



# Dissenting with Conviction and Deference: Boosters and Hedges in Nigerian Supreme Court Dissents

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## Abstract

This study examines the rhetorical presentation of arguments in dissents through markers of certainty and doubt in sixty-two Nigerian Supreme Court dissents using Hyland's (Hedging in Scientific Research Articles, John Benjamins, Amsterdam, 1998b) and Zou and Hyland's (IJAL 32:225–240, 2022) taxonomy of boosters and hedges. Findings on the frequency of the markers show that boosters are more predominant than hedges, indicating that assertive presentation of arguments is critical in the dissents. However, a discursive analysis of the specific functions of boosters and hedges in the corpus shows that most boosting features function as markers of solidarity, used to present dissenters' claims as common knowledge and accepted truth. Hedges, on the other hand, are more reader-oriented, indicating the importance of presenting convincing argumentation with some deference to members of the community of practice. Boosters are commonly marked by epistemic and evidential adverbs and adjectives, used to strengthen the force of arguments advanced in the dissents. Hedges, on the other hand, are commonly realised by cognitive and communication verbs, adverbs and nouns, used to express judges' sceptical attitude towards the arguments of the majority and appeal to legal reasoning from colleagues. These findings suggest that good argumentation in judicial dissent is a blend of certitude with deference in order to appeal to the brooding spirit of law in future adjudication or policy amendment.

**Keywords** Boosters · Hedges · Dissents · Judicial opinions · Supreme court · Nigeria

## 1 Introduction

Dissenting judgements are adversarial and argumentative texts written to negotiate justice and create legal knowledge, which could be useful in future adjudication and policy formulation. They have four distinct features including an individualistic

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tone, a sceptical voice, a democratic standard and an advocacy medium [24 p. 2]. The individualistic tone allows the dissenting judge voice their disagreement through the sceptical voice which entails questioning the decision of the majority, challenging their arguments and explaining the errors of the majority. This way, dissenting judges democratise the court by providing alternative voices against the majority which to some extent act as the voice of the minority against the majority of the adjudicating panel, as in a democracy. Such minority views serve as a means of advocating alternative interpretations of certain aspects of law which may be revisited in the future by members of the bench, the bar or even lawmakers. These traits are enacted by rhetorical elements which in discursive terms are self-reflexive in that they enable the expression of convictions and doubts of the dissenter on arguments in the majority opinion. One way to study the discourse is to explore prevalent self-reflexive elements and their specific functions in the creation of convincing arguments.

Widely researched and notably prevalent among discursive features relevant to the expression of individualistic and sceptical voices in other argumentative discourses are boosters and hedges. They have been characterised in the literature as veritable tools with which writers/speakers “engage with socially determined positions of others” [21 p. 52] to close down alternatives, emphasise certainty and create rapport with the intended audience by marking involvement with the topic and solidarity with the audience [21 p. 53]. Though established as an integral part of knowledge creation and negotiation in academic argumentation [e.g. 17, 19, 22, 27], not much has been said of the specific discursive functions of boosters and hedges in dissenting judgements. This study fills the lacuna as it explores the discursive functions of boosters and hedges in dissenting judgements to explicate the rhetorical strategies of dissenting in judicial argumentation via markers of certainty and doubt. Thus, the study is premised on the following three objectives to: (1) investigate the frequency of boosting and hedging devices in judgements. (2) examine the forms of boosters and hedges in them and (3) describe the functions of boosters and hedges in the dissenting judgements.

In what follows, I first present the background to the study via a review of related literature and a discussion of the Nigerian Supreme Court judgements in Sect. 2. Section 3 describes hedges and boosters, while Sect. 4 focuses on the method and presents the data. Findings and discussion are presented in Sect. 5 and the conclusion comes in Sect. 6.

## 2 Review of Related Literature

Judicial opinions are still largely underexplored, especially for discursive elements in subgenres like dissenting judgements. Existing linguistic studies of judgements have rather examined them for their rhetorical structures [5, 6; discourse moves [16]; argumentative patterns [9]; metadiscourse features [7]; and politeness strategies [Kurzon 23] to mention a few. Some others have examined specific lexico-grammatical means of marking stance and other subjective positions in judgements such as verb and adjective-based *that*-complement clauses in Nigerian Supreme Court

judgements [e.g. 4]; noun *that*-patterns in American and European opinions [e.g. 11, 13, 14]; noun *that*-patterns in legal academic discourses and judicial opinions [11].

Few recent exceptions to aforementioned studies have explored the generic elements and formulaic expressions in the US Supreme Court and Polish Constitutional Tribunal dissents [12]; epistemic and evidential stance markers in US Supreme Court majority and dissenting opinions [26]; stance adverbs in US Supreme Court majority and dissenting opinions [27] and the functions of boosters in Russian dissents [3]. Goźdź-Roszkowski [12], for instance, is a genre-based study of dissents in US Supreme Court opinions and Polish Constitutional Tribunal judgements, which examined the generic peculiarities of judicial justifications in dissenting opinions. The study finds that based on the acceptance of dissents as indicators of judicial independence and transparency, they can be treated as recognisable communicative events with unique discourse-based phraseology. The study also reveals that judges employ highly formulaic expressions to indicate their disagreement despite the absence of a conventionalised form of expressing dissent. It finds, however, that the US Supreme Court dissents differ from Polish, in that they exhibit predictable phraseologies that express their evaluative concerns on the outcome of the judicial-making process. Polish dissents, on the other hand, exhibit phraseologies that are more legal domain-specific as they revolve around law and its attributes. It is expected then, that Nigerian Supreme Court dissents will have some linguistic distinctives in the realisation of its communicative thrust- persuasion. Thus, this present study extends existing ones as it attempts to explore the rhetorical strategies with which dissenting judges assert their alternate views on the arguments marshalled in the majority opinions.

In another study, Poole [28] explores variation in stance adverbs in the US Supreme Court opinions, Court of Appeal majority and dissenting opinions and compares the prevalence of the adverbs in the legal discourse with academic discourse. The study finds that stance adverbs are prevalent in the legal discourse, though they exhibit some genre-specific variations across the text types analysed. It also reveals some convergence and divergence in the stance adverbs in legal writings on one hand and those in the academic texts on the other hand. The study attributes the similarities in the specific adverbial elements in the texts explored to similarities in communicative purpose (argumentation) while the disparity is influenced by discipline-specific preferences. The study differs from the present one which focuses on a sub-genre of judicial opinions- dissents, specifically exploring the marking of certainty and doubt through lexical verbs, adjectives, adverbs, and nouns not only adverbs in them. Also, since persuasion is the hallmark of argumentation in dissents, it is necessary to zero in on the specific rhetorical elements with which judges achieve such communicative endeavour, hence the exploration of hedges and boosters in the present study.

