

## Constructive Approaches to Law, Culture, and Identity

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This commentary responds to the essays by Espeland and Gooding as ethnographic studies of the cultural construction of identity with a discussion of the concept of “cultural construction.” Sophocles’ *Antigone* provides an extended illustrative example of how the poetics of identity are tied to the materiality of power. In the world of events, the concept of cultural construction is useful—as Espeland’s and Gooding’s essays show—as an alternative (and remedy) for the overuse of the concept of “choice.” To refer to identities as “cultural constructions” focuses attention on how powerful institutions and subjectivities are mutually implicated, without implying that people’s needs and world-views are commensurable—or that the outcomes of their contests are fated.

**T**he articles by Espeland and Gooding in this section are ethnographic studies of the law’s role in the cultural construction of identities. Both essays offer extended case studies of legal disputes between the federal government and—in federal parlance—Indian Tribes. The conceptual strand I want to draw forward from the essays is the idea of “cultural constructions”—a relationship between the poetics of identity politics, the material forces of real-world struggles for recognition, and modes of inquiry within and beyond sociolegal scholarship.

In this commentary, and following the authors’ leads, I explore the concept of “cultural constructions” from two reflexive ethnographic vantage points: first, as a means of widening the conceptual distance between culture and choice and, second, as a means of narrowing the practical distance between the interpretive and reformist aspects of cultural analysis. These are re-

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lated points, in that the idea that cultural differences are “about” aggregate choices is—as the essays themselves show—a fiction; however, the stakes in confronting that fiction are potentially very high and very real.

“Cultural constructions” name that fiction and what is at stake in it. Cultural constructions of identity are, as the essays show, central to both oppressive and liberatory uses of the law. For this reason, among others, it is also useful to comparative ethnography, since it commits us to examining how social processes produce *and conceal* their effects. My discussion pursues these themes of the relationships between law, choice, and cultural constructions first in an illustrative literary example, and then in Espeland’s and Gooding’s essays. We begin in the theater, and move from there to the stages of current real-world dramas involving struggles over rights, identities, and other forms of property.

Such a juxtaposition is only quasi-playful. The familiar notions of social roles, cost-benefit, transaction, social actors, and social action (among others) suggest the extent to which the theater, markets, and social science readily trade key words. It is no coincidence that social science, markets and the theater should share a certain vocabulary. Agnew (1986) tracks the common lexicons to shared origins in the early modern development of markets, theater and conceptions of the person—or, as he puts it, “artificial persons”—in Europe. As the meanings of transaction and representation borrowed heavily from each other in the early modern period, misrepresentation, concealment, illusion, and deception became fashionable objects of anxiety. Today, the concept of “cultural constructions” gives social scientists a way of placing their own analytical categories in some relation to the epistemological and political tensions within the social fields they investigate. There, misrepresentation yields productive interpretive, comparative, and reflexive issues, rather than (merely) methodological unease.

“Choice” should probably lead the roster of terms that social science shares with commodity exchange and dramatic canons. Choice is the main theme of this commentary, since both the fictional illustration and the ethnographic cases involve circumstances that mask constraint as choice. Under these conditions, “choice” has an ironic ring since it can be no more than a rhetorical device for converting institutional claims to legitimacy into an idiom of individual agency—or vice versa. The pervasiveness of “choice” in social science narrative (or social narrative more broadly) is an important cultural technology for defining individual agency as confirming collective social structures; however, this is a *pre*-definition, as if society were a congress in which individuals represent themselves by their (chosen) acts. The main argument of the literary illustration is that the conditions of free-

dom under which we might be assured that choices are self-representations in this sense cannot exist. The ethnographic essays have shown with particular clarity, although in different ways, that “cultural constructions” are not self-representations in some fictional legislature, but self-identifications with active struggles whose tactical requirements transform the very idea of identity for participants in a variety of ways.

