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LEGAL FAMILIES APPROACH: CONSISTENT PATTERNS AND TRENDS

Author analyzes the problem of combining legal systems to the legal families to create a proper methodological base for their research. Characteristics of the legal system and its components are given in the article. Author examines approaches to classification of legal systems represented in science, starting since 1874 and ending opinions of contemporaries. It is argued that an ideological component (legal awareness and legal culture of society) should be recognized the main criteria of typing legal systems in legal families. The form of the all others phenomena of the legal system (legal norms and their system, sources of law enforcement and others features) are the result of this ideological component.

Key words: legal family, legal system, types of legal systems.

Legal system: concept and main features. The research of various aspects of the formation, implementation and essence of law led to the recognition of necessity to develop a theoretical construct that embraces all legal phenomena and describes their internal and external relations holistically and systematically. The basis of this theory methodology is a systematic approach to the analysis of legal phenomena.

The value of using the category of legal system to law is the ability to use it for complex legal analyze of all aspects of society, to identify the most essential patterns that develop between its parts and in relations with other social phenomena. The term “legal system” refers to the nature and content of the law generally, and the structures and methods whereby it is legislated upon, adjudicated upon and administered, within a given jurisdiction.

The legal system can be defined as formed under the influence of certain objective patterns harmonized set of all legal phenomena of society which are in stable relationships among themselves and with other social systems. Main features of the legal system:

1. The legal system is a kind of social system. There are other types of social systems – political, economic, religious, etc. – in addition and in conjunction with it.

2. The legal system is formed usually within a state (in this case, using the name of “national legal system”). But in some cases the legal system may go beyond the limit state and embrace social systems of different countries (so having religious legal systems – Muslim, canonical, Hindu, Jewish and international legal systems, such as European law).

3. Legal systems are in different stages of development. Thus, the development of the legal system can be determined by quantitative and qualitative criteria. Quantitative include the presence of a developed system of law and the relevant sources, systems of law enforcement institutions, legal education system and so on; to quality – degree of social demand law, its real ability to regulate social relations.

4. The legal system is influenced by objective historical factors (national, religious, economic, etc.) which are unique to each society and cause a variety of legal systems. However, we must remember the existence of subjective factors also influence the legal system, especially legal policy.

5. The legal system is composed of different elements. Some of them are characterized as static, some as dynamic. The main element of any legal system is the system of law, around which all other elements are formed.

6. The legal system is characterized by integrity. This phenomenon is not only a combination of certain elements and their features. It is characterized by new features such as the ability to order. Maintaining a unity of laws is one of the most challenging roles of a legal system. It is not always easy to unite the dynamic anticipation of a legal system with the issues of association, harmony, and transmutation. It is because of the fact that laws are positive, but the social, political, economic, cultural, and historical foundations of laws are normative.

7. The legal system has a relatively sustained over time. Its features formed for a long time.

8. Legal systems retain their essence and main features even in case of change of state forms of social organization (disintegration of the state, loss of independence, union or separation).

Structure of the legal system. The structure of the legal system includes the following elements:

- subject's component – a set of all entities operating within the legal system (individual and collective, public and private)
- regulatory component – a set of rules and principles of law governing relations between subjects of law embodied in the system recognized sources of law;
- ideological component – a set of views on law and other legal phenomena covered by legal psychology and legal ideology and determine the level of legal culture, existing legal values;
- functional component – the process of lawmaking and law enforcement, judicial and other legal practice. Just the presence of the legislature is not enough for the existence of a legal system. If laws are not administered and implemented, they merely sit on paper with no practical use. Thus, for the existence of a legal system, there should be the following state apparatuses: government, judges, police, public prosecutors, and defense lawyers, among others;
- efficient component – the results of the law enforcement, the degree of its social demand.

The main types of legal systems classifications. Classification can be diachronic (historical) or synchronous in nature; it can lead to a level of legal systems, and within certain areas of law of different legal systems. Hence the basic opportunity plurality classifications based on different criteria and implemented various purposes.

We can distinguish the following types of legal systems classifications. Here are some of them:

1. *Clean legal system and the legal system of mixed type ("hybrid").* The legal system of mixed type combines rules and institutions that originate from different legal systems and interact.

