

Noise, voice and silencing during immigrant court-case performances in Swedish district courts



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Abstract

This article argues that court-ritual unawareness, linguistic shortcomings and stereotypical images about non-Swedish otherness impair the position and acting space for immigrants in a Swedish district court context. Drawing on two ethnographically informed research projects focused on courtroom interaction during more than 20 trials dealing with ‘domestic violence’ and ‘street-related crime’, we claim that immigrant voices are often silenced due to taken-for-granted practices in court. Through analyses of interviews, performances, interpreted hearings and references to a desirable Swedishness, it is argued that situations are created where immigrant participants may experience their possibility of being understood as limited and their voices as being unheard. Such conditions are emotionally draining and may result in participants choosing silence over stating their case. This is a problem, not only within the individual court case, but also for the overall legitimacy of the court system and for issues of institutional trust among citizens.

Keywords

Courtroom interaction, ritual, voice, silencing, symbolic interactionism, interpretation, legal legitimacy, principle of misrecognition

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'I'm not saying anything else. I need a doctor'

A woman in her 50s, with a linguistic and cultural background in a 'Middle Eastern country', is testifying in a court case against a man believed to have beaten and abused his wife for many years. She has turned all the more silent as the witness hearing has proceeded. She is one of several witnesses during the court case appearing to 'lose voice' the longer the hearing goes on. Towards the end of the hearing, she seems to have shrunk on her chair with her face down, staring at the table-top. She answers very reluctantly to continued questions from both prosecutor and defence lawyer, mediated through an interpreter.

What the court representatives and most of the audience do not know is that there is an exchange of messages between the interpreter and the witness that is not shared with them. In fact, the citation above was never interpreted to the court, even though the woman probably said something she thought was important from her point of view; an important message about her emotional status. As an interpreted version, it only exists in this article, following project transcripts of all matters verbalized during interpreted hearings. In the court, it was mere 'noise' – a sound without any perceived cultural or social content – to all non-bilingual participants. Earlier during this particular hearing, the interpreter, who shared the same linguistic and cultural background as the witness, had actually been adding personal orders to the witness in her language, such as, 'you have to tell the truth' or 'you must stay; you must sit down'. Meanwhile, reassuring information coming from the interrogating side, like 'I only have a few more questions', was subtracted. This incident is a telling example of what this article will argue: that immigrants face a risk of having their voices silenced to a more-than-necessary extent upon entering the Swedish courtroom. While interpretation rituals can be rather revealing examples of voice silencing, there are other, less obvious, qualities in the everyday life of the court leading to hierarchization of voices and production of silence among some of the actors within courtroom interaction. Our purpose is to present and analytically discuss a number of distance-producing practices through which courtroom interaction makes it difficult for some groups to make themselves heard. In doing so, we will engage in a sociological unpacking of aspects of courtroom interaction that are usually hidden within taken-for-granted court practices and rituals.

Most people, regardless of linguistic or national background, will find themselves restricted as to what they can say and do when facing the strictly ritualized courtroom interaction and language, sometimes referred to as 'Legalese' (Berk-Seligson, 2002). However, the right to talk and perform, and to be heard and listened to, appears to be unevenly distributed among different groups of court participants based on their immigrant background. Although such uneven distribution may not always be the case, it has been a common pattern throughout the two ethnographic projects informing this article.

Elsewhere we have argued that the successful management of routines and rituals is an important means to gaining power over definitions in court and to gain

trustworthiness in court (Elsrud, 2014, forthcoming; see also Conley and O'Barr, 1998/2005; Coulthard and Johnson, 2007; Wagner and Cheng, 2011: 1). These ideas are not new and stem from an interest in the meaning of power within a courtroom context. Garfinkel (1956) has described the court as the number one societal institution when it comes to having a naturalized, taken-for-granted right to perform 'degradation ceremonies'. In order to be successful, these ceremonies require that the person being degraded (such as a witness, a plaintiff or a defendant) comes across as different and unlike a 'common us', that the act in question appears 'abnormal', and that the degrader is perceived as a representative for the 'objective common good' rather than a single individual driven by biases, wants and emotions. Degradation ceremonies can be seen as acts of distance making and 'othering' that increase chances of gaining power over interpretative prerogatives and make the degraded person appear less reasonable. While these ceremonies may be both degrading and game-like from a sociological perspective, they normally appear as the natural order of things from the dominant perspective of the court. Using Bourdieu's (1984) terminology, this phenomenon is a matter of the 'principle of misrecognition', where certain expressions and meanings are kept out or in the margins due to the logic of the professional field. Our article argues that this misrecognition produces distance between the insiders who are defined as objective and reasonable, and outsiders normally defined as doubtful and suspect.

This article concentrates on various circumstances found during observations of courtroom interaction that facilitate such distance between parties and also between the legal professionals and the temporary court performers such as witnesses, plaintiffs and defendants. It also addresses the consequences distance making will have on issues of individual agency and empowerment, approached through the concepts of noise, voice and silencing. These concepts originate from a framework of post-colonial theory and social justice studies where it is argued that what is considered to be mere noise or a voice worth listening to, is largely dependent on power relations, on the social and cultural order of things providing discursive ideas about what and who should – and should not – be listened to (see Lederach, 2005; Mayer, 2004; Spivak, 1988).

A person or group whose voice is reduced to noise – such as a disturbing sound or a story not worth listening to – is socially and culturally silenced. Noise is what happens when utterances are misrecognized and, thus, not listened to as carriers of meaningful representations of culturally accepted values and ideas. Having a voice implies much more than being able to make meaningful sounds – it is the privilege of being respectfully and unbiasedly listened to when speaking and acting. Allowing individuals or groups to have a voice is to allow agency, a situation in which they are able to express who they are and to be allowed their emotions in an interested and respectful social environment. On an individual level, having a voice is important to self-control and empowerment. On the other hand, treating what people express as noise, or silencing people by creating barriers against certain expressions, is to obstruct agency and empowerment. Before we address these

matters in more detail, a presentation of the research focus and methodological approach is needed.