### Fictional Choices, Mythical Dramas

*Antigone*, Sophocles’ play about Oedipus’ daughter, is about choices—or, to be more precise, the difference between being and choosing. The play is easily summarized: King Creon’s army has just won a military victory, defending Creon’s crown. Antigone, who lives in Creon’s kingdom, performs the burial rites for her brother, who had fought in the opposing army. The burial flouts King Creon’s order. Although the command is unambiguously lawful both to Antigone and the audience, it is also unambiguously unjust. Mindful of the injustice but also the penalties attached to the order, Ismene (Antigone’s sister) tries to persuade Antigone to desist, but Antigone performs the rites anyway, invoking “the gods’ unwritten and unfailing laws” (l. 456) against the frailer timeliness of a king’s law.<sup>1</sup> Creon’s son Haemon, who is Antigone’s fiancé, pleads her cause before the king, and Antigone also presents her case—to no avail. Creon condemns her to imprisonment in a sealed cave; there, she hangs herself. Haemon, in grief and protest, commits suicide; when she hears this news, his mother Eurydice also kills herself. Feeling the force of his own grief, Creon realizes the justice of Antigone’s act, and the injustice that he has committed.

As the play opens, Antigone is already committed to proceeding with the rites; importantly, the audience never sees Antigone *decide*.<sup>2</sup> Ismene warns her of the risks—although Antigone is already fully aware of them—but fails to persuade her to change her mind. Indeed, the sisters’ positions are so opposite that later in the play, Antigone’s self-defense before Creon is almost the exact inverse of Ismene’s speech in this scene. For example, and most crucially, where Ismene presents compliance as the corollary of their gender (“We must remember that we two are women/ so not to fight with men”; ll. 61–62), Antigone presents her own defiance as the corollary of her birth: it is “to serve the children of my mother’s womb” (ll. 511–23, esp. 512) that she defies the law and gives herself over to the judgment of the sover-

<sup>1</sup> All quotations from *Antigone* are from Elizabeth Wyckoff’s translation, in *Sophocles I* (Greene & Lattimore 1954:157–204).

<sup>2</sup> Similarly, at the play’s close, the audience learns of Antigone’s death without witnessing a decision to hang herself.

eign.<sup>3</sup> Ismene cannot persuade Antigone any more than Creon's order could compel her to deny the actuality of her own birth, which, to Antigone, involves an ongoing commitment to specific forms of action.

In *Antigone's* many versions, the character of Ismene is relatively unsettled. Ismene does not appear in every version of the play (Steiner 1984:144); where she does appear, her role varies, ranging from subservient to insurgent (*ibid.*, pp. 144–48).<sup>4</sup> I read Ismene and Antigone as the doubled figure of a woman. They, like all the characters and their relationships in the action, are figurations of particular propositions about social reality—not individuals. To put this another way, the *separate* individualities of Ismene and Antigone are less important (at least, to this kind of mythic reading) than their status as the embodiment of a contrast between human conditions. The fact that Antigone-Ismene is the only character doubled in this way underscores “her” centrality in the play.

The action of the play itself lends support to twinning Ismene and Antigone in this way. They open the play together, emerging from the large door stage center. They exit together from the crucial scene with Creon (after l. 581). They are absent together in the play's final scenes. Once Antigone is led to her inevitable death in the cave, Ismene never reappears from her living death inside the palace.

These parallels extend to the sisters' view of femininity as necessarily involving political acts—but here the parallels stop. Their sense of their own political significance diverges dramatically (literally and figuratively). Ismene views compliance with Creon's command as the corollary of her *gender*. Antigone disobey's Creon's law—in favor of her obligations as a sister—as the corollary of her *birth*. In the play's action, the debate between them heightens the contrast between their positions, but this does not imply that their positions are actually available as alternative courses of action. Such a reading would mean that the play is “about” whether to obey the law. In that case, it offers a

<sup>3</sup> The inversion continues: Ismene argues for compliance, risking offense to “them beneath the earth” (l. 65); Antigone argues for defiance, risking of the outrage of the living (ll. 458–60). Ismene refers to their being “subject to strong power” and “the men in power” (ll. 63, 67); Antigone specifically dismisses the strength of Creon's command (“Nor did I think your orders were so strong / that you, a mortal man, could over-run / the gods' unwritten and unailing laws”; ll. 453–55).

