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COURTS: THE LEX MUNDI PROJECT

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ABSTRACT

In cooperation with Lex Mundi member law firms in 109 countries, we measure and describe the exact procedures used by litigants and courts to evict a tenant for non-payment of rent and to collect a bounced check. We use these data to construct an index of procedural formalism of dispute resolution for each country. We find that such formalism is systematically greater in civil than in common law countries. Moreover, procedural formalism is associated with higher expected duration of judicial proceedings, more corruption, less consistency, less honesty, less fairness in judicial decisions, and inferior access to justice. These results suggest that legal transplantation may have led to an inefficiently high level of procedural formalism, particularly in developing countries.

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I. Introduction.

Much of economic analysis – from the theory of the firm, to labor economics, to finance – is based on the idea that individuals and firms can use enforceable contracts to improve their well-being. Such key results as the Fundamental Welfare Theorems (Arrow and Hahn 1971) and the Coase Theorem (Coase 1960) show that welfare-improving contracting can achieve perfect efficiency. More recently, economists have recognized the limitations of the contracting process, such as asymmetric information (Stiglitz 2000), free-riding (Olson 1965), and "describability" of various contingencies (Grossman and Hart 1986). Yet even this literature focuses on the problems of negotiating contracts and takes their enforcement as free and perfect.

In economic analysis, the institution that enforces contracts both perfectly and freely is the courts. This theoretical view of perfect enforcement contrasts sharply with the empirical observation that courts are often slow, inefficient, and even corrupt. It is the enforcement of contracts by courts, rather than the negotiation of contracts, that often limits Pareto-improving trade (Johnson, McMillan and Woodruff 2002). Indeed, informal contract enforcement appears as a solution to court failures (Macaulay 1963, Galanter 1981, Ellickson 1991).

In this paper, we attempt to understand in more detail how simple disputes are resolved in courts. We do so in a comparative study of how a plaintiff can use the official court system to evict a non-paying tenant and to collect a bounced check in 109 countries around the world. We measure some of the key structural aspects of the operation of courts and examine their consequences for the quality of formal dispute resolution.

The focus on courts is crucial. For many corporations and sophisticated traders, alternative methods of dispute resolution substitute for courts. Likewise, many less wealthy individuals often

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resolve disputes privately, using neighbors, shamans, or violence. Nonetheless, we believe that a well functioning system of public dispute resolution, particularly for ordinary people, is an essential element of justice. The Enlightenment idea was precisely to make courts accessible to ordinary citizens, thereby securing justice and avoiding privatization of enforcement. If ordinary people fail to find justice in state courts, their likely alternative is not some efficient method of private dispute resolution, but rather violence or acceptance of injustice.

In a theoretical model of an ideal court, a dispute between two neighbors can be resolved by a third on fairness grounds, with little knowledge or use of law, no lawyers, no written submissions, no procedural constraints on how evidence, witnesses, and arguments are presented, and no appeal (Shapiro 1981). Yet in reality, most legal systems heavily regulate dispute resolution: they rely on lawyers and professional judges, regiment the steps that the disputants must follow, regulate the collection and presentation of the evidence, insist on legal justification of claims and judges' decisions, give predominance to written submissions, and so on. Such regulations, which we call procedural formalism or formalism for short, can have profound consequences for the quality of dispute resolution, particularly in simple disputes material to an average person. For this reason, we focus on measuring and assessing the consequences of formalism of the legal procedure.

There are several important reasons why procedural formalism exists, some good and some bad. The sovereign often has an interest in how the dispute is resolved, to punish undesirable conduct, to establish precedents, or to promote deterrence, but also to help his friends and hurt his enemies. Formalism, like all regulation, gives the sovereign more control over the outcomes relative to the informality of the neighbor model. And like all regulation, it can be used both to enhance public welfare and to facilitate sovereign abuse of the public. Informal justice may also be subject

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to various kinds of subversion: one neighbor may be more powerful than the other, and therefore able to influence the judge. Glaeser and Shleifer (2002) argue that regulation of dispute resolution can be used to limit subversion. Likewise, formalism may protect weak members of the community from judicial and prosecutorial abuse, ensuring fairness and accuracy of the process. As the great German jurist Rudolf von Jhering exclaimed, "form is the sworn enemy of arbitrary rule, the twin sister of liberty" (1898, p. 471). Yet the potential benefits of formalism may come at a heavy cost in terms of delay of adjudication, and the consequent reluctance of disputants to use the legal system. Moreover, it remains a wide-open question of how much justice formalism really buys.

We have three broad goals. First, we aim to measure the formalism of the court procedure around the world. Second, we examine empirically the consequences of formalism for the quality of the judicial system. We examine both the expected duration of dispute resolution and such crucial measures of its quality as access to justice, fairness, impartiality, consistency, and honesty. Although we do not have a direct measure of accuracy of dispute resolution, the measures of consistency and fairness come relatively close. At least for simple disputes, this analysis enables us to ask whether formalism secures justice. Third, we attempt to interpret the evidence in light of alternative theories of institutions. Specifically, we consider the possibility that the transplantation of Western legal procedures to developing countries may have led to undesirably high levels of formalism.[2]

To pursue these goals, in cooperation with Lex Mundi, the largest international association of law firms, we describe the exact procedures used to resolve two specific disputes in 109 countries.

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[2] One additional goal we pursue is to examine other determinants of judicial quality, such as the incentives of judges and regulators. Proper incentives and controls, such as mandatory time limits on judges and proper compensation systems for attorneys, have been said to improve quality (Messick 1999). We do not find much evidence for the proposition that these factors effect judicial quality; we summarize our findings in Section V.

These are the eviction of a residential tenant for non-payment of rent and the collection of a check returned for non-payment. We described the cases to a law firm in each country in great detail, and asked for a complete write-up of the legal procedures necessary to dispute these cases in court and the exact articles of the law governing these procedures. For comparability, the cases were specified so that the plaintiff has fully complied with the agreement (is 100% right), and the defendant has no justification at all. We also assumed in both cases that the defendant presents a poorly justified opposition (so default judgment is not an option) and avoids voluntary payment. To understand how courts work, we also specified that the case does not settle, and proceeds through the system until the ultimate judgment and its enforcement.

The focus on these two specific disputes has a number of advantages. First, they represent typical situations of default on an everyday contract in virtually every country. The adjudication of such cases illustrates the enforcement of property rights and private contracts in a given legal environment. Second, the case facts and procedural assumptions could be tailored to make the cases comparable across countries. This makes these cases distinct from other situations, such as divorce, in which cross-country comparability is much harder to achieve. Third, the resolution of these cases involves lower level civil trial courts in all countries (unless Alternative Dispute Resolution is used). Because these are the courts whose functioning is most relevant to many of a country's citizens, the focus on the quality of such courts is appropriate in a development context. Fourth, we focus on simple disputes resolved in lower level courts. For more complex disputes, additional issues arise, and it may not be appropriate to generalize our findings. For example, alternatives to the judicial system, such as commercial arbitration, are available in many countries to large companies, though not to ordinary citizens. Perhaps even more importantly, formalism may be essential for justice in

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complex disputes even when informality is adequate for the simple cases we consider.[3]

Using the data from the participating law firms, we construct measures of formalism (separately for eviction and for check collection), defined here as the extent to which the regulation causes dispute resolution to deviate from the neighbor model. Our data cover seven broad aspects of formalism: (1) the use of professional judges and lawyers as opposed to lay judges and self-representation, (2) the need to make written as opposed to oral arguments at various stages of the process, (3) the necessity of legal justification of various actions by either disputants or judges, (4) the regulation of evidence, (5) the nature of superior review of the first-instance judgment, (6) engagement formalities during the dispute (such as service of process by a judicial officer), and (7) the count of the number of independent procedural actions required by law. Each category includes a number of measures of formalism. From these data, we construct seven sub-indices of different aspects of formalism, and then aggregate them into an overall index.

Research in comparative law and legal history suggests that formalism varies systematically among legal origins (Berman 1983, Merryman 1985, Damaska 1986, Schlesinger et al. 1988). In particular, civil law countries generally regulate dispute resolution, including the conduct of the adjudicators, more heavily than do common law countries. What is particularly important about this observation for our purposes is that most developing countries have inherited much of their legal procedures from their colonizers. Because legal procedures have been transplanted mostly involuntarily, and have to a significant extent remained unchanged over decades, legal origin is a

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[3] Using the case of the collection of a bounced check also gets us away from the concern that rules governing the eviction of a non-paying tenant are shaped by socialist sentiment in a country. The fact that the structures of dispute resolution for eviction and check collection are so similar is inconsistent with the view that socialism drives both.

useful instrument for formalism. This also suggests that formalism might be a heritage of the colonial past rather than an efficient response to the conditions of each country.

Our data provide a striking empirical confirmation for the proposition that dispute resolution, as measured by our indices, is more formalized in civil than in common law countries. Legal origins alone explain around 40% of the variation in formalism of dispute resolution among 109 countries. In nearly all dimensions, we find greater deviation from the informal neighbor ideal in civil law (and especially French civil law) countries. This result holds for both eviction and check collection. We also find that adjudication is more formalized in the less developed than in the rich countries.

Formalism is not in itself proof of inefficiency: it may serve political goals of the state, control the subversion of the legal system, or guarantee fairness and accuracy of trials. Indeed, there is nothing normatively significant about the neighbor model; we simply use it to organize measurement. Moreover, it is difficult to believe that the optimal amount of formalism in a modern legal system is zero. The question is what are the consequences of formalism for judicial quality.

Having established these basic differences in formalism among legal origins, we examine several aspects of judicial quality. From the participating law firms, we obtain estimates of the expected duration of our specific disputes in calendar days, from the original filing of a complaint to the ultimate enforcement of judgment. In addition, we use indicators of judicial quality from other data sources, covering such areas as judicial efficiency, enforceability of contracts, access to justice, human rights protection, and corruption. Last, we use data from the World Business Environment Survey of small firms on the fairness, consistency, honesty, and other aspects of the legal system.

We find that, holding per capita income constant, procedural formalism is a strong predictor of expected duration of dispute resolution. Higher formalism also predicts lower judicial efficiency,

higher corruption, lower honesty and consistency of the system, less fairness, and inferior access to justice. These results hold both in ordinary least squares regressions, and in instrumental variable estimates where legal origin is used as an instrument for formalism. The results hold for both eviction and check collection. In our data, there is no evidence that formalism secures justice.

There are two broad interpretations of this evidence. On the first, formalism represents an efficient adaptation to the conditions of different countries, with countries exhibiting lower levels of law and order "requiring" higher formalism. On this interpretation, OLS evidence is simply a reflection of country heterogeneity: formalism is desirable but does not fully compensate for the lack of law and order. On the second – more direct – interpretation of the evidence, many countries exhibit excessive levels of judicial formalism, at least for simple disputes. The fact that many countries have inherited their legal procedures from their colonizers, and that legal origin explains such a large share of variation in levels of formalism, supports the second theory over the first. The exogenous component of formalism predicts both long duration and low quality of adjudication.

The findings reported in this paper advance the previous research in three distinct ways. First, the paper takes the research on the quantitative measurement of institutions in a new direction: the study of courts. Finding objective measures of institutional structure is sometimes more useful than just focusing on survey assessments of quality, as is often done, because it may point to the specific directions of efficiency-improving reform. Second, with respect to the study of courts, the paper is novel in attributing both their efficiency and their ability to deliver justice to the characteristics of the legal procedure, rather than to general underdevelopment of the country or to poor management practices. Third, the paper links both the lack of efficiency of courts and their inability to deliver justice to the transplantation of legal systems. As such, it supports the hypothesis

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that transplantation is in part responsible for the structure and quality of the existing institutions.

II.   Conceptual Issues.

Broad Theories

Shapiro (1981, p. 1) describes an idealized model of a court as follows: "The root concept employed here is a simple one of conflict structured in triads. Cutting quite across cultural lines, it appears that whenever two persons come into a conflict that they cannot themselves solve, one solution appealing to common sense is to call upon a third for assistance in achieving a resolution. So universal across time and space is this simple invention of triads that we can discover almost no society that fails to employ it. And from its overwhelming appeal to common sense stems the basic political legitimacy of courts everywhere. In short, the triad for the purposes of conflict resolution is the basic social logic of courts, a logic so compelling that courts have become a universal political phenomenon." In this universal model, the resolution of a dispute among two neighbors by a third is guided by common sense and custom. It does not rely on formal law and certainly does not circumscribe the procedures that the neighbors employ to address their differences.

Even though Shapiro may have captured the essential "courtness" of courts, it is striking how far the courts everywhere deviate from this ideal. They employ professional judges and lawyers, rather than neighbors, to resolve disputes. They follow heavily regimented procedures, restricting how claims and counter-claims can be presented, how evidence can be interpreted, and how various parties can communicate with each other. Rather than holding an informal meeting, many courts assemble written records of the proceedings, and allow disputants to appeal the decisions of a judge. Rather than adhere to Shapiro's ideal, most jurisdictions heavily regulate their civil procedures.

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So why isn't the informal model of a court what we see in reality? The reasons for regulating

dispute resolution are similar to those for regulating any other kind of activity: the sovereign has

either a public or a private reason for wishing a different outcome than that attained by the neighbor

model. Perhaps most importantly, as emphasized by Shapiro, most courts are associated with the

state, and sovereigns often have an interest in how disputes are resolved. They might wish to punish

some undesirable conduct to a greater extent than a judge-neighbor would, to establish precedents,

or to reduce errors relative to informal adjudication. They might alternatively wish disputes to be

resolved so as to favor themselves, or their friends, or their political supporters, as well as to punish

their enemies and political opponents. They might also wish to make sure that disputes are resolved

in a consistent way across their domains, so as to promote trade or political uniformity. They may

indeed use courts to promote policy innovations of sovereign interest, whether good or bad. To

achieve these goals, sovereigns regulate the judicial procedure to ensure that the "judges are no more

than the mouth that pronounces the words of the law, mere passive beings, incapable of moderating

either its force or rigour" (Montesquieu [1748] 1984, p. 194).

A further reason to regulate dispute resolution is that informal triad justice is vulnerable to

subversion by the powerful. As Shapiro points out, as soon as a neighbor has ruled in favor of one

of the disputants, it becomes two against one rather than a balanced triad. If two neighbors can

always win against one, it obviously becomes in the interest of each disputant to influence the judge.

 Their ability to do so, in turn, is the crucial determinant of the viability of the triad system. If one

of the two disputants is economically and politically more powerful than the other, he can encourage

the supposedly impartial judge to favor him. He can do so with carrots, such as bribes and promises

of future favors, or with sticks, such as intimidation and violence. The other side of this coin is

access to justice: the less advantaged members of a society must expect justice rather than abuse from the state or powerful opponents. Without formalism, justice might be impossible to achieve.

A leading Spanish scholar made this case a century ago: "The importance of procedural laws dwells primarily and foremost in that they guarantee and regulate the individual's right of defense against all other individuals and the State itself, which in the exercise of the judicial power could violate this right… In criminal law many crimes can be established—and in fact they have been established—for the whim of the legislators; for the demands of the forms of government; for religious and social concerns, and many crimes may also be abolished, without the social foundation being fatally compromised. Yet no society or people can convict the citizens without hearing them; without allowing them to justify; without granting them time and facilitate the means and conditions to defend themselves. And if this happens, such society and such people, corrupted by the repugnant leper of despotism, start to disintegrate and rapidly die, for having within their bowels a poisonous virus, incompatible with the vital principle of society" (López-Moreno 1901, p. 43).

For these, and possibly other reasons, most jurisdictions in the world, while adopting the triad model in broad outline, heavily regulate its implementation. As a consequence, legal procedures are universally more formalized than the neighbor model would suggest. Moreover, as legal historians have long recognized, is that there are different broad traditions of such regulation, intimately related to the civil versus common law origin of the country's laws. These traditions have derived from Roman and English law respectively, and were transplanted to many countries through conquest and colonization (by France, Germany and Spain in the case of civil law, and England in the case of common law). Although legal systems of most countries have evolved since colonial times, recent evidence shows that important features of legal origin are often preserved through the

centuries (e.g., La Porta et al. 1998, 1999).

Different writers have different theories of how legal origin has shaped legal procedure in general, and formalism in particular. Some, such as Hayek (1960) and Merryman (1985), attribute the differences to the ideas of the Enlightenment and the French Revolution. In France, the revolutionaries and Napoleon did not trust the judges, and instituted heavily codified judicial procedures as a way to control judicial discretion. According to Schlesinger et al. (1988), in civil law countries "the procedural codes are meant to be essentially all-inclusive statements of judicial powers, remedies, and procedural devices." Consistent with von Jehring's logic, procedural formalism was seen as a guarantee of freedom. In England and the United States, in contrast, lawyers and judges were on the "right" side of the revolutions, and hence the political process accommodated a great deal more judicial independence. In the common law tradition, "a code is supplemental to the unwritten law, and in construing its provisions and filling its gaps, resort must be had to the common law" (Schlesinger et al. 1988). As a consequence, less formalism is required in the judicial procedure.

Other writers, including Dawson (1960), Berman (1983), Damaska (1986), and Glaeser and Shleifer (2002) argue that the procedural differences between common and civil law go back to the 12th and 13th centuries. Glaeser and Shleifer (2002) attribute greater formalism to the need to protect law enforcers from coercion by disputing parties through violence and bribes. This threat of coercion was greater in the less peaceful France than in the more peaceful England, where neighborly dispute resolution by juries (coming closer to Shapiro's ideal) was more feasible. The different approaches to legal procedure – motivated by the different law and order environments of England and France

– were then transplanted through conquest and colonization through most of the rest of the world.[4]

The fact that most countries in the world inherited significant parts of their legal procedures – often involuntarily – is of great consequence to our analysis. At the econometric level, it suggests that legal origin can be used as an instrument for the degree of formalism of the legal procedure. At the substantive level, the nature of transplantation enables us to distinguish two hypotheses. If countries select their legal procedures voluntarily, then one can argue that greater formalism is an efficient adaptation to a weaker law and order environment. If, however, legal procedures are transplanted through colonization, the efficient adaptation model does not apply. Rather, we can attribute the consequences of legal formalism to the exogenously determined features of the legal procedure, and in this way consider the efficiency of alternative rules.

What is procedural formalism?

The differences in the broad approaches to legal procedure between common and civil law are reflected in potentially measurable areas of procedural formalism, which we call formalism for short. Below, we consider 7 such broad areas.

First, many countries rely on professional judges and lawyers in the operations of a court. Professional judges often work for the government. This ensures that the sovereign's preferences are recognized, but also enables the sovereign to protect judges, making them less vulnerable to subversion. Professional judges are also necessary when the sovereign insists on judgment in law rather than equity. By prohibiting direct participation of private parties in the legal process without

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[4] On legal transplantation, see Watson (1974), La Porta et al. (1998), and Berkowitz et al. (2002). Other recent work on optimal institutional design includes Aghion and Alesina (2002).

a duly licensed representative–who has to abide by tight standards of professional conduct and is subject to close supervision–, the sovereign also raises the level of control over the judicial process. This may serve to advance the sovereign goals as well as to prevent subversion, since a lawyer would not allow their client's improper appeals before the judge when their professional license is at stake.

Second, many countries mandate the use of written as opposed to oral presentation at various stages of the procedure. This preference for written over oral presentation raises accountability and facilitates sovereign control over the judicial process. When every piece of evidence must be presented in court with a lawyer's memo, with a copy of such memo signed and sealed by the clerk, and when every motion, exception, or piece of evidence must be accepted or rejected by the judge in writing and signed, the entire procedure can be reproduced and subject to a thorough review by an independent third party. A written record with multiple copies prevents a biased judgment based on the sudden disappearance of a key piece of evidence or of the entire file.

Third, many countries require legal justification of civil complaints as well as judicial decisions – a clear attack on the informality of the neighbor model. The reasons are again clear: the sovereign pursuing his interests and preventing subversion wants judges ruling according to his law rather than exercising discretion inherent in informality. Decisions motivated by religious, racial or other prejudices of a judge can be avoided by demanding full justification of judgments on specific articles of the law and legal reasons open to review.

Fourth, every country regulates the manner in which evidence is gathered and presented or banned in court. To prevent biased selection, judges are banned from rejecting evidence requested by the parties. Hearsay is prohibited because it cannot be controverted in open court. Mandatory pre-qualification of questions by the judge and prohibition of partisan interrogation prevent harassment

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of witnesses. Rules on authenticity and weight of evidence intend to preclude biased or unfounded assessments of facts. In all these and other ways, the regulation of evidence can serve to achieve the state's goals and reduce the dangers of subversion.

Fifth, many countries rely on comprehensive appeal procedures and extensive superior review of trial courts' decisions. Written records are complementary with appeals; without a record, the appeal must be limited or a trial must be held *de novo*. More generally, both written records and appeals are part of sovereign control of dispute resolution, used to assess, evaluate, and reverse judicial decisions should the superior court so desire. Both the pursuit of sovereign goals and the protection of judges from subversion are promoted through such arrangements.

Sixth, all countries regulate how and when a party can be considered bound by the court proceedings through engagement formalities. These include rules of notification and other procedures, such as mandatory pre-trial reconciliation, that must be used before a party can be brought to court. These rules are justified by the need to guarantee the defendant's right to defend. "The most elementary requirement of due notice is that each party should receive notice of the other side's case. This is the province of that complex bundle of rules, often very technical, concerning 'service' of writs and other formal procedural documents. These rules are intended to provide a safe and verifiable means of giving each party proper notice of proceedings" (Andrews, 1994).

Finally, many countries have very detailed regulations that control the proceedings step by step. Many of these steps can be best understood from the perspective of controlling errors as well as subversion: they are intended to ensure that a party cannot gain advantage in a trial by unfairly manipulating the process. For example, a certain number of days must elapse between one action and the next to ensure that the affected party has had enough opportunity to respond.

This discussion suggests that formalism can often be rationalized from the perspective of sovereign's public or private reasons to regulate. The empirical questions that the discussion raises are: how can we measure formalism in dispute resolution in different countries?; does it vary systematically among legal origins?; and is the variation systematically related to the quality of the legal system? Ultimately, the optimal level of formalism is an empirical question. Below, we describe our approach to the measurement of formalism and the evaluation of its consequences.

