1995

Use of Non-Discriminatory Language in Law

Mary Jane Mossman
Osgoode Hall Law School of York University, mjmossman@osgoode.yorku.ca

Follow this and additional works at: http://digitalcommons.osgoode.yorku.ca/scholarly_works

This work is licensed under a Creative Commons Attribution-Noncommercial-No Derivative Works 4.0 License.

Recommended Citation

This Article is brought to you for free and open access by the Faculty Scholarship at Osgoode Digital Commons. It has been accepted for inclusion in Articles & Book Chapters by an authorized administrator of Osgoode Digital Commons.
Use of Non-Discriminatory Language in Law

Mary Jane Mossman*
Osgoode Hall Law School, Toronto

‘Few would suggest that sexual or racial inequality exists because of language use. Nor would many argue that banishing sexist and racist labelling would in itself result in a just society. At the same time, it is clear that language not only reflects social structures but, more importantly, sometimes serves to perpetuate existing differences in power; thus, a serious concern with linguistic usage is fully warranted’.

As Frank and Treichler suggested in Language, Gender and Professional Writing, the relationship between non-discrimination and language needs to be examined carefully. Because law is made up of words: words which are written in constitutions, statutes, reported decisions and negotiated agreements, and words which are spoken in courts and tribunals and other professional settings by lawyers and adjudicators, the use of language is fundamental to law. For this reason, lawyers (as well as linguists) need to reflect on how to use non-discriminatory language.

This article focuses on non-discriminatory language in relation to gender, recognising that there are important links between gender and other aspects of non-discrimination for members of the legal profession. It begins by explaining why lawyers need to write and speak using non-discriminatory language, and then outlines some ways to achieve non-discriminatory language, especially non-sexist language, in English and in French. It concludes by linking these language issues to broader challenges of non-discrimination in the legal profession.

Why should lawyers use non-discriminatory language?

There are at least three responses to this question — lawyers should use non-discriminatory language:

1. to promote accuracy in legal speech and writing;
2. to conform to requirements of professional responsibility; and
3. to satisfy equality guarantees in laws and constitutions.

Accuracy

As Professor Christine Boyle has argued, the use of the word ‘man’ to mean ‘human’, and the use of the pronoun ‘he’ to refer to both ‘he and she’ often creates problems of ambiguity: ‘[Such language is] ambiguous, an important aspect for lawyers (who have never as a group favoured elegance over clarity) since ‘he’ is not always conventionally understood to mean ‘he or she’ any more than ‘person’ has been conventionally understood to mean male or female human being. This would be merely irritating if it were not for the real danger that use of male language has a limiting and perverting effect on intellectual inquiry.’

In reviews of the history of usage of the pronoun ‘he’, scholars have concluded that the ‘rule’ that the masculine pronoun included both masculine and feminine meanings was first established in the mid-eighteenth century, but this usage was never fully accepted by other grammarians of the eighteenth century or later. Yet, in spite of this lively debate among linguists, the English Parliament enacted Lord Brougham’s Act in 1850, the Acts Interpretation Act, an Imperial statute which defined the legal meaning of words importing the masculine as including both masculine and feminine for many common law jurisdictions. However, as Dr Jocelynne Scutt in Australia has shown so clearly, the legal interpretation of masculine pronouns has not been uniform or without controversy. Similarly, the problem of ambiguity in the use of masculine pronouns has been noted by scholars of legal theory, such as Professor Karen Busby, who documented such problems in the work of Aristotle, H L A Hart and Rawls. The problem has also been widely documented in social science studies which have demonstrated that both children and adults (of both sexes) routinely form mental pictures of males when they encounter the generic ‘man’ and the pronoun ‘he’. For legal academics, Professor Boyle has advocated clearer standards for law school casebooks; as she has stated, ‘“Men and the Law” is tolerable as an area of intellectual activity, but not if it is masquerading as “People and the Law”’. Thus, the use of non-discriminatory language requires careful choices to prevent unintended over-inclusiveness, but the objective remains an important one: the accurate expression of ideas in legal writing and speech.
Professional integrity and responsibility

‘A profession’s language is part of its public representation. Correspondence...style manuals [or precedents], job descriptions,... letters of recommendation, jargon, brochures, books, conference session titles—all communicate on behalf of the entire profession and help determine how it is perceived.’