Project approach

While this article focuses specifically on the distancing processes that can face court participants with immigrant backgrounds, the scope of the projects informing the article has been much wider. Our arguments are based on findings during two ethnographic research projects focused on a total of 24 Swedish district court cases dealing mainly not only with ‘street-related crime’ but also with ‘family-related violence’. Although ethically challenging, both projects were approved by ethical review boards. For ethical reasons related to confidentiality and potential recognition, the court cases subject to research have been anonymized in addition to the national background of the court participants and the location of the courts. It is sufficient to say that the courts have been located in three medium-sized Swedish towns and one larger city. Most studied trials have lasted for a day or longer.

The purpose in both projects has been to explore the ways notions about ethnicity, culture, gender and age are negotiated in a court context with a focus on trials where parties have an immigrant background. There is a lot to be said on the concept immigrant (*invandrare*, in Swedish) which must be addressed elsewhere. It contributes to a stubborn discourse of differentiation between an imagined dominant group of ‘Swedes’ and an imagined minority group of ‘non-Swedes’. In Sweden, this discourse is quite persistent affecting not only people born elsewhere but also those born in Sweden to parent(s) with a non-Swedish background. The latter are sometimes referred to as ‘second-generation’ immigrants, or ‘people with foreign backgrounds’ as recommended by the authorities (Friberg and Hermanson, 2000). As much as these discourses are collective imaginations and social constructs rather than descriptions of citizenship, their consequences are often real which makes research into their reconstruction and prevalence in different settings an important research focus. Depending upon this discourse to frame our research design, and to avoid identifying court cases through being too detailed on participant nationality background, we still hope to contribute to reduce its real consequences in the long run.

So far, participants’ backgrounds have been in the following countries: China, Jordan, Vietnam, Georgia, Iran, Iraq, Serbia, Rumania, Russia, Albania and Kurdistan – and Sweden. While our main concern has been to seek knowledge about immigrant-background cases, we have found it illuminating to include cases where parties have had a Swedish background. Such inclusion has given us possibilities to compare our findings in immigrant cases with findings in Swedish-background cases in order to identify unique, as well as common, qualities. A similar argument lies behind our selection of a few trials with women defendants, despite male cases being in the clear majority in these types of offences.

Such an empirical inclusion of a comparable group conforms with ethnographic work, or 'collective case study' as Stake (2000: 237) labels this type of field work, that stresses the advantages of approaching and experiencing a field or a topic through various empirical sources and perspectives (see also Denzin, 1997). Studying atypical cases, such as trials with female participants or Swedish-background cases, for comparative purposes has proved to be successful when it comes to identifying the rigidity of observed patterns. Although these atypical cases have strengthened our arguments, they will not be under scrutiny here but will be addressed in future texts.

Both projects have used a number of empirical sources. Wanting to achieve as complex and 'thick descriptions' as possible (Geertz, 1973), we have carried out detailed observations and studied documents that are related to the court cases, during more than 20 trials. We have also interviewed people who have participated as defendants in these trials. While the arguments in this paper are based mainly on observations, some interview data are also used to provide perspectives on how courtroom interaction and trial processes can be experienced and interpreted by participants.

Being influenced by symbolic interactionism, our observations have been concerned with rituals and routines during contextualized interaction. In practice this means that we have participated, as members of the audience, in the studied trials. We have observed and listened while taking notes. We have not just been interested in what is said, but also in how it is said, by whom it is said, in what context it is said, and how other participants in court have responded. From a symbolic interactionist perspective, language, voice and silence extend beyond words and utterances to various sign-languages: clothing, bodily position, raised eyebrows, tapping fingers, closed eyes or quick glances of mutual understanding between court members. Thus, the performance has been as intriguing to observe as the talk.

When a trial is over, more empirical material has been gathered. According to the Swedish principle of public access to official records, most court cases, including related documents, are open to the public unless a decision is made by the court to carry out proceedings behind closed doors based on sensitivity issues such as the young age of participants. Public access to official records includes audio-files of the hearings of all parties in a trial. For this study, these recordings have been ordered as the judgment has become final. All of these have been transcribed while interpreted hearings have also been subjected to a second review by bilingual assistants. These assistants have had some interpretation experience, but their most important skill has been that they have been fluent in both languages. Being a project interpreter differs from being a court interpreter in that the project interpreter can listen carefully at different volumes, rewinding the recording when needed, in addition to checking a dictionary in a quiet environment. When the project interpreters are tired, they take a rest. Such work conditions are hardly the case for a courtroom interpreter who is forced to present a proper interpretation in one language while simultaneously listening to a narrative in another language.

Upon transcription of hearings, we have so far conducted ethnographic interviews with three defendants whose cases we have been observing. The term 'ethnographic' in this context means that the interview focus has been on the informants' experiences of courtroom interaction and of having gone through the process of being accused of a crime to receiving a verdict. Preparations before the interviews have involved reading through documents of the trial, such as indictment and verdict, in addition to field notes. It has not been the purpose of our project interviews to question or validate a sentence, but to listen to the experiences shared by our informants and relate these to our research questions. Nevertheless, at the stage the interviews take place – after the trials and final verdicts – there is not so much to gain by providing false accounts. Rather, we have found that, so far, the informants have been eager to share with us, both unfavourable and favourable accounts about themselves.

Courtroom interaction as performance – Helpful metaphors

Symbolic interactionist and ethnomethodologist Erving Goffman (1959, 1967) has provided research with useful terms to address events and social contexts where people meet and interact. In Goffman's terms, knowledge about a courtroom – just as other arenas in public life and organisation – can be gained through regarding it as a *stage* and the participants as actors, preoccupied with a *performance*. How you act, what props you use, and the messages you manage to mediate to an audience are vital components when producing a trustworthy and successful *presentation of self*. While it is, usually, important to most people to present themselves in a positive manner at all times, it is all the more important to do so in a court setting. There is a lot more than a loss of face at stake during courtroom performances. Paradoxically, it is likely that such positive self-presentation becomes even more difficult to accomplish in the strictly ritualized space that characterizes a court trial.

Randall Collins (2004) has extended on Goffman's interest in performance and rituals by addressing their emotional consequences. In some rituals and encounters with others, people may experience that they become motivated to talk and to participate, thus feeling charged by emotional energy. In other rituals, they may feel that they are less motivated to talk and interact, defined by Collins as being drained of energy, expressed through for instance silence, shortening of answers or avoidance of eye contact. The emotional energy that normally leads to active participation in social contexts and to feelings of belonging and reciprocity is gone. They may feel ashamed, uneasy, alienated and subordinated in a particular social setting. This may be what happened to the woman in the introduction example, and this may happen if a person is treated as an object, something that makes sounds without being accredited with voice. A person drained of energy in a certain social setting will feel less motivated to contribute to the situation at hand.