III. Methodology.

Data Collection Procedures

The data used in this paper are derived from questionnaires answered by attorneys at Lex Mundi and Lex Africa member firms. Lex Mundi and Lex Africa are international associations of law firms, which include as their members law firms with offices in 115 countries. Of the 115 countries, Lex Mundi members in six did not accept our invitation to join the project, and these six jurisdictions (Burkina Faso, Cambodia, Nicaragua, Northern Ireland, Scotland, St. Kitts and Nevis) were removed from the sample. We have received and codified data from all the others.

The 109 cooperating law firms received a questionnaire designed by the authors with the advice of practicing attorneys from Argentina, Belgium, Botswana, Colombia, Mexico, and the United States. The questionnaire covered the step-by-step evolution of an eviction and a check collection procedure before local courts in the country's largest city. In presenting the cases, we provided the respondent firm with significant detail, including the amount of the claim, the location and main characteristics of the litigants, the presence of city regulations, the nature of the remedy requested by the plaintiff, the merit of the plaintiff's and the defendant's claims, and the social

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implications of the judicial outcomes. Furthermore, to understand how courts work, we specified that there is no settlement. These standardized details enabled the respondent law firms to describe the procedures explicitly and in full detail, and allowed us to get around the problem that different procedures arise in different circumstances. Our approach is preferred to just a general reading and codification of laws, where comparability across countries might not be achieved with similar precision. Moreover, the focus on two distinct cases—eviction and check collection—allowed us to deal with different types of procedures in sample countries, and thus provided a robustness check for our indices of regulation of dispute resolution. Finally, we have discovered that even the largest law firms in most countries employed individuals familiar with eviction and check collection procedures, generally because they have worked on such cases for their clients.

The questionnaires provided to law firms were divided into two parts: (1) description of the procedure of the hypothetical case step by step, and (2) multiple choice questions. The following aspects of the procedure were covered: (1) step by step description of the procedure, (2) estimates of the actual duration at each stage, (3) indication of whether written submissions were required at each stage, (4) indication of specific laws applicable at each stage, (5) indication of mandatory time limits at each stage, (6) indication of the form of the appeal, and (7) the existence of alternative administrative procedures. Multiple-choice questions were used both to collect additional information and to check the presentations and the uniformity of concepts used at the initial stage.

Prior to launching the project, the model questionnaire and two sample answers (the U.S. and Colombia) were sent to and completed by Lex Mundi members in five countries, which represent different legal institutions and different levels of economic development (France, Germany, Jordan, Kenya, and India). Their answers were used to improve the questionnaire. All firms responding in

the general round received sample answers for Colombia, France, Germany and the U.S. (represented by New York City). The completion of the questionnaires required extensive interaction by telephone and email between the authors and the attorneys at law firms. At each firm, the answers were prepared by a member of the Litigation Department, and reviewed by a member of the General Corporate and Commercial Department, which created an internal check within the firm. Two lawyers in each law firm, from different departments, were required to read, approve, and sign the questionnaire. As an additional check, the law firms were required to indicate when a particular law governed the relevant stage of the procedure, and to provide a copy of that law.

The answers provided by member law firms were coded using the descriptions of the procedures and answers to multiple-choice questions. In most cases, coding was followed by an additional round of questions to the completing attorneys aimed to clarify the inconsistencies in their answers. In our preliminary presentation of these data, several judges and litigation experts from different countries recommended exploring incentives for attorneys as an alternative determinant of efficiency. We subsequently asked all participant law firms a set of questions dealing with this issue. Finally, to ensure comparability, the count of independent procedural actions was reviewed and returned to every law firm for confirmation.

The Variables

We wish to measure the regulation of dispute resolution relative to Shapiro's (1981) hypothetical benchmark of a neighbor resolving a dispute among two others. Comparative law textbooks and manuals of civil procedure point to several areas where the laws of different countries regulate such dispute resolution differently. In our choice of the areas of regulation of dispute

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resolution, we were particularly guided by the *Civil Procedure-International Encyclopaedia of Laws* published by Kluwer Law International. The Encyclopedia covers 17 countries from different legal origins, and discusses such broad areas of civil procedure as judicial organization, jurisdiction, actions and claims, nature of proceedings, legal costs, evidence, enforcement of judgments, and arbitration. Some of the areas covered in the *Encyclopedia* were not relevant to the simple disputes we considered. Others, such as ADR, are covered briefly in our survey, although we focus on courts. Appendix 1 presents the relationship between the topics covered in the *Encyclopedia's* volume on Civil Procedure for France and the indices used in this paper.

We focus on seven areas of formalism, and codify the answers provided by Lex Mundi firms from the perspective of the neighbor model. Below, we briefly describe our approach to organizing these data. The exact definitions of the variables are contained in Table 1.

The first area covers the required degree of professionalism of the main actors in the judicial process, namely judges and lawyers. This comprises three specific areas. First, a basic jurisdictional distinction is between general and specialized courts. For the simple cases we consider, access to specialized courts generally entails procedural simplification aimed at "mass production" (similar to traffic courts in the U.S.). As a consequence, we take the resolution of disputes in specialized courts to be closer to the neighbor model than that in a general jurisdiction court.

Second, we distinguish between judges who have undergone complete professional training, and arbitrators, administrative officers, practicing attorneys, merchants, or any other lay persons who may be authorized to hear or decide the case. In some countries (e.g., New Zealand, United Arab Emirates) all disputes between landlords and tenants are resolved by housing tribunals composed of

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neighbors or by representatives of associations of landlords and tenants. Such non-professional judges are closer to the neighbor model.

Third, in some countries it is mandatory to have an attorney to appear before the judge, while in others it is entirely voluntary or even prohibited. Evidently, the absence of legal representation is closer to the neighbor model. Indeed, in the absence of such representation, the judge frequently assumes the position of a mediator guiding the parties to an agreement.

Using the data provided by law firms, we combine these three pieces of information to construct the "professional versus laymen" index for each of the two disputes for each country.

The second area we consider is the preeminence of written versus oral presentation at each stage of the procedure, including filing, service of process, defendant's opposition, evidence, final arguments, judgment, notification of judgment, and enforcement of judgment. We take oral presentation to be closer to the neighbor model, and aggregate this information for each country and each case into the index of "written versus oral" elements.

The third area is the need for legal justification (meaning reference to the legal reasons and articles of the law) in the complaint and in the judgment, as well as the necessity of basing the judgment in the law as opposed to equity. In many countries, a judgment must be justified by statutory law or settled precedents. In other countries, judgment must still be justified, but in equity rather than in law. In still other countries, judicial decisions require no justification whatsoever. Since the neighbor model presumably does not call for such legal justifications, we aggregate this information into an index of "legal justification."

The fourth area is statutory regulation of evidence. The rules of evidence are sometimes considered to be a key factor in differentiating the overall efficiency of legal procedures among

countries (Langbein 1985). First, in some countries, the judge cannot request evidence not requested by the parties, a restriction on the neighbor model. Second, the judge in some countries cannot refuse to collect or admit evidence requested by the parties, even if the judge feels this evidence is irrelevant to the case. This, too, presents a restriction on the discretion of the judge in the neighbor model. Third, hearsay evidence is not admissible in some countries while, in others, the judge can weigh it. Presumably, the inadmissibility of out-of-court statements is a restriction on judicial freedom in the neighbor model. Fourth, in some jurisdictions, the judge must pre-qualify a question before it is posed to the witness while, in others, parties may ask witnesses questions without such pre-qualification. We take the latter scenario as more compatible with the neighbor model. Fifth, in some jurisdictions, only original documents and certified copies are admissible, a restriction not present in other jurisdictions. Presumably, the neighbor model would not have these restrictions. Sixth, in some countries, authenticity and the weight of evidence are defined by law; in others, they are not. In the neighbor model, we would not expect the evidence to be subjected to rigid rules on admissibility and weight. Seventh, in some countries, but not others, there is mandatory recording of evidence, designed to facilitate the superior authority's control over the judge. We do not take such recording to be consistent with the neighbor model. As before, we aggregate these seven dimensions into the index of "statutory regulation of evidence."

The fifth area of regulation of formalism is the control of the superior review of the first instance judgment. The scope of appellate review determines the level of sovereign control over the trial court proceedings (Damaska, 1986). In general, we take the control of a judge by a superior court as inconsistent with the neighbor model, and consider a variety of mechanisms of superior review. First, in some countries, the enforcement of judgment is automatically suspended until the

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resolution of the appeal, which substantially reduces the importance of the first instance judgment. In others, the suspension of enforcement is either non-automatic, or even not allowed. We take the automatic suspension as being inconsistent with the neighbor model. Second, in some countries, the review and appeal of judicial decisions are comprehensive. In others, more compatibly with the neighbor model, only new evidence or issues of law can be reviewed on appeal, or the judgment cannot be appealed at all. Third, some countries, but not others, allow interlocutory appeals (those of interim judicial decisions), which we take to be incompatible with the neighbor model. We aggregate these three aspects of review into an "index of control of superior review."

The sixth area is engagement formalities that must be observed before a party is legally bound by the court proceedings. In some countries a lawsuit cannot be initiated unless a formal pre-trial conciliation is attempted between the parties. The notification procedures also vary markedly among countries. In some places, the complaint can be notified to the defendant by the plaintiff himself or by his attorney, or simply by mailing a letter. In others, the defendant cannot be held accountable unless he is served the claim by an appointed court officer. Finally, in some countries the judgment is deemed notified to the parties when pronounced in open court; in others it must be personally notified to the parties by a dully appointed court employee. We submit that entirely voluntary pre-trial conciliation and flexible rules of notification of process and judgment are more compatible with the neighbor model. These three dimensions are aggregated into the index of "engagement formalities."

The seventh area is the count of independent procedural actions involved in pursuing a claim through a court, covering the filing and service of a complaint, trial and judgment, and enforcement. An independent procedural action is defined as every step in the procedure, mandated by the law

or by court regulation, which demands interaction between the parties or between them and the judge or court officer, such as filing a motion or attending a hearing. We also count as an independent procedural action every judicial or administrative writ or resolution, such as issuing judgment or entering a writ of execution, which is legally required to advance the proceedings until the enforcement of judgment. Actions are always assumed to be simultaneous if possible, so procedural events that may be fulfilled in the same day and place are only counted as one action.[5] In the idealized neighbor model, there would be only three procedural actions: (1) a claimant would request the judge's intervention, (2) the judge and the claimant would together meet the defendant and the judge would issue a decision following a discussion, and (3) the judgment would be enforced. As the evidence below shows, in some countries, checks can be collected and tenants evicted in just 8 or 9 steps, while in others it takes 40 to 45 steps – a far cry from the neighbor model. We aggregate these counts into an index of "independent procedural actions" and normalize the index to fall between zero and one based on the minimum and the maximum number of actions among countries.

Having assembled the data, we combine the seven sub-indexes into the index of formalism. We scale each subindex to fall between zero and 1, so the formalism index falls between 0 and 7, with 7 representing, according to our conception, the greatest distance from the neighbor model. The exact method of the construction of the formalism index is not crucial, since the various sub-indices generally point in the same direction as to which countries regulate adjudication more heavily.

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[5] We only count the minimum number of independent procedural actions required to bring the case to completion. Thus, the appointment of a lawyer is only counted as a step if legal representation is mandatory. Notifications of interlocutory decisions that do not require further interaction between the parties and the judge or court officer (as when the clerk makes an entry into the notification book) are not counted as separate steps since they are ancillary to the decision.

Our data also enable us to provide some information on the quality of dispute resolution (see Table 1 for the description of the data). One measure of quality is an estimate – in calendar days – of duration of the process of dispute resolution by the lawyers who completed the questionnaires. Duration is measured as the number of calendar days counted from the moment the plaintiff files the lawsuit in court, until the moment of actual repossession (eviction) or payment (check). This measure includes both the days where actions take place and waiting periods between actions. The participating firms make separate estimates of the average duration until the completion of service of process, the issuance of judgment (duration of trial), and the moment of payment or repossession (duration of enforcement).[6] To the extent that we are interested in the ability of an ordinary person to use the legal system, these estimates of duration are highly relevant for efficiency.

In addition to the data from the questionnaires, we use data from surveys of business people on the quality of the legal system. Some standard surveys we rely on include measures of the efficiency of the judicial system, law enforcement quality, equality of access to non-discriminatory justice, human rights, and corruption. In addition, we use information from small firm assessments of various aspects of the quality of the legal system, including consistency, honesty, and fairness, contained in the World Business Environment Survey. These data will be used to shed light on the crucial question: does formalism secure justice?

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[6] Law firms also provide us with estimates of the minimum and the maximum amount of time in calendar days each case could take given its specifics. This request helped lawyers to focus on the <u>average</u> length of time and not just think about the worst or best case they had encountered.

IV. Procedural formalism.

Table 2 presents our data on procedural formalism, with sub-indices and the overall index. Table 2a focuses on eviction, and Table 2b on check collection (Appendices 2A and 2B provide the data on each variable in the sub-indices for all countries). The countries are arranged by legal origin, and the tables report the means and the medians by legal origin, as well as the tests of the differences in means and medians across legal origins.

Some examples illustrate the data. In New Zealand, the eviction of a non-paying tenant is handled by a specialized limited jurisdiction housing court, the "Tenancy Tribunal". The cases are decided by lay judges called "adjudicators", some of which do not even hold a law degree. Attorneys are not prohibited but strongly discouraged, so the overwhelming majority of cases are handled without the assistance of a lawyer. The proceedings are conducted orally, and most cases are decided in a single hearing. The presentation of the complaint, the opposition, the evidence, and the arguments, all take place at the hearing. The judgment is normally announced in court at the end of the hearing. The complaint is an informal document that briefly describes the facts and controversy in layperson's language. Legal reasoning and justification in specific articles of the law are neither required nor expected. The judgment may be motivated on either law or equity, as long as written reasons are provided. Evidence is scarcely regulated; it need not be on oath, it can be oral or written, and it is not bound by strict rules on administration and evaluation. The tenant and the landlord are both entitled to attend and be heard, to call evidence and to examine and cross-examine witnesses. The Tenancy Tribunal may call for and receive as evidence any statement, document, information, matter or thing that in its opinion may assist to deal effectively with the case before it. Appeal of first instance judgments is available, but only a tiny fraction of the decisions are appealed and it does

not automatically suspend the enforcement of judgment. Interlocutory appeals are prohibited. Notifications are normally by mail, without formalities or mandatory intervention of judicial officers. The entire procedure only takes ten Independent Procedural Actions from filing to actual enforcement of judgment. The formalism index for eviction in New Zealand is 1.25.

In Portugal, in contrast, evictions are handled by a professional judge at a civil district court, the "Tribunal de Comarca." The landlord needs to appoint a lawyer. The proceedings are mostly conducted in written form and most of the interaction among the parties and the judge is through written documents filed before the court. The complaint, the answer to the complaint, the answer to the opposition and to every motion filed by the parties must be in writing. The complaint must comply with formal requirements specified by law, and it must be expressly motivated in law and in facts. The court must verify compliance with formal requirements before admitting the lawsuit. Judgment is rendered in writing and fully justified in law and facts. Judgment must be motivated exclusively on legal grounds (not on equity). The judge takes the main responsibility for gathering and sifting the evidence, and he must pre-qualify the questions before they are asked of the witnesses. Appeal is comprehensive and it automatically suspends enforcement of judgment. Interlocutory appeals are broadly allowed. Notifications are mostly by mail. Finally, the procedure takes at least 22 Independent Procedural Actions from filing to enforcement. The formalism index for eviction in Portugal is 4.54.

Consider next check collection, shown in Table 2B. In the United Kingdom, the procedure for the collection of a bounced check is in most cases dismissed without a trial because the claimant obtains a summary judgment on the basis that the defendant has no real prospect of defending the claim. In most cases parties act without legal representation. The proceedings are conducted at an

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oral hearing attended by the parties and the judge. The claim is filed in writing, albeit informally. Judgment is normally given immediately after the hearing. Legal justification of claims is neither required not expected. Allocation questionnaires, explained in layperson's language, are sent to both parties to assess the expected burden and duration of the proceedings, so that the court can plan accordingly. Written reasons for judgment are not generally given, unless one party wishes to appeal. Judgment may be motivated on law or on equity grounds. Evidence is mostly gathered and presented by the parties and freely weighted by the judge. It is not mandatory to have a written record of all evidence introduced at trial. The right to appeal is not automatic; permission to appeal must be requested before the judge and is frequently denied. The claim is notified to the defendant by mail and service is deemed effective on the second day after posting. The defendant must file an acknowledgment of service to prevent a default judgment. Judgment is normally notified in court. Finally, the procedure takes 12 Independent Procedural Actions from filing to actual enforcement. The formalism index for check collection in the United Kingdom is 2.58.

The collection of a bounced check in Austria is tried before a regular commercial court. Legal representation is very common in all cases and mandatory beyond certain limit (US$3,500). The proceedings are mostly conducted in written form and most of the interaction among the parties and the judge is through written documents filed before the court. As a matter of principle, the judgment shall be announced orally immediately at the end of the final hearing, which is not the practice, though. If orally pronounced, it must be drawn in writing within four weeks. The claim must be fully justified and it must comply with formal requirements to be admissible. It is not mandatory but very common to include specific articles of the law. In the case of legal representation a qualified attorney must sign the complaint. The judgment must contain a detailed description of

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the proceedings, including particulars of the parties/attorneys, competent court, reference number, name of judge, date of decision, relief sought, motions by both parties, results of evidence, reasons, applicable law, decision, and an instruction on parties' right to appeal. By law, there must be a written or magnetic record of all evidence introduced at trial. Appeal is filed before the court of first instance and it automatically suspends enforcement. Notifications are heavily regulated. The complaint must be personally delivered to the defendant's residence together with a payment order containing legal instructions on the defendant's right to oppose. After a second unsuccessful attempt of delivery, a notice of deposit is affixed to the defendant's dwelling. Finally, at least 20 Independent Procedural Actions are required to complete the procedure. The formalism index for check collection in Austria is 3.52.

More generally, as Table 2 shows, for both check collection and eviction, the data clearly reveal that common law countries have least formalized, and French civil law countries most formalized dispute resolution, with other legal origins in the middle. For eviction, the differences hold for all sub-indices, but are stronger in some areas (legal justification, number of independent procedural actions) than in others (evidence, superior review). The differences in formalism among civil law countries (French, German, socialist and Scandinavian) are less pronounced, and typically not as statistically significant (except that German and Scandinavian origin countries regulate less heavily than Socialist and French ones). For check collection, the pattern of results is similar, except that one of the sub-indices is lower in French civil law countries than in common law countries. We return to this evidence more systematically in the regression analysis presented in Table 5, but note that the findings are broadly consistent with the thrust of the comparative law literature.

Table 3 examines the consistency of this evidence across the various sub-indices measuring alternative aspects of procedural formalism, as well as across the two cases. The evidence presents a clear picture of consistency. The various sub-indices are positively correlated with the overall index within each case. Moreover, across the two types of cases, the same sub-indices are strongly positively correlated with each other. The correlation of the formalism index between check collection and eviction is 0.83. In contrast to the general pattern, the evidence and review sub-indices are uncorrelated with the others. For most aspects of formalism, however, it appears that some countries regulate dispute resolution more heavily than others.

Table 4 asks whether the differences in formalism among countries are also a consequence of the level of economic development. Economic historians have argued that poor institutions are a consequence of underdevelopment, and only development itself brings about improved institutions, including the legal system (Demsetz 1967, North 1981, 1990). Table 4 compares formalism among countries divided into quartiles of per capita income. We find lower formalism in the richest countries, but no difference between the poorest countries and the middle 50 percent. Table 4 also shows that the richest countries have the lowest levels of formalism both within common law and within the French civil law countries.

In Table 5, we examine the determinants of formalism looking at the sub-indices and the overall index. Panel A looks at eviction, and Panel B at check collection. The omitted dummy is common law legal origin. Using the regressions that hold legal origin constant, the result that richer countries have lighter regulation of adjudication holds both for the eviction of a tenant and the check collection procedures. At the same time, the R-squared from using (the logarithm of) per capita income as the explanatory variable is only 4% for eviction and 8% for check collection.

The data for most sub-indices and the overall index also show that dispute resolution in socialist and French civil law countries is more formalized than it is in common law countries, even holding per capita income constant. The point estimates in the regressions are consistent with the means in Table 2, yielding roughly the same order of legal origins, and in most cases the coefficients are statistically significant. Dispute resolution in German and Scandinavian origin countries also appears to be more formalized than in common law countries, although the results for sub-indices are generally statistically insignificant. Perhaps most remarkably in Table 5, incremental R-squared in explaining the formalism index from the legal origin dummies is 40%: nearly half of the residual variation in formalism (holding per capita income constant) is explained by the legal tradition.

These results provide striking evidence in favor of the hypothesis from the comparative law literature that there are systematic differences in legal procedure across legal families, and, more specifically, civil law countries have more formal dispute resolution than do common law countries.[7] The next question is whether these differences in formalism matter for the quality of adjudication.

V. Consequences of formalism.

In the next several tables, we turn to the consequences of formalism for the quality of the legal system. Table 6 presents the raw information, by country, on the estimated duration of dispute resolution. As in Table 2, countries are arranged by legal origin. A striking aspect of Table 6 is the extraordinary length of time it takes, on average, to pursue either claim in court. The worldwide average time for accomplishing an eviction is 254 (median of 202) calendar days, and for collecting

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[7] We also consider the hypothesis that the influence of Catholicism, with its protection of creditors, shapes judicial formalism. Although the percentage of a country's population that is catholic is a statistically significant determinant of formalism, this variable becomes insignificant in a horse-race with legal origin, which remains important.

a check 234 (median of 197) calendar days.   With all the other costs, this number suggests why

individuals in most countries choose not to use the formal legal system to resolve their disputes.

There is tremendous variation in the estimated duration of each procedure among countries

Eviction is estimated to take 49 days in the U.S., 547 in Austria and 660 in Bulgaria. Check

collection is estimated to take 60 in New Zealand, 527 in Colombia, and 645 in Italy. The

comparison by legal origin for eviction puts common law and Scandinavian legal origin countries

on top (shortest duration) and socialist and French legal origin countries at the bottom. Interestingly,

and consistent with earlier work on creditor rights in Germany (La Porta et al. 1997), German legal

origin countries are comparatively more efficient at check collection than at eviction. But the bottom

line of Table 6 is the higher expected duration in civil law countries. In the words of an Indonesian

legal scholar, "in connection with the nature of judicial process itself and considering the formal,

punctual, and rather complicated manners and usages upheld by courts according to the Law of

Procedure (especially for the laymen), it could be said that correct judgment can not be performed

in a short time" (Gandasurbrata 1980, p.7).