This comment about a professional association concerned with language (the Modern Language Association in the USA) is equally apt to describe the need for the legal profession to adopt non-discriminatory language, both in terms of new demands in the business world and also because of requirements of Codes of Professional Conduct. In a survey of Canadian and American Codes, Chris Tennant identified three general provisions which have been used to enforce duties of non-discrimination in the legal profession (including the duty to use non-discriminatory language).

These included the duty to act with integrity, the duty to uphold the administration of justice, and the duty of courtesy and good faith towards other lawyers. Tennant also documented a number of cases in the United States in which these duties were breached by the use of inappropriate, discriminatory language. As the court held in In re Vincenti:

‘Any kind of conduct of verbal oppression or intimidation that projects offensive and invidious discriminatory distinctions, be it based on race or colour, as in this case, or, in other contexts on gender, or ethnic or national background or handicap, is especially offensive’.

In both Canada and the United States, several jurisdictions have recently introduced express provisions on non-discrimination to augment the more general Code provisions.

In this way, professional conduct codes reflect changing ideas about professional integrity and responsibility. As Dean Lynn Smith has suggested, the issue of ‘freedom of choice’ in language usage is one which must be understood in the context of late 20th century legal norms about non-discrimination.

The freedom to harm others by discriminating against them has been restricted in the late 20th century in the same way that the freedom to harm others by selling them defective goods was restricted a bit earlier on. The offence that people feel when treated with disrespect based upon their gender, race, disability, sexual orientation, age, and the like, is not a matter of social nicety but carries the risk of seriously affecting the respect in which the legal profession and the justice system are held.’ (Emphasis added)

Equality guarantees in law

The use of non-discriminatory language by Canadian lawyers is also consistent with the entrenchment of equality rights in the new Constitution, effective 1985. Although the Canadian equality guarantee is fairly recent, the jurisprudence to date has been quite responsive to the need for ‘substantive’, not merely ‘formal’, equality. In this way, the constitutional equality guarantee has created expectations of equal treatment and opportunities on the part of women, including women who are lawyers. As in the United States, there have been numerous task force inquiries on gender bias in the law and the legal profession in Canada, and task force reports have generally concluded that gender bias exists in the legal profession in Canada as in other countries. In this context, language which recognises women as equal members of the legal profession is a necessary, but not sufficient, condition of achieving equality within the profession. As Dean Sheilah Martin has suggested, even though women have achieved the right to become lawyers, practices such as the use of discriminatory language ensure that they continue to be ‘excluded’ from full participation in the profession.

Beyond the issue of language and equality for women as members of the legal profession is the issue of legal language in statutes and other documents which may create inequality for women more generally. This problem was addressed some years ago in Canada in a now-famous exchange in the McGill Law Review between Marguerite Ritchie, a lawyer who claimed that the Interpretation Act failed to accord women equality with men, and Elmer Driedger, a drafter employed by the federal government. Using the story of Alice in Wonderland, Ritchie argued that language usage needed to change to accord with legal equality objectives, suggesting that: ‘Everyone who defends this system of using male terms to include women helps to cheat women’. In this way, the existence of constitutional guarantees of equality offers another rationale for the use of non-discriminatory language by members of the legal profession.

Achieving non-discriminatory language in law

The resources for ensuring non-discriminatory language in law now include a large number of general linguistic guides, several of which are listed at the end of this article. In Canada, there are similar guides in many universities and other workplaces, and an excellent guide for non-discriminatory

**False Generics: L'Homme and Man**

Use of the word 'man' in English and the word 'homme' in French often create ambiguity because they are not always generic. It is important, however, to note that it is 'man' and 'homme' as 'morphemes' or units of meaning which create problems; thus, the English word 'human' does not create a problem because 'hu' is not a unit of meaning; by contrast 'policeman' is a sexist word. There are some simple rules to avoid discriminatory language caused by the false generics 'homme' and 'man'. For example:

(a) Instead of 'man', 'men' and 'mankind', use 'person/people', 'human being(s)', and 'humanity'. In French, instead of 'les hommes', use 'les êtres humains', 'les hommes et les femmes', or 'les gens'.