The classic definition of a mixed jurisdiction of nearly one hundred years ago was that of F.P. Walton: "Mixed jurisdictions are legal systems in which the Romano-Germanic tradition has become suffused to some degree by Anglo-American law"¹. This is not too different from the modern definition of a mixed legal system given by Robin Evans-Jones: "What I describe by the use of this term in relation to modern Scotland is a legal system which, to an extensive degree, exhibits characteristics of both the civilian and the English common law traditions"².

Some would be combinations of common law and civil law, such as Louisiana, Quebec, Scotland and Seychelles; some of civil law, common law, religious law and, until quite recently, Ottoman law, such as Israel; some of civil law, religious law, socialist law and tribal law such as Algeria; others, such as Hong Kong, that are combinations of traditional Chinese law, common law and socialist Chinese law, which itself embodies elements of the civilian tradition; some of common law, religious law and customary law such as India and Pakistan and so on. In addition, there would be ongoing mixtures, systems in transition, such as the legal systems looking for an identity, having left the socialist sphere in Europe and veered towards the civilian tradition. Poland, for instance, has a mixture of socialist law, Roman law, Polish law – itself a mix of German, French, Russian and Hungarian laws – traditional law and EU law³.

"Mixed systems" appear in ten categories: mixes of civil law and common law (3.47% of the world population); civil law and customary law (28.54%); civil law and Muslim law (3.14%); common law and customary law (2.94); common law and Muslim law (5.25%), civil law, Muslim law and customary law (3.62%); common law, Muslim law and customary law (19.17%); civil law, common law and customary law (0.8%); common law, Muslim law and civil law (0.23%); and of civil law, common law and Talmudic law (0.09%). The number of jurisdictions that fall into the "mixed systems with civil law" category are 65 (19.12% of the world's legal systems), "mixed systems with common law" are 53 (15.59 %), "mixed systems with customary law" are 54 (15.88%) and "mixed systems with Muslim law" are 33 (9.70 %).

Some scientists have suggested that all legal systems are mixed, whether covertly or overtly, and group them according to the proportionate mixture of the ingredients. Thus some continental systems are combinations of Roman, French and German laws and indigenous law such as the Dutch; some of Roman, German and French laws such as the Italian; and some such as the Greek, of customary, neo-canon, German, Greek and Roman laws. There are even more complicated crosses such as in Malta. All continental systems are better understood as overlaps. Nevertheless, when we talk of 'mixed systems', this

¹ Markesinis, B. (ed.). (1993) *The Gradual Convergence: Foreign Ideas, Foreign Influences and English Law on the Eve of the 21st Century*. Oxford: Clarendon Press.

² Walton, F.P. (2012). *The Scope and Interpretation of the Civil Code*. Nabu Press.

³ Örüçü, E. (2008). What is a Mixed Legal System: Exclusion or Expansion? *Electronic Journal of Comparative Law*, vol. 12.1; Örüçü, E. (2004). *The Enigma of Comparative Law. Variations on a Theme for the Twenty-First Century*. Leiden: Martinus Nijhoff Publishers.

obvious fact can be put to one side and serve merely as a reminder that there are no pure legal systems in the world¹.

2. *Developed and underdeveloped legal system.* Developed legal system is a system in which written law is opened, unfolded. Law is form of high intellectual order in these legal systems. Law is implemented in public life as an independent and strong social phenomenon.

Underdeveloped legal systems are those systems in which properties of law are not opened. Law doesn't play a role of independent and strong social phenomenon. Religious and traditional legal systems are these systems in the world today. Solutions of complex issues are generally rooted outside the law – in the tradition, in religious canons, ideological postulates.

3. *Parent and affiliated legal systems.*

Parent legal systems are those systems where first created original legal solutions and which subsequently formed the basis of a legal family. Affiliated legal system is a system that modeled on other (parent) legal systems.

English legal system is parent, while the legal systems of Canada, Australia, New Zealand are modeled on English law, belonging to affiliated.

Variety of existing legal systems. Humanity has entered the third millennium in a large variety of existing legal systems. The large number and diversity of legal systems are evidence that due to the diversity of human societies².

What is the legal map of the modern world? A simplified approach is when it is determined only as a collection of national legal systems (legal systems of all existing states). The difficulties begin with a fairly simple question: how many legal systems exist in the world? Members of United Nations are 193 countries. However, remember the existence of so-called unrecognized states, each of which is also beneficial own legal system. So there are more than 200 national legal systems in the world.

