expression. As identified by composition scholar Rebecca Moore Howard, "patchwriting" is a form of plagiarism often committed by beginner writers and those unfamiliar with the field or genre in which they are writing. These writers may cite their sources but paraphrase in such a way that is too close to the source, rendering the citation inadequate or misleading. In particular, patchwriting may retain the syntax of the original while substituting with synonyms, cutting out or adding modifiers or converting to passive constructions (Howard, 1999, 5). In many cases, patchwriters fail to recognize which expressions are considered stock or clichéd and which are more original expressions and research deserving of explicit credit and will thus fail to transform critical phrases.

This form of composition is unethical in most English-language academic contexts, and, even if explicitly cited, cannot be easily "cured" by adding quotation marks to increase source acknowledgement. Doing so would, at least, look awkward with quotation marks interrupting the sentences in many places, but also in many cases reveal a degree of dependence on the source material that would—like contract cheating—be deemed unoriginal writing regardless of the citation. Instead, patchwriting occupies a liminal space that is always considered taboo, with no appropriate level of acknowledgement possible within current writing practice. Patchwriting is another form of uncitable textual production that occupies an ethically-debated ground, with some composition experts such as Howard arguing for a certain amount of understanding that this sort of intermediary writing will be a typical stage of the learning process and others seeing it as an unacceptable mode of writing at any stage.

Conclusion

Of course, this list of factors is by no means exhaustive and there are many more examples of uncitable genres and conditions. What I hope this has demonstrated is that saying that plagiarism merely lacks source citation is a misleading statement. Though plagiarism is often defined as unacknowledged source reuse, we should recognize that there are a number of factors that complicate this deceptively simple definition and create conditions under which citation is not necessarily a panacea for plagiarism. A better definition of plagiarism would not merely rely on this lack of citation but recognize the very different expectations that we place on texts based on their genre, medium, credibility and competitor-status of source material, and the exact form that this source use takes. These conditions place more or less burdens on authors to use formal or informal documentation styles, acknowledge source use overtly or implicitly, and may make us more aware of the power structures that influence this source use. Uncitable conditions mean that sources are not *unacknowledged*, but rather *not comfortably able to be acknowledged*. By recognizing this difference, we might be able to see these situations not simply as a matter of unethical negligence or deception, but we might expose the often complex social norms that underlie source use and put subtle pressure on artistic and textual production. Then, rather than call for more complete citation, we might better identify the real deficiencies in plagiaristic writing whether that be in types of sources used, inequity in source use, or a greater need for more developed and original writing.

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