Table 7 presents summary statistics on other measures of judicial quality. The left panel

confirms the findings of La Porta et al. (1999) that, using measures of the quality of the legal system

from business surveys, German and Scandinavian legal origin countries generally score the highest,

with common law countries next, and French civil law countries the lowest. This particular result,

however, should be interpreted with caution since these measures of the quality of the legal system

are highly correlated with per capita income, and German and Scandinavian legal origin countries

are considerably richer than the rest.

The right panel of Table 7 is based on the World Business Environment Survey (WBES) conducted by the World Bank in 2000. The questionnaire, which was answered by managers of small firms (below 50 employees), was designed to cover various dimensions of efficiency and quality of the judicial system. Although there is no specific question about the accuracy of the judicial system, respondents are asked whether it is fair and impartial and whether it is consistent – both partly reflections of accuracy. The results show that common law countries are perceived to have fairer, more honest, faster, more affordable, and more consistent judicial systems than French and Socialist legal origin countries. Respondents had higher confidence in the legal system and felt that court decisions were better enforced in common law countries.

Table 8 presents the regression results of the determinants of judicial quality, using per capita income and our index of formalism as explanatory variables. Panel A focuses on eviction, and panel B on check collection. For both procedures, expected duration is not related to the level of per capita income in a statistically significant way. In contrast, expected duration is highly correlated with procedural formalism. Countries with higher formalism, not surprisingly, have longer expected times of using the judicial system to evict a non-paying tenant or to collect a check. This result has important implications: it suggests that legal structure, rather than the level of development, shapes this crucial dimension of judicial efficiency.

Some examples illustrate the findings of Table 8. Malawi is a low-income common law country, with per capita income of $180. It has a formalism index of 3.14 for eviction, and expected duration of only 35 days. It also has a formalism index of 2.95 for check collection, and expected duration of 108 days. By comparison, Mozambique is a low-income French legal origin country, with per capita income of $220. It has one of the highest formalism indices of 5.15 for eviction, and

expected duration of 540 days. For check collection, its formalism index is 4.49, and expected

duration is 540 days. The same pattern emerges if we compare middle income countries (e.g., New

Zealand versus Portugal), as well as rich countries (e.g., United Kingdom versus Austria).

These striking results on expected duration raise the crucial question: does procedural

formalism, at the cost of longer proceedings, buy higher quality justice controlling for differences

in levels of economic development? The answer suggested by Table 8 is NO.

Note first that richer countries have higher quality justice as indicated by nearly all survey

measures. More interestingly, nearly all survey measures suggest that higher formalism is associated

with inferior justice, holding per capita income constant. This result holds, with minor differences,

for both eviction and check collection. It holds for judicial efficiency, access to justice, enforcement

of contracts, and corruption. It also holds in the reports by small firms in World Business

Environment Survey. Here higher formalism is associated with less fairness and impartiality of the

legal system, less honesty, lower speed (consistent with the results on expected duration), less

consistency, less reliable enforcement, and less confidence in the legal system (significant only for

check collection). The effect of formalism is still negative, but not consistently significant, for the

affordability of the legal system and human rights. Table 8 provides the basic bottom line of this

paper: at least for simple disputes, higher formalism is associated not only with the expected higher

duration of dispute resolution, but also with lower quality justice as perceived by participants.

One concern with the results in Table 8 is that the quality of dispute resolution might be

driven by other exogenous factors, possibly correlated with formalism. Following La Porta et al.

(1999), we have rerun all the regressions in Table 8 controlling for ethno-linguistic fractionalization,

distance from the equator, and the physical size of the country. Formalism remains significant in

nearly all specifications, while the other factors are generally insignificant. As a further robustness check, we re-estimated the regressions in Table 8 separately for countries with above and below median per capita income. In most specifications, formalism remains a significant determinant of quality in both the rich and the poor countries.

In Table 9, we repeat the analysis of Table 8 using legal origin dummies as instruments for the formalism index. With some exceptions, the results remain statistically significant, and confirm that formalism has adverse effects on both the expected duration of proceedings and other aspects of quality of the legal system. The exogeneity of legal origin for most countries in the sample suggests that it is unlikely to be the case that countries with a worse law and order environment *choose* heavier formalism. The instrumental variable results suggest the opposite direction of causality. Specifically, countries that have inherited legal systems with heavily formalized dispute resolution end up with lower quality legal systems, at least for simple disputes.

At the same time, the instrumental variable procedure cannot reject the hypothesis that the adverse effect of French civil law on the efficiency and quality of dispute resolution works through a channel other than formalism. For example, suppose that the transplantation of French legal rules is conducive to general state interventionism and bureaucratic inefficiency, as argued in La Porta et al. (1999), and that this channel undermines the performance of courts as well. In this case, we cannot be sure that formalism, as opposed to general interventionism, is the culprit. To assess this alternative, we repeat the analysis in Tables 8 and 9 using in place of formalism a measure of state interventionism having nothing to do with courts per se, namely the heaviness of regulation of entry by new firms from Djankov et al. (2002). The latter paper finds that such regulation is heavier in French civil law countries than in common law countries. When we do this analysis, we find that,

indeed, the regulation of entry predicts longer duration of dispute resolution, and lower quality of adjudication, in both the OLS and instrumental variable regressions. However, the explanatory power of regulation of entry is only 4 to 5%, compared to the explanatory power of formalism of 18 to 20% . Thus, while we cannot reject the hypothesis that the channel of influence of legal origin on the efficiency and quality of dispute resolution is general interventionism, the channel we have identified in this paper, namely procedural formalism, explains much more than a generic measure of interventionism.

In our analysis, we also considered a number of other potential determinants of judicial quality, such as statutory protections of defendants, methods of compensation of attorneys, and mandatory limits on the time that various parties have to complete the steps in the process of adjudication. Some commentators on our paper have argued that these factors, which shape the incentives of the participants in the legal system, are more important for the quality of adjudication than procedural formalism. Except for the possible beneficial effects of hourly compensation of attorneys on duration (in contradiction to the incentives argument), we do not find much evidence that these alternative determinants of judicial quality matter. Moreover, the adverse influence of formalism persists even holding these alternative factors constant.

VII.   Conclusion

We present an analysis of legal procedures triggered by resolving two specific disputes—the eviction of a non-paying tenant and the collection of a bounced check—in 109 countries. The data come from detailed descriptions of these procedures by Lex Mundi member law firms. For each country, the analysis leads to an index of formalism —a measure of the extent to which its legal

procedure differs from the hypothetical benchmark of a neighbor informally resolving a dispute between two other neighbors. We then ask whether formalism varies systematically across countries, and whether it shapes the quality of the legal system.

Consistent with the literature on comparative law, we find that judicial formalism is systematically greater in civil law countries, and especially French civil law countries, than in common law countries. We also find lower formalism in the richest countries. The expected duration of dispute resolution is often extraordinarily high, suggesting significant inefficiencies. The expected duration is systematically higher in countries with more formalized proceedings, but is independent of the level of development. Perhaps more surprisingly, formalism is nearly universally associated with lower survey measures of the quality of legal system, including judicial efficiency, access to justice, honesty, consistency, impartiality, fairness, and even human rights.

There are two broad views of this evidence. According to the first, greater formalism is efficient in some countries, for a number of possible reasons. It can reduce error, it can advance benign political goals, or it can protect the judicial process from possible subversion by powerful interests. On this view, the various regulatory steps, such as reliance on professional judges and collection of written evidence, are there to secure a fair judicial process. Put differently, while heavily formalized adjudication appears problematic on some measures, adjudication would be even more problematic without the regulation.

According to the second view, many developing countries accepted the formalism in adjudication they now have as part of the transplantation of their legal system from their colonizers. On this view, there is no presumption that the transplanted system is efficient. Although heavy procedural formalism has theoretically plausible reasons for its existence, the reality it brings is

extreme costs and delays, unwillingness by potential participants to use the court system, and ultimately injustice. At least some of the burdens of formalism may therefore be unnecessary, and could be relieved through reform, especially for simple disputes.

We believe that the evidence in this paper supports the second theory. Specifically, the evidence points to extremely long expected duration of dispute resolution, suggesting that courts are not an attractive venue for resolving disputes. Furthermore, we find no offsetting benefits of formalism, even when looking at a variety of measures of the perception of fairness and justice by the users of the legal system. Moreover, legal origin itself appears to determine judicial quality, other things equal, suggesting that formalism is unlikely to be part of a benevolent design.

The evidence suggests that the systems of dispute resolution in many countries may be inefficient – at least as far as simple disputes are concerned. In particular, one cannot assume in economic analysis, especially as applied to developing countries, that contract enforcement is costless thanks to the functioning of courts. Indeed, in light of our evidence, it is probably safer to assume that most simple contracts cannot be enforced in courts at all and that economic agents must find alternative strategies of contracting and contract enforcement. At the theoretical level, this analysis suggests that the incomplete contracting models of Grossman and Hart (1986) are a useful way to think about reality. At the empirical level, the analysis suggests that at least some institutional features of developing countries, such as financial underdevelopment, integration of firms into groups, and the importance of family businesses, might constitute a response to the difficulties of using courts to resolve disputes.

References

Aghion, Philippe, and Alberto Alesina, "Endogenous Political Institutions," Harvard University Mimeo, (2002).

Andrews, Neil, *Principles of Civil Procedure* (London: Sweet &Maxwell, 1994).

Arrow, Kenneth, and Frank Hahn, *General Competitive Analysis* (San Francisco: Holden-Day, 1971).

Berkowitz, Daniel, Katharina Pistor, and Jean-Francois Richard, "Economic Development, Legality, and the Transplant Effect," *European Economic Review*, (2002), forthcoming.

Berman, Harold, *Law and Revolution* (Cambridge: Harvard University Press, 1983).

Coase, Ronald, "The Problem of Social Cost," *Journal of Law and Economics,* 3, (1960), 1-44.

Damaska, Mirjan, *The Faces of Justice and State Authority* (New Haven: Yale Univ. Press, 1986).

Dawson, John, *A History of Lay Judges* (Cambridge: Harvard University Press, 1960).

Demsetz, Harold, "Towards a Theory of Property Rights," *American Economic Review* , 57, (1967), 347-359.

Djankov, Simeon, Rafael La Porta, Florencio Lopez-de-Silanes, and Andrei Shleifer, "The Regulation of Entry," *Quarterly Journal of Economics,* 117, (2002), 1-37.

Ellickson, Robert, *Order without Law: How Neighbors Settle Disputes* (Cambridge: Harvard University Press, 1991).

Galanter, Mark, "Justice in Many Rooms: Courts, Private Ordering, and Indigenous Law," *Journal of Legal Pluralism,* 19, (1981), 1-47.

Gandasurbrata, Purwoto, *Indonesia. Administration of Justice: Procedural Reforms on Court Congestion*, in Purificacion Valera-Quisumbing (Ed.), Asian Comparative Law Series, Vol. 2, Asian Law Association of the Philippines and University of the Philippines, Manila, 1980.

Glaeser, Edward, and Andrei Shleifer, "Legal Origins," *Quarterly Journal of Economics*, 117, (2002), forthcoming.

Grossman, Sanford, and Oliver Hart, "The Costs and Benefits of Ownership. A Theory of Vertical and Lateral Integration," *Journal of Political Economy*, 94, (1986), 691-719.

Hayek, Friederich, *The Constitution of Liberty* (South Bend: Gateway Editions Ltd., 1960).

International Country Risk Guide. (Political Risk Services, East Syracuse, NY, 1996).

Jhering, Rudolf von, *Geist des Römischen Rechts auf den Verschiedenen Stufen Seiner Entwicklung* (The Spirit of Roman Law Through its Several Phases of Development) (Leipzig: Breitkopf und Härtel, 1898).

Johnson, Simon, John McMillan, and Christopher Woodruff, "Courts and Relational Contracts," *Journal of Law, Economics, and Organization*, (2002), forthcoming.

La Porta, Rafael, Florencio Lopez-de-Silanes, Andrei Shleifer and Robert Vishny, "Legal Determinants of External Finance," *Journal of Finance*, 52, (1997), 1131-1150.

La Porta, Rafael, Florencio Lopez-de-Silanes, Andrei Shleifer, and Robert Vishny, "Law and Finance," *Journal of Political Economy*, 106, (1998), 1113-1155.

La Porta, Rafael, Florencio Lopez-de-Silanes, Andrei Shleifer, and Robert Vishny, "The Quality of Government," *Journal of Law, Economics and Organization*, 15, (1999), 222-279.

Langbein, John, "The German Advantage in Civil Procedure," *University of Chicago Law Review*, 52, (1985), 823-866.

López-Moreno, Santiago, *Principios Fundamentales del Procedimiento Civil y Criminal* (Madrid: Librería General de Victoriano Suárez, 1901)

Macaulay, Stewart, "Non-Contractural Relationships in Business: A Preliminary Study," *American Sociological Review*, 28, (1963), 55-70.

Messick, Richard, "Judicial Reform and Economic Development: A Survey of the Issues," *World Bank Research Observer*, 14, (1999), 17-136.

Merryman, John Henry, *The Civil Law Tradition* (Stanford: Stanford University Press, 1985).

Montesquieu, M. de Secondat, *The Spirit of Laws* Special Edition, (The Legal Classics Library. The John D., Birmingham, Alabama: Lucas Printing Company, [1748] 1984).

North, Douglass, *Structure and Change in Economic History* (Cambridge: W.W. Norton and Company, 1981).

North, Douglass, *Institutions, Institutional Change, and Economic Performance* (Cambridge, U.K.: Cambridge University Press, 1990).

Olson, Mancur, *The Logic of Collective Action* (Cambridge, MA: Harvard University Press, 1965).

Schlesinger, Rudolf, Hans Baade, Mirjan Damaska, and Peter Herzog, *Comparative Law. Case-Text- Materials* (New York: The Foundation Press, Inc., 1988).

Shapiro, Martin, *Courts* (Chicago: The University of Chicago Press, 1981).

Stiglitz, Joseph, "The Contributions of Economics of Information to 20th Century Economics," *Quarterly Journal of Economics*, 115, (2000), 1441-1478.

Taelman, Piet, (editor), *Civil Procedure - International Encyclopaedia of Laws* (The Hague: Kluwer Law International, 1994).

Watson, Alan, *Legal Transplants: An approach to Comparative Law* (Charlottesville: University of Virginia Press, 1974).

World Bank, *World Business Environment Survey* (Washington, D.C.: The World Bank, 2000).

Description of the variables

This table describes the variables in the paper. The dataset is the same data used for the paper published in the Quarterly Journal of Economics with the exception of the control variable on Education (Average years of schooling). This variable has been revised, due to new data availability, to expand the sample of observations that run in the regressions (Tables VI, VII and VIII) of the paper. Unless otherwise specified, the source for the variables is the survey of law firms and the laws of each country.

Variable	Description
Professionals vs. laymen	
General jurisdiction court	The variable measures whether a court of general or of limited jurisdiction would be chosen or assigned to hear the case under normal circumstances. We define a court of general jurisdiction as a state institution, recognized by the law as part of the regular court system, generally competent to hear and decide regular civil or criminal cases. A limited jurisdiction court would hear and decide only some types of civil cases. Specialized debt-collection or housing courts, small-claims courts, and arbitrators or justices of the peace are examples. Equals one for a court of general jurisdiction, and zero for a court of limited jurisdiction.
Professional vs. non-professional judge	The variable measures whether the judge, or the members of the court or tribunal, could be considered as professional. A professional judge is one who has undergone a complete professional training as required by law, and whose primary activity is to act as judge or member of a court. A non-professional judge is an arbitrator, administrative officer, practicing attorney, merchant, or any other layperson who may be authorized to hear and decide the case. Equals one for a professional judge, and zero for a non-professional judge.
Legal representation is mandatory	The variable measures whether the law requires the intervention of a licensed attorney. The variable equals one when legal representation is mandatory, and zero when legal representation is not mandatory.
Index: Professionals vs. laymen.	The index measures whether the resolution of the case relies on the work of professional judges and attorneys, as opposed to other types of adjudicators and lay people. The index is the normalized sum of: (i) general jurisdiction court, (ii) professional vs. non-professional judge, and (iii) legal representation is mandatory. The index ranges from 0 to 1, where higher values mean more participation by professionals.
Written vs. oral	
Filing	Equals one if the complaint is normally submitted in written form to the court, and zero if it can be presented orally.
Service of process	Equals one if the defendant's first official notice of the complaint is most likely received in writing, and zero otherwise.
Opposition	Equals one if under normal circumstances the defendant's answer to the complaint should be submitted in writing, and zero if it may be presented orally to court.
Evidence	Equals one if evidence is mostly submitted to the court in written form, in the form of attachments, affidavits, or otherwise, and zero if most of the evidence, including documentary evidence, is presented at oral hearings before the judge.
Final arguments	Equals one if final arguments on the case are normally submitted in writing, and zero if they are normally presented orally in court before the judge.
Judgment	Equals one if the judge issues the final decision in the case in written form, and zero he issues it orally in an open court hearing attended by the parties. The defining factor is whether the judge normally decides the case at a hearing. If the judge simply reads out a previously made written decision, the variable equals one. Conversely, for an orally pronounced judgment that is later transposed into writing for enforcement purposes, the variable equals zero.
Notification of judgment	Equals one if normally the parties receive their first notice of the final decision in written form, by notice mailed to them, publication in a court board or gazette, or through any other written means. The variable equals zero if they receive their first notice in an open court hearing attended by them.
Enforcement of judgment	Equals one if the enforcement procedure is mostly carried out through the written court orders or written acts by the enforcement authority, and zero otherwise.

| Index: Written vs. oral elements | The index measures the written or oral nature of the actions involved in the procedure, from the filing of the complaint until the actual enforcement. The index is calculated as the number of stages carried out mostly in written form over the total number of applicable stages, and it ranges from 0 to 1, where higher values mean higher prevalence of written elements. |

Legal justification

Complaint must be legally justified	The variable measures whether the complaint is required, by law or court regulation, to include references to the applicable laws, legal reasoning, or formalities that would normally require legal training. Equals one for a legally justified complaint, and zero when the complaint does not require legal justification (specific articles of the law or case-law).
Judgment must be legally justified	The variable measures whether the judgment must expressly state the legal justification (articles of the law or case-law) for the decision. Equals one for a legally justified judgment, and zero otherwise.
Judgment must be on law (not on equity)	The variable measures whether the judgment may be motivated on general equity grounds, or if it must be founded on the law. Equals one when judgment must be on law only, and zero when judgment may be based on equity grounds.
Index: Legal justification	The index measures the level of legal justification required in the process. The index is formed by the normalized sum of: (i) complaint must be legally justified, (ii) judgment must be legally justified, and (iii) judgment must be on law (not on equity). The index ranges from 0 to 1, where higher values mean a higher use of legal language or justification.

Statutory regulation of evidence

Judge cannot introduce evidence	Equals one if, by law, the judge cannot freely request or take evidence that has not been requested, offered, or introduced by the parties, and zero otherwise.
Judge cannot reject irrelevant evidence	Equals one if, by law, the judge cannot refuse to collect or admit evidence requested by the parties, even if she deems it irrelevant to the case, and zero otherwise.
Out-of-court statements are inadmissible	Equals one if statements of fact that were not directly known or perceived by the witness, but only heard from a third person, may not be admitted as evidence. The variable equals zero otherwise.
Mandatory pre-qualification of questions	Equals one if, by law, the judge must pre-qualify the questions before they are asked of the witnesses, and zero otherwise.
Oral interrogation only by judge	Equals one if parties and witnesses can only be orally interrogated by the judge, and zero if they can be orally interrogated by the judge and the opposing party.
Only original documents and certified copies are admissible	Equals one if only original documents and "authentic" or "certified" copies are admissible documentary evidence, and zero if simple or uncertified copies are admissible evidence as well.
Authenticity and weight of evidence defined by law	Equals one if the authenticity and probative value of documentary evidence is specifically defined by the law, and zero if all admissible documentary evidence is freely weighted by the judge.
Mandatory recording of evidence	Equals one if, by law, there must be a written or magnetic record of all evidence introduced at trial, and zero otherwise.
Index: Statutory regulation of evidence	The index measures the level of statutory control or intervention of the administration, admissibility, evaluation and recording of evidence. The index is formed by the normalized sum of the following variables : (i) judge can not introduce evidence, (ii) judge cannot reject irrelevant evidence, (iii) out-of-court statements are inadmissible, (iv) mandatory pre-qualification of questions, (v) oral interrogation only by judge, (VI) only original documents and certified copies are admissible, (vii) authenticity and weight of evidence defined by law, and (viii) mandatory recording of evidence. The index ranges from 0 to 1, where higher values mean a higher statutory control or intervention.

Control of Superior Review

| Enforcement of judgment is automatically suspended until resolution of the appeal | Equals one if the enforcement of judgment is automatically suspended until resolution of the appeal when a request for appeal is granted. Equals zero if the suspension of the enforcement of judgment is not automatic, or if the judgment cannot be appealed at all. |
| Comprehensive review in appeal | Equals one if issues of both law and fact (evidence) can be reviewed by the appellate court. Equals zero if only new evidence or issues of law can be reviewed in appeal, or if judgment cannot be appealed. |

Interlocutory appeals are allowed	Equals one if interlocutory appeals are allowed, and zero if they are always prohibited. Interlocutory appeals are defined as appeals against interlocutory or interim judicial decisions made during the course of a judicial proceeding in first instance and before the final ruling on the entire case.
Index: Control of superior review	The index measures the level of control or intervention of the appellate court's review of the first-instance judgment. The index is formed by the normalized sum of the following variables : (i) enforcement of judgment is automatically suspended until resolution of appeal, (ii) comprehensive review in appeal, and (iii) interlocutory appeals are allowed. The index ranges from 0 to 1, where higher values mean higher control or intervention.

Engagement formalities

Mandatory pre-trial conciliation	Equals one if the law requires plaintiff to attempt a pre-trial conciliation or mediation before filing the lawsuit, and zero otherwise.
Service of process by judicial officer required	Equals one if the law requires the complaint to be served to the defendant through the intervention of a judicial officer, and zero if service of process may be accomplished by other means.
Notification of judgment by judicial officer required	Equals one if the law requires the judgment to be notified to the defendant through the intervention of a judicial officer, and zero if notification of judgment may be accomplished by other means.
Index: Engagement formalities	The index measures the formalities required to engage someone in the procedure or to held him/her accountable of the judgment. The index is formed by the normalized sum of the following variables: (i) mandatory pre-trial conciliation, (ii) service of process by judicial officer required, and (iii) notification of judgment by judicial officer required. The index ranges from 0 to 1, where higher values mean a higher statutory control or intervention in the judicial process.