Collins (2004) has also contributed with an interest in the relationship between individual agency and overarching structures of thought, by stressing the

connection between small-scale performances and structural limitations and potentials such as values, ideologies and discourses. He argues (2004: 3):

The smallscale, the here-and-now of face-to-face interaction, is the scene of action and the site of social actors. If we are going to find the agency of social life, it will be here. Here reside the energy of movement and change, the glue of solidarity, and the conservatism of stasis.

From Collins' perspective, it is through the individual situations and interactions that structures are both conserved and changed, and vice versa; the way individuals act in micro-rituals and situations is influenced by social and cultural ideologies and discourses. Performances in a small-scale setting are manifestations of much broader ideas that extend beyond a given courtroom or any other space. Indeed, this connection between agency and structure is what makes it possible to speak about voice (and noise). A person's utterances are only worth as much consideration as the prevailing culture legitimizes, which is not only interesting in relation to the weight put on a foreign language in court but also to the ways the court deals with people's accents or lack of courtroom experience. This reasoning is similar to Bourdieu's (1984) term 'principle of misrecognition' mentioned earlier, emphasizing that some expressions become marginalized according to the norms and values within the logic of the professional field. Some types of habitus (Bourdieu, 1984), positioned comfortably within the logic of the field, become more successful than others.

Thus, we combine Goffman's dramaturgic perspective (1959) with Collins' (2004) perspective on rituals and emotions and Bourdieu's (1984) perspective on misrecognition and habitus, while addressing different types of encounters in a court context, their production of silence and noise and their emotional consequences. In this article, we suggest that difficulties for people, in this case immigrants, to 'voice' their concerns in courtroom interactions have emotional consequences in that they may feel misunderstood, misinterpreted, drained of emotional energy and silenced. Nevertheless, the opposite may also be the case. People who feel that they are understood as capable and trustworthy actors may be reinforced in their willingness to speak and act. We suggest in this text that the matter of voice and silencing has implications for the issue of legal legitimacy (Peczenik, 1995). In accordance with our findings, we argue that people with immigrant backgrounds are exposed to the risk of being silenced in court through a number of, more or less, taken-for-granted courtroom practices. The article will address three of those rather pertinent practices. Firstly, we examine the way courtroom rituals may spawn feelings of distance and insecurity that may affect a willingness to share a story. Secondly, we address how language problems and interpreter assistance may influence emotions in court, as shown in the example in the introduction. Thirdly, we present examples of when Swedishness becomes the norm in court and how this may influence the way immigrants in court are perceived in addition to their emotional status in court.

Silenced by court ritual

Interaction in court is highly ritualized. There are a number of acts to perform and rules to follow that secure a certain order of events – from opening ritual and pleading to closing statements and declaration of day and time for sentence availability – as well as speech hierarchical structures that allocate the rights to speech for some and silence for others at any given moment. Sometimes a court case will take place without any breaches of court procedure, making the rituals invisibly embedded in a seemingly smooth interaction orchestrated by the courtroom professionals and exercised by everyone in the room (including the audience who normally listens in silence). At other times, rituals and the rules they are connected to become surprisingly detectable due to somebody's violation of the rules. The following example from observation notes is of a violation of the rules, making it obvious that the defendant was not allowed to talk at that moment:

More questions arrive, and there appears to be some misunderstanding during the interpretation. For a while the interpreter and the old defendant talk back and forth, then the co-defendant jumps in. She appears to dislike the interpretation.

Co-defendant: I'm sorry, but I have to interrupt here.

Judge: No, no, you are quiet [angry voice].

Prosecutor: No, no, you say nothing [angry voice].

Both the prosecutor and the judge are clearly angry and their voices and appearances are such that we interpret the situation as a berating with a clear hierarchical tone, such a tone that you hear when the speaker looks down on the accused or at least believe they have the right to address the person with a hectoring and dominant tone.

In this incident, the person who wanted to speak against a courtroom script prescribing silence was trying to help her elderly mother who had obvious trouble understanding court procedure and keeping up with courtroom interaction. The daughter was raising concerns about her mother's understanding of the language during the trial. In doing so, she was reprimanded and silenced. Her objection became un-welcomed noise according to the cultural logic of the court, while the rather noisy oburgation by the judge and prosecutor was turned into voice, something worth listening to, since they had the right to define the situation and influence practice.

Using Becker's (1973) terminology, the prosecutor and the judge can be seen as 'rule enforcers', protecting the order of interaction and the power positions within that order. The co-defendant, who lacked a *feel for the game* (Bourdieu, 1984), did not try to disrupt after this. Since her violation of the rules appears to have been prompted by a questioning of the interpretation procedure going on next to her, it is possible that also the voice of the non-Swedish speaking co-defendant was simultaneously silenced.

The relationship between ritual, voice and silence may be much more implicit and embedded into interaction than is suggested by the above example.

Bourdieu (1984) and his concepts of habitus and field can again provide us with additional ways to understanding how courtroom rituals may either hinder or facilitate voice in court. They become tools of misrecognition (Bourdieu, 1984). Putting Bourdieu's concepts to work in a court setting, Inghilleri (2005: 125–145) argues that the court can be seen as a manifestation of a (judicial) professional field where an awareness of the field's routines is necessary in order to master its logic. As the embodied, socialized and internalized knowledge and scheme of interpretation a person has gathered through his or her upbringing and life trajectory, habitus will hinder or facilitate interaction in any given context – including court. If your habitus is not 'tuned in' with the judicial field and all the routines that reproduce it, if your class, national and cultural background or your gendered experiences do not fit easily into the logic of the court, then you end up with less power in court and an unfavourable position in relation to court professionals.

Ritual knowledge is powerful capital in court. In a court-savvy habitus, there is a 'feel for the game' which makes it possible for people to participate in a certain social situation with a feeling of easy control. Adding Goffman's (1959) dramaturgical perspective we might conclude that a habitus that is inappropriate for a given context, such as a courtroom, means lesser knowledge of useful dramaturgical skills and strategies. Having an inappropriate habitus also means having a lack of control, a lack of feeling like a competent actor with a voice that counts, thus, using the words of Collins, one may be drained of emotional energy.