In a more recent study, McKeown [26] examines epistemic (im)possibility and evidential (dis)belief markers in majority and dissenting opinions of the United States Supreme Court and finds that majority and dissenting opinions feature more epistemic (im)probability markers than evidential (dis)belief ones. The study reveals, however, that dissents contain more evidential (dis)belief markers which are emphasised or boosted with “high-strength markers” [26 p. 332], necessitated by the

need to strengthen the justifications for the views projected in them. While the study succeeds in establishing the presence of high strength markers in dissents, little is known of context-specific functions such markers perform in Supreme Court dissents, which is one of the gaps this study seeks to fill.

Furthermore, Boginskaya [3] investigates the functions of boosters in Russian dissents<sup>1</sup> and finds that Russian judges present their arguments convincingly by their use of boosting features which are classified as certainty, intensity, extremity and solidarity boosters to express their disagreement with the majority opinion; the highest being certainty boosters. The least occurring are intensity and extremity boosters which the study suggests might have been informed by the Russian judges' legal orientation that emphasises objectivity and impersonality in writing dissents. On the form of linguistic elements that realise these functions, the study finds modals as the most frequent, especially *must* and *shall*, while the adverbs *particularly* and *always* are the most predominant lexical items serving boosting functions in the study. The study extends existing ones by providing some insight into specific functions of boosters in presenting convincing argumentation but differs from the present study in a number of ways. First, it reports rhetorical strategies of judgements emanating from a Civil law system whereas the present study concentrates on judgements from a Common Law jurisdiction. Second, it leaves out hedges, which in other specialised discourses, are a key element of good argumentation [21]. Aside from these, the study focused more on modal verbs which are characteristically polysemous and prevalent in the subjective marking of conviction. The present study attempts to provide a balanced perspective to argumentation in judicial opinions by exploring both boosters and hedges marked through other lexico-grammatical means.

The few existing linguistic descriptions of judicial dissents have provided some insight into the generic and rhetorical distinctives of judicial argumentation. However, these findings seem one-sided based on the fact that argumentation entails the use of "language to acknowledge, construct and negotiate social relations" [21 p. 66]. It remains to be seen what linguistic means dissenting judges deploy in simultaneously asserting and negotiating justice. And since good argumentation is one done with some deference to discourse community members, it becomes important to explore this fact in the context of dissenting judgements by investigating the blend of boosters and hedges in them.

## 2.1 Nigerian Supreme Court Judgements

The Supreme Court became the highest court in Nigeria in 1963 after it was declared a republic. Prior to this time, existing Supreme Courts were only intermediate courts of appeal between the subordinate local courts and the Privy Council. Presently, it is recognised in the 1999 Constitution (as amended) as

<sup>1</sup> The review here is in respect of its empirical contribution to the study of judges' rhetorical strategies in communicating dissents in jurisdictions other than the Common Law. While there may be political or juridical variables which might have possibly influenced some of the findings reported, the present study is silent on such since it is not directly related to the objectives of the present study.

Nigeria's most superior court. The Nigerian Supreme Court is first a court of appeal but exercises some degree of original jurisdiction in civil matters. In its appellate jurisdiction, it has an exclusive power to hear and determine appeals from the court of appeal in cases between the federation and a state or between states and individuals. Usually, the court is constituted by a panel of not less than five judges. However, in situations where there is the need to review previous decisions made by the court or when there is the need to address issues requiring constitutional interpretation, a panel of seven judges is required [2]. The Nigerian Supreme Court handles both civil and criminal litigations. Civil cases are those that are between individuals; government and corporate organisations; or individuals and corporate organisations. Anyone can institute a civil case (e.g., land dispute, tax disputes, cases between the federal government and the state and so on). Criminal cases, on the other hand, are those instituted by representatives of the government, against a person or a group who have violated a law which prescribes as an offence against the state. As in civil cases, criminal cases can go to the Supreme Court. However, the Supreme Court only hears criminal cases that have high impact constitutional leaning. This is in respect of its tradition which does not alter lower courts' judgments except when they are constitutionally deficient. The highlight of every case in the Nigerian Supreme Court is the judgment. It marks the end of legal proceedings before a particular court [1]. A Supreme Court judgment is a written document from the Supreme Court that contains proceedings of cases, verdicts given by the various judges as well as the legal principles that serve as the rationale behind such decisions, meant to guide the bench, the bar, academia and the public [8].

In Nigeria, a case in the Supreme Court is anchored by a presiding judge and four (or six others in a panel of seven judges) others. Among these five, one writes the leading judgement which represents the opinions of the majority, while four others may write to concur or dissent with the lead judgement. In other words, judgements of the Nigerian Supreme Court are presented in three modes; the leading judgement, concurring or supporting judgements and/or the dissenting judgement. A concurrence supports the opinion in the lead judgement and forms a part of the majority opinion. The concurrence could be three or four supporting opinions among the five judges who heard a case. When all four others support the lead judgements, then the outcome of a case is unanimous. However, where one or two judges have alternate or conflicting views from those advanced in the lead judgement, a dissenting judgement emerges. Thus, dissenting judgements are written in situations where a dissenting judge believes that justice will be better served by following an approach different from the one stated in the majority judgement. They are 'individual judicial expressions which do not involve an exercise of judicial power' [12 p. 384], but provide alternative reasoning and justification for the dissent which may be useful for other legal subjects in the future. They expand the scope of legal knowledge and contribute to legal learning and thoughts. Thus, they have law-making potential as they inform both legal experts and students of law on alternate legal reasonings on similar issues in the future. Since dissenting judgements are known to enable judges to express their individuality, they should be expressive with self-reflexive rhetorical elements such as hedges and boosters.

### 3 Hedges and Boosters

Hedges are words such as *maybe*, *possibly*, and *seem*, which are used to reduce the illocutionary force of a claim by expressing doubt and indicating that a proposition is a product of a writer's opinion rather than a fact. They indicate a writer's attempt to reduce overt and explicit commitment to the truth of a statement. They also express writers/speakers' deference, humility and willingness to accommodate colleagues' views on a subject of discourse [20 p. 45]. Items categorised as hedges are described as polypragmatic, meaning that their functions vary and overlap most time [20]. In terms of form, they are commonly realised through lexical, grammatical and 'strategic means' (p. 3), the most common markers being modal auxiliary verbs (e.g. *may*, *might*, *can*, *could*, etc.); epistemic or evidential lexical verbs (e.g. *I think* he has a point; *it seems* to me that), epistemic adjectives (e.g. *it is doubtful*, *likely*), adverbs (e.g. *generally*, *possibly*) and nouns (e.g. *possibility*). These could be realised as single lexical items, in clusters or in grammatical patterns as in examples 1–3.