But besides them there are supranational legal systems applicable to the social systems of several countries. Such, for example, is the legal system of the European Union.

The problem of the existence of international legal systems is a particular object of research³. We should not forget about the existence of religious legal systems, which are also have supranational character and great specificity which largely remains little studied in the domestic legal science. Thus the legal map of the world is a complex system of national, international and religious legal systems.

Comparative law uses specific terminology to refer to a group of legal systems that have similar legal features “legal family”, “legal circles”, “structural commonality”. However, two terms are most prevalent in modern comparative law – “legal family” and “legal tradition”. There are different approaches to distinguish these categories.

John Henry Merryman's use of legal ‘system’ and ‘tradition’ is somewhat clearer. A legal ‘system’, he writes, ‘is an operating set of legal institutions, procedures, and rules’. On the other hand, a legal tradition “is a set of deeply rooted, historically conditioned attitudes about the nature of law, about the role of law in the society and the polity, about the proper organization and operation of a legal system, and about the way law is or should be made, applied, studied, perfected, and taught. The legal tradition relates the legal system to the culture of which it is a partial expression. It puts the legal system in cultural perspective⁴.

Patrick Glenn has emphasized a more complex and inclusive understanding of ‘legal tradition’. Underscoring the link to the past present in all legal orders, he identifies such a tradition with ‘the content and flow of large bodies of normative information over time and over space’⁵. Indeed, viewed in this way, historical and comparative research is very inclusive and expansive, enveloping both state law and other non-state norms. He admits that this greatly complicates ‘the taxonomic project’ and the popular conception of legal families: “Taxonomy and legal families have the task or objective of separation and distinguishing,

¹ Örücü, E. (2008). What is a Mixed Legal System: Exclusion or Expansion? *Electronic Journal of Comparative Law*, vol. 12.1.

² Бержель, Ж.-Л. (2000). *Общая теория права*. Москва: Nota Bene.

³ Луць, Л.А. (2003). *Європейські міждержавні правові системи та проблеми інтеграції з ними правової системи України: Теоретичні аспекти*. Київ: Ін-т держави і права ім. В.М. Корецького НАН України.

⁴ Merryman, J. H. (2007). *The Civil Law Tradition, 3rd Edition: An Introduction to the Legal Systems of Europe and Latin America*. Stanford University Press.

⁵ Glenn, P. (2008). A Concept of Legal Tradition. *Queen's Law Journal*, 34, 427, 431; Glenn, P. (2005). *On Common Laws*. Oxford: Oxford University Press.

whereas legal traditions have the task only of supporting their own forms of normativity. This usually involves more art than science, more attempting to do justice than attempting to build and classify systems”.

The notion of family as such has some advantages. It enables us to extend the metaphor to talk about family members, such as children and parents, cousins, distant relatives etc. We may even speak of immediate or distant relatives and, thus, we can talk about the legal genetics, the historical relations between different legal systems. The notion of legal family, in this sense, contains the idea of historical relationships between different systems of law. Some of the scholars have even gone so far as to explain that comparative law is but the study of historical relations between legal systems¹. This degree of transformation in the conceptions and characterizations of legal families over time is startling. Legal families imply ancestry, while legal traditions entail “pastness”². Thus the idea of legal tradition reduces domestic legal systems into certain groups or families based on their commonalities in terms of legal concepts, in particular; legitimacy, validity, and enforceability. In short, a legal system integrates all laws in existence within its jurisdiction. A legal family provides membership to legal systems based on commonalities of principles, rules, and institutions³. We will use the term “legal families”.

Legal families: classification criteria. Legal family is a certain set of legal systems, which are united by common most important traits that indicate substantial similarity of these systems. The legal families approach, which has indeed been accused of being overtly western and in this sense basically biased⁴, are seeking to answer one basic question: can the great number of legal systems of the world be divided into few large entities, i.e., families, groups, spheres or equivalent? (For some comparative lawyers to think globally equals to stress the commonalities, i.e. that what is similar (integrative comparison), whereas, to others this means to appreciate and to underline the differences (contrastive comparison) between legal systems).