Some light can be shed on the consequences of not having ritual knowledge and a 'feel for the game', through looking at an interview with Farid, a young man who had participated in a trial for the first time a few weeks before the interview. His parents had Middle Eastern backgrounds and had been struggling for a long time in Sweden to make ends meet. He was entering court without a defence lawyer since the crime he was accused of was not serious enough to allow him one. We asked about his experiences of court procedures and routines:

Interviewer: Had you ever seen a trial?

Farid: No this was the first time. Really, I had no one to tell me what it was like.

Interviewer: No, that's right, you didn't have a defence lawyer?

Farid: No.

Interviewer: But did you want a defence lawyer?

Farid: I wanted . . . , at least someone who described the procedure. What I shall do and such things. I didn't even know where I should sit (laughter).

Interviewer: Wasn't there anyone who told you how it worked, or about the routines in court?

Farid: Jabril [co-defendant] told me, but I don't socialize with him because he lives in Largetown [city far from Farid].

(...)

Farid: Yes, so he told me the last minute how it is done and that, but it would be better if someone sat beside me in there, who I could ask.

(..)

Farid: And there is a bunch of questions that they ask. Do I have to... I didn't know if I had to answer them or not. There was a bunch of such things that I didn't know. Apparently I was supposed to say that I don't want to plead... Really, I don't know. It is the first time. I don't know how it works really.

Farid did not know when to speak and when not to. He said only a few words during the whole trial which lasted a full day and involved Farid and two co-defendants. He was the only one without a lawyer who could provide him with a feel for the game. A few weeks after the trial, Farid remained puzzled about the routines. He used to have an image of a trial as a gathering where people meet to seek justice. Looking back after the trial, he says he now sees it more as a ritualized competition between prosecutor and defence lawyers. Finding oneself verbally silenced by the highly ritualized court interaction is not the same as being cognitively disabled. Farid was quick to see through the game.

Farid: As I said earlier, lawyers and prosecutors, it is just a job to them. They are just after the result. So when they enter it is as if they are playing a game, or as when two football teams play against each other. It is a debate (...) Jabril told me his lawyer sits and writes 'fuck, how I hate him' when he [refers to the prosecutor] does well. It's a game to them really. We are just game characters to them.

Interviewer: Yeah, but how does that feel?

(..)

Farid: Yeah, I don't know. Well, maybe they didn't think that our thing was big enough, but I don't know. I still think you should be serious when it is a trial.

From a symbolic interactionist perspective, the success of a game of interaction – performed unknowingly or knowingly by the actors – is linked to its performance being perceived as realistic and authentic. An audience has to be 'duped by the act' in order to respect the events that take place. Far from duped, Farid, as a temporary visitor to constantly repeated court performances, had been quick to catch on, finding himself to be just another game character. Revealing the game, exposing what is misrecognized, did not provide him with the knowledge capital to change it. He remained silent.

Two different ways of silencing have been addressed in this section, one following a direct order from court representatives and the other following an internal logic where the actor realizes that silence must be the best way to deal with the situation. Both processes of silencing can be understood as expressions of a failing habitus, where ascribed or perceived status is not sufficient for having a voice. Issues of noise, voice and silence become all the more prevalent in relation to

court language mastery and failure, a topic that will occupy much of the remaining article.

Silenced by language

Like ‘proper’ ritual performance, language mastery, too, influences the way people are coded and positioned in a symbolic and social hierarchy. The language in court is not only highly ritualized, it is also often formal and professional. Berk-Seligson (2002) calls it ‘Legalese’ to highlight the very specialized language of court interaction. The Legalese of Swedish court cases is made up by both court-specific language and general bureaucratic expressions, a language rarely used in everyday social interaction among members of the ‘general public’. Thus, there is unequal language access embedded in almost any trial since fluency in the language spoken ‘on stage’ is necessary for mastering the game. Farid recalls:

Farid: Well, at least the judge understood that I didn’t know those lawyer-like words so he... when he noticed that I didn’t understand, HE [emphasized] simplified his words at least. But the prosecutor didn’t. He just repeated the exact same words when I didn’t understand. Yes.

Interviewer: What do you think about the language during the trial?

Farid: Well, actually, if you don’t give me a lawyer at my first trial how can you then expect that I should know this stuff.

(...)

Interviewer: But, but did you understand the language?

Farid: Well, really, what I didn’t understand, I asked about afterwards. Asked Jabril [co-defendant]. Cause he knows it better than me.

Interviewer: Yes. Did you ask in the break or...?

Farid: Yes, during breaks.

Interviewer: But when you sat in court?

Farid: No, there I was like a question-mark.

To feel like a question-mark in relation to courtroom interaction is not a good starting point for experiencing self-confidence in speech and action. Experiencing lack of knowledge about both routines and language, Farid kept quiet and to himself during most of the trial. It kept him unmotivated to talk and to share his opinions of what had happened, thus reducing the possibility of the court to understand what had actually happened from Farid’s perspective. While most likely both class and immigrant background, and perhaps also age, intersected in his experiences of Legalese in the courtroom, the situation had a silencing effect.

The Legalese of the courtroom may puzzle temporary participants regardless of ethnic and cultural background (see also Elsrud, 2014). However, there is another language aspect that affects only immigrants who are not fluent in the

Swedish language. More thoroughly argued elsewhere (Elsrud, 2014, forthcoming), just the fact that you speak with a heavy accent may place you in an unfavourable position in the courtroom (see also Lindholm and Yourstone Cederwall, 2013; Torstensson, 2010). A person who is not able to speak the language at all may encounter even more obstacles. The following was observed during an interpreter-assisted court case:

Defence lawyer: Prosecutor, a little, little slower, please.

Interpreter: My client needs a bit more time.

Prosecutor: I was going to take it all in its entirety. Then you can interpret in the meantime.

Interpreter: Yes [very hesitantly].