Independent procedural actions

Filing and service	The total minimum number of independent procedural actions required to complete filing, admission, attachment, and service.
Trial and judgment	The total minimum number of independent procedural actions required to complete opposition to the complaint, hearing or trial, evidence, final arguments, and judgment.
Enforcement	The total minimum number of independent procedural actions required to complete notification and enforcement of judgment.
Index: Independent procedural actions	An independent procedural action is defined as a step of the procedure, mandated by law or court regulation, that demands interaction between the parties or between them and the judge or court officer (e.g., filing a motion, attending a hearing, mailing a letter, or seizing some goods). We also count as an independent procedural action every judicial or administrative writ or resolution (e.g., issuing judgment or entering a writ of execution) which is legally required to advance the proceedings until the enforcement of judgment. Actions are always assumed to be simultaneous if possible, so procedural events that may be fulfilled in the same day and place are only counted as one action. To form the index, we: (1) add the minimum number of independent procedural actions required to complete all the stages of the process (from filing of lawsuit to enforcement of judgment); and (2) normalize this number to fall between zero and one using the minimum and the maximum number of independent procedural actions among the countries in the sample. The index takes a value of zero for the country with the minimum number of independent procedural actions, and a value of one for the country with the maximum number of independent procedural actions.

Formalism index

Formalism index	The index measures substantive and procedural statutory intervention in judicial cases at lower-level civil trial courts, and is formed by adding up the following indices: (i) professionals vs. laymen, (ii) written vs. oral elements, (iii) legal justification, (iv) statutory regulation of evidence, (v) control of superior review, (vi) engagement formalities, and (vii) independent procedural actions. The index ranges from 0 to 7, where 7 means a higher level of control or intervention in the judicial process.

Incentives of parties

Mandatory time limit for admission	Equals one if the judge is required by law to admit or reject the lawsuit within a certain period of time, and zero otherwise.
Mandatory time limit to present evidence	Equals one if the period in which the parties may collect or present evidence is fixed by law to a certain number of days after service or number of days before hearing, and zero otherwise.

Mandatory time limit to present defense	Equals one if the defendant is required by law to file the opposition within certain time limit, either in terms of number of days from service or number of days before the hearing. The variable equals zero otherwise.
Mandatory time limit for judgment	Equals one if the judge is required by law to enter judgment within a specified period of time after the conclusion of the hearing or the final pleadings, and zero otherwise.
Mandatory time limit for notification of judgment	Equals one if the court is required by law to notify the parties within a specified period of time after judgment is entered, and zero otherwise.
Index: Mandatory time limits	The presence of mandatory time limits in the procedure. The index is calculated as the average of: (i) term for admission, (ii) term to present evidence, (iii) term to present defense, (iv) term for judgment, (v) term for compliance, (vi) term for notification of judgment. The index ranges from 0 to 1, where higher values mean more mandatory deadlines.
Quota litis prohibited	The variable equals one if quota litis or contingent fee agreements are prohibited by law in all cases, and zero otherwise.
Loser pays rule	The variable equals one if the loser is required to pay all the costs of the dispute, and zero otherwise.

Duration in practice

Duration until completion of service of process	Estimated duration, in calendar days, between the moment the plaintiff files the complaint until the moment of service of process to the defendant.
Duration of trial	Estimated duration, in calendar days, between the moment of service of process and the moment the judgment is issued.
Duration of enforcement	Estimated duration, in calendar days, between the moment of issuance of judgment and the moment the landlord repossesses the property (for the eviction case) or the creditor obtains payment (for the check collection case).
Total duration	The total estimated duration in calendar days of the procedure under the factual and procedural assumptions provided. It equals the sum of: (i) duration until completion of service of process, (ii) duration of trial, and (iii) duration of enforcement.

Other judicial quality measures

Enforceability of contracts	"The relative degree to which contractual agreements are honored and complications presented by language and mentality differences." Scale for 0 to 10, with higher scores indicating higher enforceability. *Source*: *Business Environmental Risk Intelligence.* Exact definition in *Knack, Stephen and Philip Keefer, 1995.*
Legal system is fair and impartial	"In resolving business disputes, do you believe your country's court system to be fair and impartial?" The scale ranges from 1 to 6, where higher scores mean a fairer and more impartial legal system. *Source: World Business Environment Survey.*
Legal system is honest or uncorrupt	"In resolving business disputes, do you believe your country's court system to be honest/uncorrupt?" The scale ranges from 1 to 6, where a higher score signals a more honest and uncorrupt system. *Source: World Business Environment Survey.*
Legal system is affordable	"In resolving business disputes, do you believe your country's court system to be affordable?" The scale ranges from 1 to 6, where a higher score means a more affordable legal system. *Source: World Business Environment Survey.*
Legal system is consistent	"In resolving business disputes, do you believe your country's court system to be consistent?" The scale ranges from 1 to 6, where a higher score means a more consistent legal system. *Source: World Business Environment Survey.*
Confidence in legal system	The questionnaire asks the managers the degree to which they believe the system will uphold contracts and property rights in a business dispute. The scale ranges from 1 to 6, where a higher score means a higher degree of confidence on the system. *Source: World Business Environment Survey.*
Corruption	A composite index for the year 2000 that draws on 14 data sources from seven institutions: the World Economic Forum, the World Business Environment Survey of the World Bank, the Institute of Management Development (in Lausanne), PricewaterhouseCoopers, the Political and Economic Risk Consultancy (in Hong Kong), the Economist Intelligence Unit and Freedom House's Nations in Transit. The score ranges between 10 (highly clean) and 0 (highly corrupt). *Source: Transparency International (2001).*
Law and Order	Integrity of legal system in 2000. This component is based on the Political Risk Component 1 (Law and Order) from the PRS Group's International Country Risk Guide (various issues). Rankings are modified to a 10 point scale. *Source: Economic Freedom of the World (2002).*

| Quota litis prohibited | Equals one if quota litis or contingent fee agreements are prohibited by law in all cases, and zero otherwise. |
| Loser pays rule | Equals one if the loser is required to pay all the costs of the dispute, and zero otherwise. |

Other variables

Log of GNP per capita	Logarithm of GNP per capita in 1999, Atlas method, expressed in current US dollars. When 1999 income data in US dollars was not available, the latest available number was used (1996 for Kuwait, 1997 for Cayman Islands, Gibraltar, Turks and Caicos Island, 1998 for Anguilla, Bahrain, Netherlands Antilles, United Arab Emirates). Income for Anguilla, the British Virgin Islands, the Cayman Island, Gibraltar, Monaco, the Netherlands Antilles, and the Turks and Caicos Islands is GDP per capita (PPP) from the CIA World Factbook. *Source: World Development Indicators.*
Legal origin	Identifies the legal origin of the company law or commercial code of each country(English, French, Socialist, German, Scandinavian). *Source: La Porta, et al. (1999).*
Latitude	The absolute value of the latitude of the capital of the country, scaled to take values between 0 and 1. *Source: CIA Factbook.*
Average years of schooling	Average years of schooling of population over 25 years of age in 2000 or last year available (1990 for Estonia, Kazakhstan, Latvia, Lithuania and Vietnam, and 1980 for St.Vincent) from *Barro and Lee database*. The data for Cote d'Ivore, Lebanon, Morocco, Nigeria and Tanzania are from the *Human Development Report 1994*, The number for Belize comes from *http://www.ethnologue.com/*. The number for Ukraine is the value for mean actual years of schooling in 2000 from *Gorodnichenko and Sabirianova's working paper "Returns to Schooling in Russia and Ukraine: A Semiparametric Approach to Cross-Country Comparative Analysis," University of Michigan working paper, September 2004.*
Ethnic fractionalization	Ethnic fractionalization is computed as one minus the Herfindahl index of ethnic group shares. This calculation considers the probability that two persons, randomly chosen, from a population belong to different groups. *Source: Alesina et al. (2002).*

Table 2A: Eviction of a tenant

This table classifies countries by legal origin and shows the professionals vs. laymen, written vs. oral elements, legal justification, statutory regulation of evidence, control of superior review, and engagement formalities indices, and the normalized number of independent procedural actions for the case of eviction of a tenant. All variables are described in Table 1.

	Professionals vs. laymen	Written vs. oral elements	Legal justification	Statutory regulation of evidence	Control of superior review	Engagement formalities	Independent procedural actions	**Formalism index**
English legal origin								
Anguilla	0.67	0.88	0.67	0.13	1.00	0.67	0.28	**4.28**
Australia	0.00	0.57	0.33	0.25	0.67	0.00	0.17	**1.99**
Bahrain	0.33	0.63	1.00	0.38	1.00	0.33	0.25	**3.92**
Bangladesh	0.33	0.63	0.67	0.13	1.00	0.33	0.28	**3.36**
Barbados	0.67	0.50	0.00	0.25	0.67	0.00	0.25	**2.33**
Belize	0.00	0.38	0.67	0.38	0.67	0.00	0.00	**2.08**
Bermuda	0.33	0.38	0.00	0.25	0.33	0.00	0.03	**1.32**
Botswana	0.67	0.75	0.67	0.38	0.67	0.67	0.28	**4.07**
BVI	0.67	0.50	0.33	0.38	0.67	0.00	0.33	**2.88**
Canada	0.00	0.75	0.33	0.38	0.33	0.33	0.19	**2.32**
Cayman	0.67	0.63	0.67	0.25	0.67	0.33	0.39	**3.60**
Cyprus	0.67	0.63	0.67	0.38	0.67	0.33	0.17	**3.50**
Ghana	0.67	0.50	0.00	0.50	0.33	0.33	0.36	**2.69**
Gibraltar	0.67	0.75	0.33	0.13	0.33	0.00	0.31	**2.51**
Grenada	0.33	0.38	0.67	0.38	0.67	0.33	0.11	**2.86**
Hong Kong	0.33	0.75	1.00	0.13	0.67	0.00	0.25	**3.13**
India	0.33	0.75	1.00	0.38	0.33	0.33	0.39	**3.51**
Ireland	0.67	0.71	0.33	0.13	1.00	0.00	0.36	**3.20**
Israel	0.67	0.88	1.00	0.50	0.67	0.00	0.19	**3.90**
Jamaica	0.67	0.38	0.33	0.25	0.67	0.00	0.08	**2.38**
Kenya	0.33	0.75	0.33	0.38	0.67	0.00	0.39	**2.85**
Malawi	0.33	0.63	0.67	0.38	0.67	0.33	0.14	**3.14**
Malaysia	0.67	0.63	0.33	0.50	0.67	0.00	0.42	**3.21**
Namibia	0.67	0.63	0.67	0.38	1.00	0.33	0.19	**3.86**
New Zealand	0.00	0.50	0.33	0.00	0.33	0.00	0.08	**1.25**
Nigeria	0.33	0.63	0.33	0.38	1.00	0.00	0.42	**3.08**
Pakistan	0.67	0.63	0.67	0.25	1.00	0.00	0.53	**3.74**
Singapore	0.67	0.63	0.33	0.38	0.67	0.00	0.44	**3.11**
South Africa	0.67	0.50	0.67	0.38	1.00	0.33	0.14	**3.68**
Sri Lanka	0.67	0.63	1.00	0.38	1.00	0.00	0.22	**3.89**
St. Vincent	0.67	0.50	0.67	0.38	0.67	0.67	0.31	**3.85**
Swaziland	0.67	0.63	1.00	0.25	1.00	0.00	0.19	**3.74**
Tanzania	0.33	0.63	0.33	0.50	0.67	0.33	0.11	**2.90**
Thailand	0.67	0.88	1.00	0.38	0.67	0.33	0.33	**4.25**
Trinidad & Tobago	0.67	0.63	0.00	0.25	0.33	0.00	0.28	**2.15**
Turks and Caicos	0.67	0.63	0.00	0.38	0.67	0.00	0.47	**2.81**
UAE	0.00	0.50	0.33	0.00	0.00	0.33	0.28	**1.44**
Uganda	0.00	1.00	0.33	0.38	0.67	0.00	0.14	**2.51**
United Kingdom	0.67	0.75	0.33	0.00	0.33	0.00	0.14	**2.22**
USA	0.33	0.63	1.00	0.13	0.67	0.00	0.22	**2.97**
Zambia	0.67	0.50	0.33	0.38	0.67	0.33	0.19	**3.07**
Zimbabwe	0.33	0.63	0.67	0.38	0.67	0.33	0.11	**3.11**
Mean	**0.48**	**0.63**	**0.52**	**0.30**	**0.67**	**0.17**	**0.25**	3.02
Median	**0.67**	**0.63**	**0.50**	**0.38**	**0.67**	**0.00**	**0.25**	3.10
Socialist legal origin								
Bulgaria	0.67	0.88	1.00	0.25	1.00	0.33	0.39	**4.51**
China	0.67	0.75	0.33	0.38	1.00	0.00	0.28	**3.40**
Croatia	0.67	0.63	1.00	0.25	0.67	0.00	0.22	**3.43**
Czech Republic	0.67	0.38	1.00	0.25	1.00	0.00	0.25	**3.54**
Estonia	0.67	0.75	1.00	0.38	1.00	0.67	0.28	**4.74**
Georgia	0.67	0.63	0.67	0.25	1.00	0.00	0.31	**3.51**
Hungary	0.67	0.75	1.00	0.13	0.67	0.00	0.25	**3.46**
Kazakhstan	0.67	0.63	0.67	0.38	1.00	0.00	0.67	**4.00**
Latvia	0.67	0.63	1.00	0.38	1.00	0.00	0.19	**3.86**
Lithuania	0.67	0.75	1.00	0.38	1.00	0.00	0.42	**4.21**
Poland	0.67	0.75	1.00	0.50	1.00	0.00	0.17	**4.08**
Romania	0.67	0.75	1.00	0.50	1.00	0.00	0.56	**4.47**
Russia	0.67	0.50	0.67	0.38	1.00	0.00	0.11	**3.32**
Slovenia	0.67	0.75	1.00	0.38	1.00	0.00	0.47	**4.26**
Ukraine	0.67	0.75	0.33	0.63	1.00	0.00	0.22	**3.60**
Vietnam	0.67	0.50	0.00	0.25	1.00	0.00	0.42	**2.86**
Mean	**0.67**	**0.67**	**0.79**	**0.35**	**0.96**	**0.06**	**0.32**	3.83
Median	**0.67**	**0.75**	**1.00**	**0.38**	**1.00**	**0.00**	**0.28**	3.73
French legal origin								
Argentina	1.00	1.00	1.00	0.13	1.00	0.67	0.69	**5.49**
Belgium	0.67	0.75	0.33	0.25	0.67	0.33	0.17	**3.17**
Bolivia	1.00	1.00	0.67	0.25	1.00	0.67	0.53	**5.11**
Brazil	1.00	0.63	1.00	0.38	0.67	0.00	0.17	**3.83**
Chile	1.00	0.88	0.67	0.50	0.67	0.67	0.42	**4.79**
Colombia	0.67	1.00	1.00	0.25	0.00	0.33	0.69	**3.94**
Costa Rica	0.67	0.86	1.00	0.50	1.00	0.67	0.36	**5.05**
Cote D'Ivoire	0.67	0.50	0.67	0.25	0.67	0.67	0.22	**3.64**
Dominican Republic	0.33	0.63	1.00	0.38	1.00	0.67	0.36	**4.36**

	Professionals vs. laymen	Written vs. oral elements	Legal justification	Statutory regulation of evidence	Control of superior review	Engagement formalities	Independent procedural actions	**Formalism index**
Ecuador	0.67	0.88	1.00	0.63	0.67	0.33	0.47	**4.64**
Egypt	0.67	0.63	1.00	0.50	0.33	0.33	0.14	**3.60**
El Salvador	0.33	1.00	0.67	0.75	0.67	0.67	0.17	**4.25**
France	0.33	0.75	1.00	0.13	0.67	0.67	0.06	**3.60**
Greece	1.00	1.00	1.00	0.50	0.00	0.67	0.14	**4.31**
Guatemala	1.00	1.00	1.00	0.75	1.00	0.67	0.36	**5.78**
Honduras	0.67	1.00	1.00	0.63	0.67	0.33	0.39	**4.68**
Indonesia	0.33	0.88	0.67	0.50	0.67	0.33	0.50	**3.88**
Italy	1.00	1.00	0.67	0.13	0.67	0.67	0.11	**4.24**
Jordan	0.67	0.63	0.67	0.50	0.00	0.33	0.58	**3.38**
Kuwait	0.33	0.88	1.00	0.25	1.00	1.00[c]	0.14[c]	**4.60**
Lebanon	1.00	0.88	1.00	0.50	1.00	0.67[a]	0.53	**5.57**
Luxembourg	0.33	0.86	0.67	0.50	1.00	0.00	0.31	**3.66**
Malta	0.67	0.63	0.67	0.38	0.67	0.33	0.08	**3.42**
Mexico	0.33	0.88	1.00	0.50	0.67	0.67	0.78	**4.82**
Monaco	0.33	0.63	0.67	0.25	0.33	0.67	0.06	**2.93**
Morocco	0.67	1.00	0.67	0.63	1.00	0.67	0.17	**4.79**
Mozambique	1.00	0.75	1.00	0.38	1.00	0.67	0.36	**5.15**
Netherlands	0.33	0.63	0.67	0.13	0.67	0.33	0.25	**3.00**
Netherlands Antilles	0.67	0.63	0.33	0.25	0.67	0.67	0.42	**3.63**
Panama	1.00	1.00	1.00	0.25	1.00	0.67	1.00	**5.92**
Paraguay	0.67	0.86	1.00	0.63	0.67	0.67	0.61	**5.09**
Peru	1.00	0.88	1.00	0.38	1.00	0.67	0.50	**5.42**
Philippines	1.00	1.00	1.00	0.50	0.33	0.67	0.50	**5.00**
Portugal	1.00	0.75	1.00	0.38	1.00	0.00	0.42	**4.54**
Senegal	0.67	0.63	0.33	0.63	0.67	0.67	0.31	**3.89**
Spain	0.67	0.88	1.00	0.63	0.67	0.67	0.31	**4.81**
Tunisia	0.67	0.75	0.67	0.25	0.67	0.67	0.22	**3.89**
Turkey	0.67	0.63	1.00	0.75	0.00	0.00	0.44	**3.49**
Uruguay	1.00	0.50	0.67	0.13	0.67	0.33	0.69	**3.99**
Venezuela	1.00	1.00	1.00	0.50	1.00	0.67	0.64	**5.81**
Mean	**0.72**	**0.81**	**0.83**	**0.42**	**0.69**	**0.53**	**0.38**	**4.38**
Median	**0.67**	**0.87**	**1.00**	**0.44**	**0.67**	**0.67**	**0.36**	**4.33**
German legal origin								
Austria	0.67	0.86	1.00	0.13	0.67	0.00	0.31	**3.62**
Germany	0.33	0.88	1.00	0.50	0.67	0.00	0.39	**3.76**
Japan	0.67	1.00	1.00	0.25	0.67	0.00	0.14	**3.72**
Korea	0.67	0.88	0.33	0.13	0.67	0.33	0.33	**3.33**
Switzerland	0.67	0.63	1.00	0.25	1.00	0.33	0.08	**3.96**
Taiwan	0.67	0.50	0.67	0.38	0.67	0.00	0.17	**3.04**
Mean	**0.61**	**0.79**	**0.83**	**0.27**	**0.72**	**0.11**	**0.24**	**3.57**
Median	**0.67**	**0.87**	**1.00**	**0.25**	**0.67**	**0.00**	**0.24**	**3.67**
Scandinavian legal origin								
Denmark	0.67	0.75	0.67	0.13	1.00	0.00	0.39	**3.60**
Finland	0.33	0.50	0.67	0.25	0.67	0.00	0.11	**2.53**
Iceland	0.67	0.38	1.00	0.38	0.67	0.33	0.06	**3.47**
Norway	0.67	0.75	0.67	0.13	1.00	0.33	0.17	**3.71**
Sweden	0.67	0.75	0.33	0.25	1.00	0.00	0.31	**3.31**
Mean	**0.60**	**0.63**	**0.67**	**0.23**	**0.87**	**0.13**	**0.21**	**3.32**
Median	**0.67**	**0.75**	**0.67**	**0.25**	**1.00**	**0.00**	**0.17**	**3.47**
Mean for all countries	**0.58**	**0.71**	**0.68**	**0.33**	**0.71**	**0.27**	**0.31**	**3.68**
Median for all countries	**0.67**	**0.75**	**0.67**	**0.38**	**0.67**	**0.33**	**0.28**	**3.63**

	Professionals vs. laymen	Written vs. oral elements	Legal justification	Statutory regulation of evidence	Control of superior review	Engagement formalities	Independent procedural actions	**Formalism index**
Tests of means (t-stats)								
Common vs. Socialist	-3.08[a]	-1.13	-2.89[a]	-1.31	-4.57[a]	1.87[c]	-1.98[c]	**-3.87[a]**
Common vs. French	-4.34[a]	-5.61[a]	-5.20[a]	-3.21[a]	-0.41	-7.07[a]	-3.38[a]	**-7.77[a]**
Common vs. German	-1.31	-2.53[b]	-2.29[b]	0.50	-0.54	0.70	0.22	**-1.74[c]**
Common vs. Scandinavian	-1.10	0.01	-0.98	1.20	-1.77[c]	0.42	0.72	**-0.86**
Socialist vs. French	-0.78	-3.14[a]	-0.57	-1.27	3.38[a]	-7.00[a]	-0.94	**-2.49[b]**
Socialist vs. German	1.71	-1.68	-0.28	1.31	4.12[a]	-0.57	1.29	**1.10**
Socialist vs. Scandinavian	1.90[c]	0.65	0.80	2.07[c]	1.36	-0.76	1.57	**1.93[c]**
French vs. German	0.98	0.35	0.00	1.81[c]	-0.24	4.09[a]	1.56	**2.37[b]**
French vs. Scandinavian	0.99	2.44[b]	1.63	2.23[b]	-1.25	3.55[a]	1.72[c]	**2.82[a]**
German vs. Scandinavian	0.13	1.48	1.06	0.59	-1.51	-0.21	0.39	**1.04**
Tests of medians (z-stats)								
Common vs. Socialist	-3.08[a]	-1.51	-2.81[a]	-0.92	-4.22[a]	2.13[b]	-1.64	**-3.50[a]**
Common vs. French	-3.78[a]	-4.67[a]	-4.48[a]	-2.77[a]	-0.86	-5.60[a]	2.76[a]	**-5.97[a]**
Common vs. German	-1.29	-2.00[b]	-2.17[b]	0.68	-0.47	0.64	0.20	**-1.75[c]**
Common vs. Scandinavian	-1.06	-0.30	-1.03	1.45	-1.79[c]	0.33	0.73	**-0.85**
Socialist vs. French	-0.98	-2.78[a]	-0.04	-1.22	3.50[a]	-5.02[a]	-0.73	**-2.45[b]**
Socialist vs. German	1.63	-1.60	-0.21	1.27	3.10[a]	-0.99	1.14	**0.88**
Socialist vs. Scandinavian	1.79[c]	0.40	1.22	1.95[c]	1.33	-1.21	1.49	**1.53**
French vs. German	1.07	0.38	-0.21	1.78[c]	0.16	3.39[a]	1.60	**2.25[b]**
French vs. Scandinavian	1.07	2.05[b]	1.62	2.17[b]	-1.26	3.06[a]	1.79[c]	**2.67[a]**
German vs. Scandinavian	0.14	1.57	1.18	0.48	-1.42	-0.22	0.46	**1.28**

a=significant at 1% level; b=significant at 5% level; c=significant at 10% level.

