



## The Intransitive Usage of the English Verb *Lay* in COCA and BNC

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### ABSTRACT

One of the most confusing sets of English verbs is *lay* and *lie*; the former has been used as an intransitive verb in the place of the latter with or without speakers' cognizance of their correct usage (National Council of Teachers of English, 1956). Using two corpora, Corpus of Contemporary American English and the British National Corpus, this study examined 1) whether *lay* as an intransitive verb is more frequently used in American than British contexts and 2) whether it is found more often in spoken English than written English. The frequencies of the present participle of *lay* plus prepositions, *on* and *in*, were counted in COCA and BNC, and their normalized indexes were compared for analysis. The results showed that *lay* as an intransitive verb has been used more frequently in American than in British English, which implies that British speakers are more reluctant to accept the marked language form than their American counterparts. Spoken English is found to be more tolerant of non-standard forms than written English. The study suggests this intransitive usage of the English verb *lay*, though still a marked form, should be taught to ESL/EFL learners along with its unmarked form as a transitive verb.

### I. INTRODUCTION

One of the sets of English verbs which are most confusing seems to be *lie* and *lay*, and the multitude of webpages specifically single out this set explaining/preaching the proper usages of these verbs (e.g., Lay vs. lie, 2018). Cullen (2008), an owner of a business writing blog, prescribes for the improper usage of these verbs by providing the distinctive definitions of these words with the examples of misusage. Noting that these words are often used interchangeably, she indicates that *lie* implies to recline, an intransitive verb which requires no direct objects whereas *lay* is a transitive verb meaning to place something. In terms of sentence structure, *lie* stands alone while *lay* should be followed by a direct object. The clear

distinction between these verbs in respect to transitivity is unusual given that the majority of English verbs have both intransitive and transitive entries.

One possible reason for the confusion might stem from the fact the past tense of *lie* and the base form of "to lay" is a homonym, with the same spelling and sound but with different meanings. The conjugated forms of 'lie' is *lie-lay-lain* while the past tense and past participle of 'to lay' is *laid*. Even with the emphasis on the correct usage of these verbs, the confounding usage of *lay* is intermittently observed in the news media as in "The body was laying on the sidewalk and was covered with a white blanket" (Body found on E. Edwards, 2015). In the above sentence, the main action verb is "lay" in the past progressive form. Because "lay" is a transitive verb, it should precede an

object. However, it is used as an intransitive verb followed by the preposition “on” as in the case of “lie.” It is perplexing to the eyes of prescriptivists who think language users should conform to Standard English to maintain the ideal form of the language because this deviation occurs in newsmedia. The news media are regarded as a vanguard of Standard English defined by Trudgill (1995, p. 5-6). He defines Standard English as the variety: “Usually used in print, normally taught in schools, learned by non-native speakers, spoken by educated people, and used in news broadcasts.”

While this interchanging use of *lay* seems nothing surprising to descriptivists, a host of teachers in the ESL community are slow to introduce this language form to their students sticking to the prescriptivist perspective. Many test items have been even built on the dichotomic distinction between the usages of the two verbs. Notwithstanding its apparent breakaway from the standard and its significance in the field of TESL, few studies have investigated this language phenomenon: the use of *lay* as an intransitive verb.

## II. LITERATURE REVIEW

In the Oxford English Dictionary, *lay* (Lay, 2017a) as a verb has sixteen entries, all of which need to be accompanied by an object except for one entry which is used in nautical language, meaning to go or come. Cambridge Dictionaries Online has five entries for verb *lay* (Lay, 2017b); all of those require an object. Unlike the above two dictionaries, the Merriam-Webster Dictionary includes an entry for an intransitive verb even though it marks its usage as being non-standard. It says *lay* has the same meaning as *lie* (Lay, 2017c).

