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LEGAL TRADITIONS *of the* WORLD

FOURTH EDITION

H. PATRICK GLENN

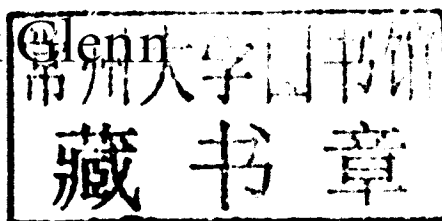


LEGAL TRADITIONS OF THE WORLD

SUSTAINABLE DIVERSITY
IN LAW

Fourth Edition

H. Patrick Glenn



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For Jane

who wouldn't have written it
quite
the same way

LIST OF ABBREVIATIONS OF PERIODICALS AND LAW REPORTS

AC	Appeal Cases (law reports)
African J. Int'l. & Comp. L.	African Journal of International and Comparative Law
Alberta L. Rev.	Alberta Law Review
All ER	All England Reports
ALR	Australian Law Reports
Am. Bus. L. J.	American Business Law Journal
Am. J. Comp. Law	American Journal of Comparative Law
Am. J. Int. Law	American Journal of International Law
Am. J. Juris.	American Journal of Jurisprudence
Am. J. Legal Hist.	American Journal of Legal History
Am. J. Semitic Lang. & Lit.	American Journal of Semitic Languages and Literatures
Am. Rev. Int'l. Arb.	American Review of International Arbitration
Ann. Rev. L. & Soc. Sc.	Annual Review of Law and Social Science
Am. U.J. Int'l. L. & Pol'y.	American University Journal of International Law and Policy
Am. U. Int'l. L. Rev.	American University International Law Review
Anthr. Q.	Anthropology Quarterly
Arab Law Q.	Arab Law Quarterly
Arch. philos. dr.	Archives de philosophie du droit
Asian J. Comp. L.	Asian Journal of Comparative Law
Asian-Pac. L. & Pol. J.	Asian-Pacific Law and Policy Journal
Aust. J. Asian L.	Australian Journal of Asian Law
Aust. L. J.	Australian Law Journal
BGHZ	Entscheidungen des Bundesgericht
BLD	Bangladesh Legal Decisions
BMCL	Bulletin of Medieval Canon Law
Bol. mex. der. comp.	Boletín mexicano de derecho comparado
Boston Coll. Int. & Comp. L. Rev.	Boston College International and Comparative Law Review
Boston U. Int. L. J.	Boston University International Law Journal
Brigham Young U. L. Rev.	Brigham Young University Law Review
Brooklyn J. Int'l. L.	Brooklyn Journal of International Law
Buff. L. Rev.	Buffalo Law Review
c.	century
C. E.	Conseil d'État

Calif. L. Rev.	California Law Review
Cambr. L. J.	Cambridge Law Journal
Can. Bar Rev.	Canadian Bar Review
Can. Hum. Rts Yrbk.	Canadian Human Rights Yearbook
Can. J. Law and Soc.	Canadian Journal of Law and Society
Cardozo L. Rev.	Cardozo Law Review
Chi-Kent J. Int'l. & Comp. L	Chicago-Kent Journal of International and Comparative Law
Chicago-Kent L. Rev.	Chicago-Kent Law Review
CJQ	Civil Justice Quarterly
Clevel. St. L. Rev.	Cleveland State Law Review
CLR	Commonwealth Law Reports
CMLR	Common Market Law Review
Col. J. Asian L.	Columbia Journal of Asian Law
Col. L. Rev.	Columbia Law Review
Commonw. L	Commonwealth Lawyer
Commonw. L. Bull.	Commonwealth Law Bulletin
Comp. St. Soc. & Hist.	Comparative Studies in Society and History
Contr. Ind. Soc. (N.S.)	Contributions to Indian Sociology (New Series)
Curr. Legal Problems	Current Legal Problems
Dalhousie L. J.	Dalhousie Law Journal
Dalloz	Recueil Dalloz
DLR	Dominion Law Reports
Duke L. J.	Duke Law Journal
Early Med. Eur.	Early Medieval Europe
Edinb. L. Rev.	Edinburgh Law Review
E.J.C.L.	Electronic Journal of Comparative Law
Eur. J. Int. L	European Journal of International Law
Eur. Rev. Pr. L.	European Review of Private Law
Gaz. Pal.	Gazette du Palais
Fordham Int'l. L. J.	Fordham International Law Journal
George Washington L. Rev.	George Washington Law Review
Georgia Rev.	Georgia Review
Germ. L. J.	German Law Journal
Global J.	Global Jurist
Harv. Hum. Rts J.	Harvard Human Rights Journal
Harv. Int'l. L. J.	Harvard International Law Journal
Harv. L. Rev.	Harvard Law Review
Hastings L. J.	Hastings Law Journal
Hastings Int. & Comp. L. Rev.	Hastings International and Comparative Law Review
HKLJ	Hong Kong Law Journal
Hum. Rts L. Rev.	Human Rights Law Review