The interpreter looked at the prosecutor with a puzzled expression. The prosecutor looked down at her papers and continued to read. The young co-defendant looked at the prosecutor, first surprised and then with an angry look. Nobody said anything. The prosecutor continued to read in the same high speed as before, and the others listened obediently. From an observer's perspective, the prosecutor was obstructing the interpreter's chance of doing a good job and the client's possibility of understanding and feeling at least a little bit as an actor in the ritual. It is, thus, a matter of a micro-demonstration of power in which the prosecutor showed little interest in creating a better understanding among the actors in the court system.

It was clear during this trial that the interaction between the court and its temporary participants was all but smooth. On several occasions, we observed verbal interruptions that were related to the act of interpretation *per se*. The interpreter interrupted routines to tell the prosecutor to slow down; the judge interrupted by telling the interpreter to do her job and a bi-lingual co-defendant interrupted to try to adjust the interpretation. The only interruption that was reprimanded was the one carried out by the co-defendant, but all interruptions caused noticeable frustration among participants. However, the main actor in the interpretation drama, which was the woman needing the interpretation was effectively silenced due to the court's failure to provide her with a smooth way to hear and speak. Not only could her interpreter not keep up with the speed of the prosecutor, but she was also forced to try to accommodate her account to a version she could not have understood. When misunderstandings between the woman and her interpreter could not be corrected by the bi-lingual co-defendant since that would conflict with court ritual, her control over her story was additionally threatened. Since there were no instances present with the formal right to successfully slow down the prosecutor's pace there appeared to be rather limited support in the room for the woman to gain power over her self-presentation.

It is clear from section 10 of the Swedish Language Act (2009: 600) and chapter 5, section 6, in the Code of Judicial Procedure (Rättegångsbalken, 1942:740) that the court language in Sweden must always be Swedish and that

non-Swedish-speaking participants have the right to an interpreter. In addition, in the Interpreters' Codes of Conduct (Kammarkollegiet, 2004/2011), it is stressed that it is the interpreter's responsibility to inform the court if he or she has misinterpreted or left out vital information and that the court should give the interpreter enough time and information to be able to do their best work. If a translation is considered incorrect, it is possible to appeal but this requires that there are people in court who master both languages perfectly. When no one else with bilingual skills is present, the language of interpretation becomes mere noise and, sometimes even disturbing noise, as exemplified in a comment from an interpreter during a break. She claimed that the court often wants her to interpret simultaneously on Fridays since nobody wants to work late before the weekend.

The second language being mere noise is perhaps one of the most troublesome and silencing aspects of immigrant court cases in Sweden. This 'noise' is full of meaning – of potential important information as well as disinformation. As argued elsewhere (Elsrud, 2014), interpretations in court are often skewed by linguistic additions, subtractions and alterations such as first person/third person flexing or grammatical changes leading to rather profound changes of meaning.

The request to see a doctor provided at the beginning of this article is one of the many examples of noise not even being translated to the court. Other times, whole sentences are added, as in this verbal exchange:

Prosecutor addressing witness: Have I understood you properly that Asad has not, after he has moved to Middletown, proposed to you?

Witness' interpreter addressing the court: No, but now I'm starting to get a bit irritated. Now I'm becoming sad. I have children, and I don't get what you are saying, what you are up to?

In fact, the witness said 'What marriage? That is not true. I have children, and he has a wife. How could this be possible?' Thus, the court interpreter had removed part of her own storyline, her own choice of self-presentation, and added: 'No, but now I'm starting to get a bit irritated, now I'm becoming sad' and 'I don't get what you are saying, what you are up to?' Her seemingly surprised response directed towards no one in particular became skewed into a much more confronting and obstinate counterattack directed straight at the prosecutor. While perhaps this was a sympathetic attempt by the interpreter to put the witness' frustration into words, it is far from harmless from an empowerment and legal rights' perspective. In this example, adding a fantasy voice results in the silencing of the witness' voice.

Silenced by differentiating stereotypes

Another phenomenon that might influence opportunities for making yourself heard is related to the encountering of stereotypical images – in this case of 'Swedes' and 'immigrants'. It is not unusual for ideas about 'Swedishness' and 'otherness' to

appear in the courtroom (see Elsrud, forthcoming). In this case the prosecutor is talking about a family of three who has been living in Sweden for more than 30 years.

Ling [defendant one] as well as her brother [defendant two] and mother [defendant three] have stayed in Sweden long enough to [know] where they should be aware of pertaining Swedish legislation and know that you must not hinder the police in their exercise of authority (. . .) And considering how Ling's behaviour has been described, we all understand why Stina Stinsson [complaining police officer] needed to take control of the situation.

Although the prosecutor acknowledges that the family has been living in Sweden for a long time, the statement succeeds in distancing the family from Swedish values and Swedishness. By saying that the family 'should be' aware of pertaining Swedish legislation her unspoken message suggests that the members are not. They have been in Sweden all this time, and they still do not respect Swedish police authorities. Trying to imagine the same statement directed at a person born and raised in Sweden, unveils the cultural situatedness of the concept 'Swedish'. It would seem odd to refer to Swedish rules when reprimanding just any defendant. Thus, what is observed is the active production of distinction and otherness.

However, being born in Sweden is not always enough to be able to reach a standard where your Swedishness is taken for granted. In this case a lawyer working for the defence is questioning a witness about the family of the accused. Referring to the children who have been born in Sweden he states: 'Did they want to live like their Swedish buddies.' Not only is their Swedishness questioned, but the statement suggests that the 'Swedish buddies' have a lifestyle that would be desirable for these children.

Not all cultural references are detectable through direct referral to nationality. Other, more implicit, assumptions may also have stereotyping consequences. The following comes from a summary of observation notes in relation to a court case extending over many days:

The hearing of an elderly illiterate woman of Middle Eastern background had turned antagonistic and by the time it was over the witness was very upset. Asked by the judge how much money she had spent/lost by appearing in court (in order for the court to reimburse her) she answered, supported by the interpreter, 'I don't want your money'. The situation led to a verbal exchange that was indisputably emotional. (. . .) A few days later another female witness appeared for her hearing, and when it was time for the 'reimbursement ritual' at the end the judge said something similar to 'and then I will add an allowance. That is if you want it?' [Short pause as the woman fails to come up with an answer] 'There was someone who didn't, wasn't there?', the judge continued as the room remained silent. I interpreted his voice and body language as slightly mocking.