This non-standard usage of *lay* as *lie* has held on for long in prose as well as speech regardless of the efforts of keeping the usages of the two verbs separate by school teachers and grammarians. One rare study on the confusion in the usage of *lay* was done by Austin (1999). Austin says it is not a surprise that *lie* and *lay* are confusing because they have the same Germanic root: *leg*. Austin indicated the usage of *lay* as an intransitive verb had been discovered between 1300 and 1907 even in the works by such renowned authors as Bacon, Fielding and Byron. One good example of this usage is from Fielding’s Tom Jones (1749): “The flame which had before laid in embryo now burst forth” (p. 65). Similarly, the transitive usage of *lie* was observed approximately in the same period between the late fourteenth and eighteenth centuries. Samuel Garth’s quotation (1750) provided an example of this usage: “Whilst Seas of melted oar lye waste the plain” (p. 16).

In the late eighteenth century, prescriptive grammarians discussed the confusion of these verbs, and their correct usage of these verbs was established. Since then, the intransitive usage of *lay* has been regarded as dialectic and uneducated while the usage of *lie* as a transitive verb was

rarely found. Austin (1999) pointed out that this non-standard intransitive *lay* was found even in the speech of educated speakers. One example is John Mayor’s comment on Tony Blaire’s absence in the House of Commons in 1995: “He should *lay* back and enjoy it.” Austin noted that although the intransitive *lay* is found less often in writing than in speaking, this form is increasingly used in less formal writing such as advertisement and is expanding its appearance in scholarly writing. Lastly, Austin indicated that the preference of *lay* would result in the convergent use of intransitive and transitive forms to *lay*. Her study has provided an overview on the confusion of *lay* and *lie*; yet it only investigated British contexts. Furthermore, the author’s arguments are based on the examples of her own choice, which makes her claim less persuasive.

The only study which dealt with this topic in both British and American contexts and fielded out the statistical results was by Rynell (1988). The researcher investigated the texts from America and England and enumerated his findings by hand. Rynell notes that American scholars are more inclined to accept the interchanging use of *lay* and *lie* than their British counterparts, and its indiscriminate use is more often found in American than in British contexts. Even though two-thirds of the texts were mostly from British literary works, the usage of the nonstandard form of *lay* for *lie* was discovered less often in British than in American texts. The present participle pair of *laying* and *lying* also turned up the same results. Another significant aspect of his study is it categorized the usage into subgroups: intentional and deliberate and unintentional and inadvertent interchanged use of the two verbs. Its finding reveals that writers used *lay* for *lie* four times more often intentionally. That is, they deliberately chose the non-standard form *lay* over *lie* in their writing. In contrast, the use of *lie* as a transitive verb was not found even once. The result was the same with the present participle form *lying* substituting *laying*. Rynell’s study used mostly literary written texts with sampling inclined toward British texts, and the findings from both texts were not normalized taking into this disproportion. However, his study confirmed, through the use of descriptive statistics, the general idea that the non-standard usage of the transitive verb *lay* for the intransitive verb *lie* is often found in speaking as well as written texts whereas the case of using the intransitive *lie* for transitive *lay* was scarcely found.

With respect to the confusion of *lay* and *lie*, few studies have systematically described this language feature, the usage of *lay* as an intransitive verb. If any, most of those studies regarding this topic are grounded in the frame that the usage of *lay* and *lie* are distinct, and substituting one form with the other is regarded as nonstandard. For example, a series of questions and answers as to the correct usage of English were published under the name of “Current English” by the National Council of Teachers of English. In one volume, answering the confusion of *lay* and *lie*, the writer pointed to the usage of the transitive verb *lay* as an intransitive verb in informal speech and labeled it as nonstandard (NCTE, 1956). The author went ahead to say

that the expression such as “He laid down for an hour.” (p. 39) would not be used by careful speakers, and “The man lying against...” would be preferred in formal English. These kinds of studies are reflecting the perspective of prescriptive grammarians or school teachers who think preserving the pure forms of original language is the best way of using the language ideally. This view, however, does not take into account the fact that the inherent characteristic of language is that it changes, and if not, it is a dead language.

So far, the previous comparative research on the usage of vocabulary were most performed manually; that is, the selection of tokens was likely to be purposeful and unsystematic. Therefore, the sample tokens were unlikely to represent the whole range of words used in diverse language contexts. However, with the advent and development of various corpora, researchers have been able to access and investigate the huge volume of data in a more efficient and systematic way. Corpora enable researchers to utilize the vast size of linguistic data, the electronic texts collected from a wide range of fields and in some cases over a long period of time. Due to this electronic format, with less effort, researchers are able to access and retrieve the data they are targeting, which has recently increased the number of corpus-based vocabulary research.