1. Perhaps the dispute will be clearer, if I go into the correspondence on the matter. *diss\_53\_txt*
2. The lower court, in my humble view, was clearly in error in believing the evidence of DW3, DW4, DW5 and DW6. *diss\_23\_txt*
3. It seems to me that the contract between the parties was entered by the parties and performed in Jos, Plateau State. *diss\_6\_txt*

Following Hyland's [20] taxonomy, hedges are broadly classified as *content-oriented* and *reader-oriented*. *Content-oriented* hedges allow writers to present claims with an attitude of caution by limiting the level of personal commitment they attach to such claims in terms of their veracity. They are further divided into two: *accuracy-oriented* hedges and *writer-oriented* hedges. *Accuracy-oriented* hedges are used to present propositions or claims with degrees of precision or a sense of plausibility rather than exactitude, especially in the absence of full justification for such claims. They further divide into *attribute hedges* and *reliability hedges*. *Attribute hedges* indicate the degree of precision intended and convey the sense in which an idea may be held to be true. They are lexically realised by adverbs such as *almost*, *quite*, *generally*, and *approximately*; in clusters and grammatical structures such as *in a strict sense*, *from a practical point of view*, *I am quite sure that*. *Reliability hedges* (e.g. *it seems to me that*; *it appears that*), on the other hand, express a speaker/writer's uncertain knowledge and indicate the confidence they are willing to invest in the validity of a claim [20]. To sum these up, attribute and reliability hedges, which are sub-types of accuracy and content-oriented hedges will be explored in the corpus. This is necessary to specifically classify the functions of hedging features in the dissenting judgements.

The other type of content-oriented hedges is *writer-orientation*. With these types of markers, writers hedge their claims to knowledge to protect themselves from possible negative responses such may engender. In other words, they withhold the writer's commitment to the content of the proposition by attributing the source of a claim to other sources while leaving its truth value open [20 p. 176].

Usually, they are impersonally marked with agentless expressions and reporting verbs as in example 4.

4. It is obvious that section 4(1) of Decree No. 18 of 1994 *postulates* that the tribunal created under section 1(1) thereof shall its first sitting. *diss\_4\_txt*

Another function of hedges is reader orientation. *Reader-oriented* hedges allow writers to express their conformity to the expectations of their discourse community in terms of deference due to members of the community when presenting claims or opinions [20 p. 178]. They are used to manage the interpersonal rather than epistemic aspects of knowledge creation based on the writer's awareness of the possible response or reactions of their colleagues as both interested experts and members of the discourse community. *Reader-oriented hedges* are realised through personal attribution alongside judgemental and deductive lexical verbs as in examples 5 and 6:

5. I am almost repeating myself beyond expectation. I should not. And so *I am of the view* that the question of admissibility of exhibits A and B is a non-sequitor. *diss\_11\_txt*

6. The lower court, *in my humble view*, was clearly in error in believing the evidence of DW3, DW4, DW5 and DW6. *diss\_23\_txt*

For clarity, the taxonomy of hedges to be explored in this study includes reader-oriented, writer-oriented, accuracy and attribute hedges. This classification of hedges has only (to the best of my knowledge) been widely explored in academic writing, where it has provided a systematic classification of a set of markers which are known to be fuzzy and polysemous and sometimes problematic.

Boosters, on the other hand, are words used to strengthen an argument by emphasising the mutual experiences needed (by the reader) to draw the same conclusions as the writer. They include words such as *clearly*, *obviously*, and *certainly*, which writers use to close down alternative arguments with conviction [21]. In judicial opinions, 'boosters help the writer create an impression of certainty, conviction and assurance, illustrating trust and confidence in readers, thus challenging the majority opinion' [3 p. 264]. In the words of Hyland [20 p. 238], boosters allow writers to project a credible image of authority, decisiveness, and conviction to their views.' Following Hyland [19]; Zou and Hyland, [29] and other grammars on boosting features [e.g. 26], they are functionally classified as solidarity, certainty, intensity, and belief boosters.

*Solidarity boosters* (e.g. it is *evident* that, clearly) are also known as accepted truth as they downplay the author's involvement in the propositional content of an argument. They imply that the claim or statement made is already generally accepted in the discipline. To readers, such imply that they do not need further explanation because readers already possess the requisite understanding, as they are members of the relevant discourse community [29 p. 97]. *Intensity boosters* (e.g. amazingly, extremely) amplify the emotive strength of a statement by highlighting speakers/writers' affective response to what they are discussing. They are often combined with attitude markers to enhance an argument. *Certainty boosters*

(e.g. *certainly*, *definitely*) indicate speakers' epistemic conviction. Such boosting devices increase the force of statements and emphasise certainty, strong commitment, and conviction. They emphasise the strength of the writer's commitment to a proposition, to convince the reader of the logicity of the argument [19 p. 369–370]. *Belief boosters* (e.g. *I believe*, *I know* as a fact that) allow writers to express their conviction on the propositional content of their arguments. They are used to emphasise the writer's commitment but avoid attributing such beliefs to the audience's shared background knowledge. Table 1 shows these functional classifications of boosters and hedges explored in the study:

Boosters and hedges are most commonly realised lexically and grammatically, though Hyland [19] identifies some strategic realisations in for instance conditional clauses, and rhetorical questions among others. However, the present study focuses on lexical and grammatically marked ones especially those signalled by lexical verbs, adjectives, adverbs and nouns.

## 4 Data Selection and Methods

The data for this study is a corpus of sixty-two Nigerian Supreme Court dissenting judgements purposively sampled from fifty civil cases totalling 301,548 tokens. The cases were drawn from *Nigerian Weekly Law Reports* [www.nwlonline.com](http://www.nwlonline.com) a private database of court cases delivered between 1980 till date. The corpus design followed three basic criteria. First, the case type, the corpus was limited to only civil cases, which are one of the three aspects of law the Nigerian Supreme Court deals with (others include Constitutional and Criminal Cases). This is to enable a concentration on an aspect of law per time which could be extended in future research. Second, the period, due to the amount of data available on the database and to avoid possible influences of generational and diachronic variation in the style of the genre, the corpus was limited to judgements delivered between 2000 and 2022. Also, because, not all the cases delivered in these periods have dissents, only those containing dissenting judgements were selected. Thus, a total of 62 dissenting judgements comprising 39 single dissents, 10 double dissents and only one having 3 dissents make up the corpus. The single case with three dissents is a constitutional one involving seven judges (see Sect. 2 for discussion on case types and judgements). The list of cases

**Table 1** Taxonomy of boosters and hedges

Boosters	Hedges
Certainty	Reader-oriented
Solidarity	Writer-oriented
Intensity	Attribute
Belief	Reliability

and dissenting judgements are presented in Appendix 1. The judgements were converted into text formats and analysed using Antconc 4.2.