We later found out that there did not exist a relationship between the two women. They were born in different countries, spoke different languages and did not socialize where they lived in Sweden. Being witnesses in the same court case was the one thing they had in common. Yet, the judge appears to have placed them both within the same imagined immigrant community (Anderson, 1991), expecting from person number two what number one had initiated.

Lack of language skills may also serve a stereotyping purpose. During one observed trial, a defence lawyer repeatedly used the same difficult concept that his client could not understand. Looking at the court representatives, he says with a patronizing tone 'yes, it is a difficult word' before he laughs. While being an example of silencing through language, it clearly also belongs to methods used more or less knowingly to construct a non-Swedish stereotype. This lawyer appeared more loyal to his Swedish and professional identity than to his client.

Another type of stereotyping takes place through the use of differentiating concepts. An expert on 'honour-related crime' called in as an expert witness for the prosecutor states:

If you are not Swedish and end up in a foster family? It is impure living. It becomes a disgrace to the flock.

Leaving aside the pros and cons of creating a separate concept, such as 'honour-related', to describe criminal acts of mainly Muslim immigrants (see de los Reyes, 2003), the reference to 'flock' when describing a group of people present in court is deeply problematic. The idea belongs to a discourse of past colonial times, separating 'white, modern and cultivated Europeans' from 'primitive, non-modern and non-cultivated others' (see Elsrud and Lalander, 2007; Hall, 1990; Jordan, 1995; Mills, 1991). People in that courtroom found themselves being ascribed animal-like qualities by representatives for the Swedish authorities.

People finding that their behaviour or their stories tend to become addressed and interpreted as expressions of 'otherness' and different from Swedish standards may find it difficult to trust the judicial system, subsequently turning to silence when facing a situation where they feel they lack voice.

Some court participants may arrive at the courtroom with negative experiences of processes prior to trial. Amir, for instance, felt that he was convicted in advance. He was one of the actors in a group of immigrants being sentenced for instigation to a crime committed and admitted to by a group of men with mostly Swedish backgrounds. The 'Swedish group' accused him and the other immigrants of having encouraged them to commit the crime. Amir felt he was sentenced even before the trial. Several times he talked about stereotypical images of bad immigrants in both the press and among the police. He felt that there exists a 'societal wish' that immigrants are always guilty. He recalls experiences from police hearings:

Amir: The police just wanted to hear what they . . . , really, what they wrote [refers to negative press images of the area and events]. They just wanted to look at it the way

they wanted to look at it. They didn't give a shit about what we said. Do you understand? They wanted what the people wanted...that we should be sentenced. The immigrants.

Being listened to is essential to the experience of having a voice. Amir's statement suggests that he did not feel that he had a voice and that this lack of voice is connected to his label as an 'immigrant'. We asked him if he thought it would have been different if he had had a Swedish background.

Amir: Yes, definitely. Cause then they would have seen me..., a Swede among a whole bunch of immigrants. (...) Things would have been so much better for me, really. Cause that's what happened to the Swedes. People..., everyone believed in them, just because they were Swedes, and we were immigrants. Everyone believed in them. Everyone, the prosecutor, they bought, everything they said. That's how it happened. They had no evidence, no witnesses, no..., nothing, you know. They just bought into what the Sw..., they said, you know [painful silence]. And that was it [whispering, and then another silence]. It doesn't matter now. I don't know.

There was a lot of pain and resignation in the interview with Amir. He had just reached the age of criminal responsibility in Sweden when he was accused and found guilty for a crime he feels he did not commit. He felt that there was a wish, among the general public, the police and in court, to find him guilty and that this desire was so strong that it blocked people's capability of listening to what he had to say. Amir felt that his voice was not heard and that his perspective and that of the other immigrants was silenced all through the process, both prior to the court case and during the trial. This feeling did not motivate him to present his story in court since he thought that the odds were against him.

Both the observed examples of stereotypical othering in court and Amir's feelings of being sentenced beforehand and not listened to because of his immigrant background touch upon an existing research discussion about the relationship between values within the judicial field and the values and social structures in the society in general. In two influential anthologies (Diesen et al., 2005; Sarnecki, 2006a) about ethnic discrimination within the Swedish judicial process, a number of researchers address signs of discrimination within a Swedish court context.

It is argued that negative discrimination takes place at various levels throughout the judicial process and that such discrimination rarely is carried out intentionally or knowingly but is an effect of social values and stereotypical images that extend outside the judicial context to the society at large. The media, Sarnecki (2006b: 4) argues, is a very potent stereotyping agent when it comes to the dissemination of negative stereotypes in society at large. From such a perspective, Amir's interpretation as well as signs of differentiation of 'Swedes' and 'immigrants' in court are signs of persistent discourses appearing in different societal contexts, including the court.

Conclusion

Concerns about the handling of ‘immigrant’ court cases exist not only in Sweden. Patterns indicating different forms of ‘ethnic discrimination’ within the judicial field are discussed in, for instance, the US (Banks, 2004; Kupchik and Harvey, 2007; Zatz, 2000) and in Great Britain (Feilzer and Hood, 2004; Jones and Singer, 2008). Like the Swedish findings mentioned earlier (Diesen et al., 2005; Sarnecki, 2006a), they point at a statistic tendency for an unfair treatment of immigrants and/or ethnic minorities – or groups based on skin colour – in court and hearing contexts. Assuming that these tendencies are rooted in tacit common sense and stereotypical ideas about differences between an ‘us’ and a ‘them’ rather than in deliberate efforts to differentiate, we need to engage in qualitative research into face-to-face interaction to provide a better understanding of how various patterns may evolve (see Zatz, 2000). In this paper we have presented some of the advantages of such close-up studies of courtroom interaction arguing that, what happens in individual court cases is connected to more abstract structures through rituals, language structures and practices and ideas about cultural differences. Such structures frame both voices and silence.

Having a voice – being able to share with the court a truthful and desired image of self – is part and parcel of being seen, heard and listened to. This experience, in turn, is fundamental to the experience of having agency, of feeling that you are able to share your viewpoints and self-expressions in a ‘fair hearing’ where you are able to make a difference to the development of the interaction and the outcome. Addressing the issue of voice in relation to conflict solving, Lederach (2005: 56) argues:

[V]oice is about meaningful conversation and power. *Meaningful conversation* suggests mutuality, understanding and accessibility. *Power* suggests that the conversation makes a difference: Our voices are heard and have some impact on the direction of the process and the decisions made.