The idea of grouping of legal systems in the “legal family” dates back to the eighteenth century and has gained wide acceptance in early XX century. Let us see the evolution of the idea of grouping of legal systems⁵:

Gumersindo de Azcarate (Spain), *Ensayo de una Introduccion al Estudio de la Legislacion Comparada* (1874) singled Neo-Latin Peoples (France, Spain, Portugal, Italy, Belgium, Latin America), Germanic Peoples (Germany, Netherlands, Switzerland, England and Ireland, Scotland, United States), Scandinavian Peoples, Slavic Peoples (Russia, other Slavic Peoples), other Peoples of Christian-European Civilizations (Greece, Malta, Jonian Islands), other Peoples from Different Civilizations (Turkey, Egypt, and Tunisia; India and China; Liberia);

Ernest Glasson (France), *Le Mariage civil et le divorce* (2nd ed., 1880) proposed classification limited to European countries for legal systems strongly influenced by Roman law (Italy, Spain, Portugal, Romania, Greece), legal systems that are immune from Roman-law influence (England, Scandinavia, Russia), legal systems that combine Roman and Germanic influence (France, Germany, Switzerland);

Clovis Bevilacqua (Brazil), *Resumo das Liccoes de Legislacao Comparada sobre o Direito Privado* (1893) had based criteria of legal influence and adds to Glasson's classifications a fourth category – legal systems of Latin America.

At the 1900 Congress, Gabriel Tarde, professor at the Coll'ège de France, articulated a clear defense of legal family classifications as a central goal of comparative law. In his words, “under this new viewpoint, the task of comparative law is less to indefinitely collect exhumed laws than to formulate a natural that is, rational classification of juridical types, of branches and families of law”. Tarde's paradigm for comparative law taxonomies borrowed heavily from linguistics and biology. He stressed that, despite the existing heterogeneity of language families, linguists had no trouble sorting newly-discovered languages into existing categories. The same was true, he argued, for botanical and zoological classifications, which

¹ Watson, A. (1993). *Legal Transplants: An Approach to Comparative Law*. University of Georgia Press.

² Pargendler, M. (2012). The Rise and Decline of Legal Families. *The American Journal of Comparative Law*, Vol. 60, 1043-1074.

³ Bhandari, S. Law, Legal Systems, and Legal Families. <<http://ssrn.com/abstract=2425472>> (2014, April, 16).

⁴ Hagen, H. (2004). *Kulturfremdes Recht Erkennen: Ein Beitrag zur Methodenlehre der Rechtsvergleichung*. Helsinki: Forum Iuris; Husa, J. (2004). Classification of Legal Families Today – Is it Time for Memorial Hymn? *Revue Internationale de Droit Comparé*, Vol. 56, 1, 11-38.

⁵ Pargendler, M. (2012). The Rise and Decline of Legal Families. *The American Journal of Comparative Law*, Vol. 60, 1043-1074.

remain unaltered by the discovery of new animals and plant species or the extinction of existing ones. Tarde argued that, so long as the classification is the right one, “the interest in completing the collection becomes secondary”.

It was the impetus for further classification of legal systems:

Adh'emar Esmein (France), *Le droit compare et l'enseignement du droit* (1900), proposed a division of Western legal systems into four groups: the Latin group (France, Belgium, Italy, Spain, Portugal, Romania, and Latin American countries), the Germanic group (Germany, Scandinavian countries, Austria, and Hungary), the Anglo-Saxon group (England, the United States, and the British colonies and dominions), the Slavic group. In addition to these, Esmein suggested the inclusion of a fifth group for Muslim law as yet another original system and of interest to European nations because of their colonies' Muslim populations.;

Candido Luiz Maria de Oliveira (Brazil), *Curso de Legislação Comparada* (1903) singled legal systems strongly influenced by Roman law (Italy, Spain, Portugal, Romania, Greece), legal systems that combine Roman and Germanic influence (France (including French colonies), Germany, Austria, Hungary, Belgium, Holland, Serbia, Montenegro, Bulgaria, Turkey), legal systems that are immune from Roman law influence (England, United States, Sweden, Norway, Denmark, Finland, Russia), republics of Hispanic America;