The analysis follows a form-to-function approach as follows. First, a list of boosters and hedges was generated following an established inventory of such markers in existing grammars of academic [21, 27] and judicial discourses [3]. Second, each item on the compiled list was searched using the Key Word in Context tool in *Antconc* 4.2. Following Hyland [19–21], items identified as hedges are those lexical and grammatical means with which the dissenting judges indicate (a) a lack of complete commitment to the truth of a proposition as in the use of *largely* in example 7; (b) a desire not to express that commitment categorically as in *likely* in 8; (c) and those with which they orient to themselves or the readers as in 9 and 10 respectively. It should be noted that all modal auxiliaries were excluded from the list of both boosters and hedges to enable concentration on other lexico-grammatical means of expressing doubts and certainty in the corpus. This is because, in existing studies of boosters and hedges [3, 20], modals have been consistently found as the highest occurring of other linguistic features (confirmed in the preliminary search in the corpus) which has in a way restricted the visibility of other lexical and grammatical means of performing similar functions. A preliminary search of the corpus analysed in the present study shows the following frequency for must (512), will (461), should (113), shall (119), may (292), can (127) and cannot (130); an indication that they are prevalent and have the tendency to overcrowd other lexical and grammatical markers of the same phenomena which in my view are not less important.

7. I think, with respect, that the statement of the court below reproduced above is largely speculative and based on mere suspicion. diss\_36\_txt

8. But is that enough for me to order that the matter be tried by another Judge or competent jurisdiction? I think not, particularly in the light of the final order I am likely to make in the light of the parties before this court. diss\_60\_txt

9. The lower court, in my humble view, was clearly in error in believing the evidence of DW3, DW4, DW5 and DW6. diss\_23\_txt

10. It does seem to me that the only question that the trial court would appear to have considered on this plea of estoppel per rem judicatam is that of the res or the subject-matter of the litigation. diss\_44\_txt

Items identified as boosters are lexical and grammatical items that emphasise certainty; express collegiality; galvanise support and present the judges' personal beliefs and claims as convincing as in examples 11–14 respectively.

11. *Indeed*, the position taken by the trial court is what the law has prescribed. diss\_40\_txt

12. Finally and on the contrary, *it is clear* that there is a very live issue in this appeal.

13. *I know as a matter of fact* that most High courts do not sit at 9.00 am prompt. diss\_53\_txt

14. It is *of course true that* the courts have been generous in the grant of the order to bring a representative action where the facts justify it. *diss\_60\_txt*

Thirdly, all identified hedges and boosters (see Appendix 2 for the list of items) were extracted and manually examined in the *File View* of the software to ascertain their functions as boosters and hedges based on the aforementioned criteria. Then, they were coded following the research objectives for their frequency, forms (verbs, adjectives, adverbs/adverbials, nouns and grammatical structures) and functions. The coded file was checked multiple times to ensure consistency in the analysis. Finally, the frequency of the coded items was obtained and presented in simple percentages and normalised frequency per 1000 words (ptw).

## 5 Findings and Discussion

### 5.1 Frequency and Forms of Hedges and Boosters in the Dissents

The quantitative analysis of sixty-two Nigerian Supreme Court dissenting judgements shows that boosters and hedges are essential rhetorical means in the expression of alternative views on majority opinions. However, as Table 2 indicates, boosters are more frequent than hedges by more than two boosters to one hedging feature.

This foregrounds the prime place of convincing and assertive presentation of arguments in judicial dissents which is in sharp contrast with what obtains in academic discourse where hedges are more predominant [19]. This suggests that regardless of similarity in communicative thrust in academic and judicial discourses, the discourse domain and peculiarity of the discourse community to some extent influence the rhetorical choices of writers/speakers. In other words, different discourse communities prefer different stance features that reflect discipline-specific peculiarities [28].

In terms of specific linguistic realisation of these rhetorical functions, boosters tend to be more lexically realised than in clusters or grammatical structures as shown in Table 3. They are mainly realised by epistemic and evidential adverbs (46%) followed by epistemic verbs (19%), grammatical structures (18%) and epistemic and evidential adjectives (16%). The predominance of adverbs as boosters in Nigerian Supreme Court dissents is similar to the US Supreme Court judgements, where stance adverbs are prevalent [10, 28].

Hedges, on the other hand, are predominantly realised by cognitive verbs (37%) followed by adverbs (30%), grammatical structures (29%), adjectives (2%)

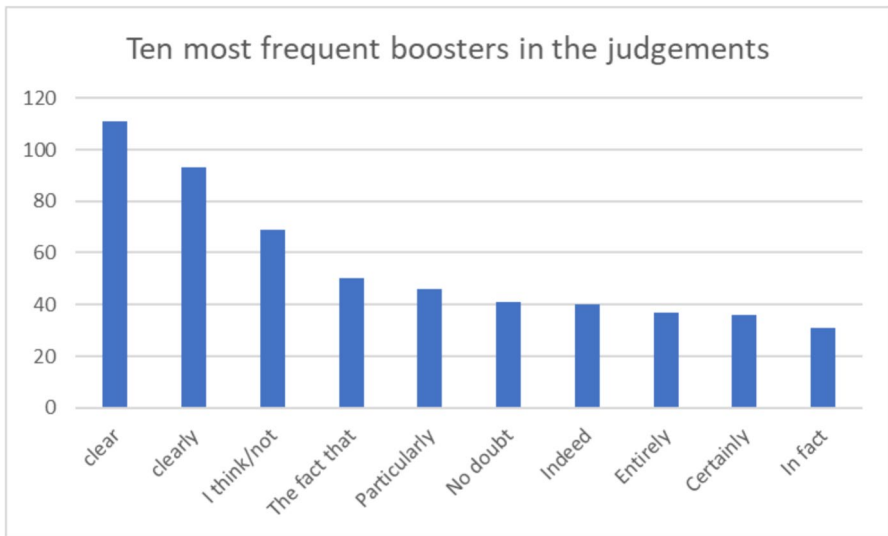
**Table 2** Frequency of hedges and boosters in the corpus

Category	Tokens	Ptw
Boosters	1009	670.4
Hedges	495	328.9
Total	1505	1000

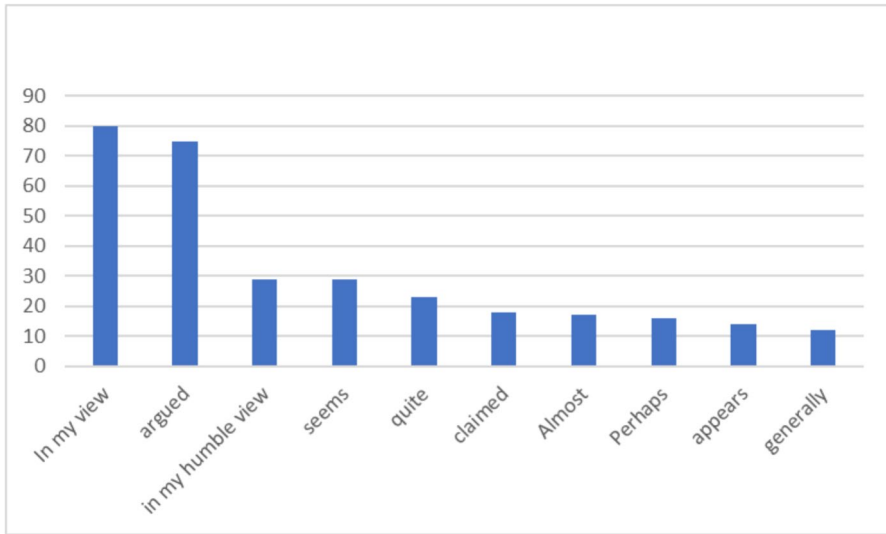
**Table 3** Linguistic forms of boosters and hedges in the corpus