Hum. Rts Q.	Human Rights Quarterly
Ind. J. Global Legal St.	Indiana Journal of Global Legal Studies
I.C.L.Q.	International and Comparative Law Quarterly
Ind. Taur.	Indologica Taurinensia
Int. Bus. Lawyer	International Business Lawyer
Int'l. J. L. Cont	International Journal of Law in Context
Int. J. Middle East St.	International Journal of Middle East Studies
Int. J. Const. L.	International Journal of Constitutional Law
Int. Lawyer	International Lawyer
Int. Lit. News	International Literary News
Int. Phil. Q.	International Philosophical Quarterly
Int. Pol. Sci. Rev.	International Political Science Review
Int. Rev. Law and Econs.	International Review of Law and Economics
Int. Soc. Sci. J.	International Social Sciences Journal
Islamic & Comp. Law Q.	Islamic and Comparative Law Quarterly
Isl. L. and Soc.	Islamic Law and Society
J. African Law	Journal of African Law
J. Am. Oriental Soc.	Journal of the American Oriental Society
J. Am. Acad. Rel.	Journal of the American Academy of Religion
J.C.P.C.	Judicial Committee of the Privy Council
J. Chinese Law	Journal of Chinese Law
J. Comp. Law & Int. Law	Journal of Comparative and International Law
J.Comp.L	The Journal of Comparative Law
J. dr. int.	Journal du droit international
J. Econ. & Soc. Hist. Orient	Journal of the Economic and Social History of the Orient
J. Fam. Law	Journal of Family Law
J. Fin. Econ.	Journal of Financial Economics
J. Glob. Hist.	Journal of Global History
J. Hist. Ideas	Journal of the History of Ideas
J. Hist. Int. L.	Journal of the History of International Law
J. Indian Law Inst.	Journal of the Indian Law Institute
J. Indian Phil.	Journal of Indian Philosophy
J. Int. Ass. Buddhist St.	Journal of the International Association of Buddhist Studies
J. Isl. L. & Cult.	Journal of Islamic Law and Culture
J. Jur. Papyrol.	Journal of Juristic Papyrology
J. Law and Econs.	Journal of Law and Economics
J. Law and Rel.	Journal of Law and Religion
J. Law and Soc.	Journal of Law and Society
J. Legal Hist.	Journal of Legal History
J. Legal Pl. & Unoff. L.	Journal of Legal Pluralism and Unofficial Law
J. Malaysian & Comp. L.	Journal of Malaysian and Comparative Law

J. Politics	Journal of Politics
J. Rel.	Journal of Religion
J.C.P.	Juris-classeur périodique
J. World Inv.	Journal of World Investment
JZ	Juristen Zeitung
Jaipur L. J.	Jaipur Law Journal
Jewish L. Ann.	Jewish Law Annual
Jewish L. Assoc. St.	Jewish Law Association Studies
Jur. Rev.	Juridical Review
Law & Hist. Rev.	Law and History Review
Law & Philos.	Law and Philosophy
Law & Pol. Int'l. Bus.	Law and Policy in International Business
Law & Society Rev.	Law and Society Review
Ld. Raym.	Raymond, Lord (Law Reports)
Legal St.	Legal Studies
LGDJ	Librairie Générale de Droit et de Jurisprudence
LQR	Law Quarterly Review
L.R.I.	Law Reports of India
McGill L. J.	McGill Law Journal
Med. St.	Mediaeval Studies
Melb. U. L. Rev.	Melbourne University Law Review
Mich. L. Rev.	Michigan Law Review
Minn. L. Rev.	Minnesota Law Review
M.L.R	Modern Law Review
Mod. Lang. Notes	Modern Language Notes
Nat. L. J.	National Law Journal
Ned. tijd. rechtsphil	Nederlands tijdschrift voor rechtsfilosofie en rechtstheorie
Neth.I.L. Rev	Netherlands International Law Review
N. Car. L. Rev.	North Carolina Law Review
NJW	Neue juristische Wochenschrift
New Mex. L. Rev.	New Mexico Law Review
Notre Dame L. Rev.	Notre Dame Law Review
N.Y.U.J. Int'l. L.& Pol.	New York University Journal of International Law and Policy
NZLJ	New Zealand Law Journal
OED	Oxford English Dictionary
OJLS	Oxford Journal of Legal Studies
Or. L. Rev.	Oregon Law Review
Osgoode Hall L. J.	Osgoode Hall Law Journal
Ottawa L. Rev.	Ottawa Law Review
OUCLJ	Oxford University Commonwealth Law Journal
Parker Sch. J. East Eur. Law	Parker School Journal of East European Law