Thus, the examples provided in this research – informants feeling that they had no knowledge of the rituals that framed their day in court or that no one listened to their version, or observations of interpreters who are not given enough time to interpret or prosecutors suggesting a witness or defendant is not Swedish enough to know the rules yet – are ultimately issues related to disempowerment and to being drained of emotional energy (Collins, 2004).

We have addressed a number of aspects on courtroom interaction that – together and alone – influence the possibilities for a positive self-representation during a court case: rituals, interpretation of language and stereotypes. If space had permitted, each of these aspects could have been explained, scrutinized and nuanced in much more detail. Nevertheless, these shared findings are problematic enough to be taken seriously. Although there have been a few observed court cases within our research project that have excelled at not ascribing differences to people of immigrant background,¹ the patterns of voice silencing described in the article

have been prevalent through different district courts, in medium-sized towns as well as in city settings. This silencing of voices is rarely debated publicly in ways that could change the professional field and provide actors in court with better opportunities for self-presentation and self-confident performance. It remains a matter of misrecognition (Bourdieu, 1984), which helps to conserve the unspoken logic of the field.

Interpreted hearings have been found most obviously problematic in creating silence in court. Sometimes the meaning provided by participants in non-Swedish languages becomes skewed as their languages are interpreted into Swedish. At other times non-Swedish languages are even reduced to mere noise as they are not translated at all or rendered irrelevant to a point where the interpreter is not allowed the time needed to keep up with the speed of court proceedings. Our findings may not come as a surprise. In a report (Domstolsverket, 2010: 4), the Swedish National Courts Administration claims that the quality of court interpretation must be vastly improved in order to guarantee legal security and to maintain public confidence in criminal court ruling procedure. The report also states that there are not enough authorized interpreters (especially not ones specialized in court interpretation) and calls for increased and improved interpreter training.² It is alarming to consider that not much appears to have changed since the report in 2010.

Although shortcomings during interpreted hearings appear to be most obvious from a silencing perspective, the other identified voice-reducing or silencing practices deserve more attention too. The tendency to silence through differentiating stereotypes by positioning certain parties in opposition to Swedish standards is also threatening to issues of self-presentation in the courtroom. When used by court representatives, Swedish 'identity' and 'Swedishness' are addressed as normative and desirable standards that the immigrant participants are said to not completely meet. From the informants' point of view, they are also standards they feel they cannot reach, making their 'non-Swedish' voices pointless. Swedishness emerges as a sacred object in a Durkheimian sense, increasing feelings of solidarity among group members while distancing and excluding others (Durkheim, 1995; see also Collins, 2004 and Goffman, 1959, 1967). As a secret object, it stands above critical examination. It comes across as a 'common good' that immigrants in the studied court cases should either be able to understand after a long time in the country (but do not) or have as a desirable objective for their children.

Rituals are similarly vital to group solidarity – and to group exclusion. As our research shows, court rituals and props can appear rather strange to those not initiated into court ritual procedures. Farid felt like a question-mark and turned silent, not because he had nothing to say but because he realized he could not play a game he just had discovered. Often, court participants do not have the ritual knowledge capital needed to enter the game as full-fledged opponents, but remain ritual 'outsiders'. Being a ritual 'insider' on the other hand is a great weapon in the struggle over ritual domination (Collins, 2004: 41). Insiders maintain and reconstruct the logic of the field. In Bourdieu's (1984) terms, their habitus provides them

with a ritual ease and naturalness that makes it difficult for other participants to identify and question the shortcomings of the field's logic.

When ritual outsiders fail to speak the proper language, perform the proper rituals or to come across as a 'proper' Swede, it is not just a case of individuals being silenced in a specific context. Silencing has implications on many levels, ranging from emotional deadlocks – such as anger or feelings of energy drainage or neglect – that spill over from courtroom experiences into other arenas of social interaction, to an overall lack of trust in the Swedish justice system. The principle of legal security rests on core values such as legality, equality before the law, fair trial (access to justice) and the principle of proportionality when public authority is exercised. If court rituals, interpretation services or stereotypical images serve to silence, exclude or alienate, these core principles are at risk, and the defendant may not receive a fair verdict (see Berk-Seligson, 2002). Even more serious, when the legal system fails to uphold the rule of law, its legitimacy in a greater perspective will also be endangered (Peczenik, 1995; Staaf, 2005).

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Notes

1. Cases that deviate from the patterns described in this paper will be incorporated in forthcoming publications addressing performance variations among court and prosecutor representatives.
2. Domstolsverket/Swedish National Courts Administration (2010: 4, 15–19). For further reading, *Government bill 2012/12: 132 Interpretation and Translation in Criminal Proceedings*, pp. 34–35.

References

- Anderson B (1991) *Imagined Communities: Reflections on the Origin and Spread of Nationalism*. London: Verso.
- Banks C (2004) *Criminal Justice Ethics: Theory and Practice*. CA: Sage.
- Becker H (1973) *Outsiders: Studies in the Sociology of Deviance*. New York, NY: The Free Press.
- Berk-Seligson S (2002) *The Bilingual Courtroom: Court Interpreters in the Judicial Process*. Chicago: University of Chicago Press.