Forms	Boosters	%	Hedges	%
Verbs	195	19	183	37
Adverbs	468	46	151	30
Adjectives	165	16	10	2
Nouns	0	0	8	2
Grammatical/cluster	181	18	143	29
Total	1009	100	495	100

and a few nouns (2%). Figures 1 and 2, present the most frequent linguistic forms functioning as boosters and hedges in the corpus. The frequency of epistemic and evidential adverbs and verbs in the corpus reflects the role of the dissenting judge which is to challenge the arguments of the majority using established laws, precedents and fact. Among the top ten words acting as boosters in the corpus, the adjective *clear* is the most prevalent providing evidential support to the claims projected by the dissenting judges. Closely following are epistemic adverbs *clearly*, *indeed*, *certainly*, *indeed*, *in fact*, and some lexico-grammatical forms such as *the fact that*, *I think that* and *no doubt*. These findings partly conflate with existing studies of majority and dissenting judgements of the US Supreme Court where *clearly*, *indeed* and *certainly* are prominent and mark epistemic stance [28]. Hedges, on the other hand, have verbs lexically and grammatically marking epistemic uncertainty in the corpus. In other words, verbs such as *argued*, *claimed*, *seem*, and *appear(s)*, sometimes are used as single lexical items hedging a claim or as predicates in complement clauses, especially the *that*-clause.



**Fig. 1** Ten most frequent boosters in the dissenting judgements



**Fig. 2** Ten most common hedges in the dissenting judgements

Hedges are also realised by adverbs, and adverbials in clusters. The specific functions of these linguistic items will be expounded further in the following section which discusses the contextual functions of boosters and hedges in the corpus.

## 5.2 Functions of Boosters in the Dissents

A contextual analysis of the discursive functions of boosters in the corpus, as shown in Table 4, indicates that collegial solidarity marked through the presentation of arguments as accepted truth, established laws and precedents is critical in the presentation of convincing arguments. This is necessitated partly by the need to demonstrate expertise in the nuances of their community of practice. Thus, the larger chunk of boosters in the corpus mark solidarity with 36% rates, followed by intensity boosters (23%), which are used to strengthen the illocutionary force of arguments. Certainty boosters express judges' epistemic convictions on propositions where they feature with 22% rates while belief boosters project their convictions on issues argued with 18% occurrence rates. These functions as well

**Table 4** Functions of boosters

Functions	Token	%
Solidarity	368	36
Intensity	234	23
Certainty	225	22
Belief	182	18
Total	1009	100

as the specific prevalent linguistic items realising them are discussed sequentially in the following sections.

### 5.2.1 Boosters as Solidarity Markers

In the corpus, over one-third (36%) of the linguistic features acting as boosters function as solidarity markers. This suggests that convincing argumentation depends on judges' rhetorical manoeuvring of their readers by appealing to shared knowledge to achieve a degree of intimacy as members of the same community of practice. Thus, they deploy solidarity markers to present claims as accepted truth, legal norms that are presented as commonplace for the legally inclined. Such markers downplay the writer's involvement in the propositional content of the arguments. They are used rather to invite colleagues to figure out the veracity or soundness of such established facts. This is indicated in their impersonal use of the evidential adjective *clear* (111 tokens), typically acting as predicates in the *that*-complement clause and collocating with intensifiers such as *very clear*, *absolutely clear* and *abundantly clear*. Also commonly used to mark solidarity in the dissents is the epistemic adverb variant *clearly* (93 tokens), *in fact* (31 tokens), and the grammatical structure, *the fact that* (50 tokens). Examples 15–17 are some instances of boosters marking solidarity in the corpus.

15. From the foregoing, it becomes **very clear that** in 1979 when exhibit 1 was drawn and filed, only 4 plots of land were given to 1st respondent as per the plan No. ECAS/4/79 with area of 1.847.546 sq. meters. *diss\_36\_txt*

16. **Clearly**, the evidence of the appellant quoted above raised a defence of bona fide claim of right made in good faith. *diss\_60\_txt*

17. **The fact that** they may be interested in the result of these proceedings is of no moment. *diss\_1\_txt*

The markers in 15, 16 and 17 are used to rhetorically manipulate collegial understanding as they appeal to the readers as intelligent members of the discourse community who should be familiar with the presented existing claims, evidence and facts to make logical inferences. By reference to the preceding argument in 15, the appellant's quotation in 16, and the fact in 17, the writer takes for granted the expertise of their reading colleague indirectly inviting them to align with their claims as colleagues. Notably, the class of verbs, adverbs, adjectives and grammatical constructions realising this boosting function are epistemic/evidential which reflects in their roles as markers of solidarity elsewhere described as signals of epistemic positioning which is a core feature of judicial arguments [4, 11].

### 5.2.2 Boosters as Intensity Markers

Dissenting judges amplify the propositional force of their arguments using intensity boosters. They are typically realised by adverbs and have 23% of all boosting features in the dissents. In terms of functions, they are used in two ways, first, to restrict epistemic specifications on the propositional content of arguments where they feature with content adverbs such as *particularly*, *entirely*, *never*, *completely*,

*always*, and *absolutely*. They are also used to amplify the emotional force they attach to issues argued using words such as *remarkably*, *perfectly*, and *notably*, among others. Examples 18–20 are some of such instances from the corpus.

18. I have studied the record herein **particularly** the pleadings, evidence thereon, and judgments of the lower courts. I totally disagree with the learned counsel for the defendants...diss\_32\_txt

19. I have **never** come across a more oppressive and hostile litigation than this in my life as a Judge. Here is a case where the trial Judge refused to stand down a matter for ninety minutes. diss\_53\_txt

20. I further wish to state that the authorities cited by the respondents are **remarkably** distinguishable from the case at hand. diss\_30\_txt

In 18, the judge uses *particularly* to specify the range of precedents that inform his disagreement with the majority. In 19, the epistemic adverb *never* is used in two ways: to amplify the strength of the judge's negative evaluation of the litigation which was described as oppressive and hostile and to challenge the procedural flaws in the decision of the trial judge on the case. This appears to be a common marker of dissents as it is prevalent in the US Supreme Court dissents [28]. In 20, the adverb *remarkably* attaches some emotive flavour to the epistemic depth of the respondent's arguments.