PFNSP	Presses de la Fondation nationale des sciences politiques
Philos. Soc. Sci.	Philosophy of the Social Sciences
PL	Public Law
PLoS Biology	Public Library of Science Biology
Prax. Jur. Rel.	Praxis juridique et religion
P. Rim L. & P. F	Pacific Rim Law & Policy Journal
Proc. Am. Phil. Soc	Proceedings of the American Philosophical Society
Proc. Brit. Acad.	Proceedings of the British Academy
PUF	Presses universitaires de France
QB	Queen's Bench (Law Reports)
RabelsZ	Rabels Zeitschrift für ausländisches und internationales Privatrecht
Rev. crit. d.i.p.	Revue critique de droit international privé
Rev. dr. int. dr. comp.	Revue de droit international et de droit comparé
Rev. dr. McGill	Revue de droit de McGill
Rev. Cent. E. Eur. L.	Review of Central and East European Law
Rev. gén. dr.	Revue générale de droit
Rev. hell. dr. int.	Revue hellénique de droit international
Rev. hist. dr. fr. étr.	Revue historique de droit français et étranger
Rev. hist. Fac. dr.	Revue d'histoire des Facultés de droit
Rev. int. dr. comp.	Revue internationale de droit comparé
Rev. int. dr. econ.	Revue internationale de droit économique
Rev. jur. Th.	Revue juridique Thémis
Rev. Politics	Review of Politics
Rev. rech. jur.	Revue de la recherche juridique
Rev. trim. dr. civ.	Revue trimestrielle de droit civil
Rev. univ. dr. de l'homme	Revue universelle des droits de l'homme
S. Atlantic Q.	South Atlantic Quarterly
S. C. L. Rev.	South Carolina Law Review
S. Calif. L. Rev.	Southern California Law Review
Scientif. Am.	Scientific American
S.C.C.	Supreme Court Cases (India)
SCR	Supreme Court Reports (Can.)
Singapore. J. Int. & Comp. L.	Singapore Journal of International and Comparative Law
Sing. J. L. S.	Singapore Journal of Legal Studies
Soc. Anthr.	Social Anthropology
St. Med. & Renais. Hist.	Studies in Medieval and Renaissance History
Stan. L. Rev.	Stanford Law Review
Stell. L. Rev.	Stellenbosch Law Review
St.Th.L.Rev.	St. Thomas Law Review
Suffolk Trans. L. J.	Suffolk Transnational Law Journal

Suffolk Univ. L. Rev.	Suffolk University Law Review
SUNY	State University of New York
Sup. Ct. Econ. Rev.	Supreme Court Economic Review
Sydney L. Rev.	Sydney Law Review
Texas L. Rev.	Texas Law Review
Tex. Wes. L. Rev	Texas Wesleyan Law Review
TLS	Times Literary Supplement
Tulane Eur. Civ. L. F.	Tulane European and Civil Law Forum
Tulane L. Rev.	Tulane Law Review
U.B.C.L.Rev.	University of British Columbia Law Review
U. Calif. Davis L. Rev.	University of California at Davis Law Review
UCLA J.Isl. & N.East.L.	University of California at Los Angeles Journal of Islamic and Near Eastern Law
UCLA L. Rev.	University of California at Los Angeles Law Review
UCLA Pacific Basin L.J.	University of California at Los Angeles Pacific Basin Law Journal
U. Miami Inter-Am. L. Rev.	University of Miami Inter-American Law Review
Univ. Illinois L. Rev.	University of Illinois Law Review
U. Pa. J. Int'l. Econ. L.	University of Pennsylvania Journal of International Economic Law
U. Pa L. Rev.	University of Pennsylvania Law Review
Va. L. Rev.	Virginia Law Review
Vand. L. Rev.	Vanderbilt Law Review
Victoria Univ. Wellington L. Rev.	Victoria University of Wellington Law Review
Wash. Univ. L. Rev.	Washington University Law Review
Wayne L. Rev.	Wayne Law Review
WLR	Weekly Law Reports
Women's St.	Women's Studies
Yale J. Int'l. L.	Yale Journal of International Law
Yale L. J.	Yale Law Journal
ZGR	Zeitschrift für geschichtliche Rechtswissenschaft
ZRG	Zeitschrift der Savigny Stiftung für Rechtsgeschichte, Germanistische Abteilung
ZvglRwiss	Zeitschrift für vergleichende Rechtswissenschaft
ZeuP	Zeitschrift für europäisches Privatrecht