Table 2B : Collection of a check

This table classifies countries by legal origin and shows the professionals vs. laymen, written vs. oral elements, legal justification, statutory regulation of evidence, control of superior review, and engagement formalities indices, and the normalized number of independent procedural actions for the case of collection of a check. All variables are described in Table 1.

	Professionals vs. laymen	Written vs. oral elements	Legal justification	Statutory regulation of evidence	Control of superior review	Engagement formalities	Independent procedural actions	Formalism index
English legal origin								
Anguilla	0.00	0.38	0.33	0.13	1.00	0.00	0.13	**1.96**
Australia	0.00	0.50	0.33	0.25	0.67	0.00	0.05	**1.80**
Bahrain	0.33	0.75	1.00	0.75	1.00	0.33	0.24	**4.40**
Bangladesh	0.67	0.63	0.67	0.13	1.00	0.00	0.16	**3.24**
Barbados	0.33	0.38	0.33	0.25	0.67	0.33	0.08	**2.37**
Belize	0.00	0.38	0.00	0.38	0.67	0.00	0.00	**1.42**
Bermuda	0.33	0.38	0.00	0.25	0.33	0.33	0.16	**1.78**
Botswana	0.67	0.75	0.67	0.38	0.67	0.67	0.29	**4.08**
BVI	0.33	0.38	0.00	0.38	1.00	0.33	0.11	**2.52**
Canada	0.33	0.50	0.00	0.38	0.67	0.00	0.21	**2.09**
Cayman	0.67	0.63	0.33	0.25	0.67	0.00	0.21	**2.75**
Cyprus	0.67	0.63	0.67	0.38	0.67	0.33	0.34	**3.68**
Ghana	0.67	0.50	0.00	0.50	0.33	0.33	0.32	**2.65**
Gibraltar	0.67	0.75	0.33	0.13	0.33	0.00	0.18	**2.39**
Grenada	0.33	0.38	0.67	0.38	0.67	0.33	0.05	**2.80**
Hong Kong	0.00	0.63	0.00	0.00	0.00	0.00	0.11	**0.73**
India	0.67	0.63	1.00	0.38	0.33	0.00	0.34	**3.34**
Ireland	0.67	0.57	0.33	0.13	0.67	0.00	0.26	**2.63**
Israel	0.33	0.88	0.67	0.50	0.67	0.00	0.26	**3.30**
Jamaica	0.67	0.38	0.33	0.25	0.67	0.00	0.05	**2.34**
Kenya	0.67	0.63	0.33	0.38	0.67	0.00	0.42	**3.09**
Malawi	0.67	0.63	0.33	0.25	0.67	0.33	0.08	**2.95**
Malaysia	0.33	0.50	0.00	0.50	0.67	0.00	0.34	**2.34**
Namibia	0.67	0.63	0.67	0.38	1.00	0.33	0.16	**3.82**
New Zealand	0.00	0.50	0.33	0.00	0.67	0.00	0.08	**1.58**
Nigeria	0.33	0.63	0.33	0.38	0.67	0.33	0.53	**3.19**
Pakistan	0.67	0.63	0.67	0.25	1.00	0.00	0.55	**3.76**
Singapore	0.33	0.38	0.00	0.50	0.67	0.33	0.29	**2.50**
South Africa	0.00	0.38	0.33	0.25	0.67	0.00	0.05	**1.68**
Sri Lanka	0.67	0.86	0.67	0.38	1.00	0.00	0.21	**3.78**
St. Vincent	1.00	0.43	0.67	0.38	0.67	0.33	0.16	**3.63**
Swaziland	0.67	0.63	1.00	0.25	1.00	0.00	0.16	**3.70**
Tanzania	0.67	0.86	0.67	0.50	0.67	0.33	0.13	**3.82**
Thailand	0.33	0.50	0.67	0.38	0.67	0.33	0.26	**3.14**
Trinidad & Tobago	0.33	0.63	0.00	0.25	0.33	0.00	0.26	**1.80**
Turks and Caicos	0.00	0.25	0.00	0.38	1.00	0.00	0.24	**1.86**
UAE	1.00	0.88	1.00	0.13	0.33	0.00	0.47	**3.81**
Uganda	0.00	0.71	0.67	0.38	0.67	0.00	0.18	**2.61**
United Kingdom	0.67	0.71	0.33	0.13	0.67	0.00	0.08	**2.58**
USA	0.33	0.75	0.33	0.13	1.00	0.00	0.08	**2.62**
Zambia	0.00	0.57	0.33	0.38	0.67	0.00	0.18	**2.13**
Zimbabwe	0.33	0.63	0.67	0.38	0.67	0.33	0.11	**3.11**
Mean	**0.43**	**0.58**	**0.42**	**0.31**	**0.68**	**0.13**	**0.20**	**2.76**
Median	**0.33**	**0.63**	**0.33**	**0.38**	**0.67**	**0.00**	**0.18**	**2.64**
Socialist legal origin								
Bulgaria	0.67	0.88	1.00	0.25	1.00	0.33	0.45	**4.57**
China	0.67	0.75	0.33	0.38	1.00	0.00	0.29	**3.41**
Croatia	0.67	0.75	1.00	0.25	0.67	0.00	0.29	**3.62**
Czech Republic	0.67	0.83	1.00	0.38	1.00	0.00	0.18	**4.06**
Estonia	0.67	0.75	1.00	0.38	1.00	0.33	0.24	**4.36**
Georgia	0.67	0.63	0.67	0.25	0.67	0.00	0.21	**3.09**
Hungary	0.67	0.75	0.67	0.13	1.00	0.00	0.21	**3.42**
Kazakhstan	0.67	0.75	0.67	0.50	1.00	0.33	0.84	**4.76**
Latvia	0.67	0.63	1.00	0.38	1.00	0.00	0.26	**3.93**
Lithuania	0.67	0.75	1.00	0.50	1.00	0.00	0.55	**4.47**
Poland	0.67	0.88	1.00	0.38	1.00	0.00	0.24	**4.15**
Romania	0.67	0.75	1.00	0.50	1.00	0.00	0.50	**4.42**
Russia	0.67	0.50	0.67	0.38	1.00	0.00	0.18	**3.39**
Slovenia	0.67	0.75	1.00	0.50	1.00	0.00	0.34	**4.26**
Ukraine	0.67	0.75	0.33	0.63	1.00	0.00	0.29	**3.66**
Vietnam	0.67	0.50	0.33	0.25	1.00	0.00	0.50	**3.25**
Mean	**0.67**	**0.72**	**0.79**	**0.38**	**0.96**	**0.06**	**0.35**	**3.93**
Median	**0.67**	**0.75**	**1.00**	**0.38**	**1.00**	**0.00**	**0.29**	**3.99**
French legal origin								
Argentina	1.00	1.00	1.00	0.13	1.00	0.67	0.61	**5.40**
Belgium	0.33	0.75	0.33	0.13	0.67	0.33	0.18	**2.73**
Bolivia	1.00	1.00	0.67	0.38	1.00	1.00	0.71	**5.75**
Brazil	0.33	0.50	1.00	0.38	0.67	0.00	0.18	**3.06**
Chile	1.00	0.75	0.67	0.50	0.67	0.67	0.32	**4.57**
Colombia	0.67	1.00	1.00	0.38	0.00	0.33	0.74	**4.11**
Costa Rica	1.00	1.00	1.00	0.50	1.00	0.67	0.32	**5.48**
Cote D'Ivoire	0.67	0.63	0.67	0.13	0.67	0.67	0.24	**3.65**
Dominican Republic	0.33	0.75	0.67	0.38	1.00	0.67	0.29	**4.08**

	Professionals vs. laymen	Written vs.oral elements	Legal justification	Statutory regulation of evidence	Control of superior review	Engagement formalities	Independent procedural actions	Formalism index
Ecuador	1.00	1.00	0.67	0.63	0.67	0.33	0.63	**4.92**
Egypt	1.00	0.75	1.00	0.50	0.00	0.33	0.21	**3.79**
El Salvador	0.33	0.88	1.00	0.88	0.67	0.67	0.18	**4.60**
France	0.33	0.75	1.00	0.13	0.33	0.67	0.03	**3.23**
Greece	0.67	1.00	1.00	0.50	0.00	0.67	0.16	**3.99**
Guatemala	1.00	1.00	1.00	0.75	1.00	0.67	0.26	**5.68**
Honduras	0.67	1.00	1.00	0.63	0.67	0.33	0.61	**4.90**
Indonesia	0.33	0.88	0.67	0.50	0.67	0.33	0.53	**3.90**
Italy	0.67	0.86	1.00	0.00	0.67	0.67	0.18	**4.04**
Jordan	0.67	0.75	0.67	0.50	0.00	0.33	0.61	**3.52**
Kuwait	0.67	0.88	0.67	0.13	0.67	0.67	0.21	**3.88**
Lebanon	1.00	0.75	0.67	0.63	1.00	0.33	0.47	**4.85**
Luxembourg	0.33	0.71	0.67	0.50	1.00	0.00	0.34	**3.56**
Malta	0.00	0.63	0.33	0.38	0.67	0.33	0.11	**2.44**
Mexico	0.33	0.88	1.00	0.50	0.67	0.33	1.00	**4.71**
Monaco	0.33	0.71	0.33	0.25	0.33	0.67	0.11	**2.74**
Morocco	1.00	1.00	0.67	0.50	0.67	0.67	0.21	**4.71**
Mozambique	0.67	0.75	1.00	0.50	0.67	0.67	0.24	**4.49**
Netherlands	0.33	0.63	0.67	0.13	0.67	0.33	0.32	**3.07**
Netherlands Antilles	0.67	0.88	0.33	0.25	0.33	0.00	0.39	**2.85**
Panama	1.00	1.00	1.00	0.25	1.00	0.67	0.92	**5.84**
Paraguay	1.00	1.00	1.00	0.63	0.67	0.67	0.95	**5.91**
Peru	1.00	0.88	1.00	0.38	1.00	0.67	0.68	**5.60**
Philippines	1.00	1.00	1.00	0.50	0.33	0.67	0.50	**5.00**
Portugal	0.67	0.75	1.00	0.50	0.67	0.00	0.34	**3.93**
Senegal	0.67	0.88	0.67	0.63	0.67	0.67	0.55	**4.72**
Spain	1.00	1.00	1.00	0.63	0.67	0.67	0.29	**5.25**
Tunisia	0.67	1.00	0.67	0.25	0.67	0.67	0.13	**4.05**
Turkey	0.00	1.00	0.67	0.63	0.00	0.00	0.24	**2.53**
Uruguay	1.00	0.50	0.67	0.13	0.67	0.33	0.76	**4.05**
Venezuela	1.00	1.00	1.00	0.50	1.00	0.67	0.84	**6.01**
Mean	**0.68**	**0.85**	**0.80**	**0.42**	**0.63**	**0.49**	**0.41**	4.29
Median	**0.67**	**0.88**	**0.83**	**0.50**	**0.67**	**0.67**	**0.32**	4.10
German legal origin								
Austria	0.67	0.86	1.00	0.38	0.33	0.00	0.29	**3.52**
Germany	0.33	0.88	1.00	0.50	0.67	0.00	0.13	**3.51**
Japan	0.33	0.88	0.67	0.25	0.67	0.00	0.18	**2.98**
Korea	0.67	0.88	0.33	0.13	0.67	0.33	0.37	**3.37**
Switzerland	0.67	0.63	0.67	0.38	0.33	0.33	0.13	**3.13**
Taiwan	0.33	0.50	0.67	0.38	0.33	0.00	0.16	**2.37**
Mean	**0.50**	**0.77**	**0.72**	**0.33**	**0.50**	**0.11**	**0.21**	**3.15**
Median	**0.50**	**0.87**	**0.67**	**0.38**	**0.50**	**0.00**	**0.17**	**3.25**
Scandinavian legal origin								
Denmark	0.33	0.63	0.00	0.13	1.00	0.33	0.13	**2.55**
Finland	0.67	0.63	0.67	0.25	0.67	0.00	0.26	**3.14**
Iceland	0.67	0.63	1.00	0.38	1.00	0.33	0.13	**4.13**
Norway	0.33	0.75	0.67	0.13	1.00	0.00	0.08	**2.95**
Sweden	0.67	0.75	0.33	0.25	0.67	0.00	0.32	**2.98**
Mean	**0.53**	**0.68**	**0.53**	**0.23**	**0.87**	**0.13**	**0.18**	**3.15**
Median	**0.67**	**0.63**	**0.67**	**0.25**	**1.00**	**0.00**	**0.13**	**2.98**
Mean for all countries	**0.57**	**0.71**	**0.64**	**0.36**	**0.70**	**0.25**	**0.30**	**3.53**
Median for all countries	**0.67**	**0.75**	**0.67**	**0.38**	**0.67**	**0.33**	**0.24**	**3.52**

				Tests of means (t-stats)				
Common vs. Socialist	-3.29[a]	-3.38[a]	-4.19[a]	-1.55	-4.53[a]	1.45	-3.38[a]	**-5.24[a]**
Common vs. French	-3.85[a]	-7.97[a]	-6.29[a]	-2.71[a]	0.82	-7.42[a]	-4.63[a]	**-7.52[a]**
Common vs. German	-0.59	-2.73[a]	-2.25[b]	-0.37	1.84[c]	0.30	-0.11	**-1.12**
Common vs. Scandinavian	-0.79	-1.35	-0.75	1.22	-1.70[c]	0.02	0.33	**-1.03**
Socialist vs. French	-0.21	-3.05[a]	-0.12	-0.74	4.07[a]	-6.47[a]	-0.92	**-1.36**
Socialist vs. German	3.81[a]	-0.73	0.55	0.67	7.13[a]	-0.70	1.78[c]	**3.23[a]**
Socialist vs. Scandinavian	3.11[a]	0.93	1.71	2.35[b]	1.36	-0.95	1.95[c]	**2.81[b]**
French vs. German	1.40	1.24	0.78	0.96	1.02	3.58[a]	1.88[c]	**2.72[a]**
French vs. Scandinavian	1.05	2.55[b]	2.32[b]	2.05[b]	-1.64	3.09[a]	1.94[c]	**2.45[b]**
German vs .Scandinavian	-0.30	1.17	0.99	1.51	-3.32[a]	-0.21	0.44	**-0.02**

				Tests of medians (z-stats)				
Common vs. Socialist	-3.27[a]	-3.31[a]	-3.66[a]	-1.55	-4.23[a]	1.42	-3.10[a]	**-4.37[a]**
Common vs. French	-3.51[a]	-6.12[a]	-5.17[a]	-2.76[a]	0.43	-5.73[a]	-4.01[a]	**-5.87[a]**
Common vs. German	-0.55	-2.40[b]	-2.15[b]	-0.47	1.95[c]	0.26	-0.38	**-1.09**
Common vs. Scandinavian	-0.79	-1.54	-0.74	1.39	-1.75[c]	-0.04	0.17	**-1.02**
Socialist vs. French	-0.63	-2.82[a]	0.08	-0.98	4.11[a]	-4.90[a]	-0.55	**-1.29**
Socialist vs. German	2.97[a]	-1.16	0.68	0.58	3.88[a]	-0.71	2.04[b]	**2.58[a]**
Socialist vs Scandinavian	2.60[a]	1.26	1.51	2.14[b]	1.33	-0.95	1.95[c]	**2.48[b]**
French vs. German	1.55	1.26	0.79	1.20	1.44	3.10[a]	2.01[b]	**2.74[a]**
French vs. Scandinavian	1.22	2.48[b]	1.74[c]	2.07[b]	-1.73[c]	2.77[a]	2.06[b]	**2.17[b]**
German vs .Scandinavian	-0.32	1.23	0.87	1.43	-2.35[b]	-0.22	0.75	**0.37**

a=significant at 1% level; b=significant at 5% level; c=significant at 10% level.

Table 3: Correlations of formalism index and its components

Indices	Formalism index	Professionals vs. laymen	Written vs. oral elements	Legal justification	Statutory regulation of evidence	Control of superior review	Engagement formalities	Independent procedural actions
Panel A: Eviction								
Professionals vs. laymen	0.6420[a]	1.0000						
Written vs. oral elements	0.6614[a]	0.3073[c]	1.0000					
Legal justification	0.6840[a]	0.2598	0.3976[a]	1.0000				
Statutory regulation of evidence	0.4161[a]	0.1471	0.2390	0.2049	1.0000			
Control of superior review	0.4573[a]	0.2342	0.1009	0.2121	0.0090	1.0000		
Engagement formalities	0.5988[a]	0.2349	0.4041[a]	0.2795	0.1995	0.0037	1.0000	
Independent procedural actions	0.5353[a]	0.3952[a]	0.3858[a]	0.1799	0.1546	0.1110	0.1717	1.0000
Panel B: Check								
Professionals vs. laymen	0.7625[a]	1.0000						
Written vs. oral elements	0.7305[a]	0.5090[a]	1.0000					
Legal justification	0.7573[a]	0.4921[a]	0.6083[a]	1.0000				
Statutory regulation of evidence	0.4800[a]	0.1845	0.3052[c]	0.3184[b]	1.0000			
Control of superior review	0.3264[b]	0.1255	-0.0439	0.1051	0.0316	1.0000		
Engagement formalities	0.6125[a]	0.4082[a]	0.4391[a]	0.2977[c]	0.2296	-0.0296	1.0000	
Independent procedural actions	0.6517[a]	0.4836[a]	0.4538[a]	0.3406[b]	0.2869	0.0957	0.2909[c]	1.0000
Panel C: Correlations between eviction and check indices								
Formalism index	0.8257[a]							
Professionals vs. laymen		0.5229[a]						
Written vs. oral elements			0.7054[a]					
Legal justification				0.7502[a]				
Statutory regulation of evidence					0.9086[a]			
Control of superior review						0.7866[a]		
Engagement formalities							0.8126[a]	
Independent procedural actions								0.8575[a]

a=significant at 1% level; b=significant at 5% level; c=significant at 10% level

Table 4: Eviction of a tenant and check collection by legal origin and income level

This table classifies countries by GNP per capita and shows the formalism index for the case of eviction of a tenant and the case of collection of a check. All variables are described in Table 1.

By GNP per capita level	All countries		English legal origin countries		French legal origin countries	
	Eviction	Check	Eviction	Check	Eviction	Check
Low income - bottom 25 percentile						
Mean	3.69	3.76	3.20	3.18	4.44	4.58
Median	3.60	3.68	3.11	3.19	4.66	4.71
Number of countries	28	28	13	13	10	10
Medium income - middle 50 percentile						
Mean	3.95	3.73	3.18	2.71	4.59	4.46
Median	3.91	3.93	3.35	2.45	4.54	4.57
Number of countries	54	54	18	18	23	23
High income - top 75 percentile						
Mean	3.14	2.88	2.53	2.33	3.60	3.32
Median	3.20	2.95	2.51	2.50	3.60	3.23
Number of countries	27	27	11	11	7	7
All countries						
Mean	3.68	3.53	3.02	2.76	4.38	4.29
Median	3.63	3.52	3.10	2.64	4.33	4.10
Number of countries	109	109	42	42	40	40
Tests of means (t-stats)						
Bottom 25 vs. middle 50	-1.20	0.12	0.07	1.65	-0.52	0.34
Bottom 25 vs. top 25	2.66[b]	4.04[a]	2.77[b]	3.23[a]	2.72[b]	4.27[a]
Middle 50 vs. top 25	3.70[a]	3.35[a]	2.05[c]	1.11	2.93[a]	2.64[b]
Tests of medians (z-stats)						
Bottom 25 vs. middle 50	-1.51	-0.08	-0.28	1.56	-0.47	0.16
Bottom 25 vs. top 25	1.99[b]	3.55[a]	2.06[b]	2.87[a]	2.34[b]	2.93[a]
Middle 50 vs. top 25	3.62[a]	3.16[a]	1.93[c]	0.63	2.62[a]	2.53[b]

a=significant at 1% level; b=significant at 5% level; c=significant at 10% level.

Table 5: Indices regressions
Panel A: Eviction of a tenant

Ordinary least squares regressions of the cross-section of countries for the case of eviction of a tenant. The dependent variables are the indices of formalism and its component indices. Robust standard errors are shown in parentheses. All variables are described in Table 1.