For example, using three corpora including the BNC, Y. Kim & J. Suh (2006) analyzed the usage of the polysemous English words (e.g., *reservation*) and revealed that all the entries of those words were proportionally represented in the real contexts of the corpora. They argued, however, that the Korean high school textbooks do not properly reflect this proportionate representation of the meanings of the targeted words as shown in the corpora. Another study by S. Lee (2013) created a corpus compiling the transcripts of 226 episodes of the American TV show, Friends, and revealed that the relatively small size of word families were required for ESL learners to comprehend the show compared to other American TV shows.

In this paper, the researcher aimed to explore the language phenomenon of the interchanging use of *lay* and *lie* using two corpora: the British National Corpus (BNC) and Corpus of Contemporary American English (COCA). With the use of these corpora, this study looked at a variety of genres including speaking, writing, news media, academic writing, etc. It also enumerated the findings in concrete statistics, which enabled the investigator to analyze and judge the results in a more reliable and objective manner. Ultimately, the current study intends to address the following questions:

- 1) Is the interchanging use of *lay* (*laying in* and *laying on*) and *lie* (*lying in* and *lying on*) found more often in American English than in British English?
- 2) Is the interchanging use of *lay* (*laying in* and *laying on*) and *lie* (*lying in* and *lying on*) found more often in spoken English than in written English?

in both American and British contexts?

### III. Method

#### 1. Language Items and Forms Under Investigation

This study did not investigate all the entries of the words of *lay* and *lie*. Instead, it primarily focused on the entries of each word, of which usage have been reported to be most confounding, that is, putting something for *lay* and reclining for *lie*. Table 1 shows the verbs with their representative meanings and verb conjugation.

TABLE 1  
Language Forms

	lay	lie	lie
Definition	To put something	To recline	To tell untrue remarks
Simple present	lay(s)	lie(s)	lie(s)
Simple past	laid	lay	laid
Past participle	laid	lain	laid
Present participle	laying	lying	lying

Even though *lie* in the third column has the similar spelling with the other two, it is excluded from this study because it has a disparate lexical meaning and is not confusing in the usage. Narrowing down the focus of this study, the researcher looked into the two verb forms: present participles of *lie* and *lay* followed by prepositions, *on* and *in*. The researcher excluded the present tense forms of these verbs because *lie* in the present tense has two distinctive usages: One denotes not telling the truth, and the other reclining. The past tense was also precluded on the grounds that the past tense of *lie* meaning ‘reclining’, *lay*, has the same spelling with the present tense of *lay* meaning ‘placing’. So, in an attempt to avoid the confusion stemming from this homonym aspect, the past tense of these words were left out in this study. The target forms included two prepositions of *on* and *in* after the present participle of *lie* and *lay*. The transitive verb, *lay*, always requires an object, that is, a noun phrase. Accordingly, *lay* followed by prepositions represents that it is used not as a transitive but intransitive verb. To find the prepositions going along with *lie*, the researcher ran the Key Words in Context (KWIC) search with that word and found two prepositions that most frequently go with *lie*: *on* and *in*.

The present participle can be used in various tenses and forms. First, the most common usage would be in the progressive tenses as in “Eric was lying on his bed.” Another form widely used is a post modifier as in the following example, “She found a pencil lying on the sink.” The present participle is also used in the participle phrase. In the following sentence, “Lying on the ground, Kaaka continued talking,” lying on is leading a participle phrase. In sum, the study has investigated two forms of the present participles with two different prepositions: lying on, lying

*in*, *laying in*, and *laying on*. This present-participle with prepositions seems to be a right form for comparing the usage of *lie* and *lay* without being complicated by other meanings.