LIST OF BIBLICAL ABBREVIATIONS

Deut.	Deuteronomy
Exod.	Exodus
Gen.	Genesis
Isa.	Isaiah
Lev.	Leviticus
Matt.	Matthew
Rom.	Epistle to the Romans

PREFACE TO THE FOURTH EDITION

This fourth edition attempts once again to capture significant elements in the massive flow of information which is the life of legal traditions. There are correspondingly many changes and additions to the literature cited. There is also one major change of structure, since the ninth chapter is no longer designated as an 'Asian' legal tradition but rather as a 'confucian' one. The geographic designation of earlier editions was never a very happy one and the return or revival of confucianism now appears sufficiently evident to justify the change. Material on adat law has correspondingly been integrated into the third chapter on chthonic legal tradition, though the ninth chapter retains its discussion of buddhism, taoism and shintoism. The final chapter has also been in some measure re-written, with fuller development of multivalent forms of logic and their application in law. The first two chapters on the concept of tradition now include references to parallel notions (e.g., places of memory, collective memory, Entstehungsgeschichte, deep history) used in philosophy, history and the social sciences. The first chapter also deals with the importance of knowing how to talk about books you haven't read.¹ These first two chapters remain essential to the overall argument of the book but may now be complemented, for the many pressed for time, by a shorter article which in some measure provides an overview of them.² The designation of a 'chthonic' legal tradition in the third chapter has also been reconciled, I am hoping, with the language of 'indigenous' or 'aboriginal' legal traditions. In the fourth chapter on talmudic law there is acknowledgment of the ambiguity of Paul towards the law, and of the use of 'ghettoization' in state construction. The fifth chapter on civil law situates doctrinal categorization within Plato's teaching of divisio, Nordic law in relation to continental law and the new French fiducie in relation to the trust. Scepticism towards the effect of 'legal origins' on national economic performance is more fully acknowledged. The sixth chapter draws a sharper distinction between doctrinal schools of islamic law (madhahib) and physical schools (madrasas), and now includes references to takaful as a form of islamic insurance, hudud criminal offences and wahhabism in Saudi Arabia. There is mention of islamic reactions to current western economic difficulties. Chapter 7 on the common law acknowledges current reforms of the judiciary and the legal professions and the ongoing, vigorous debates on citation of foreign material in the U.S. Supreme Court and appropriate sources of legislative interpretation. A distinction between civil and common law

¹ P. Bayard, *How to Talk About Books You Haven't Read*, trans. J. Mehlman (London: Granta, 2007).

² See H. P. Glenn, 'A Concept of Legal Tradition' (2008) 34 Queen's L. J. 427; and further H. P. Glenn, 'Doin' the Transsystemic: Legal Systems and Legal Traditions' (2005) 50 McGill L. J. 863. For the particular tradition of common laws as supportive of law within and beyond the state, H. P. Glenn, *On Common Laws* (Oxford: Oxford Univ. Press, 2007); H. P. Glenn, 'Transnational Common Laws' (2006) Fordham Int'l. L. J. 457.

traditions is maintained.³ Chapter 8 has been enhanced by references to current writing of Sanskritists on hindu legal tradition.