- Bourdieu P (1984) *Distinction*. London: Routledge & Kegan Paul.
- Collins R (2004) *Interaction Ritual Chains*. Princeton, NJ: Princeton University Press.
- Conley JM and O'Barr WM (1998/2005) *Just Words: Law, Language and Power*. Chicago, IL: University of Chicago Press.
- Coulthard M and Johnson A (2007) *An Introduction to Forensic Linguistics*. London: Routledge.
- de los Reyes P (2003) *Patriarkala Enklaver eller Ingenmansland? Våld, Hot och Kontroll mot Unga Kvinnor i Sverige* [Patriarchal Enclaves or no Man's Land. Violence, Threats and Control against Young Women in Sweden]. Norrköping: Integrationsverkets skriftserie IV.
- Denzin N (1997) *Interpretive Ethnography*. Thousand Oaks, CA: Sage.
- Diesen C, Lernestedt C, Lindholm T, et al. (2005) *Likhet inför Lagen* [Equality Before the Law]. Stockholm: Natur & Kultur.
- Domstolsverket [Swedish National Courts Administration] (2010) *Kvaliteten på Tolkning i Domstolar, m.m.* [The quality of court interpretation, etc]. Jönköping. Domstolsverkets rapportserie 2010: 4.
- Durkheim É (1995) *The Elementary Forms of Religious Life*. New York, NY: Free Press.
- Elsrud T (2014) Othering the 'other' in court. Threats to self-presentation during interpreter assisted hearings. *International Journal of Law, Language & Discourse* 4(1): 27–68.
- Elsrud T (forthcoming) Constructing otherness in Swedish District Courts: Concurrent distance-making performances during courtroom interaction. In: Brydon D, Fur G, Forsgren P (eds) *Archives and Voices in Postcolonial Places*. Amsterdam: Rodopi (under review).
- Elsrud T and Lalander P (2007) 'Projekt Norrliden'. Om småstadspressens etnifiering och genderisering av en förort ['The Norrliden Project']. Local news ethnification and genderization of a marginalized town area]. *Sociologisk Forskning* 2: 6–25.
- Feilzer M and Hood R (2004) *Differences or Discrimination?* London: Youth Justice Board.
- Friberg A and Hermanson G (2000) *Begreppet Invandrare – Användningen i Myndigheters Verksamhet* [The Immigrant Concept – Usage in Authoritative Practice]. Stockholm: Kulturdepartementet, Regeringskansliet [Government Offices of Sweden] Ds. 2000, p. 43.
- Garfinkel H (1956) Conditions of successful degradation ceremonies. *The American Journal of Sociology* 61(5): 420–424.
- Geertz C (1973) *The Interpretation of Culture*. New York, NY: Basic Books.
- Goffman E (1959) *The Presentation of Self in Everyday Life*. New York, NY: Anchor.
- Goffman E (1967) *Interaction Ritual: Essays on Face-to-face Behaviour*. Garden City, NY: Anchor Books.
- Hall S (1990) Cultural identity and diaspora. *Framework* 36: 222–237.
- Inghilleri M (2005) The sociology of Bourdieu and the construction of the 'Object' in translation and interpreting studies. In: Inghilleri M (ed.) *The Translator: Bourdieu and The Sociology of Translation and Interpreting*. Manchester: St Jerome Publishing, pp.125–145.
- Jones A and Singer L (2008) Statistics on Race and the Criminal Justice System –2006/7. *A Ministry of Justice Publication under Section 95 of the Criminal Justice Act 1991*. London: Ministry of Justice.
- Jordan G (1995) Flight from modernity: Time, the other and the discourse of primitivism. *Time & Society* 4(3): 281–303.
- Kammarkollegiet (2004/2011) *God Tolkсед* [Proper Interpretation Practice]. Stockholm: Kammarkollegiet.

- Kupchik A and Harvey A (2007) Court context and discrimination: Exploring biases across juvenile and criminal courts. *Sociological Perspectives* 50: 417–444.
- Lederach JP (2005) *The Moral Imagination: The Art and Soul of Building Peace*. New York, NY: Oxford University Press.
- Lindholm T and Yourstone Cederwall J (2013) Ethnicity and gender biases in the courtroom. In: Granhag PA (ed.) *Forensic Psychology in Context: Nordic and International Approaches*. London: Routledge, pp.228–246.
- Mayer B (2004) *Beyond Neutrality: Confronting the Crisis in Conflict Resolution*. San Francisco, CA: Jossey-Bass.
- Mills S (1991) *Discourses of Difference: An Analysis of Women's Travel Writing and Colonialism*. London: Routledge.
- Peczenik A (1995) *Vad är Rätt? Om Demokrati, Rättssäkerhet, Etik och juridisk argumentation* [What is Right? On Democracy, Law, Ethics and Legal Argumentation.] Stockholm: Norstedts Juridik AB.
- Proposition [Legal Bill] 2012/12:132. Tolkning och Översättning i Brottmål [Interpretation and Translation in Criminal Proceedings].
- Rättegångsbalken (1942:740) [Code of Judicial Procedure].
- Sarnecki J (ed) (2006a) *Är rättvisan rättvis? Tio Perspektiv på Diskriminering av etniska och religiösa minoriteter inom rättssystemet* [Is justice fair? Ten perspectives on discrimination of ethnic and religious minorities within the judicial system]. *SOU* 30: 9–38.
- Sarnecki J (2006b) Strukturell Diskriminering i Rättsväsendet på grund av Etnisk och Religiös Tillhörighet. En Introduktion och Sammanfattning [Structural discrimination in the judicial system, based on ethnic or religious belonging. An introduction and conclusion]. In: Sarnecki J (ed) *Är Rättvisan Rättvis? Tio Perspektiv på Diskriminering av Etniska och Religiösa Minoriteter inom Rättssystemet* [Is Justice Fair? Ten Perspectives on Discrimination of Ethnic and Religious Minorities within the Judicial System]. *SOU* 30: 9–38.
- Spivak GC (1988) Can the Subaltern speak? In: Nelson C, Grossberg L (eds) *Marxism and the Interpretation of Culture*. Urbana, IL: University of Illinois Press, pp.271–313.
- StAAF A (2005) *Rättssäkerhet och Tvångsvård: en Rättssociologisk Studie* [Legal Security and Compulsory Treatment and Care: A Socio-legal study]. Lund: Sociologiska institutionen, Univ.
- Stake R (2000) Case studies. In: Denzin NK, Lincoln YS (eds) *Handbook of Qualitative Research*, 2nd ed. Thousand Oaks, CA: Sage, pp.435–454.
- Swedish Language Act (2009:600) [Språklagen (2009:600)].
- Torstensson N (2010) *Judging the immigrant: Accents and attitudes*. PhD Thesis, Department of Language Studies, Umeå University, Umeå.
- Wagner A and Cheng L (eds.) (2011) *Exploring Courtroom Discourse. The Language of Power and Control*. Farnham, Surrey: Ashgate.
- Zatz M (2000) The convergence of race, ethnicity, gender, and class on court decision-making: Looking toward the 21st century. *Criminal Justice* 3: 503–552.