### 5.2.3 Boosters as Certainty Markers

In dissenting judgements, certainty boosters are used to express the dissenting judges' epistemic commitment to the propositional contents of their arguments and to emphasise their epistemic conviction on the validity of the arguments they assert. Unlike findings elsewhere, where certainty markers are more predominant in dissenting judgements [3], they have 22% occurrence rates, second to the least occurring of boosters in Nigerian Supreme Court judgements. This may be due to the class of linguistic items explored in the present study. Certainty boosters are realised lexically by adverbs such as *certainly*, *indeed*, *definitely*, *undoubtedly*, *surely*, *actually*, and in clusters such as *no doubt*, *in fact*, and *without doubt* among others. They are personally and impersonally marked as indicated in examples 21–23.

21. Therefore, if Metzger is good in England and its legal system, it is **certainly** not good enough for Africa. diss\_11\_txt

22. I entertain **no doubt** that the court below was right when it held that the parties in Exhibit C are the same as in the present suit. diss\_44\_txt

23. It is **true** that he (Chief Kalu Orji) was once the Chairman of the Board of Directors of the 1st defendant/Bank. diss\_42\_txt

In 21, the adverb *certainly* impersonally emphasises the judge's epistemic conviction on the assertion that judicial nuances in the Western legal system are not always applicable in Africa. In 22, the judge by the adverbial *no doubt* validates a claim

upheld at the Court of Appeal on the identity of one of the parties in the case adjudicated. In 23, the adjective *true* substantiates the claim on the personality of one of the defendants, an indication of the judge's commitment to the propositional content of the claim.

### 5.2.4 Boosters as Markers of Belief

Apart from expressing epistemic convictions on issues argued, judges also project their perceptions and deductions in their arguments using belief boosters. With such boosters, they project authoritative voices into the discourse. Belief boosters amount to 18% of the boosting features found in the corpus. They are realised lexico-grammatically by cognitive verbs which serve as predicates in complement structures such as *that*-complement clauses. The most frequent of such verbs include *think*, *find*, *belief*, *know*, *I am of the firm view that*, among others. Typically, belief boosters are personally marked with personal pronouns alongside cognitive verbs in *that*-complement clauses which are realised in two forms, such as with *that*-omission as in 24, and those with the *that*-clause as in 25.

24. I **think that** the foregoing reflects in a nutshell the state of the parties cases in the appeal. *diss\_19\_txt*

25. The omission in my view is fatal. There was no finding because I **believe** in the first place there was no charge against the appellant. *diss\_41\_txt*

In 24, the cognitive verb *think* presents the judge's deduction on the parties' arguments. It is an instance of a belief booster featuring in a *that*-complement clause where a verb frontloads the stance while the complement clause completes the sense of the predicate in the main clause. *Believe*, in 25, demonstrates the judge's conviction on the status of the appellant's case before the court, but this time features in a complement clause with an omitted relative pronoun. The next section discourses the findings on the functions of hedges in the corpus.

### 5.3 Functions of Hedges in the Dissenting Judgements

As indicated in Table 5, hedges perform varying functions in the discourse of dissenting opinions, the most frequent being reader-oriented hedges with 33% occurrence, followed by writer-oriented hedges at 31%. Attribute hedges have 24% occurrence rates while reliability hedges have 12% rates. The frequency of reader-oriented hedges over other functional types in the corpus suggests that convincing

**Table 5** Functions of hedges

Functions of hedges	Token	%
Reader-oriented hedges	164	33
Writer-oriented hedges	155	31
Attribute hedges	117	24
Reliability hedges	59	12
Total	495	100

argumentation in dissenting judgements is not devoid of deference to members of the legal discourse community, which is a rhetorical strategy necessary to win the support of the reading audience. At the same time, the nature of their argumentative practice demands that judges lend their voices as experts to project their expertise which is indicated in their use of writer-oriented hedges. Furthermore, the need to present their claims with some degree of variability and not with the exactitude of a core empirical finding necessitated their use of attribute hedges. In other words, by their use of attribute hedges, dissenting judges present their assertions as one among many possible interpretations. This allows them to avoid being interpreted as categorical, which could threaten their appeal to collegial affiliation. Reliability hedges allow them to restrict the level of confidence with which they present their views and as a result, help manage possible negative reactions such claims may engender. Each of these functions of hedges as well as the linguistic features realising them are discussed in some detail in subsequent sections.

### 5.3.1 Reader-Oriented Hedges

In dissenting judgements, hedging devices are used to present claims in deference to other legal experts interested in the case. The preponderance of reader-oriented hedges in the corpus, with close to one-third of the hedging features in the dissents (33%), points to the importance of seeking reader acceptance in the presentation of arguments in the legal discourse. This partly conflates with the prevalence of solidarity boosters discussed earlier, which is a strategy to present arguments as accepted truths not to be refuted. This is similar to the argumentative culture in academic discourse where ‘communal accreditation’ [20 p. 184] is a major consideration in presenting scientific claims. In the corpus analysed, dissenting judges orient to their readers by personal attribution realised through epistemic lexical verbs such as verbs of judgement and deductions such as *feel*, *seem*, and *appeared* and through clusters such as *in my opinion*, *in my humble view* and *in my view* which is the most frequent. Some of such instances are presented in examples 26 and 27.

26. *In my view*, the denials are not specific but highly evasive. I expected the 3rd respondent to deny that Chief Orji Uzor Kalu is not her son, if that was the correct position. *diss\_42\_txt*

27. *It seems to me* that the issue by the respondents of the writs of certiorari/prohibition was complimentary to the writ of Habeas Corpus earlier issued by them. *diss\_4\_txt*

In examples 26 and 27, the opinions are presented as open-ended ones which are subject to dialogue by the clusters *in my view* and *it seems to me*. With these devices, the reading audience is invited to consider such positions against existing perspectives. In other words, by presenting the positions from their perspective, dissenting judges defer to their colleagues as experts in the field who possess the ability to reason along and possibly align with them.

### 5.3.2 Writer-Oriented Hedges

Close to reader-oriented hedges in the corpus are writer-oriented ones which have 31% occurrence rates. They hedge the judge's commitment to the claims where they appear while leaving their truth values open. In other words, they minimise the dissenting judge's presence in their arguments; a strategy that shields them from the possible consequences such claims may generate. Writer-oriented hedges in the dissents analysed were marked by the use of impersonal expressions which are used to attribute the source of a claim to precedents, parties' arguments or the arguments of their learned colleagues on the same bench or in lower benches. In the corpus, they are linguistically realised through lexico-grammatical means with epistemic and evidential verbs in *that*-complement clauses such as *it seems that*, *it appears that*. They are also realised through reporting verbs such as *argued* and *claimed* in complement clauses as in examples 28 and 29:

28. In support of issue No. 2, *it was argued that* a court has jurisdiction to set aside its decision which is a nullity. *diss\_25\_txt*

29. *It appears that* there is no judgment in this appeal, but only a sentence. The omission is fatal. *Diss\_60\_txt*

In 28, the judge hedges his opinion stated later in the complement clause by first presenting a preceding argument in the main clause. This way, the judge's position on the argument projected in the main clause is delayed possibly to allow the reading audience to ruminate a bit on the possibility of a court setting aside its own decision, which the dissenting judge disagrees with. In 29, the judge expresses their perception of the appeal using an agentless clause probably to dodge the consequence of negatibility that could result from such projected perception.