As with earlier editions, much gratitude is owed, most notably to Graciela Jasa Silveira for inspired and diligent research assistance, and to the McGill Law Faculty Dobson Fellowship programme for financial assistance. Nafay Choudhury also provided much appreciated help with web sites and students in the McGill graduate seminar in Legal Traditions provided invaluable criticism and refinement over the last three years. I am also particularly grateful to Gary Bell, Don Davis, Jr., Federico Escobar Cordoba, Sergio Ferlito, Ko Hasegawa, Yuval Sinai, Jukka Snell, and the anonymous evaluators of Oxford University Press for advice and comment. Anna Young was once again indispensable on the technological front and many people at Oxford University Press maintained the tradition of helpful and expert assistance. My warmest thanks to all.

H. Patrick Glenn
Montreal and Sutton, Quebec
September 2009

³ For justification, relying on ongoing institutional differences, H. P. Glenn, 'A Western Legal Tradition?' forthcoming in O. Chase, J. Walker and B. Leon, *Common Law, Civil Law and the Future of Categories* (Toronto: LexisNexis, 2010).

PREFACE TO THE FIRST EDITION

The notion of tradition, after two or three centuries of neglect and opprobrium in the western world, has recently received renewed attention. This appears due in large measure to circumstances internal to western societies, notably that which a recent social science world survey described as a 'postmodern shift' in the last twenty-five years from 'rational-legal authority' to 'self-expression'.⁴ Political and social theory has thus turned to tradition as a possible means of maintaining social coherence and identity in liberal, industrialized societies. There has been some reflection of this larger movement in legal writing where, however, the concept, or tradition, of 'rational-legal authority' is profoundly anchored. This book attempts to advance our understanding of tradition in law—or, more precisely, our understanding of legal traditions—for several reasons.

The first is one which appears peculiar to the west (though it pertained as well to the former Soviet Union)—the decline in normative authority of formal sources of law. This phenomenon is not only the object of social science surveys; it is now being recognized explicitly in popular culture. A government-sponsored television commercial in a large, western democracy recently announced that automobile seat-belts would be obligatory in the future and continued: '*It's not just the law; it makes good sense*' [emphasis added]. If formal sources of law, and the law they produce, have become too thin and weak for the tasks they should accomplish,⁵ supportive normativity may be found in tradition. This is the project of recent political and social theory; it is here being replicated in law.

A further reason, extending beyond western societies, lies in the necessity of collaboration amongst jurists of all traditions in the resolution of many problems of the world. These may be life-threatening or patrimonial, commercial or gender-related, criminal or environmental—there now appears to be no area of law free of the possibility of extra-jurisdictional complication. Cases may be dealt with by formal methods of choice of law, but inter-traditional understanding may obviate the necessity for expensive and lengthy second-order litigation. Beyond the level of the individual case, there is also the question of the role and influence in the world of particular laws and particular lawyers. The role of human rights in international debate is only one, highly visible, example of this general question. How should we think about the general relations amongst laws and lawyers, somehow recognized as different? How do we agree upon the role of whatever we currently understand as law? How do we avoid both dominance and resistance to dominance, and the violence both may

⁴ R. Inglehart, 'Changing values, economic development and political change' (1995) 47 *Int. Soc. Sci. J.* 379 (reporting results of 43-nation World Values Survey in 1990–1).

⁵ See B. Oppetit, *Droit et modernité* (Paris: Presses Universitaires de France, 1998) at 7 ('graves dysfonctionnements, marqués par des phénomènes d'indifférence au droit et d'ineffectivité des règles').

entail? How, in the language of the Mexican novelist Carlos Fuentes, do we 'overcome separation'?⁶

Tradition appears today as the most fruitful field of enquiry in addressing these questions. It does not appear to be the product of any particular civilization, yet appears present, explicitly or implicitly, as a formative influence in the law of all of them (including, and to the present day, that of the west). The same cannot be said of the notion of a legal system, the history of which is clearly and exclusively associated with western (and derived Soviet) legal theory, and which now may be thought of as part of the problem rather than as the solution. Systemic thought is an inherent part of what has been described, polemically, as 'The Great White Lie of Western Legal Theory'. Its theoretical utility has been further limited by the collapse of the Soviet legal system. Similar problems arise with the notion of 'culture' or 'legal culture'. It too appears largely a creation of the western enlightenment,⁷ though suffering from a remarkable level of ambiguity. In concentrating on current forms of human thought and activity, moreover, it appears antithetical to whatever normativity may be derived from the past.