## 2. Corpora

For this study, two corpora were employed: the British National Corpus (Davies, 2004) and Corpus of Contemporary American English (Davies, 2008). These corpora were selected because both corpora have spoken and written data, which allow the researcher to compare the results from both genres in American and British contexts. Table 2 below shows the prominent features of the two corpora while Table 3 presents the respective sizes of their subcorpora. In searching for the targeted tokens, the web-based interface was employed: <https://corpus.byu.edu>. This website enables users to search words switching ten different corpora including COCA and the BNC and provides search results of frequencies and per million indexes across all the subcorpora of a selected corpus. As indicated in Table 2, COCA includes approximately 570 million tokens collected through the most recent year, 2017. Compared to COCA, the size of the BNC is relatively small with 100 million words collected between 1980s and 1993.

**TABLE 2**  
Comparison Between COCA and the BNC

	COCA	BNC
Kinds of English	Contemporary American English	British English
Size	570 millions	100 millions
Design	Spoken & Written (1: 4)	Spoken & Written (1:9)
Genre	Spoken, Fiction, Magazines, Newspaper, Academic	Spoken, Fiction, Magazines, Newspaper, Academic, Others
Annotation	Tagged for pos using CLAWS	Tagged for pos using CLAWS
Update	Updated each year since the early 1990s; the most recent year-2017	1980s-1993

**TABLE 3**  
Sizes of the Subcorpora of COCA and the BNC

	COCA	BNC
Spoken	116,748,578	9,963,663
Fiction	111,845,122	15,909,312
Magazines	117,354,113	7,261,990
Newspaper	112,995,407	10,466,422
Academic paper	111,410,528	15,331,668
Non-academic paper	N/A	16,495,185
Miscellaneous	N/A	20,835,159
Total	570,353,748	96,263,399

## 3. Normalization

For the *lay/lie* plus prepositions, the exact word search

was used. After the search results for each token turned up, the researcher manually checked them again to verify whether they included the untargeted tokens. After all, the frequencies of these search results were mainly used for the analysis. Through a manual verification process, the investigator found the total tokens of *laying on* also contains 84 tokens of an idiom which denotes transitiveness in COCA and four in the BNC. In the following sentence, “Jesus did laying on of hands for the sick and dying to give comfort and to heal in biblical times.” the idiomatic expression, *laying on of hands*, has a meaning of ‘the act of contacting something with your hand,’ which is originated from the Bible and connotes transitive ‘placing.’ It was discovered mostly in the journal called Church History. So, in the calculation of the total tokens, these tokens were left out.

In comparing the results from these corpora with different sizes, normalization was made in an attempt to make the findings comparable and reliable. Each count under investigation was normalized to PM (Per Million), the adjusted number of tokens in one million, which is calculated by converting the original counts into the relative counts to one million words. For example, if the token *lying on* has 4170 hits in COCA, this number would be multiplied by 1,000,000 and then divided by the total number of the COCA tokens (570,353,748), which would then produce the PM, 7.31. This index indicates that *lying on* was found 7.31 times out of one million tokens in COCA, which enables the researcher to compare the original counts from the two corpora with different sizes in an objective way. This study mainly utilized the per million indexes provided by the website; however, when the indexes were not available, the researcher calculated them by hand following the procedure mentioned above.

## IV. RESULTS AND DISCUSSION

Table 4 shows that total frequencies of the tokens under investigation with their nominalized indexes below. As expected, the nonstandard form of *lay* as an intransitive verb was less frequently used than the regular form, *lie*. In COCA, *lying on* had 8340 hits with the normalized index of 17.94 per million words while *laying on* was found 938 times with 1.65 times per a million words. That is, *laying on* with the intransitive connotation is more than ten times less preferred than *lying on*. The results also provide an analogous pattern even in the pair of *lying in* and *laying in*. *lying in* had fewer hits than *lying on*, which tells that *on* is the preposition that collocates more frequently with the verb *lie* than *in*. As in the previous case, *laying in* is a much more marked form than *lying in* with almost one eighth frequencies of the latter. Though with the fewer total tokens, the results in the BNC also showed a similar pattern as in COCA. The nominalized indexes of *lying* with both prepositions in BNC are more than 17 times larger than those of *laying* plus prepositions. In general, the results in table 4 confirm that *lay* is still a marked verb



signifying ‘reclining’ compared to the standard, *lie*.