Georges Sauser-Hall (Switzerland), *Fonction et methode du droit compare* (1913) Switzerland, used racial or ethnographic criteria and proposed division into the following groups – laws of peoples of Arian or Indo-European Race (Hindu, Iranian (Persian, Armenian, etc.), Celtic (Celtic, Welsh, Irish, and Gaelic), Graeco-Latin (Greek, Roman, Canon, and Neo-Latin), Germanic or Teutonic (Scandinavian, Germanic, Dutch, and Swiss), Anglo-Saxon (English, Anglo-American, and New-Saxon), Slav (Russian, Slovenian, Czech, Polish, Bulgarian, etc.); laws of peoples of Semitic races (Assyrian, Egyptian, Hebrew, Arab-Islamic), laws of Mongol races (Chinese, Japanese), Barbarian peoples;

Henry Levy-Ullman (France), *Observation generales sur les communications relatives au droit prive dans les pays etrangers* (1923), proposed a classification based on criteria of sources of law and legal evolution – continental legal systems ("written law"), legal systems of English language-countries ("common law"), Islamic law;

Enrique Martinez Paz (Argentina), *Introduccion al Estudio del Derecho Civil Comparado* (1934), uses and modifies Glasson's classification, as modified by Bevilacqua – Barbarian (England, Sweden, Norway), barbarian-Roman (Germany, France, Austria), Barbarian-Roman-Canon (Spain, Portugal, Italy), Roman-Canon-Democratic (Latin America, Switzerland, Russia);

Pierre Arminjon (Egypt), Boris Nolde (Russia), & Martin Wolff (Germany), *Traite de droit compare* (1950) based on criteria centers of influence which took into account history, legal sources, legal technique, legal terms and concepts, and culture grouped legal systems on seven families such as French Law, German Law, Scandinavian Law, English Law, Russian Law, Islamic Law, Hindu Law;

Rene David (France), *Traite elementaire de droit civil compare* (1950) proposed classification on the basis of ideology which included Western Law (French group, Anglo-American group), Socialist Law, Islamic Law, Hindu Law, Chinese Law;

Adolf F. Schnitzer (Switzerland), *Vergleichende Rechtslehre* (1961) represented classification reflected the legal history and divided five basic groups of legal systems that were the law of the primitive people (in a broad meaning of the word), the law of the culture-people of the Mediterranean, Euro-American legal sphere, religious law containing Jewish, Christian and Islamic law, and the law of African-Asian people. He further refined this system so that the law of the Euro-American legal sphere was divided into a further four groups: Roman, German, Slavic and Anglo-American law. Within these subgroups he identified, e.g., French, Italian, German, Nordic, Baltic, Soviet, Polish, Hungarian, US and English law. Schnitzer's tendency to stress culture has today many followers in comparative law, albeit in a different form.;

Rene David (France), *Les grands systemes de droit contemporain* (1962), had taken as a criterion of classification legal techniques and concepts; worldview and ideology and called such groups of legal systems the Romano-Germanic Law, the Common Law, the Socialist Law;

Konrad Zweigert and Hein Kotz (Germany), *Einführung in die Rechtsvergleichung auf dem Gebiete des Privatrechts* (1969) introduced as a criterion “styles” (combination of history, mode of thought, distinctive institutions, legal sources, and ideology) – Romanistic Legal Family, Germanic Legal Family, Anglo-American Legal Family, Nordic (Scandinavian) Legal Family, Far Eastern Legal Family, Islamic

Law, Hindu Law;

Ugo Mattei (Italy), *Three Patterns of Law: Taxonomy and Change in the World's Legal System* (1997) distinguished three types of norms that affect the behavior of mankind. The most important point is to look where the legal norms come from. He divides sources of law into three main groups: politics, law and philosophical or religious tradition. The proposed classification or taxonomy consists of the rule of professional law (the fields of political and legal decision making are separated), the rule of political law (law and legal processes are largely specified by political relationships) and the rule of traditional law (law and religion or some other philosophical–religious tradition is not separated from law);

Jacques Vanderlinden (Belgium), *Francais juridique et science du droit* (1995), proposed private law-centred approach: it begins from straight criticism of old classifications, moves on to legal theory and finally stretches into a somewhat novel macro-classification attempt. He classified the systems into five groups: customary law systems, doctrinal systems, jurisprudential systems, legislative systems and systems of revelation;