(b) Instead of 'no man', use 'no one'; instead of 'fellow man', use 'people', 'citizens', 'friends', or 'human beings'. In French, instead of 'l'homme', use 'la personne'; recast sentences to use an indefinite pronoun ('quiconque') or use both masculine and feminine forms.

(c) Occupational titles can be altered to remove 'man'. In French, feminine equivalents of male job titles can be formed, or male and female alternatives without 'homme' can be used. In English, the morpheme 'man' can be replaced.

<table>
<thead>
<tr>
<th>English Term</th>
<th>French Equivalent</th>
</tr>
</thead>
<tbody>
<tr>
<td>freshman</td>
<td>homme d'affaires</td>
</tr>
<tr>
<td>garbageman</td>
<td>femme d'affaires</td>
</tr>
<tr>
<td>groundsman</td>
<td>homme politique</td>
</tr>
<tr>
<td>fireman</td>
<td>politicien ou politicienne</td>
</tr>
<tr>
<td>barman</td>
<td>personne</td>
</tr>
<tr>
<td></td>
<td>hommes</td>
</tr>
<tr>
<td></td>
<td>femmes</td>
</tr>
<tr>
<td>man-made</td>
<td>manufacturé, synthétique</td>
</tr>
<tr>
<td>manpower</td>
<td>personnel</td>
</tr>
<tr>
<td>grantsmanship</td>
<td>travailler</td>
</tr>
<tr>
<td>workmanship</td>
<td>artisan</td>
</tr>
</tbody>
</table>

At the same time, remember that sometimes it is appropriate for people to be men and women. As Conrad Teitell has explained:

'It's all right to call a man a man and a woman a woman. Women (not people) are pregnant. Men (not people) are sperm donors. And you can call a male baseball player a second baseman. But if a woman plays that position, she's a second basewoman'.

In this context, however, be aware that the word 'woman' also has exclusive meanings, representing primarily white and mainstream women, thus excluding others. In the face of difficulties like these, Frank and Treichler recommend discussion and negotiation; they also suggest that 'when members of a group specify how they wish to be designated, take their arguments seriously and, if possible, respect their preferences'.

**Pronouns**

The pattern of pronouns in different languages varies greatly. In English, the first person may be both singular and plural ('I' and 'we'), while the second person is the same for both singular and plural ('you'). In neither of these is there any gender differentiation. In the third person in English, however, pronouns are gendered in the singular ('he' or 'she'), but undifferentiated by gender in the plural ('they'). By contrast, French has two pronouns in the second person ('tu' and 'vous'), and also differentiates by gender in both singular and plural in the third person ('il' and 'elle' and 'ils' and 'elles'). There are other languages which do not distinguish by gender in the third person or which may have additional pronouns to those used in English and French.

The issue of pronouns in French is linked to the broader issue of French as a gendered language; that is, every noun in French is marked as masculine or feminine (not necessarily linked to biological sex). In this context, the search for non-discriminatory language in relation to pronouns is necessarily part of a broader problem. As with English, there is some resistance to language change in French, although King's view is that 'in the area of nonsexist language, Quebec has shown a more progressive and informed attitude than has France'.

Here are some suggestions to overcome the 'false generic' pronoun problem in English and French:

(a) Replace 'he' in English with 'he or she'; and in writing with 'he/she'. In French, replace 'il' with 'il ou elle'; 'ils' can be replaced with 'ils ou elles'. In French, the masculine and feminine forms of numerous pronouns can be used together: 'tous et toutes', 'chacun et chacune', 'ceux et celles', 'aucun et aucune', 'nul et nulle', 'pas un et pas une', 'certains et certaines', and 'quelques-uns et quelques-unes'.

(b) In English, re-write the sentence in the plural.

(c) In English and French, use an indefinite pronoun: 'one' or 'on'; or use the second (or first) person

If a student has problems, he can take another course if problems arise.
Si un étudiant a des problèmes, il peut suivre un autre cours.