<sup>4</sup> Both elements appear in Sophocles' version. After failing to dissuade Antigone from her insurrection, Ismene presents herself for judgment as an accomplice, but Antigone refuses to accept her act of solidarity, and rejects her (ll. 536–60).

At the end of the Sophocles version, Ismene survives, but “[m]ythographers waver as to Ismene's end” (Steiner 1984:148). Steiner (p. 151) refers to her “classical femininity” and notes (p. 151n.) the interpretive and moral debate over her character: Is she heroic, sane and ethical?—or is she pitiable, crushed? In the reading I offer here, I suggest that the significance of femininity is less as an attribute of either sister than as a focal point to the difference *between* them *in relation* to Creon's power.

very mixed message, since Antigone dies for her disobedience, and Creon is also destroyed.

By reading the “two” women as one doubled feminine figure, the play delivers a unified message on the theme of justice. Specifically, the doubled figure permits the audience to see the *difference* between being and choosing as the sign of *both* the subject’s vulnerability to the king’s power and authority *and* the vulnerability of the king to the force of justice. The figuration of this vulnerability in women makes the message legible and the play’s action credible, as Ismene is made to explain to Antigone in the speech cited above (at l. 61). Eventually, Creon, the king, is made to embody his own twin, as husband and father, paralleling the women’s subject/sister figures, but this twinning is very tentative, as Creon begins to awaken to the idea of justice. The moment comes in Creon’s remorseful speech at the very end of the play—but the difference between power and justice, which he has only just realized, has been defined and embodied in the difference between the two women’s positions.

The difference between being and choosing is the play’s fulcrum. Although Antigone says to Ismene (in l. 555): “you chose to live when I chose death,” their “choices” are fundamentally different. Ismene accepts the conditions imposed by Creon as a moral dilemma, imagining herself—by virtue of her vulnerabilities as a woman—as necessarily choosing between the laws of men and the laws of the gods. Antigone consistently refuses this dilemma, since she never considers abandoning her brother for the sake of her king’s command. As noted above, Antigone’s course of action is defined before the play begins. Ismene does find a choice to make—and her choosing unfolds before our eyes—once she conceives of her femininity in relation to the state. Antigone refuses to consider her own femininity except as an extension of her birth—as her brother’s sister.

Choosing between two unchosen courses, Ismene is transformed into a simulacrum of her self. Her gender—defined (in her own words) by the law’s power over her—becomes the engine of her removal from her own life. Her identity remains accessible—to herself, to us—only through the law; her actions are comprehensible only in its context. Choosing in the universe Creon made, she dies from herself. Antigone, on the other hand, refuses to permit the law to have explanatory power in relation to her own sense of agency.

Creon himself plays cruelly on these meanings of “choice” and Antigone’s commitment when he invents a prison for her where she will “choose” her own death (ll. 773–76): “take her where the foot of man comes not. / There shall I hide her in a hollowed cave / living, and leave just so much to eat / as clears the city from the guilt of death.” Since Ismene is in a sense al-

ready among the dead, she does not appear at the end of the play with the other characters to mourn the death of Antigone.

The action of the play sharpens the focus on particular differences in the relationship between Ismene's and Antigone's relationship to the state as women. Ismene is a sympathetic character, but Antigone is heroic. Ismene's choice is an ordinary one. She prefers to live. Antigone, in refusing choice, places herself in a literally impossible—unlivable—position. Importantly (and this is essential to what follows here), we need *both* characters to understand the course that *either* takes. In other words, we need *both* characters and their *respective* tragedies to comprehend the force of circumstances upon their spirits, and to take the measure of their loss in our own lives.