Dependent variables:	Log GNP per capita	Socialist legal origin	French legal origin	German legal origin	Scandinavian legal origin	Constant	N [R^2]
			Independent variables:				
Formalism index	-0.1223[b] (0.0567)					4.6934[a] (0.4800)	109 [0.04]
	-0.1254[b] (0.0489)	0.7437[a] (0.1791)	1.3681[a] (0.1712)	0.7842[a] (0.2257)	0.5729[b] (0.2677)	4.0386[a] (0.3789)	109 [0.44]
Professionals vs. laymen	-0.0106 (0.0169)					0.6936[a] (0.1410)	109 [0.00]
	-0.0115 (0.0180)	0.1843[a] (0.0387)	0.2410[a] (0.0562)	0.1556[b] (0.0744)	0.1482[c] (0.0851)	0.5697[a] (0.1469)	109 [0.20]
Written vs. oral elements	-0.0019 (0.0103)					0.7261[a] (0.0873)	109 [0.00]
	-0.0047 (0.0102)	0.0435 (0.0395)	0.1887[a] (0.0342)	0.1714[b] (0.0774)	0.0092 (0.0790)	0.6644[a] (0.0865)	109 [0.26]
Legal justification	0.0069 (0.0207)					0.6426[a] (0.1740)	109 [0.00]
	0.0057 (0.0216)	0.2710[a] (0.0902)	0.3092[a] (0.0602)	0.2991[b] (0.1273)	0.1306 (0.1203)	0.4769[a] (0.1776)	109 [0.22]
Statutory regulation of evidence	-0.0437[a] (0.0094)					0.7078[a] (0.0792)	109 [0.16]
	-0.0435[a] (0.0102)	0.0274 (0.0357)	0.1171[a] (0.0333)	0.0489 (0.0660)	0.0169 (0.0524)	0.6557[a] (0.0808)	109 [0.26]
Control of superior review	-0.0253 (0.0158)					0.9404[a] (0.1333)	109 [0.02]
	-0.0276 (0.0171)	0.2768[a] (0.0464)	0.0263 (0.0617)	0.1053 (0.0736)	0.2585[a] (0.0931)	0.8914[a] (0.1410)	109 [0.17]
Engagement formalities	-0.0221 (0.0168)					0.4646[a] (0.1412)	109 [0.01]
	-0.0218 (0.0141)	-0.1239[b] (0.0571)	0.3514[a] (0.0497)	-0.0242 (0.0772)	0.0049 (0.0876)	0.3520[a] (0.1190)	109 [0.46]
Independent procedural actions	-0.0257[a] (0.0094)					0.5183[a] (0.0825)	109 [0.05]
	-0.0221[b] (0.0107)	0.0647 (0.0424)	0.1343[a] (0.0398)	0.0281 (0.0520)	0.0045 (0.0640)	0.4285[a] (0.0909)	109 [0.17]

a=significant at 1% level; b=significant at 5% level; c=significant at 10% level

Table 5: Indices regressions
Panel B: Check collection

Ordinary least squares regressions of the cross-section of countries for the case of check collection. The dependent variables are the indices of formalism and its component indices. Robust standard errors are shown in parentheses. All variables are described in Table 1.

Dependent variables:	Log GNP per capita	Socialist legal origin	French legal origin	German legal origin	Scandinavian legal origin	Constant	N [R²]
Formalism index	-0.2109[a] (0.0594)					5.2787[a] (0.5138)	109 [0.08]
	-0.2072[a] (0.0501)	1.0579[a] (0.1915)	1.5422[a] (0.1922)	0.7622[a] (0.2464)	0.8339[a] (0.2977)	4.4465[a] (0.4042)	109 [0.48]
Professionals vs. laymen	-0.0412[b] (0.0164)					0.9077[a] (0.1404)	109 [0.05]
	-0.0420[b] (0.0185)	0.2154[a] (0.0462)	0.2568[a] (0.0656)	0.1473 (0.0899)	0.1939[b] (0.0952)	0.7712[a] (0.1555)	109 [0.21]
Written vs. oral elements	-0.0117 (0.0099)					0.8112[a] (0.0845)	109 [0.01]
	-0.0162 (0.0099)	0.1386[a] (0.0373)	0.2751[a] (0.0343)	0.2207[a] (0.0726)	0.1330[a] (0.0467)	0.7090[a] (0.0767)	109 [0.42]
Legal justification	-0.0316 (0.0209)					0.8984[a] (0.1715)	109 [0.02]
	-0.0328[c] (0.0193)	0.3533[a] (0.0852)	0.3809[a] (0.0586)	0.3609[a] (0.1191)	0.1824 (0.1684)	0.6884[a] (0.1615)	109 [0.32]
Statutory regulation of evidence	-0.0397[a] (0.0103)					0.6846[a] (0.0861)	109 [0.12]
	-0.0402[a] (0.0115)	0.0437 (0.0398)	0.1080[a] (0.0355)	0.0965 (0.0656)	0.0009[c] (0.0557)	0.6376[a] (0.0915)	109 [0.20]
Control of superior review	-0.0224 (0.0159)					0.8891[a] (0.1340)	109 [0.01]
	-0.0131 (0.0169)	0.2687[a] (0.0456)	-0.0486 (0.0615)	-0.1589[c] (0.0864)	0.2119[b] (0.0940)	0.7893[a] (0.1357)	109 [0.21]
Engagement formalities	-0.0243 (0.0167)					0.4550[a] (0.1438)	109 [0.02]
	-0.0262[b] (0.0138)	-0.0866[c] (0.0446)	0.3579[a] (0.0482)	0.0235 (0.0745)	0.0540 (0.0852)	0.3485[a] (0.1175)	109 [0.47]
Independent procedural actions	-0.0399[a] (0.0112)					0.6327[a] (0.1025)	109 [0.08]
	-0.0366[a] (0.0120)	0.1247[b] (0.0478)	0.2120[a] (0.0453)	0.0723[c] (0.0429)	0.0576 (0.0495)	0.5025[a] (0.1039)	109 [0.26]

a=significant at 1% level; b=significant at 5% level; c=significant at 10% level

Table 6: Duration in practice

This table classifies countries by legal origin and shows the duration in practice for the eviction and the check case. All variables are described in Table 1.

By legal origin	Eviction of a tenant				Check collection			
	Duration until completion of service of process	Duration of trial	Duration of enforcement	Total duration	Duration until completion of service of process	Duration of trial	Duration of enforcement	Total duration
English legal origin								
Anguilla	1	60	30	91	1	30	7	38
Australia	3	35	6	44	25	160	135	320
Bahrain	41	120	224	385	54	114	200	368
Bangladesh	30	180	180	390	30	180	60	270
Barbados	4	67	21	92	2	49	60	111
Belize	30	15	14	59	30	15	15	60
Bermuda	4	25	21	50	4	100	21	125
Botswana	14	42	7	63	14	42	21	77
BVI	2	42	14	58	42	21	120	183
Canada	5	21	17	43	21	250	150	421
Cayman	30	136	14	180	30	60	30	120
Cyprus	60	120	180	360	60	120	180	360
Ghana	20	140	90	250	20	52	18	90
Gibraltar	160	50	14	224	160	50	14	224
Grenada	15	90	75	180	8	90	30	128
Hong Kong	7	35	150	192	7	40	14	61
India	142	24	46	212	7	53	46	106
Ireland	11	60	50	121	11	60	60	130
Israel	3	272	135	410	60	120	135	315
Jamaica	45	46	14	105	45	87	70	202
Kenya	12	122	121	255	12	122	121	255
Malawi	3	30	2	35	3	90	15	108
Malaysia	60	90	120	270	15	15	60	90
Namibia	11	25	83	118	11	25	83	118
New Zealand	10	40	30	80	10	30	20	60
Nigeria	32	126	208	366	81	100	60	241
Pakistan	60	245	60	365	60	185	120	365
Singapore	9	40	11	60	11	18	19	47
South Africa	10	189	10	209	10	60	14	84
Sri Lanka	90	440	200	730	60	200	180	440
St. Vincent	3	302	30	335	3	22	10	35
Swaziland	5	28	7	40	5	28	7	40
Tanzania	7	180	30	217	7	90	30	127
Thailand	30	510	90	630	30	90	90	210
Trinidad & Tobago	54	103	35	192	51	101	42	194
Turks and Caicos	14	100	60	174	14	30	30	74
UAE	14	180	90	285	14	365	180	559
Uganda	1	7	21	29	14	40	45	99
United Kingdom	14	73	28	115	14	73	14	101
USA	6	33	10	49	23	17	14	54
Zambia	14	90	7	111	14	120	54	188
Zimbabwe	8	180	9	197	8	180	9	197
Mean	**26**	**112**	**61**	**199**	**26**	**88**	**62**	**176**
Median	**13**	**82**	**30**	**180**	**14**	**67**	**44**	**126**
Socialist legal origin								
Bulgaria	60	450	150	660	10	250	150	410
China	15	105	60	180	15	120	45	180
Croatia	60	180	90	330	60	180	90	330
Czech Republic	60	90	180	330	30	60	180	270
Estonia	59	136	110	305	59	136	110	305
Georgia	30	60	90	180	30	60	90	180
Hungary	90	185	90	365	90	185	90	365
Kazakhstan	10	50	60	120	10	50	60	120
Latvia	27	41	11	79	28	41	120	189
Lithuania	30	90	30	150	30	60	60	150
Poland	90	720	270	1080	90	730	180	1000
Romania	30	140	103	273	30	105	90	225
Russia	10	90	30	130	10	90	60	160
Slovenia	133	510	360	1003	133	510	360	1003
Ukraine	14	90	120	224	14	90	120	224
Vietnam	35	55	60	150	35	35	50	120
Mean	**47**	**187**	**113**	**347**	**42**	**169**	**116**	**327**
Median	**33**	**98**	**90**	**248**	**30**	**98**	**90**	**224**
French legal origin								
Argentina	60	300	80	440	20	200	80	300
Belgium	3	60	57	120	0	20	100	120
Bolivia	14	60	20	94	14	360	90	464
Brazil	30	60	30	120	30	90	60	180
Chile	15	200	25	240	15	140	45	200
Colombia	139	279	82	500	165	216	146	527
Costa Rica	20	90	30	140	10	180	180	370
Cote D'Ivoire	8	120	2	130	8	82	60	150
Dominican Republic	30	90	90	210	35	90	90	215
Ecuador	38	40	30	108	38	235	60	333
Egypt	7	180	45	232	7	150	45	202
El Salvador	45	60	45	150	25	15	20	60
France	16	75	135	226	16	75	90	181

	Eviction of a tenant				Check collection			
By legal origin	Duration until completion of service of process	Duration of trial	Duration of enforcement	Total duration	Duration until completion of service of process	Duration of trial	Duration of enforcement	Total duration
Greece	32	35	180	247	180	45	90	315
Guatemala	10	180	90	280	10	120	90	220
Honduras	15	30	30	75	30	90	105	225
Indonesia	30	165	30	225	30	165	30	225
Italy	0	450	180	630	0	415	230	645
Jordan	7	100	30	137	7	100	40	147
Kuwait	3	65	25	93	7	240	110	357
Lebanon	1	912	60	973	1	540	180	721
Luxembourg	20	120	240	380	15	45	150	210
Malta	30	610	90	730	30	365	150	545
Mexico	20	60	100	180	33	99	151	283
Monaco	17	86	16	119	24	26	16	66
Morocco	15	365	365	745	15	135	42	192
Mozambique	30	450	60	540	30	300	210	540
Netherlands	17	7	28	52	17	7	15	39
Netherlands Antilles	15	70	20	105	20	36	37	93
Panama	36	50	48	134	76	86	35	197
Paraguay	12	50	140	202	25	32	165	222
Peru	41	135	70	246	81	135	165	441
Philippines	42	97	25	164	42	97	25	164
Portugal	20	280	30	330	20	280	120	420
Senegal	5	60	90	155	5	150	180	335
Spain	60	55	68	183	49	69	29	147
Tunisia	3	28	2	33	3	1	3	7
Turkey	30	180	90	300	30	30	45	105
Uruguay	120	120	90	330	150	120	90	360
Venezuela	30	300	30	360	30	300	30	360
Mean	**27**	**167**	**72**	**266**	**34**	**147**	**90**	**272**
Median	**20**	**94**	**53**	**206**	**22**	**110**	**90**	**221**
German legal origin								
Austria	7	360	180	547	14	270	150	434
Germany	29	191	111	331	29	61	64	154
Japan	3	350	10	363	3	47	10	60
Korea	30	180	93	303	20	40	15	75
Switzerland	16	180	70	266	59	75	90	224
Taiwan	30	120	180	330	30	60	120	210
Mean	**19**	**230**	**107**	**357**	**26**	**92**	**75**	**193**
Median	**23**	**186**	**102**	**331**	**25**	**61**	**77**	**182**
Scandinavian legal origin								
Denmark	20	180	25	225	15	40	28	83
Finland	15	70	35	120	35	145	60	240
Iceland	22	12	30	64	71	105	75	251
Norway	7	300	58	365	7	50	30	87
Sweden	6	135	19	160	6	165	19	190
Mean	**14**	**139**	**33**	**187**	**27**	**101**	**42**	**170**
Median	**15**	**135**	**30**	**160**	**15**	**105**	**30**	**190**
Mean for all countries	**29**	**151**	**74**	**254**	**31**	**122**	**80**	**234**
Median for all countries	**17**	**97**	**57**	**202**	**20**	**90**	**60**	**197**
Tests of means (t-stats)								
Common vs. Socialist	-2.05[b]	-1.84[c]	-2.46[b]	-2.42[b]	-1.74[c]	-2.37[b]	-2.91[a]	-2.85[a]
Common vs. French	-0.16	-1.66	-0.77	-1.64	-0.93	-2.66[a]	-2.16[b]	-2.94[a]
Common vs. German	0.47	-2.49[b]	-1.65	-2.36[b]	0.03	-0.13	-0.52	-0.30
Common vs. Scandinavian	0.76	-0.52	0.95	0.17	-0.05	-0.39	0.76	0.10
Socialist vs. French	2.23[b]	0.37	1.80[c]	1.14	0.71	0.51	1.33	0.91
Socialist vs. German	1.90[c]	-0.51	0.15	-0.07	1.06	0.94	1.18	1.12
Socialist vs. Scandinavian	2.08[c]	0.51	1.91[c]	1.14	0.88	0.78	2.05[c]	1.23
French vs. German	0.68	-0.83	-1.14	-1.03	0.45	1.04	0.57	1.10
French vs. Scandinavian	1.03	0.33	1.23	0.83	0.35	0.82	1.72[c]	1.33
German vs. Scandinavian	0.82	1.43	2.44[b]	2.63[b]	-0.08	-0.19	1.19	0.32
Tests of medians (z-stats)								
Common vs. Socialist	-2.86[a]	-1.76[c]	-2.59[a]	-1.94[c]	-2.05[b]	-1.91[c]	-2.97[a]	-2.61[a]
Common vs. French	-1.39	-1.61	-1.54	-1.67[c]	-0.92	-2.20[b]	-2.45[b]	-2.87[a]
Common vs. German	-0.22	-2.68[a]	-1.59	-2.46[b]	-0.48	-0.11	-0.58	-0.39
Common vs. Scandinavian	-0.05	-0.66	0.05	-0.26	-0.14	-0.81	0.05	-0.17
Socialist vs. French	2.18[b]	0.58	2.13[b]	0.95	1.38	0.01	1.36	0.15
Socialist vs. German	1.93[c]	-1.70[c]	-0.37	-1.26	1.04	1.07	0.93	1.22
Socialist vs. Scandinavian	2.36[b]	0.21	2.49[b]	1.08	1.00	0.50	2.62[a]	1.24
French vs. German	0.56	-1.98[b]	-1.56	-2.12[b]	0.07	1.22	0.59	1.04
French vs. Scandinavian	1.05	-0.16	1.43	0.70	0.31	0.34	1.83[c]	1.19
German vs. Scandinavian	0.83	1.47	1.83[c]	1.83[c]	0.00	-0.46	0.73	-0.37

a=significant at 1% level; b=significant at 5% level; c=significant at 10% level.

Table 7: Other outcomes

This table classifies countries by legal origin and shows other outcomes that might be related to judicial efficiency for the eviction of a tenant and the check collection cases. All variables are described in Table 1.

By legal origin	Efficiency of the judicial system	Equal access to justice	Enforceabi-lity of contracts	Corruption	Human rights	Legal system is:					Court decisions are enforced	Confidence in legal system
						Fair and impartial	Honest or uncorrupt	Quick	Affordable	Consistent		
English legal origin												
Mean	7.94	3.93	6.56	6.28	3.79	4.02	3.87	2.78	3.23	3.52	3.76	4.03
Median	8.00	3.75	7.09	5.95	4.00	3.98	3.82	2.48	3.21	3.35	3.71	4.13
Socialist legal origin												
Mean	.	6.88	4.85	6.37	3.50	3.08	2.95	2.28	3.13	2.97	3.40	3.46
Median	.	7.50	5.00	6.53	3.50	2.87	2.80	2.27	3.21	2.79	3.39	3.43
French legal origin												
Mean	6.61	3.09	5.30	5.41	3.28	3.08	3.07	2.01	2.94	2.88	3.31	3.77
Median	6.58	2.50	4.91	5.00	3.00	3.07	2.88	1.88	2.84	2.80	3.13	4.00
German legal origin												
Mean	8.90	7.08	7.50	8.03	4.50	3.76	3.92	2.44	2.16	2.92	3.04	3.69
Median	9.50	7.50	7.91	8.54	4.50	3.76	3.92	2.44	2.16	2.92	3.04	3.69
Scandinavian legal												
Mean	10.00	10.00	8.12	10.00	4.80	4.16	4.65	2.57	3.20	3.86	3.33	4.16
Median	10.00	10.00	8.25	10.00	5.00	4.16	4.65	2.57	3.20	3.86	3.33	4.16
Mean for all countries	**7.55**	**4.35**	**6.07**	**6.24**	**3.97**	**3.43**	**3.35**	**2.34**	**3.07**	**3.13**	**3.48**	**3.79**
Median for all countries	**7.25**	**5.00**	**5.57**	**5.73**	**4.00**	**3.51**	**3.33**	**2.26**	**3.09**	**3.04**	**3.47**	**3.89**
Tests of means (t-stats)												
Common vs. Socialist	n.a.	-1.79[c]	2.13[b]	-0.10	0.29	4.70[a]	3.98[a]	1.81[c]	0.56	2.39[b]	1.91[c]	2.76[a]
Common vs. French	2.54[b]	1.01	2.74[a]	1.72[c]	1.31	4.64[a]	3.50[a]	3.44[a]	1.80[c]	3.34[a]	2.49[b]	1.55
Common vs. German	-0.96	-2.25[b]	-1.20	-1.86[c]	-1.24	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.
Common vs. Scandinavian	-1.96[c]	-4.16[a]	-1.78[c]	-3.80[a]	-1.62	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.
Socialist vs. French	n.a.	2.24[b]	-0.86	1.22	0.25	0.00	-0.46	1.57	1.06	0.48	0.39	-1.71[c]
Socialist vs. German	n.a.	-0.15	-3.87[a]	-2.08[c]	-2.12[c]	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.
Socialist vs. Scandinavian	n.a.	-5.69[a]	-7.15[a]	-6.71[a]	-3.05[b]	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.
French vs. German	-3.04[a]	-2.80[a]	-4.19[a]	-3.03[a]	-2.39[b]	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.
French vs. Scandinavian	-4.39[a]	-4.61[a]	-5.00[a]	-5.08[a]	-2.74[b]	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.
German vs. Scandinavian	-1.30	-2.63[b]	-0.89	-2.61[b]	-0.98	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.	n.a.
Tests of medians (z-stats)												
Common vs. Socialist	n.a.	-1.74[c]	1.85[c]	-0.21	0.62	3.68[a]	3.49[a]	1.79[c]	0.16	2.14[b]	1.66[c]	2.61[a]
Common vs. French	2.58[a]	1.08	2.00[b]	1.51	1.46	4.15[a]	3.18[a]	3.61[a]	1.70[c]	3.20[a]	2.60[a]	1.62
Common vs. German	-0.90	-2.18[b]	-1.07	-1.91[c]	-1.01	0.60	-0.45	0.30	1.66[c]	1.21	1.36	0.68
Common vs. Scandinavian	-2.17[b]	-3.46[a]	-1.49	-3.31[a]	-1.65[c]	-0.60	-1.21	-0.15	0.08	-0.75	1.21	-0.15
Socialist vs. French	n.a.	2.17[b]	-0.09	1.41	0.29	0.25	-0.19	2.38[b]	1.40	0.54	0.44	-1.64
Socialist vs. German	n.a.	-0.52	-2.58[a]	-1.86[c]	-1.64	-1.04	-1.62	-0.69	1.39	-0.23	0.23	-0.46
Socialist vs. Scandinavian	n.a.	-2.74[a]	-2.49[b]	-2.95[a]	-1.94[c]	-1.62	-1.62	-1.04	0.23	-1.62	0.00	-1.39
French vs. German	-2.18[b]	-2.53[b]	-3.12[a]	-2.69[a]	-2.24[b]	-1.11	-1.05	-1.30	1.42	-0.31	0.50	0.19
French vs. Scandinavian	-3.07[a]	-3.37[a]	-2.94[a]	-3.42[a]	-2.55[b]	-1.42	-1.55	-1.42	-0.56	-1.42	-0.31	-0.80
German vs. Scandinavian	-1.75[c]	-2.56[b]	-0.43	-2.49[b]	-0.98	-1.00	-1.00	-1.00	-1.00	-1.00	-1.00	-1.00

a=significant at 1% level; b=significant at 5% level; c=significant at 10% level.
n.a.=not applicable due to lack of observations; .=missing

Table 8: Outcomes and the formalism index (OLS regressions)
Panel A: Eviction of a tenant

Ordinary least squares regressions of the cross-section of countries for the case of eviction of a tenant. Robust standard errors are shown in parentheses. All variables are described in Table 1.

Dependent variables:	*Independent variables:*			
	Log GNP per capita	Formalism index	Constant	N [R²]
Log of duration	0.0215 (0.0501)	0.3225[a] (0.0747)	3.8787[a] (0.5508)	109 [0.14]
Efficiency of the judicial system	0.8281[a] (0.1242)	-0.7366[a] (0.1359)	3.1661[b] (1.4065)	56 [0.59]
Access to justice	1.6093[a] (0.1717)	-0.8574[a] (0.2511)	-5.7556[a] (1.7325)	77 [0.57]
Enforceability of contracts	0.7962[a] (0.0735)	-0.6193[a] (0.0920)	1.6002[c] (0.8514)	52 [0.80]
Corruption	1.0104[a] (0.1037)	-0.5260[b] (0.2082)	-0.1247 (1.1458)	86 [0.60]
Human rights	0.4676[a] (0.0629)	-0.3521[a] (0.1016)	1.0766 (0.7609)	57 [0.51]
Legal system is fair and impartial	0.0993[c] (0.0540)	-0.4451[a] (0.0786)	4.3855[a] (0.4777)	65 [0.26]
Legal system is honest or uncorrupt	0.2181[a] (0.0599)	-0.4188[a] (0.0742)	3.2849[a] (0.5359)	65 [0.28]
Legal system is quick	0.0056 (0.0859)	-0.2816[a] (0.0794)	3.3915[a] (0.7280)	65 [0.11]
Legal system is affordable	-0.1251[b] (0.0487)	-0.1106 (0.0706)	4.4672[a] (0.4030)	65 [0.13]
Legal system is consistent	0.0946 (0.0608)	-0.2602[a] (0.0741)	3.4090[a] (0.5225)	65 [0.14]
Court decisions are enforced	0.1067[c] (0.0559)	-0.2082[a] (0.0676)	3.4581[a] (0.4226)	65 [0.12]
Confidence in legal system	0.1390[b] (0.0539)	-0.0945 (0.0768)	3.0863[a] (0.4874)	65 [0.11]

a=significant at 1% level; b=significant at 5% level; c=significant at 10% level

Table 8: Outcomes and the formalism index (OLS regressions)
Panel B: Check collection

Ordinary least squares regressions of the cross-section of countries for the case of check collection. Robust standard errors are shown in parentheses. All variables are described in Table 1.