On peut suivre un autre cours s'il y a des problèmes.

(d) In English, using 'they' as an indefinite singular pronoun. This solution remains controversial, even though it was routinely used in earlier times by authors such as Jane Austen and Jonathan Swift. However, such usage tends to be frowned on in professional writing, and legal drafters such as G C Thornton have warned that plural pronouns should not be used to refer to singular nouns in statutory language because 'such usage while of undoubted antiquity is generally accepted as ungrammatical and it may contribute to ambiguity'.

(e) In English and French, restructure the sentence to eliminate the use of the pronoun.

The student with a disability may feel more at ease if he explores the campus prior to the first day.

La personne choisie occupera un poste de directeur.

(f) In English, use the appropriate gender pronouns when the context suggests that either men or women are intended.

Non-sexist vocabulary

The use of non-discriminatory language requires careful attention to the meanings of words, in terms of both dictionary and more colloquial meanings. Frank and Treichler include a discussion of the evolution of meanings for words describing 'disability', for example, describing the innovative use of language in this context in recent years. They also note the 'false universals' which may affect accuracy in writing about race. Non-discriminatory language for these situations, as for non-sexist writing, requires both attention to existing vocabulary and also innovative practices. Thus, while the primary focus here is nonsexist writing, it is important to reinforce the warning offered by Frank and Treichler that 'these issues [gender, race, and disability et cetera] intersect, illuminating once again the social and cultural complexity of language and its defiance of the quick fix'.

A full discussion of non-sexist vocabulary is a large task, and beyond the scope of this article. Here are some suggestions for non-sexist writing in two contexts: job titles and forms of address, an issue for both English and French; and words and word groups which need to be avoided to achieve non-discriminatory writing.

Use job titles in English and French which are non-sexist

English

This recommendation is somewhat more difficult in practice than in theory, but is generally accomplished by using gender-neutral terms.

Gender-neutral terms are achieved by:

(i) Removing the compound 'man'

fireman firefighter
policeman police officer

Note: The use of 'person' is not generally recommended; in some cases, it is merely coy, while in others, it is a euphemism for 'women', eg. 'chairman' for a man and 'chairperson' for a woman.

(ii) Replacing the 'weakening' suffix

authoress author
sculptress sculptor
poetess poet
songstress singer
jockette jockey

Note: The word 'actress' seems to be in transition in this context; women now often refer to themselves as 'actors'.

(iii) Refraining from using 'woman' as an adjective

woman lawyer lawyer
woman doctor doctor

French

Because the French language has grammatical gender (all nouns are marked as masculine or feminine), the search for nonsexist alternatives in French has led researchers (at least in Quebec) 'to the recognition of, indeed the creation of, gender-marked feminine forms'. In the evolution of feminine forms, it has also been suggested that there have been some 'aberrations' such as 'Madame la juge' (the noun is 'le juge') or 'Madame la directeur' (the noun is 'le directeur').

In Quebec, the preference seems to be the use of a feminine article along with the masculine form of noun in some cases, or with a 'femininised noun' in others; however, the practices in Quebec differ in a number of ways from those in France, so great care is needed. This overview presents examples used in Quebec.

(i) Using a feminine article

un membre une membre
un notaire une notaire
un ministre une ministre
un chef une chef
un témoin une témoin

In such cases, it is never appropriate to use the adjective 'femme'.

International Legal Practitioner  March 1995
(ii) Some special cases
In Québec, L'Office de la langue française has authorised the use of 'feminine' forms of male job titles, along with the feminine article. Not all of these forms are recognised in France however; these examples have been borrowed from a much fuller discussion in Talking Gender.