Ismene and Antigone live in the world Creon made: choices frame events, events shape experience, experiences add up to (or cancel) a lifetime, and so on—but the world is still Creon's. In such a world, Creon will always insist that Antigone's act was a choice; this is how he legitimates his punishing authority. But Antigone has *not* chosen; she has acted. Her act is the extension of her birth. Her act is not an event; it is her meaning as a self, a "meaning-event" (Foucault 1977:174). Antigone insists on her own self-referentiality; she enters the play *already justified*.<sup>5</sup>

By a fatal confusion, Creon himself is blocked from seeing the connections in which Antigone constitutes her claims to personhood. Creon cannot see the justice in Antigone's act because he views her *act* as her *choice*; he cannot imagine otherwise because he also mistakes her *being* for her *gender*. Twice, he says that he will not be ruled by a woman (ll. 526, 678–80), in the context of sealing his case against her. Creon's notion of a woman's gender is the one that Ismene embodies in the play—constituted in obedience to laws, or, to be even more specific, in events in time (e.g. *acts* of law or lawmaking, *acts* of obedience). Antigone refuses to acknowledge this specific concept of "woman" because it would subdivide her personhood (pitting subject against sister), making it impossible for her to act in accord with timeless principles of justice.

These inflections of gender, agency, power and temporality develop around Antigone's character. Antigone alone in the play

<sup>5</sup> In Sophocles' version of the play, Antigone's self-sufficiency is underscored by her exalted liminality: she is between girlhood and womanhood (see, e.g., ll. 578–79), and between betrothal and marriage; the action of the play is staged outdoors, outside palace doors and city gates, and, ultimately, at the mouth of a cave. At the same time, though she might be self-sufficient, Antigone's self is not autonomous. Her self encompasses the "children of [her] mother's womb", and all the citizens who are too "cowed" by Creon to speak (l. 509; see also Haemon's speech, ll. 683–723). While her self-referentiality removes her from the realm of choice, her inclusion of others within her personal meaning hints at other (rival) canvases of self-realization. Similarly, she explains her "defiant" act as an acknowledgment of the compass of divine agency, especially in her sense of the burial rite as a sacred personal duty. Her *act* is her own, but her *agency* is not individual, as Creon would have it.

never refers to her gender, nor even to the man she was to have married (with the exception of her lament en route to her death, ll. 813–14). She does not “have” a gender. *She is*. And Antigone is the first to point to the temporal flaw in Creon’s reasoning, in her distinction between his order and the “unfailing laws” of the gods (l. 455). The Chorus reiterates her temporal distinction between laws in time and timeless laws (ll. 602–13).<sup>6</sup> Again, Creon sees a distinction between Antigone’s logic and his own, but, seeing Antigone as a woman, he initially understands her insurrection only in relation to her disobedience. Only later does he see that her insurrection was lodged against more than his rule—it was also against his injustice.

Until the end of the play, the disobedient act is all-important for Creon, since his own centrality as the ordering principle of the kingdom preresquires a world of *events*, constituted in choices. It is only by this means that he can interpellate himself in the autobiographies of his subjects, short of sentencing them to death. For Antigone, too, meaning is constituted in acts; however, the origin of her actions is not in her choices, but her personhood. Ismene’s agency is of the other kind. Their doubled figure puts the disjunction between being and choosing squarely at stage center. This disjuncture returns us to the essays by Espeland and Gooding.

### Real-World Choices and the Myth of Freedom

Thinking in terms of “cultural constructions” is the beginning of a challenge to the pervasive notion that social life consists of a succession of individual decisions occasioned by the need and opportunity to maximize self-interest. There might seem to be little room around this notion—and less need for it—given its centrality as an organizing principle of many institutions and practices associated with dominant formulations of modernity. Yet room must be found, if people’s “choices” are to be understood for what they are, animated by powerful needs and hedged by powerful constraints. At issue in the problem of the law’s role in the cultural construction of identities is a series of distinctions: between being and choosing, power and politics, meanings and events, names and things, agency and organization, demands for justice and practices of recognition.

Espeland and Gooding, in different ways, address this problem by making questions of identity secondary to a prior ques-

<sup>6</sup> The full passage (ll. 452–57) reads: “Nor did I think your orders were so strong / that you, a mortal man, could over-run / the gods’ unwritten and unfailing laws. / Not now, nor yesterday’s, they always live, / and no one knows their origin in time.” The Chorus echoes this temporal distinction later (ll. 602–13): “What madness of man, O Zeus, can bind your power? / . . . Unaged in time / monarch you rule of Olympus’ gleaming light. / Near time, far future, and the past, / one law controls them all: / any greatness in human life brings doom.”

tion as to how struggles take shape in and around legal institutions, and how legal institutions and processes are implicated in people's sense of who they are as social actors. By focusing on the details of litigation as each case unfolded in practice (rather than on the individual parties), the authors are able to account for both the ongoing interaction between the government and the tribes *and* the ongoing salience of the incommensurabilities that divide the parties.