Dependent variables:	*Independent variables:*			
	Log GNP per capita	Formalism index	Constant	N [R²]
Log of duration	0.0275 (0.0392)	0.3110[a] (0.0518)	3.8605[a] (0.3836)	109 [0.17]
Efficiency of the judicial system	0.7978[a] (0.1375)	-0.5060[a] (0.1419)	2.4336 (1.6000)	56 [0.54]
Access to justice	1.5831[a] (0.1796)	-0.5006[b] (0.2339)	-6.9574[a] (1.8681)	77 [0.54]
Enforceability of contracts	0.7490[a] (0.0749)	-0.5228[a] (0.0840)	1.5219[c] (0.8233)	52 [0.79]
Corruption	0.9577[a] (0.1085)	-0.5728[a] (0.1494)	0.4156 (1.1997)	86 [0.62]
Human rights	0.4678[a] (0.0691)	-0.1938 (0.1409)	0.4368 (0.9590)	57 [0.46]
Legal system is fair and impartial	0.0657 (0.0500)	-0.4181[a] (0.0600)	4.5087[a] (0.4408)	65 [0.33]
Legal system is honest or uncorrupt	0.1866[a] (0.0566)	-0.3882[a] (0.0615)	3.3808[a] (0.5016)	65 [0.33]
Legal system is quick	-0.0155 (0.0835)	-0.2565[a] (0.0688)	3.4382[a] (0.7102)	65 [0.13]
Legal system is affordable	-0.1332[a] (0.0471)	-0.0920 (0.0554)	4.4512[a] (0.3897)	65 [0.13]
Legal system is consistent	0.0747 (0.0575)	-0.2647[a] (0.0557)	3.5603[a] (0.4929)	65 [0.20]
Court decisions are enforced	0.0910[c] (0.0539)	-0.1922[a] (0.0547)	3.5026[a] (0.4096)	65 [0.14]
Confidence in legal system	0.1312[b] (0.0526)	-0.1315[b] (0.0571)	3.2796[a] (0.4656)	65 [0.14]

a=significant at 1% level; b=significant at 5% level; c=significant at 10% level

Table 9: Outcomes and the formalism index (instrumental variables regressions)
Panel A: Eviction of a tenant

Instrumental variables regressions of the cross-section of countries for the case of eviction of a tenant. The first stage regression (not shown) has the formalism index as the dependent variable and the independent variables are: (a) the log of GNP per capita; (b) the set of legal origin dummies; and (c) a constant term. Standard errors are shown in parentheses. All variables are described in Table 1.

Dependent variables:	Independent variables:			
	Log GNP per capita	Formalism index	Constant	N [R²]
Log of duration	0.0160 (0.0532)	0.2777[b] (0.1216)	4.0889[a] (0.7510)	109 [0.14]
Efficiency of the judicial system	0.7938[a] (0.1337)	-1.0811[a] (0.2838)	4.7352[a] (1.7295)	56 [0.57]
Access to justice	1.6188[a] (0.1719)	-0.7507[c] (0.4160)	-6.2334[a] (2.1931)	77 [0.57]
Enforceability of contracts	0.7605[a] (0.0760)	-0.9007[a] (0.1770)	2.9767[a] (1.0350)	52 [0.77]
Corruption	0.9822[a] (0.1059)	-0.8130[a] (0.2622)	1.1893 (1.3503)	86 [0.58]
Human rights	0.4582[a] (0.0636)	-0.4931[b] (0.1860)	1.6816[c] (0.9861)	57 [0.50]
Legal system is fair and impartial	0.1152[c] (0.0619)	-0.7004[a] (0.1554)	5.2521[a] (0.5884)	65 [0.18]
Legal system is honest or uncorrupt	0.2334[a] (0.0657)	-0.6636[a] (0.1626)	4.1158[a] (0.6980)	65 [0.21]
Legal system is quick	0.0214 (0.0866)	-0.5349[a] (0.1738)	4.2514[a] (0.9763)	65 [0.02]
Legal system is affordable	-0.1223[b] (0.0506)	-0.1543 (0.1145)	4.6156[a] (0.4593)	65 [0.13]
Legal system is consistent	0.1088 (0.0654)	-0.4875[a] (0.1490)	4.1807[a] (0.6781)	65 [0.05]
Court decisions are enforced	0.1154[c] (0.0582)	-0.3478[a] (0.1247)	3.9322[a] (0.5085)	65 [0.08]
Confidence in legal system	0.1483[a] (0.0552)	-0.2450[b] (0.1172)	3.5971[a] (0.5873)	65 [0.06]

a=significant at 1% level; b=significant at 5% level ; c=significant at 10% level

Table 9: Outcomes and the formalism index (instrumental variables regressions)
Panel B: Check collection

Instrumental variables regressions of the cross-section of countries for the case of check collection. The first stage regression (not shown) has the formalism index as the dependent variable and the independent variables are: (a) the log of GNP per capita; (b) the set of legal origin dummies; and (c) a constant term. Standard errors are shown in parentheses. All variables are described in Table 1.

| Dependent variables: | Independent variables: | | | |
	Log GNP per capita	Formalism index	Constant	N [R²]
Log of duration	0.0275 (0.0440)	0.3108[a] (0.1054)	3.8614[a] (0.6174)	109 [0.17]
Efficiency of the judicial system	0.7216[a] (0.1362)	-0.8787[a] (0.2565)	4.3645[b] (1.8209)	56 [0.50]
Access to justice	1.5808[a] (0.1822)	-0.5115 (0.3487)	-6.9002[a] (2.2091)	77 [0.54]
Enforceability of contracts	0.6856[a] (0.0757)	-0.7861[a] (0.1524)	3.0087[a] (0.9594)	52 [0.76]
Corruption	0.9389[a] (0.1087)	-0.6760[a] (0.2208)	0.9470 (1.3943)	86 [0.62]
Human rights	0.4398[a] (0.0698)	-0.4291[b] (0.1802)	1.4945 (1.0541)	57 [0.42]
Legal system is fair and impartial	0.0633 (0.0512)	-0.5838[a] (0.1186)	5.1567[a] (0.5178)	65 [0.28]
Legal system is honest or uncorrupt	0.1842[a] (0.0576)	-0.5570[a] (0.1272)	4.0408[a] (0.6209)	65 [0.28]
Legal system is quick	-0.0180 (0.0831)	-0.4327[a] (0.1400)	4.1271[a] (0.9317)	65 [0.07]
Legal system is affordable	-0.1336[a] (0.0470)	-0.1196 (0.0911)	4.5593[a] (0.4455)	65 [0.13]
Legal system is consistent	0.0727 (0.0579)	-0.4016[a] (0.1159)	4.0957[a] (0.6212)	65 [0.15]
Court decisions are enforced	0.0896 (0.0541)	-0.2889[a] (0.0994)	3.8808[a] (0.5000)	65 [0.11]
Confidence in legal system	0.1299[b] (0.0530)	-0.2216[b] (0.0914)	3.6317[a] (0.5518)	65 [0.12]

a=significant at 1% level; b=significant at 5% level ; c=significant at 10% level

Appendix 1. Mapping between the "International Encyclopaedia of Laws – Civil Procedure," and the variables and indices in the paper

This table compares the coverage of all the variables and indices in the paper with the table of contents of the Encyclopedia of Laws – Civil Procedure (French monograph). The first column shows the different parts of the "International Encyclopaedia of Laws-Civil Procedure." The second column gives the names of the variables in the paper that are related to the chapter in the encyclopedia. The last column indicates if the variables in the second column belong to the Formalism Index (FI); to other determinants of judicial efficiency (Other), which are not reported in this version but are available from the authors; or to variables that are outcomes in the paper (Outcomes).

Encyclopedia of Laws – Civil Procedure (France)	Variables in the paper	Indices in the paper

Part I. Judicial organization
  1. The courts and their members
  2. The bar
  3. Law officials
	Variable: Professional vs. non-professional judge
	Variable: Legal representation is mandatory
	Variable: Service of process by judicial officer required
	Variable: Notification of judgment by judicial officer required
		FI: Professionals vs. laymen
		FI: Professionals vs. laymen
		FI: Engagement formalities
		FI: Engagement formalities

Part II: Jurisdiction
  1. Domestic jurisdiction
  2. International jurisdiction
	Variable: General jurisdiction court
	Not covered: Lex Mundi Project analyzed simple local disputes only
		FI: Professionals vs. laymen

Part III: Actions and claims
  1. Actions
 	
  2. Claims and defenses
 	
  3. Sanctions and procedural irregularities
	Not covered: Right to sue assumed by case facts.
	        Collective actions outside of scope of Lex mundi Project, which analyzed simple local disputes only.
	Variables: Filing and opposition
	Variable: Complaint must be legally justified
	Variables: Mandatory time limits
		
		FI: Written vs. oral elements
		FI: Legal justification
		Other: Mandatory time limits

Part IV: Proceedings
  1. Pre-trial proceedings: Conciliation before trial
  2. Proceedings in first instance
 	
  3. Review proceedings (appeal)
	Variable: Mandatory pre-trial conciliation
	
	Variables: Filing, service, opposition, final arguments, judgment, notification of judgment.
	Variable: Complaint must be legally justified
	Variable: Judgment must be legally justified
	Variable: Judgment must be on law (not on equity)
	Variable: Independent procedural actions for filing and service
	Variable: Independent procedural actions for trial and judgment
	Variable: Duration of filing and service
	Variable: Duration of trial and judgment
	Variable: Service of process by judicial officer required
	Variable: Notification of judgment by judicial officer required
	Variable: Defendant's economic situation is considered at judgment
	Variable: Enforcement of judgment is automatically suspended until resolution of the appeal
	Variable: Comprehensive review in appeal
	Variable: Interlocutory appeals are allowed
		FI: Engagement formalities
		
		FI: Written vs. oral elements
		
		FI: Legal justification
		FI: Legal justification
		FI: Legal justification
		FI: Independent procedural actions
		FI: Independent procedural actions
		Outcomes: Duration in practice
		Outcomes: Duration in practice
		FI: Engagement formalities
		FI: Engagement formalities
		Other: Defendant protection
		FI: Control of superior review
		
		FI: Control of superior review
		FI: Control of superior review

Encyclopedia of Laws – Civil Procedure (France)	Variables in the paper	Indices in the paper
Part V: Incidents	Mostly not covered: Outside standardized facts included in questionnaire	
	Variable: Interlocutory appeals are allowed	FI: Control of superior review
Part VI: Legal costs and legal aid 1. Legal costs	Variable: Legal representation is mandatory	FI: Professionals vs. laymen
	Variable: Attorney fees are fixed or limited by statute, court or administrative regulation	Other: Attorney's incentives
	Variable: Most common remuneration of litigation attorneys	Other: Attorney remuneration
	Variable: Quota litis or contingent fee agreements	Other: Quota litis
	Variable: Looser pays rule	Other: Other determinants
	Variable: Fully compensatory interests	Other: Other determinants
2. Legal aid	Variable: Mandatory legal aid available by law or by order of the court	Other: Defendant protection
Part VII: Evidence 1. Burden of proof	Variable: Authenticity and weight of evidence defined by law	FI: Statutory regulation of evidence
	Variable: Judge has the independent legal obligation to investigate facts	Other: Defendant protection
2. Admissibility of evidence	Variable: Judge can not introduce evidence	FI: Statutory regulation of evidence
	Variable: Judge can not reject irrelevant evidence	FI: Statutory regulation of evidence
	Variable: Out-of-court statements are inadmissible	FI: Statutory regulation of evidence
	Variable: Only original documents and certified copies are admissible	FI: Statutory regulation of evidence
	Variable: Mandatory pre-qualification of questions	FI: Statutory regulation of evidence
3. Administration of evidence	Variable: Mandatory recording of evidence	FI: Statutory regulation of evidence
	Variable: Oral interrogation only by judge	FI: Statutory regulation of evidence
	Variable: Evidence	FI: Written vs. oral elements
Part VIII: Particular proceedings	Not covered: Lex Mundi Project covered only eviction and check collection proceedings	
Part IX: Enforcement of judgments and preliminary seizure for security 1. Enforcement of domestic judgments	Variable: Independent procedural actions for enforcement of judgment	FI: Independent procedural actions
	Variable: Duration of enforcement of judgment	Outcomes: Duration in practice
	Variable: Enforcement of judgment.	FI: Written vs. oral elements
	Variable: Defendant's economic situation is considered at enforcement of judgment	Other: Defendant protection
	Variable: Enforcement of judgment is automatically suspended until resolution of the appeal.	FI: Control of superior review
	Variable: Transfer of debtor's property only through public auction	Other: Defendant protection
	Variable: Mandatory exclusion of defendant's essential survival assets	Other: Defendant protection
2. Protective measures	Variable: Attachment of debtor's property only after judgment	Other: Defendant protection
3. Recognition and enforcement of foreign judgments	Not covered: Lex Mundi Project analyzed simple local disputes only	
Part X: Arbitration	Not covered: Lex Mundi Project focused on judicial procedures	
	Variable: Administrative procedures	Other: Other determinants

Appendix 2A: Eviction of a tenant

This table classifies countries by legal origin and shows the professional vs. laymen, written vs. oral arguments, legal justification, and engagement formalities indices for the case of eviction of a tenant. All variables are described in Table 1.