Thinking about tradition, however, is not an uncontroversial or simple process. Thinking about a single tradition appears inadequate, since the tradition chosen may be in some manner exceptional, as may be, indeed, all traditions. A single tradition may also have camouflaged its relations with other traditions. Addressing multiple traditions does, however, create problems of its own. How are separate traditions identified? What manner of analysis can be adopted which is appropriate to a number of traditions, yet not exclusive to any one of them? Is a theory of traditions possible? Can one even know a tradition which is not one's own? The organization of this book, and even the titles of its chapters, reflects these difficulties. Multiple traditions are addressed, though a further multiplicity is not excluded and is even acknowledged. Traditions are identified, but not in definitive form, and even the definite article is avoided (grammar permitting). A theory of traditions is contemplated, but not constructed. Learning about tradition is taken to be a process of learning from traditions. Whether this is possible is taken to be a matter of practice. More will be said, particularly after some practice.

Since people may come to this book with different objectives, it can be read in a number of ways. If you are not so much interested in law, but interested in tradition and its relation to society, you can read only the first two chapters and the last chapter. You will pick up some law even in this process, particularly in the last chapter. If your interests are strictly legal (as you understand these things) you can read only the middle seven chapters, and if you are interested only in specific legal traditions, only

⁶ Address to McGill University, Winter, 1995; and see C. Fuentes, 'The Mirror of the Other' (1992) 254 *The Nation* 408, notably at 409 ('We have too many common problems which demand cooperation and understanding in a new world context, to clash as much as we do').

⁷ On both system and culture as concepts derived from western tradition, see below Ch. 5, *Revolutions, systems, language and interpretation*.

the chapters relating to them. Alternatively, the seven legal chapters can be read, if you will, horizontally. Each is composed of four parts (dealing respectively with the nature of a particular tradition, its underlying justification, its concept of change, and its relation to other traditions), so the traditions can be read serially with respect to any one or more of these questions. You can also read it from beginning to end, which might present some advantages, since that's the way it was written.

The book attempts to cover a great deal of ground and much is owed, to many. Most immediately, thanks are due to Dean Roberto Santacruz Fernández of the Faculty of Law of the Universidad Autónoma de Puebla and to Jorge Chávez Ramírez, Director of International Relations of the same University, for a warm and spontaneous welcome received in the academic year 1995/6 in Puebla, Mexico. Special thanks are also due to Emma Pacheco, of the UAP Office of International Relations. For the increasingly rare, and much appreciated, enjoyment of a sabbatical year, I owe thanks to Dean Stephen Toope of the Faculty of Law of McGill University. More generally, in a way which can never be adequately repaid, I owe thanks to a remarkable group of colleagues at the Faculty of Law and Institute of Comparative Law of McGill University, who together succeed in creating an environment which is both provocative and collegial. I am also very grateful to Gary Bell, John Brierley, George Bermann, Jane Matthews Glenn, Wael Hallaq, Konstantinos Kerameus, Li Xiaoping, Joshua Shmidman, Stephen Toope, Catherine Valcke, Harro von Senger, Ernest Weinrib, Jeremy Webber, Katherine Young and the several anonymous readers of Oxford University Press for careful readings, sharing of learning, or both. I am also greatly indebted to the editorial staff of Oxford University Press for their patience and professionalism. Research assistants who have provided invaluable assistance include Abdul-Basit Khan, Marie-Pierre Lami, Alissa Malkin, Claudia Pierrot, Laurie Sargent, Marisa Selig, and Ed Vandenburg. I am also grateful for having received the financial support of the Wainwright Trust of the McGill University Faculty of Law and of the Bora Laskin National Fellowship in Human Rights Research. Portions of this book were the object of presentations at the Faculty Seminar programme of the Faculty of Law, Fribourg University, Switzerland; the Graduate Studies Programme, Harvard Law School; the Instituto de Investigaciones Jurídicas of the Universidad Nacional Autónoma de México; the Centre of Private Law of the Russian Federation, Moscow; and the Faculty of Law of the National University of Singapore: and I received valuable comments in each of those places. Over the last ten years I also have learned much from students in the graduate seminar in Legal Traditions at McGill. I received invaluable library assistance from the Law Library, McGill University; the Swiss Institute of Comparative Law, Lausanne, Switzerland; and the Instituto de Investigaciones Jurídicas of Mexico City, and I am much indebted to the cosmopolitan character of those collections.

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Puebla, Mexico and
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