Appreciating the law's role in the cultural construction of identities allows the the authors scope to probe the cultural, social and legal technologies that fuse issues of representation indelibly to issues of practice and power. Focusing on the legal cases as an event-series of choices would have tended to flatten differences that are clearly of pressing relevance to the Yavapai and Colville people whose concerns are at the heart of the essays. Accordingly, the authors do not expect the law to resolve cultural incommensurabilities, but rather, explore how the legal process is implicated—both positively and negatively—in the formulation of collective self-identity.

The essays by Espeland and Gooding are rich ethnographic explorations of legal contests between the United States and Indian Tribes—the Yavapai (Arizona) in Espeland's case and the Colvilles (Oregon and Washington) in Gooding's. The authors' attention to legal disputes yields detailed accounts of the law's role in the cultural construction of identity. Espeland's examination of Yavapai resistance to federal implementation of the National Environmental Policy Act of 1969 concentrates on the forms and content of the legal dispute and transformations of Yavapai people's affirmative self-identity in relation to these. Gooding's investigation of a current treaty case involving the Colvilles' fishing rights yields a multilayered portrayal of how, in this context, Colville demands were effectively mobilized in available rights idioms, yet in terms that restricted their room for maneuver within the cultural assumptions about race, language, and identity inscribed in those idioms.

While both case studies involve federal-Indian disputes over tribal use of land and natural resources, these essays make two quite different accounts of relationships between "law and society." The differences are important, in that it is the particularities of the disputes—the bureaucratic forms and substantive demands *in practice*—that are salient to the authors' analyses and broader intentions. And the situations of the Yavapai and the Colvilles differ—culturally, historically, legally and in terms of the practical immediacies of their grievances. As the authors make abundantly clear, understanding these particularities as irreducible complexities in the case studies is essential to appreciating how, *in practice*, the terminology, concepts, and practices



that make up the legal disputes in question shift and circulate as cultural expressions.

In their different contexts and from their different points of view, then, Espeland and Gooding track the circulation of the law's signs and practices, emphasizing the perspectives of Indian litigants and their supporters. The law's transformative power in relation to Yavapai or Colville people's cultural identity inheres in the practical uses to which they put the law's idioms, limits, and opportunities as *their own* cultural expressions. This does not make these essays case studies of modernization, legal pluralism, or cultural change; any of these would presuppose that there is some a priori entity that can be known as authentically Yavapai or Colville. That is precisely the view of culture that both authors contest in different ways—and that the Yavapai and Colvilles also contest through a legal process built on the premise of primordial “authenticity.”

Both authors draw parallels between their case studies and other recent ethnographic reassessments of colonialism in and beyond North America.<sup>7</sup> Their references to these works indicate the broader significance they attach to their respective projects—in showing law, everyday social experience, and social science to be mutually implicated in specific ways. For Espeland, the significance of the Yavapai situation leads her to consider the law's language of interests and the limits of commensurability. For Gooding, the wider implications of the study are in the domain of rights language, and the assumptions about nature, culture, and society inscribed in them. In both case studies—as in the wider literature reassessing colonial experience—lexicons of cultural identity and social process, including legal process, are shown to travel easily across legal, academic, and everyday discursive genres and institutional domains—and these are also part of the story.