<table>
<thead>
<tr>
<th>English</th>
<th>French</th>
</tr>
</thead>
<tbody>
<tr>
<td>un chercheur</td>
<td>une chercheuse</td>
</tr>
<tr>
<td>un professeur</td>
<td>une professeure</td>
</tr>
<tr>
<td>un conférencier</td>
<td>une conférencière</td>
</tr>
<tr>
<td>un conseiller</td>
<td>une conseiller</td>
</tr>
<tr>
<td>un policier</td>
<td>une policière</td>
</tr>
<tr>
<td>un expert</td>
<td>une experte</td>
</tr>
<tr>
<td>un consultant</td>
<td>une consultante</td>
</tr>
<tr>
<td>un président</td>
<td>une présidente</td>
</tr>
<tr>
<td>un doyen</td>
<td>une doyenne</td>
</tr>
</tbody>
</table>

(iii) Use the following kinds of salutations for persons whose individual names are unknown:

<table>
<thead>
<tr>
<th>English</th>
<th>French</th>
</tr>
</thead>
<tbody>
<tr>
<td>To Whom it May Concern</td>
<td>A qui de droit</td>
</tr>
<tr>
<td>Dear committee</td>
<td>Chers/Chères membres du comité</td>
</tr>
<tr>
<td>Dear colleague</td>
<td>Cher/Chère collègue</td>
</tr>
<tr>
<td>Dear registrar</td>
<td>Monsieur le Registraire/ Madame la Registraire</td>
</tr>
<tr>
<td>Dear Chair/President</td>
<td>Monsieur le Directeur/ Madame la Directrice</td>
</tr>
<tr>
<td>Dear Madam or Sir</td>
<td>Madame/Monsieur</td>
</tr>
</tbody>
</table>

Note: increasingly, it is acceptable to use no salutation at all, or to use another form of correspondence such as a memo instead of a letter.

When writing to a person whose name (but not sex) is known, use a salutation such as 'Dear C A Phillips'.

(iv) Use parallel descriptions of men and women

<table>
<thead>
<tr>
<th>English</th>
<th>French</th>
</tr>
</thead>
<tbody>
<tr>
<td>Le juge Lamer et Madame</td>
<td>Les juges Lamer et L'Heureux-Dubé</td>
</tr>
</tbody>
</table>

Choosing a non-sexist vocabulary

Most guidelines for nonsexist language contain lists of words which are best avoided because their meanings have become, apparently irredeemably, sexist. Thus, for example, the Ontario Women's Directorate has suggested complete avoidance of words such as 'henpecked', 'mama's boy', 'plain Jane', and 'sissy'; and there is general agreement that the word 'lady' should be used only if men are also referred to as 'gentlemen'. In addition, the Directorate has suggested the use of inclusive words instead of stereotyped words, such as the following examples:

<table>
<thead>
<tr>
<th>Stereotyped</th>
<th>Inclusive</th>
</tr>
</thead>
<tbody>
<tr>
<td>bad guy</td>
<td>villain, rogue</td>
</tr>
<tr>
<td>bag lady</td>
<td>street person</td>
</tr>
<tr>
<td>bag man (political)</td>
<td>go-between, fixer</td>
</tr>
<tr>
<td>con man</td>
<td>con artist</td>
</tr>
<tr>
<td>mother hen</td>
<td>busybody, fussbudget</td>
</tr>
<tr>
<td>old maid</td>
<td>single woman (or avoid)</td>
</tr>
<tr>
<td>old wives' tale</td>
<td>myth, folktale</td>
</tr>
<tr>
<td>spinster</td>
<td>single woman</td>
</tr>
<tr>
<td>tomboy</td>
<td>rough and tumble child</td>
</tr>
<tr>
<td>yes man</td>
<td>toady, hanger-on, sycophant</td>
</tr>
</tbody>
</table>

In addition, non-sexist language guidelines often offer cautions about the ways in which words may take on differing meanings when used in relation to women, by contrast to men. Frank and Treichler quote a statement by Marlo Thomas in 1980 on the different and gendered meanings of the adjective 'ruthless': 'A man has to be Joe McCarthy to be called ruthless. All a woman has to do is put you on hold'.
That the gap length for Hill was shorter than for Committee. In general terms, the research showed that their responses to questions and the beginning of the 'wait time' between the end of questions was less authoritative in courtrooms. Indeed, there is evidence that non-discriminatory language is connected to issues of power.