However, at the same time, it has been admitted that it is virtually impossible to construct an ideal system of classification that would be even reasonably comparable to the taxonomies of those made by zoologists or botanists¹. Efforts to achieve consensus on criteria have so far been largely unsuccessful. The main difficulty for classification of legal families has been in finding a suitable criterion for division. Previously the classification attempts were by and large made on the basis of one or only a few criteria; however, the modern approach is to take into account several different criteria that contain many factors held to be relevant². Even though there are some differences, the elements that are taken into account are very much of a similar type: history, ideology, legal style, legal argumentation and thinking, codification level of law, judicial reasoning, structural system of law, structure of court system, spirit and mentality of legal actors, training of lawyers, law's relation to religion and to politics, the economical basis of law, the background philosophy of legal thinking, the doctrine of sources of the law, the empirical effectiveness of formal legal rules, the role of tradition in law, paradigmatic societal beliefs about law, etc. It often leads to comparative law is called cross-jurisdictional, multi-linguistic, often interdisciplinary-leaning nature. And legal family approach gets the status “umbrella approach”, which has seen the inclusion of – among others – legal anthropology, legal sociology, comparative politics, legal history and even linguistics within their broad disciplinary church³.

The need for classification of legal systems due to the fact that classification helps to establish the most important common qualities of all legal systems, contributes to their deeper knowledge, allows to fix the relationships between legal systems. Classification facilitates the definition of the place and importance of the legal system in the overall global system. It makes enable to take reasonable predictions about the ways of further development of legal systems, helps to unify the current legislation and improvement of national legal systems.

Typology of legal families. The division into legal families is not just classification. This is special allocation process. Legal systems can be distributed not any but the most significant and meaningful criteria. So the typology of legal systems, defining the basic and most common types of legal systems that exist in the legal world map.

Some comparativists (O. Skakun, L. Luts) suggest using methodological potential typology along with the classification. Typology in comparative law is a process of grouping legal systems based on theoretical models (type). The typology provides a holistic knowledge of the object reveals its back-links, essential features and characteristics of the whole system⁴. L. Luts said that the classification is used when there is a need to obtain knowledge only for some of the object, not the integral knowledge of the object, and therefore can not be used for integrated knowledge of group legal systems and legal map of the whole

¹ Bogdan, M. (2012). *Concise Introduction to Comparative Law*. Europa Law Publishing.

² Malmström, Å. (1969). *The System of Legal Systems. Notes on a Problem of Classification in Comparative Law*. *Scandinavian Studies in Law*, 13, 129–49.

³ Hendry, J. *Comparative Law and the (Im)Possibility of Legal Translation*. <<http://ssrn.com/abstract=2256888>> (2013, April, 26).

⁴ Скакун, О.Ф. (2007). О термино-понятиях «типология», «типологизация», «тип» в сравнительном правоведении. *Порівняльно-правові дослідження: матеріали Другого міжнародного наукового семінару «Порівняльне правознавство: сучасний стан і перспективи розвитку»*. Київ: Ін-т держави і права ім. В.М.Корецького НАН України, 1 – 2, 31.

world¹.

The main element of any legal system is law. All other elements of the legal system are formed around it². But law is not sole structural component of legal system³. We support the views of scientists who believe that its structure includes all the legal effects of a particular society: law, legal institutions, legal practice, law implementation and enforcement of law, freedoms and bindings, legal culture etc.

Selection methodology of the legal system elements is evaluating of its impact on the development of the whole system and research of their relationships in terms of “cause – effect”. To my mind an ideological component (legal awareness and legal culture of society) should be recognized the main criteria of typing legal systems in legal families. The form of the all others phenomena of the legal system (legal norms and their system, sources of law enforcement and others features) are the result of this ideological component. However, use of such a complex and multifaceted phenomenon as the criterion of separation can cause some difficulties. Therefore it is possible isolation of other additional criteria, on the one hand be most clearly reflect the specifics of a particular society sense of justice, and the other to be simple and convenient tool for comparison. One of the most convenient in terms of these criteria is the source of law. The specificity of thinking is reflected in the sources of law.

So, it is necessary to distinguish two separate families (types) of religious and traditional law along with families of Romano-Germanic and Anglo-American law. The main criteria for each type of separation is quite significant differences in thinking, but also clearly seen the difference and derivative criterion – the sources of law.

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¹ Луць, Л.А. (2007). *Типологізація сучасних правових систем світу: Відкрита лекція*. Київ, Сімферополь: Ін-т держави і права ім. В.М. Корещького НАН України; Логос.

² Тихомиров, Ю.А. (1996). *Курс сравнительного праоведения*. Москва: Норма.

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