### 5.3.3 Attribute Hedges

Attribute hedges in the dissenting judgements involve adverbs described as degree of precision adverbs such as content adverbs, downtoners used to express variability or to indicate the precise standpoint from which the reading audience is invited to interpret issues evaluated. According to Hyland [20 p. 164] they 'allow deviations between idealised models of nature and instances of actual behaviour to be accurately expressed.' Attribute hedges are used to specify the extent of confidence or range of possibilities judges attach to issues they address. In other words, they are used to specifically state the degree of precision attributed to an evaluated issue. In the corpus, they have 24% occurrence rates and are lexically realised by content disjuncts (e.g. essentially), style disjuncts (e.g. generally) and downtoners (e.g. quite, almost). Among these, the downtoner, *quite* is more frequent with 23 instances of all attribute hedges in the corpus. Examples 30–33 are instances from the data.

30. I am not even *quite sure* whether the respondent can be retried, as there was no trial in the first place. *diss\_17\_txt*

31. *Quite clearly*, the instant ground 2 does not come within the embrace of any of the errors in law as I have defined here. diss\_7\_txt
32. It is *almost* a recitation in the judicial system that a plaintiff cannot rely on the weakness of a defendant's case. diss\_23\_txt
33. *Generally*, a court of law has the duty to grant an application for the amendment of processes before it...diss\_4\_txt

In 30, *quite* limits the degree of the adjective *sure* which indicates the judge's cautious expression of certainty on the status of the respondent's case. In 31, is an instance of the adverb *quite* modifying another adverb, this time serving as a downtoner. It limits the force of the assertion on the said ground 2. *Almost*, in 32, is another degree of precision adverb which expresses the writer's choice not to sound too assertive, despite expressing a well-known fact in law. *Generally*, in 33, expresses a sense of variability in the duty of the court in granting an application, suggesting that exceptions are possible.

### 5.3.4 Reliability Hedges

In the dissents analysed, judges sometimes avoid expressing their conclusions too confidently by the use of reliability hedges. They are used to express epistemic possibility; in that they indicate the degree of precision or reliability judges are willing to attach to their claims. They are the least occurring of the hedges with 13% occurrence rates. In the corpus, they are mostly realised by content disjuncts such as *perhaps*, *apparently* and *likely*, which indicate propositional uncertainty, a few modal adjectives (e.g. *apparent*, *doubtful*) and nouns (e.g. *doubt*, *possibility*). Among these linguistic forms, *perhaps* is the most frequent. Examples 34–36 are some instances from the data.

34. *Perhaps* the only seemingly relevant aspect of this court's decision to the first issue in this matter is what. Onu, JSC, said at page 326 of the judgment. diss\_18\_txt
35. It was when the 1979 Constitution was promulgated and superior courts of record were specifically listed leaving out the National Industrial Court of Nigeria that problems started. It became *doubtful* whether the National Industrial Court of Nigeria was a court of superior record under that Constitution. diss\_57\_txt
36. If the 1st respondent had commenced the action earlier, there could have been the *possibility* of the 1st appellant filing the motion earlier. diss\_53\_txt

In 34, *perhaps* limits the degree of confidence attached to the judge's assessment of the decision of the majority on the first issue for determination. In 35, the modal adjective *doubtful* expresses the writer's doubt on the status of the National Industrial Court following the omission in the Constitution and in 36, the hedging device expresses probability conditioned by the initial action expected of the first respondent.

## 6 Conclusion

The study aimed at investigating the frequency, forms and discursive functions of markers of doubt and certainty in Nigerian Supreme Court dissents. Findings have shown that hedges and boosters are core rhetorical elements with which dissenting judges express individualistic and sceptical voices on the arguments of the majority. However, in terms of the frequency of the markers, boosters are more prevalent than hedges in the dissents. This sharply contrasts with the reality in other argumentative climes (e.g. academic discourse), where hedges are largely preferred over boosters [19–21]. The prevalence of boosting features affirms the persuasive thrust of judicial argumentation, one which requires assertively projecting judges' authority and expertise in the comity of experts. On the forms of rhetorical elements acting as hedges and boosters, the study finds that while boosters are most commonly realised lexically by epistemic adverbs and adjectives, hedges are grammatically realised by verbs that act as predicates in *that*-complement clauses. The adjective *clear* and its adverbial variant *clearly* stand out as boosting features in Nigerian Supreme Court dissents while reporting and cognitive verbs predominate in clusters and grammatical structures as hedging features. By exploring other lexico-grammatical means, the study has found that adverbs, verbs, adjectives and nouns are equally important in convincing argumentation, not only modals.

In terms of the functions of hedges and boosters, the study reveals solidarity marking as the most prevalent function of boosters while reader orientation is atypical of hedges in the dissents. By dissenting judges presenting arguments as established norms or common knowledge, they seek the patronage of colleagues on such arguments. On the other hand, by orienting towards readers, they engage their reading audience to reason along their lines of argument as experts in the discourse community. Thus, there is a degree of convergence in the functions of boosters and hedges in the corpus. The convergence in rhetorical strategies despite the polypragmatic divides indicates that collegial affiliation and approval are central to the communicative purpose of dissenting judgements whether realised by boosting or hedging features. It could be surmised, then, that dissenting argumentation is not only about asserting claims but patronising the approval of members of the discourse community who may reference such dissents in future adjudication. Findings on the frequency and forms of boosters and hedges in the present study extend existing ones in a closely related study of boosters in Russian dissents where boosters mainly mark certitude. The present study has found that while assertive presentation of arguments is important to dissenting judges, collegial affiliation and solidarity with other experts in the discourse community also matter, hence the prevalence of solidarity markers in the corpus.

In conclusion, the present study has contributed to the ongoing discussion on the linguistic and rhetorical realisation of dissenting arguments, especially as it concerns the discursive functions of markers of certainty and doubts which have received very limited attention. It is, however, not without some limitations. First, the size of the corpus used; a larger corpus could reveal more interesting

features marking certainty and doubts in the sub-genre. The study could also have been made comparative at the genre level to enable a comparison of the markers in dissents with those of lead judgements for possible convergence and divergence in the items explored. These could be explored in future research. Specific lexico-grammatical patterns representing individualistic and sceptical voices in dissents could also be examined in further studies.