**TABLE 4**  
Total Frequencies and Normalized Indexes

	lying on	laying on	lying in	laying in
COCA FREQ (Per Million)	4170 (7.31)	469 (0.82)	2955 (5.18)	367 (0.64)
BNC FREQ (Per Million)	879 (9.13)	57 (0.59)	639 (6.64)	33 (0.34)

The first research question investigated whether the use of *lay* as an intransitive verb is more common in American than British English. The search results from the two corpora, the BNC and COCA representing the British and American contexts respectively, are shown in Table 4. PM indexes of each corpus are given in parenthesis below the frequencies. The marked forms, *laying on* and *laying in*, were more frequently found in COCA than in the BNC. *Laying on* was discovered almost 40 per cent more often in the American than in the British English texts; *laying in* occurred almost twice more often in COCA than in the BNC. These results support the assumption by Rynell (1988) that British people are more likely to strive to preserve the Standard English forms than their American counterparts. Rynell, though studying only literary texts from both countries, revealed that American writers were more receptive of the interchanging use of *lie* and *lay* than their British counterparts. One thing to note is that caution is needed on the use of total frequencies in analyzing corpus results. In Table 4, *laying on* has 469 hits in COCA with only 57 in the BNC. The transition of these numbers to a simple ratio would bring out 8.2; however, the ratio of the normalized index taking into account the relative sizes of both corpora would be only 1.39.

Then, in order to examine whether this difference is statistically significant, Paul Rayson’s (2003) log-likelihood test was conducted. The results show the frequencies of *laying on* and *laying in* are significantly higher in COCA than in the BNC with the log-likelihood (LL) scores of 5.97 and 14.33 respectively. The LL score higher than 3.84 indicates there is a significant difference between the two measurements under comparison at the 95% confidence level (McEnery & Hardie, 2012). The statistical analysis also confirmed British speakers’ rather conservative stance toward accepting marked language forms.

The second research question investigated whether the interchanging use of *lay* and *lie* is found more often in spoken English than in written English in both American and British English. Table 5 shows the frequencies of the target tokens and their normalized indexes of the COCA subcorpora. The normalized index of the spoken corpus for *laying on* is the highest with 2.21 out of five subcorpora. Moreover, even when the normalized indexes of spoken and written corpora are compared, *lay* as in “The person is dead *laying on* the ground” is used more often as an intransitive verb in spoken than in written English. The normalized index per million words of *laying on* in

the spoken corpus is 2.21 while that in other subcorpora combined stands at 0.47. As shown in Table 5, *laying in* also presented the similar results to those of *laying on*. Its PM index of the spoken corpus is outstanding compared to those of the other written corpora. *Laying in* was used almost four times more frequently in the spoken than written genre.

Another round of a statistical analysis was run using the log-likelihood test to check whether these differences are statistically significant at the 95% confidence level. The analysis showed significant differences in the PM indexes between the spoken corpus and the combined written corpora; the LL score for *laying on* is 269.69 while that of *laying in* is 181.29. Both scores indicate there are considerable differences between the compared indexes given that the threshold score for statistical significance is only 3.84. The descriptive statistics of the BNC for the two tokens are also similar to those of COCA. The per million indexes of the spoken corpus for both the tokens are almost five times larger than those of the combined written corpora (see Table 6). The statistical analysis also confirmed the descriptive results: the LL score for *laying on* is 13.9 while that for *laying in* stands at 12.7. These results demonstrate that even in the British English contexts, people use the intransitive *lay* more frequently in spoken than in written register. All in all, the descriptive data as well as the statistical analyses indicate that the intransitive *lay* is more frequently used in spoken than written English in both contexts, which is also in line with the claim by Austin (1999) that the intransitive *lay* is more preferred in spoken than in written English.