The use of non-discriminatory language is not an isolated issue for the legal profession. Non-discriminatory language use is linked to other professional concerns, including, for example, positions of leadership for women as lawyers. Canadians often take pride in the fact that three women have been appointed to the Supreme Court of Canada, that a woman has become Prime Minister, and that the Canadian Bar Association has twice elected women as President. These recent accomplishments are important, but not yet sufficient. One has only to reverse the gender and realise that women have never had access to power as lawyers to the same extent as men: it is almost impossible to imagine 'only' three men ever on the Supreme Court of Canada, 'only' one male Prime Minister in history, or 'only' two male Presidents of the Canadian Bar Association. As the quotation at the beginning of this paper suggests, the issue of language is connected to issues of power.

The issue of non-discriminatory language is also related to differences in speech patterns for men and women, and the way these differences affect relative access to the power of speech. As Lynn Hecht Schafran has reported, language patterns frequently used by women ('characterised by questioning intonations, hedges, and overly polite forms') may be less authoritative in courtrooms. Indeed, there is recent scholarship about the patterns of speech in the Anita Hill/Clarence Thomas hearings which suggests significant differences between Hill and Thomas in terms of 'wait time' between the end of their responses to questions and the beginning of the next question from a member of the US Senate Committee. In general terms, the research showed that the gap length for Hill was shorter than for Thomas. As well, Thomas gave more monosyllabic answers than Hill, a result which indicates that Thomas faced an environment favouring an effortless explanation... much more often than Hill did. In such a context, Hill not only had more difficulty making her position understood but she also faced more interruptive speech patterns than did Thomas. The problems experienced by battered women in court proceedings provide another example of the ways in which women's speech often remains 'unheard' by lawyers and judges.

Thus, the issue of non-discriminatory language in law needs to be understood in the context of power: power which is revealed in the relative access of women and men to leadership positions in law, in the subtle use of pictures which devalue women in legal and other publications, and in the patterns of speech of members of the legal profession which may undermine women's voices and fail to understand their experiences of harm. Moreover, the issue of non-sexist language is also connected to other aspects of non-discriminatory language use: the need to use words so as to avoid bias about race, class, sexual orientation, ability, etc, and to encourage innovation and inclusiveness for people in these groups, some of whom are women. In these cases as well, the issue of non-discriminatory language use is an issue about power. For members of the legal profession especially, the use of non-discriminatory language is a necessary part of achieving equality and non-discrimination goals in the law.

* Professor of Law. The research assistance of Susan Saltzman, Class of 1994, Osgoode Hall Law School, and the technical assistance of Hazel Pollack are gratefully acknowledged. This article was first presented as a paper at the IBA Section on Business Law and Section on General Practice Conference in New Orleans, October 1993.

**List of References**

Baron, D, Grammar and Gender (New Haven, Yale University Press: 1986).

Bodine, 'Androcentrism in Prescriptive Grammar: Singular "they", Sex-Definite "he", and "he or she"' (1973), 4(2) Language in Society 129.


Eichler, Margrit and Lapoint, Jeanne, On the Treatment of the Sexes in Research (Social Sciences and Humanities Research Council of Canada: 1985).
Foreign Law Firms in the PRC

Jingzhou Tao
Avocat à la Cour de Paris, Coudert Brothers,
Beijing Office

The Chinese Ministry of Justice (MOJ) began drafting a regulation authorising foreign law firms to open their representative offices prior to 1980. The official provisions on such authorisation were only published in July 1992. The Chinese Government was aware of the existence de facto of foreign law firms in China but it did not take any measure either officially to authorise such foreign law firms or to force them to close their doors. Almost all foreign law firms operating in China had been doing so in some sort of disguised form before. However, things have changed since July 1992. According to recent newspapers, some 41 overseas law services from the United States, Hong Kong, Taiwan and countries in the European Community have set up offices in Chinese cities, such as Beijing, Shanghai and Guangzhou.

This article will focus on the foreign lawyer’s role in foreign investments in China. We will first consider foreign firms’ activities before official approval of the MOJ, and then we will briefly examine the activities which are permitted and prohibited by the Provisions and finally we will discuss daily activities of a foreign law firm in China.

■ ‘To be or not to be’ in China

Although foreign law firms have been operating in China for more than a decade, they have been doing so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disguised forms, with no formal legal recognition as law firms. Now they may register so in various disgu...