Espeland's and Gooding's references to collective identities as “cultural constructions” is not to be confused with some pre-given collective subjective experience of solidarity or cultural homogeneity, though solidarities are part of the story these authors tell. The term itself bespeaks a determined effort to avoid both the romantic and racist misreadings of the modern word *culture*—and, yet, equally important, also to avoid confusing discrimination or disadvantage with identity. Espeland's and Gooding's approaches to experience through “cultural constructions” point to ways in which institutions of the state are implicated in subjective experience, as well as to how people whose subjectivities are recognized and acknowledged only beyond the margins

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<sup>7</sup> Clifford 1988; Comaroff & Comaroff 1991; Mertz 1988; see also Cooper & Stoler 1989. For specific attention to the law's availability as an idiom of resistance in colonial and postcolonial contexts, see Lazarus-Black 1994 and Lazarus-Black & Hirsch 1994.

of official recognition marshal forces to put their needs forward as legal demands.

Yet, the very notion of subjectivity is also (by implication) repositioned in these works—since both authors have rejected a concept of culture as a bounded collective entity and, presumably with it, the corollary notion of persons as bounded individual entities. The ethnographic reassessments of colonial experience from which Espeland and Gooding draw some of their own energy for reflexive critique emphasize agency and resistance as fresh starting points from which to reread colonial encounters. In those contexts, as in the preceding articles, the analytical relevance of “identity” emerges as *social action*—as experience, not as a representational space or, even less, a category or type.

It is no more possible to conceive of cultural identity apart from the arenas of contest in which questions of identity arise and are perforce answered somehow than it is to imagine Ismene and Antigone without each other, Creon, or the war that made the dead man a traitor. In the drama, Antigone’s tragedy serves to illuminate what would otherwise be invisible by virtue of its taken-for-granted everyday quality, and that is the construction of *Ismene’s* autobiography within the premise of her vulnerability to the law. Ismene despairs of precisely what Antigone embodies, that is, the efficacy of her personal agency beyond the terms the law allows. This situation does not make Ismene’s life inevitably tragic (although it is tragic in the play). It does make her character’s identity incomprehensible apart from play of power and force on which it is contingent; she draws this contingency herself, in her appeal to Antigone to obey the law.

In the world of events, as Espeland and Gooding suggest, a reference to the cultural construction of identities also places in the foreground the contingencies that link signs of self-recognition and solidarity to fields of power. “Cultural identity” is a dynamic and composite set of signs by which the potency of cultural solidarity might be registered and confirmed within particular social fields and contests by participants and observers alike (although not necessarily in the same way), and incorporated into narrative, formulations of agency (e.g., in lawsuits, or in social science). In this sense, identity can be said to be subjective and private without being somehow “interior” or utterly beyond the limits of ethnography; subjectivity and privacy are political and legal relations, in these contexts.

More than political, identity *is* politics in the foregroundings Espeland and Gooding provide for us. Neither construals nor structures, “cultural constructions” (in Espeland’s and Gooding’s pens) connect social inquiry to legal and local processes as well as to a vital mythos of selves, persons, and groups. Never the reciprocal of *deconstruction*, the “cultural construction of identities” in these articles refers to a *doubling* of the registers in which

human experience can be felt, known, and recorded by both participants and social scientists. The two registers are in the world of events and in an imagined world of pure, yet still social, freedom. In *Antigone*, these two worlds and the connecting “space” between them is figured in the two sisters. Crucially, both worlds are on stage; otherwise the connection between the play’s action and the one of justice would be lost. In the world of events, as Espeland and Gooding portray it, the horizon between the world of events and the imaginary world of pure freedom materializes as demands for justice before the law, and as cultural analysis. And, as in *Antigone*, the light from that horizon is well within our field of vision, illuminating the action. “Cultural constructions,” then, mark conceptual sites where the empirical, interpretive, reflexive and reformist dimensions of social inquiry are inextricably joined.

As in relation to *Antigone*, if we can talk about cultural constructions in real life, it is not to imply that some things are *not* cultural constructions, but to garner some means of registering the social effects—positive, negative, and ambiguous—of individual and collective agency in a highly uncertain world. The footing under “cultural constructions” is neither “natural” nor “authentic” (as some usages would seem to imply), but the possibility of justice and the promise of change—a mythic freedom without which the world of events would be inconceivable as a stage for social analysis, its powers unnameable. Cultural constructions might yield others, but there is no escaping them altogether, any more than Antigone could escape from the stage, or we can vanish into the mythic realm of freedom that makes social science thinkable and relevant.

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