**TABLE 5**

The Comparison of Frequencies of *laying on* and *laying in* Between the Spoken Corpus and the Written Corpora in COCA

Section	<i>laying on</i>			<i>laying in</i>		
	Freq	Per Mil	Spoken Vs. Written (PM)	Freq	Per Mil	Spoken Vs. Written (PM)
All	469	0.84		367	0.64	
Spoken	258	2.21	2.21	192	1.64	0.64
Fiction	123	1.1		61	0.55	
Magazine	35	0.3		80	0.68	
Newspaper	39	0.35	0.47	25	0.22	0.39
Academic	14	0.13		9	0.08	

TABLE 6

The Comparison of Frequencies of *laying on* and *laying in* Between the Spoken Corpus and the Written Corpora in BNC

Section	<i>laying on</i>			<i>laying in</i>		
	Freq	Per Mil	Spoken Vs. Written (PM)	Freq	Per Mil	Spoken Vs. Written (PM)
All	61	0.59		33	0.34	
Spoken	16	1.60	1.60	11	1.10	1.10
Fiction	8	0.50		2	0.13	
Magazine	6	0.83		5	0.69	
Newspaper	5	0.48	0.48	1	0.1	0.26
Non academic	7	0.42		10	0.61	
Academic	2	0.13		1	0.07	
Miscellaneous	13	0.62		3	0.14	

One thing we need to give a thought to in the results is that the use of *lay* as an intransitive verb was found in newspapers, magazines, and even in academic writings, if not as frequently as in spoken contexts. Considering the written texts usually go through the elaborate screening process for nonstandard language forms, it does not seem right to write off this language phenomenon as writers' lack of care. Moreover, as indicated earlier, the spoken corpus of COCA is comprised of the texts from major news networks in the United States. The scripts, excluding the ones from interviews, are likely to have been written and screened by professional broadcasting writers and editors before the reporters and anchors deliver them to the public. Therefore, there is a chance the users of this marked form deliberately chose it over the unmarked form as an alternative of the latter. Then, this observation can be explained from a descriptive perspective, that is, language forms are always in transition and language users are getting less reluctant to use the marked form as people no longer frown at the sign, "less than 10 items," at the check-out counter.

## V. CONCLUSION

This study confirmed the general assumption that *lay* as an intransitive verb is still an unmarked case. The analysis of the two corpora showed the majority of people use *lie* as a norm when they indicate 'reclining.' In respect to the discrepancy between British and American contexts, the findings of this study suggest that American people are more open to accepting marked language forms compared to British people. They used *lay* as an intransitive verb more frequently than British speakers, which supports the claim by Rynell (1988). The findings of this study also confirmed the characteristics of spoken language, which is more tolerant of non-standard forms than written language. The interchanging usage of *lay* as an intransitive verb is more frequently discovered in spoken than in written English. This also conforms to the claim by Austin

(1999) that the intransitive *lay* is more frequently used in spoken than in written contexts. Lastly, news media texts were the genre where the distinction between the intransitive *lie* and transitive *lay* was least rigorously made all across the genres represented in the corpora under investigation.

With all these findings, we need to be cautious on rushing to the conclusion that ESL/EFL teachers should stop teaching English learners about the correct use of *lie* and *lay*. The majority of speakers still prefer to use the standard form of *lie* over *lay* for indicating 'reclining,' and this unorthodox use of *lay* as an intransitive verb was mostly confined in spoken English. Thus, when it comes to teaching this feature, a descriptive viewpoint is recommended in which teachers explain the usage of the two verbs, *lie* and *lay*, providing actual examples. This approach might help reduce students' confusion when they come across the irregular usage of *lay* as an intransitive verb in the actual linguistic contexts.

This study only focused on analyzing the target feature, the interchanging use of *lay* and *lie*, in a synchronic framework, and the findings provided little information how this phenomenon has changed diachronically. Therefore, the future study from the diachronic viewpoint might help provide insights on whether or not the usage of *lay* and *lie* has converged over the course of time.

The spoken corpus of COCA consists of the texts from major news networks in the United States. The transcripts include the refined scripts edited by writers as well as raw interview transcripts from the public. While it is true the former also contains the non-standard usage of *lay* as an intransitive verb, the latter is likely to have this unorthodox feature more often than the former. However, this study did not take into account this factor for the analysis; instead, it analyzed the texts as a whole disregarding this discrepancy. Therefore, the following study needs to analyze separately the texts produced by the workers in the news media and the interview texts which do not go through any process of refining. Then, we will be able to obtain a better insight into whether news media deliberately use the non-standard form, *lay*, or the texts just reflect general public's incorrect language use.

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