## Appendix 1

### List of cases and dissenting judgements

S/N	Names of Cases	Dates delivered	DJs	No of DJs	No of words
1	Akpaji v Udemba SC 247/2002	13/2/2009	Aderemi	1	3640
2	Spieß v Oni SC/197/2013	3/6/2016	Aka'ahas& Okoro	2	8042
3	Olubodun v Lawal SC.53/2002	13/6/2008	Ogbuagu	1	8642
4	Okonkwo v CCB SC.58/1998	28/2/2003	Nikki Tobi	1	14,924
5	Ugwuanyi v NICON Ins. Plc SC. 248/2005	22/2/2013	Bode Rhodes-Vivor	1	3769
6	Okoye v Nwakwo SC.234/2004	27/6/2014	Ngwuta	1	3588
7	Sky Bank Plc v Akinpelu SC. 38/2003	5/3/2010	Ogbagu	1	3717
8	Ogolo v Ogolo SC. 193/97	12/12/2003	Katsina-Alu	1	3478
9	Olori Motors Company Ltd. V UBN SC. 278/2001	7/4/2006	Katsina-Alu & Oguntade	2	7180
10	Korea Nat. Oil Corp v O.P.S (Nig) Ltd SC.249/2012	24/2/2017	Muhammad	1	4974
11	Chukwu v Akpelu SC. 250/2005	13/12/2013	Chukwuma-Eneh	1	5283
12	Chudi Verdical Co Ltd. v I.I (NG) Ltd SC. 246/2009	8/6/2018	Eko	1	2848
13	Ewete v Gyang Sc/25/1997	7/3/2003	Katsina, Kalgo & Uwaifo	3	2209
14	Mobil Prod. (Nig) Un Ltd v Monokpo Sc. 320/2001	12/12/2003	Katsina-Alu	1	4939
15	Bassil v Fajebe SC. 76/93	27/4/2001	Onu and Belgore	2	3709
16	Ezemba v Ibeneme SC.142/2000	22/7/2004	Nikki Tobi	1	11,626
17	Chief of Air Staff v Iyen SC. 217/2002	28/1/2005	Nikki Tobi	1	10,869
18	Okike v LPDC SC. 58/2004	15/07/2005	Kutigi	1	3043

S/N	Names of Cases	Dates delivered	DJs	No of DJs	No of words
19	Obasi Bros. Co. Ltd v M.B.A.S Ltd. SC. 290/2000	4/2/2005	Kalgo	1	4613
20	Eke v Ogbonda SC. 64/2001	8/12/2006	Oguntade (part dissent)	1	2999
21	A.P.C Ltd v NDIC (NUB LTD) SC. 135/2003	14/7/2006	Oguntade	1	5410
22	Dada v Dosunmu SC. 134/2002	22/9/2006	Mohammed & Kutigi	2	6556
23	Saleh v Monguno SC. 403/2001	7/7/2006	Oguntade & Katsina Alu	2	4129
24	Adesanyoye v Adewale SC. 17/2004	14/7/2006	Oguntade	1	1696
25	Mozie v Mbamalu Sc. 345/2001	14/7/2006	Oguntade & Mohammed	2	10,615
26	A.-G., Abia State v A.-G., Fed. SC. 99/2005 SC. 121/2005 SC. 216/2005	7/7/2006	Kutigi & Mudstapher	2	10,425
27	A.G., Federation v Abuba- kar SC. 136/2005	1/7/2008	Oguntade	1	8610
28	Abubakar v. Waziri SC. 41/2005	7/6/2008	Chukwuma-Eneh	1	3996
29	Pam v Mohammed SC. 238/2007	30/5/2008	Nikki Tobi	1	15,144
30	Ejezie v Anuwu Sc.340/2002	18/4/2008	Nikki Tobi	1	7839
31	Akaninwo v. Nsirim SC. 88/2001	18/1/2008	Nikki Tobi	1	9603
32	Danladi v T.S.H.A SC. 148/2013	21/11/2014	Bode Rhodes-Vivor	1	2327
33	Awala v Nig. Telecom SC.319/2006	21/6/2019	Aka'ahas	1	1159
34	Oboh v NFL. Ltd SC. 841/2016	18/12/2020	Muhammad	1	3616
35	Skye Bank Plc v. Iwu SC. 885/2014	30/6/2017	Aka'ahas	1	6137
36	Onakoya v F.R.N SC. 11/2001	28/6/2002	Ogundare & Ejwumi	2	7451
37	A.S.T.C v Quorum Consor- tium Ltd SC.121/2003	3/4/2009	Chukwuma-Eneh	1	7993
38	A.-G., Cross River State v F.R.N SC. 45/2019	17/5/2019	Peter-Odili	1	11,917
39	P.T.F v Fidelity Bank Plc SC. 196/2009	10/12/2021	Agim	1	4221
40	Skypower Exp. Airways Ltd v UBA Plc SC. 80/2016	7/1/2022	Eko	1	2063

S/N	Names of Cases	Dates delivered	DJs	No of DJs	No of words
41	Orakul Resources Ltd v N.C.C SC.142/2007	7/1/2022	Eko	1	3899
42	Igwe v Kalu SC. 26/1996	11/7/2002	Kutigi & Kalgo	2	5513
43	Ajibode v Gbadamosi SC. 254/2012	22/1/2021	Eko	1	2861
44	Aya v Nkanu SC. 940/2015	11/6/2021	Agim	1	4929
45	Egesimba v Onuzuruike SC. 118/1998	20/8/2002	Nikki Tobi	1	10,442
46	Vital Inv. Ltd v CAP Plc SC. 267/2007	28/5/2021	Eko	1	3317
47	Aje Printing (Nig) Ltd v Ekiti L.G.A SC. 124/2009	23/4/2021	Peter Odili	1	2975
48	Famu v Kassim SC. 218/2011	23/11/2012	Ogunbiyi	1	1445
49	Okukuje v Akwido SC. 58/1992	26/1/2001	Wali & Iguh	2	16,615
50	Oguebie v FBN SC. 177/2007	17/1/2020	Peter-Odili	1	4695
TOTAL = 301,690					

## Appendix 2

Boosting and hedging features adapted from Hyland [19–21] Zou and Hyland [29]

Boosters	Hedges
Always clearly clear believe	About almost apparent
Certain certainly definitely	Apparently appear appears
Demonstrate demonstrated doubtless	Appeared approximately argues
No doubt without doubt established	Argued claim claimed
Evident evidently find found	Doubt doubtful essentially
In fact indeed know well known	Fairly feel generally
Undoubtedly absolutely actually never Obviously obviously of course	In most cases in my opinion
Really shows shown sure surely	In my view in my humble view
True truly particularly the fact that	I am of the view that largely
Apparently extensively categorically	Likely mainly mostly often
Completely credible entirely essentially Extremely firmly fully	On the whole perhaps possible
I am of the firm view that manifest	Possibly postulate probably
Necessarily notably perfectly plainly	Quite rather seems seem
Plain precisely profound remarkably Unequivo- cally unquestionably uphold Clearly indicates it is trite that I think/not	Sometimes sometime supposed uncertain Unclear usually
It goes without saying I do not think	Indicates indicated suggests
Especially meaningfully	Suggested suggest virtually
	At least consistent with unlikely
	Possibility relatively
	It would appear that

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