Eviction - by legal origin	General jurisdiction court	Professional vs. non-professional judge	Legal representation is mandatory	Professionals vs. laymen	Filing	Service of process	Opposition	Evidence	Final arguments	Judgment	Notification of judgment	Enforcement of judgment	Written vs. oral elements	Complaint must be legally justified	Judgment must be legally justified	Judgment must be on law (not on equity)	Legal justification	Judge can not introduce evidence	Judge can not reject irrelevant evidence	Out-of-court statements are inadmissible	Mandatory pre-qualification of questions	Oral interrogation only by judge	Only original documents and certified copies are admissible	Authenticity and weight of evidence defined by law	Mandatory recording of evidence	Statutory regulation of evidence	Enforcement of judgment is automatically suspended until resolution of the appeal	Comprehensive review in appeal	Interlocutory appeals are allowed	Control of superior review	Mandatory pre-trial conciliation	Service of process by judicial officer required	Notification of judgment by judicial officer required	Engagement formalities	Filing and service	Trial and judgment	Enforcement	Independent procedural actions	Independent procedural actions (index)	Formalism index
English Legal Origin																																									
Anguilla	1	1	0	0.67	1	1	1	1	0	1	1	1	0.88	1	0	1	0.67	0	0	0	0	0	0	0	1	0.13	1	1	1	1.00	1	0	1	0.67	7	6	4	17	0.28	4.28
Australia	0	0	0	0.00	1	1	1	0	n.a	0	0	1	0.57	1	1	0	0.33	1	0	1	0	0	0	0	0	0.25	1	0	1	0.67	0	0	0	0.00	4	5	4	13	0.17	1.99
Bahrain	0	1	0	0.33	1	1	0	0	1	1	0	1	0.63	1	1	1	1.00	0	0	1	0	0	0	0	1	0.38	1	1	1	1.00	0	1	0	0.33	5	3	8	16	0.25	3.92
Bangladesh	0	1	0	0.33	1	1	1	0	0	1	0	1	0.63	1	1	1	1.00	0	0	0	1	0	0	0	1	0.13	1	1	1	1.00	0	1	0	0.33	8	4	5	17	0.25	3.36
Barbados	1	1	0	0.67	1	1	0	0	0	0	0	1	0.50	0	0	0	0.00	1	0	1	0	0	1	0	0	0.25	0	1	1	0.67	0	0	0	0.00	5	6	5	16	0.25	2.33
Belize	0	0	0	0.00	1	1	0	0	0	0	0	1	0.38	0	1	1	0.67	0	1	0	1	0	0	1	0	0.38	0	1	1	0.67	0	0	0	0.00	4	1	2	7	0.00	2.08
Bermuda	0	1	0	0.33	1	0	0	0	0	0	0	1	0.38	0	0	0	0.00	1	0	1	0	0	0	0	0	0.25	0	1	1	0.33	0	0	0	0.00	3	1	4	8	0.03	1.32
Botswana	1	1	0	0.67	1	1	1	1	0	1	0	1	0.75	1	0	0	0.33	1	0	1	0	0	0	0	0	0.38	0	1	1	0.67	1	1	1	0.67	6	7	4	17	0.28	4.07
BVI	1	1	0	0.67	1	1	1	0	0	0	0	1	0.50	1	0	0	0.33	1	0	1	0	0	0	0	1	0.38	0	1	1	0.67	0	0	0	0.00	7	6	6	19	0.33	2.88
Canada	0	0	0	0.00	1	1	1	0	0	1	1	1	0.75	0	1	0	0.33	1	0	1	0	0	0	0	0	0.38	1	0	0	0.33	1	0	0	0.33	4	6	4	14	0.19	2.32
Cayman	1	1	0	0.67	1	1	1	0	0	0	1	1	0.63	1	1	0	0.67	1	0	0	0	0	0	0	1	0.25	0	1	1	0.67	0	0	0	0.00	7	9	5	21	0.39	3.60
Cyprus	1	1	0	0.67	1	1	1	0	0	1	0	1	0.63	1	1	0	0.67	0	0	0	0	0	0	0	1	0.38	0	1	1	0.67	0	1	0	0.33	6	4	3	13	0.17	3.50
Ghana	1	1	0	0.67	1	1	1	0	0	0	0	1	0.50	0	0	0	0.00	1	0	0	0	0	0	0	1	0.50	0	0	1	0.33	0	1	0	0.33	9	4	7	20	0.36	2.69
Gibraltar	1	1	0	0.67	1	1	1	1	0	0	0	1	0.75	1	0	0	0.33	0	0	0	0	0	0	0	1	0.13	0	0	0	0.33	0	0	0	0.00	8	4	6	18	0.31	2.51
Grenada	0	1	0	0.33	1	1	0	0	0	0	0	1	0.38	0	1	1	0.67	0	0	1	0	0	0	0	1	0.38	1	1	0	0.67	0	1	0	0.33	5	1	5	11	0.11	2.86
Hong Kong	0	1	0	0.33	1	1	1	1	0	1	0	1	0.75	1	1	1	1.00	1	0	0	0	0	0	0	0	0.13	0	1	1	0.67	0	0	0	0.00	4	8	4	16	0.25	3.13
India	0	1	0	0.33	1	1	1	1	0	1	0	1	0.75	1	1	1	1.00	1	0	0	0	0	0	0	1	0.38	0	1	1	0.33	0	1	0	0.33	8	7	6	21	0.39	3.51
Ireland	1	1	0	0.67	1	1	1	0	n.a	0	0	1	0.71	1	0	0	0.33	0	0	0	0	0	0	0	0	0.13	1	1	1	1.00	0	0	0	0.00	8	7	5	20	0.36	3.20
Israel	1	1	0	0.67	1	1	1	0	1	1	1	1	0.88	1	1	1	1.00	1	1	0	0	0	0	0	0	0.50	0	1	1	0.67	0	0	0	0.00	3	7	4	14	0.19	3.90
Jamaica	1	1	0	0.67	1	1	0	0	0	0	0	1	0.38	1	0	0	0.33	1	0	1	0	0	0	0	0	0.25	0	1	1	0.67	0	0	0	0.00	4	3	3	10	0.08	2.38
Kenya	0	1	0	0.33	1	1	1	0	0	1	1	1	0.75	0	1	0	0.33	1	0	1	0	0	0	0	1	0.38	0	1	1	0.67	0	0	0	0.00	5	9	7	21	0.39	2.85
Malawi	1	0	0	0.33	1	1	1	0	0	1	0	1	0.63	1	0	1	0.67	1	0	1	0	0	0	0	1	0.38	0	1	1	0.67	1	0	0	0.33	5	2	5	12	0.14	3.14
Malaysia	1	1	0	0.67	1	1	1	0	0	0	1	1	0.63	1	1	1	0.33	1	1	0	0	0	0	0	0	0.50	0	1	1	0.67	0	0	0	0.00	4	9	9	22	0.42	3.21
Namibia	1	1	0	0.67	1	1	1	1	1	0	0	0	0.63	1	1	0	0.67	1	0	0	0	0	0	0	1	0.38	1	1	1	1.00	0	1	0	0.33	4	5	5	14	0.19	3.86
New Zealand	0	0	0	0.00	1	1	0	0	0	0	0	1	0.50	1	0	0	0.33	1	0	1	0	0	0	0	0	0.00	1	1	0	0.33	0	0	0	0.00	3	1	6	10	0.08	1.25
Nigeria	0	1	0	0.33	1	1	1	0	1	0	1	1	0.63	0	1	0	0.33	1	0	1	0	0	0	0	1	0.38	1	1	1	1.00	0	0	0	0.00	10	6	6	22	0.42	3.08
Pakistan	1	1	0	0.67	1	1	1	0	0	1	0	1	0.63	1	0	1	0.67	1	0	1	0	0	0	0	1	0.25	1	1	1	1.00	0	0	0	0.00	11	10	5	26	0.53	3.74
Singapore	1	1	0	0.67	1	1	1	1	0	0	0	1	0.63	1	0	0	0.33	1	1	0	0	0	0	0	0	0.38	0	1	1	0.67	0	0	0	0.00	9	7	7	23	0.44	3.11
South Africa	1	1	0	0.67	1	1	1	0	0	0	0	1	0.50	1	0	1	0.67	1	0	1	0	0	0	0	1	0.38	1	1	1	1.00	0	1	0	0.33	5	4	3	12	0.14	3.68
Sri Lanka	1	1	0	0.67	1	1	1	0	0	1	0	1	0.63	1	1	1	1.00	0	0	1	0	0	1	0	1	0.38	1	1	1	1.00	0	0	0	0.00	7	5	3	15	0.22	3.89
St. Vincent	1	1	0	0.67	1	1	1	1	0	0	0	0	0.50	1	0	1	0.67	0	0	1	0	0	0	0	1	0.38	1	1	1	0.67	1	1	0	0.67	5	7	6	18	0.31	3.85
Swaziland	1	1	0	0.67	1	1	1	1	0	0	1	1	0.63	1	1	1	1.00	0	0	0	1	0	0	0	1	0.25	1	1	1	1.00	0	0	0	0.00	4	6	4	14	0.19	3.74
Tanzania	0	1	0	0.33	1	1	1	0	0	1	0	1	0.63	1	0	0	0.33	1	0	1	0	0	0	0	0	0.50	0	1	1	0.67	0	1	0	0.33	6	2	3	11	0.11	2.90
Thailand	1	1	0	0.67	1	1	1	0	1	1	1	1	0.88	1	1	1	1.00	1	0	1	0	0	1	0	1	0.38	0	1	1	0.67	0	1	0	0.33	8	6	5	19	0.33	4.25
Trinidad & Tobago	1	1	0	0.67	1	1	1	0	0	1	0	1	0.63	0	0	0	0.00	1	0	0	0	0	0	0	1	0.25	0	0	0	0.33	0	0	0	0.00	7	5	5	17	0.28	2.15
Turks and Caicos	1	1	0	0.67	1	1	1	1	0	0	0	1	0.63	0	0	0	0.00	1	0	1	0	0	0	0	1	0.38	0	1	1	0.67	0	0	0	0.00	7	10	7	24	0.47	2.81
UAE	0	0	0	0.00	1	1	1	0	0	0	0	1	0.50	1	0	0	0.33	0	0	0	0	0	0	0	0	0.00	0	0	0	0.00	1	0	1	0.33	3	9	5	17	0.28	1.44
Uganda	0	0	0	0.00	1	n.a	n.a	n.a	n.a	1	n.a	1	1.00	0	0	1	0.33	1	0	0	0	0	0	0	1	0.38	0	1	1	0.67	0	0	0	0.00	6	5	1	12	0.14	2.51
United Kingdom	1	1	0	0.67	1	1	1	1	0	0	0	1	0.75	1	0	0	0.33	0	0	0	0	0	0	0	0	0.00	0	0	0	0.33	0	0	0	0.00	3	5	4	12	0.14	2.22
USA	0	1	0	0.33	1	1	0	0	0	0	1	1	0.63	1	1	1	1.00	1	0	0	0	0	0	0	1	0.13	0	1	1	0.67	0	0	0	0.00	6	3	6	15	0.22	2.97
Zambia	1	1	0	0.67	1	1	1	0	0	0	0	1	0.50	0	1	0	0.33	0	0	0	0	0	0	0	1	0.38	1	1	1	1.00	0	1	0	0.33	7	2	5	14	0.19	3.07
Zimbabwe	0	1	0	0.33	1	1	1	1	0	0	0	1	0.63	0	1	0	0.33	0	0	1	0	0	0	0	1	0.38	1	1	1	1.00	0	0	0	0.33	6	3	2	11	0.11	3.11
Mean	**0.60**	**0.83**	**0.00**	**0.48**	**1.00**	**1.00**	**0.83**	**0.32**	**0.08**	**0.52**	**0.20**	**0.98**	**0.63**	**0.52**	**0.50**	**0.55**	**0.52**	**0.38**	**0.10**	**0.74**	**0.02**	**0.00**	**0.38**	**0.02**	**0.76**	**0.30**	**0.33**	**0.76**	**0.90**	**0.67**	**0.14**	**0.33**	**0.05**	**0.17**	**5.69**	**5.29**	**4.95**	**15.93**	**0.25**	**3.02**
Median	**1.00**	**1.00**	**0.00**	**0.67**	**1.00**	**1.00**	**1.00**	**0.00**	**0.00**	**1.00**	**0.00**	**1.00**	**0.63**	**1.00**	**0.50**	**1.00**	**0.50**	**0.00**	**0.00**	**1.00**	**0.00**	**0.00**	**0.00**	**0.00**	**1.00**	**0.38**	**0.00**	**1.00**	**1.00**	**0.67**	**0.00**	**0.00**	**0.00**	**0.00**	**5.00**	**5.50**	**5.00**	**16.00**	**0.25**	**3.10**
Socialist Legal Origin																																									
Bulgaria	1	1	0	0.67	1	1	1	0	1	1	1	1	0.88	1	1	1	1.00	1	0	0	0	0	0	1	0	0.25	1	1	1	1.00	0	1	0	0.33	7	7	7	21	0.39	4.51
China	1	1	0	0.67	1	1	1	0	0	1	1	1	0.75	0	1	0	0.33	0	0	0	0	0	0	1	0	0.38	1	1	1	1.00	0	0	0	0.00	5	6	6	17	0.28	3.40
Croatia	1	1	0	0.67	1	1	0	0	0	1	1	1	0.63	1	1	1	1.00	0	0	0	0	0	0	1	0	0.25	1	1	0	0.67	0	0	0	0.00	7	4	4	15	0.22	3.43
Czech Republic	1	1	0	0.67	1	1	0	0	0	1	1	1	0.38	1	1	1	1.00	0	0	0	0	0	0	1	0	0.25	1	1	1	1.00	0	0	0	0.00	7	5	4	16	0.25	3.54
Estonia	1	1	0	0.67	1	1	1	0	0	1	0	1	0.75	1	1	1	1.00	0	0	0	0	0	0	1	0	0.38	1	1	1	1.00	1	0	1	0.67	9	4	4	17	0.28	4.74
Georgia	1	1	0	0.67	1	1	1	0	0	0	0	1	0.63	1	0	1	0.67	0	0	0	0	0	0	1	0	0.25	1	1	1	1.00	0	0	0	0.00	8	5	5	18	0.31	3.51
Hungary	1	1	0	0.67	1	1	1	0	0	1	0	1	0.75	1	1	1	1.00	0	0	0	0	0	0	0	0	0.13	0	1	1	0.67	0	0	0	0.00	6	4	6	16	0.25	3.46
Kazakhstan	1	1	0	0.67	1	1	1	0	0	0	0	1	0.63	1	0	0	0.67	0	1	0	0	1	0	0	1	0.38	1	1	1	1.00	0	0	0	0.00	7	17	7	31	0.67	4.00
Latvia	1	1	0	0.67	1	1	1	0	0	1	0	1	0.63	1	1	1	1.00	1	0	0	0	1	0	0	0	0.38	1	1	1	1.00	0	0	0	0.00	7	2	5	14	0.19	3.86
Lithuania	1	1	0	0.67	1	1	1	0	0	1	1	1	0.75	1	1	1	1.00	0	0	0	0	0	0	0	0	0.38	1	1	1	1.00	0	0	0	0.00	10	9	3	22	0.42	4.21
Poland	1	1	0	0.67	1	1	1	0	0	1	0	1	0.75	1	1	1	1.00	1	0	0	0	0	0	0	1	0.50	1	1	1	1.00	0	0	0	0.00	4	5	4	13	0.17	4.08
Romania	1	1	0	0.67	1	1	1	0	0	1	1	1	0.75	1	1	1	1.00	1	0	0	1	0	0	1	0	0.50	1	1	1	1.00	0	0	0	0.00	8	10	9	27	0.56	3.32
Russia	1	1	0	0.67	1	1	0	0	0	1	0	1	0.50	0	1	1	0.67	1	1	1	0	0	1	0	0	0.38	1	1	1	1.00	0	0	0	0.00	4	3	4	11	0.11	3.32
Slovenia	1	1	0	0.67	1	1	1	0	0	1	1	1	0.75	1	1	1	1.00	0	0	0	0	0	0	1	0	0.38	1	1	1	1.00	0	0	0	0.00	9	8	7	24	0.47	4.26
Ukraine	1	1	0	0.67	1	1	1	0	0	1	1	1	0.75	1	0	0	0.33	0	1	1	0	0	1	1	1	0.63	1	1	1	1.00	0	0	0	0.00	7	3	5	15	0.22	3.60
Vietnam	1	1	0	0.67	1	1	0	0	0	1	1	1	0.50	0	0	0	0.00	0	1	0	0	0	1	0	0	0.25	1	1	1	1.00	0	0	0	0.00	9	6	7	22	0.42	2.83
Mean	**1.00**	**1.00**	**0.00**	**0.67**	**1.00**	**1.00**	**0.75**	**0.06**	**0.06**	**0.94**	**0.56**	**1.00**	**0.67**	**0.63**	**0.94**	**0.81**	**0.79**	**0.31**	**0.19**	**0.63**	**0.13**	**0.06**	**0.50**	**0.25**	**0.75**	**0.38**	**0.94**	**1.00**	**0.94**	**0.96**	**0.06**	**0.06**	**0.06**	**0.06**	**7.13**	**5.75**	**5.81**	**18.69**	**0.32**	**3.83**
Median	**1.00**	**1.00**	**0.00**	**0.67**	**1.00**	**1.00**	**1.00**	**0.00**	**0.00**	**1.00**	**1.00**	**1.00**	**0.75**	**1.00**	**1.00**	**1.00**	**1.00**	**0.00**	**0.00**	**1.00**	**0.00**	**0.00**	**0.50**	**0.00**	**1.00**	**0.38**	**1.00**	**1.00**	**1.00**	**1.00**	**0.00**	**0.00**	**0.00**	**0.00**	**7.00**	**5.00**	**5.50**	**17.00**	**0.28**	**3.73**
French Legal Origin																																									
Argentina	1	1	1	1.00	1	1	1	1	1	1	1	1	1.00	1	1	1	1.00	0	0	0	0	0	1	0	0	0.13	1	1	1	1.00	0	1	1	0.67	13	11	8	32	0.69	5.49
Belgium	1	1	0	0.67	1	1	0	1	1	1	1	1	0.75	1	0	0	0.33	0	0	0	0	0	1	0	0	0.25	0	1	1	0.67	0	1	1	0.33	5	3	5	13	0.17	3.17
Bolivia	1	1	1	1.00	1	1	1	n.a	1	1	1	1	1.00	1	0	1	0.67	0	0	0	0	0	1	0	0	0.25	1	1	1	1.00	0	1	1	0.67	13	8	5	26	0.53	5.11
Brazil	1	1	1	1.00	1	1	1	0	1	0	0	1	0.63	1	1	1	1.00	0	0	0	0	0	1	0	0	0.38	1	1	1	0.67	0	0	0	0.00	4	6	3	13	0.17	3.83
Chile	1	1	1	1.00	1	1	1	0	1	1	1	1	0.88	1	0	1	0.67	1	0	0	0	0	1	0	0	0.50	0	1	1	0.67	0	1	1	0.67	8	9	5	22	0.42	4.79
Colombia	1	1	0	0.67	1	1	1	1	1	1	1	1	1.00	1	1	1	1.00	1	0	0	0	0	0	0	1	0.25	0	0	0	0.00	0	1	1	0.33	10	17	5	32	0.69	3.94
Costa Rica	1	1	0	0.67	1	1	1	n.a	1	1	1	1	0.86	1	1	1	1.00	1	0	0	0	0	1	0	1	0.50	1	1	0	1.00	0	1	1	0.67	8	8	4	20	0.36	5.05
Cote D'Ivoire	1	1	0	0.67	1	1	0	0	0	0	0	1	0.50	1	0	1	0.67	0	0	0	0	0	0	1	0	0.25	0	1	1	0.67	0	1	1	0.67	6	3	6	15	0.22	3.64
Dominican Republic	0	1	1	0.33	1	1	1	0	0	1	0	1	0.63	1	1	1	1.00	1	0	0	0	0	1	0	0	0.38	1	1	0	1.00	0	1	1	0.67	7	5	8	20	0.36	4.36
Ecuador	0	1	1	0.67	1	1	0	1	1	1	0	1	0.88	1	1	1	1.00	1	0	0	0	0	1	1	0	0.63	1	1	0	0.67	0	1	0	0.33	11	7	6	24	0.47	4.64
Egypt	1	1	0	0.67	1	1	1	0	0	0	0	1	0.63	1	1	1	1.00	1	0	0	0	0	1	0	1	0.50	0	1	1	0.33	0	1	0	0.33	4	2	6	12	0.14	3.60
El Salvador	0	1	0	0.33	1	1	1	1	1	1	1	1	1.00	1	1	1	1.00	1	1	1	0	1	1	0	1	0.75	0	1	1	0.67	0	1	1	0.67	6	3	4	13	0.17	4.25
France	0	1	0	0.33	1	1	1	0	1	1	1	1	0.75	1	1	1	1.00	0	0	0	0	0	0	0	1	0.13	0	1	1	0.67	0	1	1	0.67	4	4	4	12	0.14	3.60
Greece	1	1	1	1.00	1	n.a	n.a	1	n.a	1	1	1	1.00	1	1	1	1.00	1	1	0	0	0	1	1	1	0.50	0	1	1	0.00	0	1	1	0.67	4	3	5	12	0.14	4.31
Guatemala	1	1	1	1.00	1	1	1	1	1	1	1	1	1.00	1	1	1	1.00	1	1	1	0	1	1	1	1	0.75	1	0	0	1.00	0	1	1	0.67	5	11	4	20	0.36	5.78
Honduras	0	1	1	0.67	1	1	0	0	n.a	1	1	1	0.88	1	1	1	1.00	0	0	0	1	0	1	1	0	0.63	1	0	0	1.00	0	1	0	0.33	6	9	6	21	0.39	4.68
Indonesia	1	0	0	0.33	1	1	1	1	1	0	0	1	0.88	1	1	0	0.67	0	0	0	0	0	0	0	0	0.50	0	1	1	0.67	0	1	1	0.33	8	10	7	25	0.50	3.88
Italy	1	1	1	1.00	1	1	1	1	1	1	1	1	1.00	1	1	0	0.67	0	0	0	0	0	0	0	0	0.13	0	1	1	0.67	0	1	1	0.67	4	1	6	11	0.11	4.24

Eviction - by legal origin

Country	Gen. juris. court	Prof. vs non-prof. judge	Legal rep. mandatory	**Prof. vs laymen**	Filing	Service of process	Opposition	Evidence	Final arguments	Judgment	Notif. of judgment	Enforce. of judgment	**Written vs oral**	Complaint legally just.	Judgment legally just.	Judgment on law	**Legal just.**	Judge cannot introduce ev.	Judge cannot reject irrel. ev.	Out-of-court inadm.	Mand. pre-qual. questions	Oral interrog. only by judge	Only orig. docs/cert. copies	Authent./weight def. by law	Mand. recording of ev.	**Stat. reg. of ev.**	Enforce. auto suspended	Comprehensive review	Interloc. appeals allowed	**Control of sup. review**	Mand. pre-trial concil.	Service by jud. officer req.	Notif. by jud. officer req.	**Engagement form.**	Filing & service	Trial & judgment	Enforcement	Indep. proc. actions	**Indep. proc. actions idx**	**Formalism index**
Jordan	1	1	0	0.67	1	1	0	0	1	1	1	1	0.63	0	1	1	0.67	0	0	1	0	1	0	0	1	0.50	0	0	0	0.00	0	1	0	0.33	9	9	10	28	0.58	3.38
Kuwait	0	1	0	0.33	1	1	1	1	1	1	1	1	0.88	1	1	1	1.00	0	0	1	0	0	0	0	1	0.25	1	1	1	1.00	1	1	1	1.00	5	3	4	12	0.14	4.60
Lebanon	1	1	1	1.00	1	1	1	0	1	1	1	1	0.88	1	1	1	1.00	0	0	1	0	1	0	1	1	0.50	1	1	1	1.00	0	1	1	0.67	9	11	6	26	0.53	5.57
Luxembourg	0	1	0	0.33	1	1	0	1	n.a	1	1	1	0.86	1	1	0	0.67	0	0	1	0	1	0	1	1	0.50	1	1	1	1.00	0	0	0	0.00	6	7	5	18	0.31	3.66
Malta	1	1	0	0.67	1	1	1	0	0	1	0	1	0.63	0	1	1	0.67	0	0	1	0	1	0	0	1	0.38	1	1	1	0.67	0	1	1	0.33	3	2	5	10	0.08	3.42
Mexico	0	1	0	0.33	1	1	1	1	1	1	1	1	0.88	1	1	0	0.67	0	0	1	0	1	0	0	1	0.50	0	1	1	0.67	0	1	1	0.67	14	12	9	35	0.78	4.82
Monaco	0	1	0	0.33	1	1	0	1	0	1	1	1	0.63	1	1	0	0.67	0	0	0	0	0	0	1	0	0.25	0	0	1	0.33	1	1	1	0.67	4	2	3	9	0.06	2.93
Morocco	1	1	0	0.67	1	1	1	1	1	1	1	1	1.00	1	1	0	0.67	0	0	1	0	1	1	1	1	0.63	1	1	1	1.00	0	1	1	0.67	5	4	4	13	0.17	4.79
Mozambique	1	1	1	1.00	1	1	1	0	0	1	1	1	0.75	1	1	1	1.00	0	0	1	0	0	0	1	1	0.38	1	1	1	1.00	0	1	1	0.67	10	6	6	22	0.36	5.15
Netherlands	0	1	0	0.33	1	1	0	0	0	1	1	1	0.63	1	0	1	0.33	0	0	0	0	0	0	0	0	0.13	0	1	1	0.67	0	1	0	0.33	8	4	4	16	0.25	3.00
Netherlands Antilles	1	1	0	0.67	1	1	0	0	0	1	1	1	0.63	1	0	0	0.33	0	0	0	0	0	1	0	1	0.25	0	1	1	0.67	0	1	1	0.67	10	6	6	22	0.42	3.63
Panama	1	1	1	1.00	1	1	1	1	1	1	1	1	1.00	1	1	1	1.00	0	0	0	0	0	1	1	0	0.25	1	1	1	1.00	0	1	1	0.67	16	15	12	43	1.00	5.92
Paraguay	0	1	1	0.67	1	1	0	1	n.a	1	1	1	0.86	1	1	1	1.00	0	0	0	0	0	0	1	1	0.63	1	1	1	1.00	0	1	1	0.67	10	10	9	29	0.61	5.09
Peru	1	1	1	1.00	1	1	1	1	1	1	1	1	0.88	1	1	1	1.00	0	0	0	0	0	1	0	0	0.38	1	1	1	1.00	0	1	1	0.67	9	9	7	25	0.50	5.42
Philippines	1	1	1	1.00	1	1	1	1	1	1	1	1	1.00	1	1	1	1.00	0	0	0	0	0	1	0	0	0.50	1	1	1	0.33	0	1	1	0.67	13	7	5	25	0.50	5.00
Portugal	1	1	1	1.00	1	1	1	0	1	1	1	1	0.75	1	1	1	1.00	0	0	0	0	1	0	0	1	0.38	1	1	1	1.00	1	0	0	0.00	6	10	6	22	0.42	4.54
Senegal	1	1	0	0.67	1	1	0	0	0	1	1	1	0.63	1	0	0	0.33	0	0	1	0	1	1	1	1	0.63	0	1	1	0.67	0	1	1	0.67	8	4	6	18	0.31	3.89
Spain	1	1	0	0.67	1	1	0	1	0	1	1	1	0.88	1	1	1	1.00	1	0	0	0	0	1	1	1	0.63	0	1	1	0.67	0	1	1	0.67	8	2	8	18	0.31	4.81
Tunisia	1	1	0	0.67	1	1	0	1	1	1	1	1	0.75	1	1	0	0.67	0	0	0	0	0	0	1	1	0.25	0	1	1	0.75	0	1	1	0.67	6	3	6	15	0.22	3.49
Turkey	1	1	0	0.67	1	1	1	0	0	1	0	1	0.63	1	1	0	0.67	1	0	1	0	1	1	0	0	1.00	0	0	0	0.13	0	0	0	0.00	10	6	7	23	0.44	3.99
Uruguay	1	1	1	1.00	1	1	1	0	0	0	0	1	0.50	1	1	0	0.67	1	0	0	0	0	0	0	0	0.13	0	1	1	0.67	0	1	1	0.33	14	8	10	32	0.69	3.99
Venezuela	1	1	1	1.00	1	1	1	1	1	1	1	1	1.00	1	1	1	1.00	0	0	0	0	0	1	0	1	1.00	0	1	1	0.67	0	1	1	0.67	14	9	7	30	0.64	5.81
Mean	**0.73**	**0.98**	**0.45**	**0.72**	**1.00**	**1.00**	**0.72**	**0.43**	**0.52**	**0.95**	**0.83**	**1.00**	**0.81**	**0.88**	**0.95**	**0.68**	**0.83**	**0.28**	**0.08**	**0.65**	**0.45**	**0.35**	**0.38**	**0.40**	**0.75**	**0.42**	**0.48**	**0.83**	**0.78**	**0.69**	**0.08**	**0.90**	**0.60**	**0.53**	**7.98**	**6.70**	**6.05**	**20.73**	**0.38**	**4.38**
Median	**1.00**	**1.00**	**0.00**	**0.67**	**1.00**	**1.00**	**1.00**	**0.00**	**1.00**	**1.00**	**1.00**	**1.00**	**0.87**	**1.00**	**1.00**	**1.00**	**1.00**	**0.00**	**0.00**	**1.00**	**0.00**	**0.00**	**0.00**	**0.00**	**1.00**	**0.44**	**0.00**	**1.00**	**1.00**	**0.67**	**0.00**	**1.00**	**1.00**	**0.67**	**8.00**	**7.00**	**6.00**	**20.00**	**0.36**	**4.33**

German Legal Origin

Country	Gen. juris. court	Prof. vs non-prof. judge	Legal rep. mandatory	**Prof. vs laymen**	Filing	Service	Opposition	Evidence	Final args	Judgment	Notif.	Enforce.	**Written**	Complaint just.	Judgment just.	On law	**Legal just.**	Judge n.intro.	Judge n.reject	Out-of-court	Pre-qual.	Oral only judge	Only orig. docs	Authent. law	Mand. record	**Stat. ev.**	Enf. suspended	Comprehens.	Interloc.	**Control**	Pre-trial concil.	Service officer	Notif. officer	**Engagement**	Filing	Trial	Enforce.	Indep.	**Indep. idx**	**Formalism**
Austria	1	1	0	0.67	1	1	1	0	n.a	1	1	1	0.86	1	1	1	1.00	0	0	0	0	0	0	0	1	0.13	1	1	0	0.67	0	0	0	0.00	6	6	6	18	0.31	3.62
Germany	0	1	0	0.33	1	1	1	1	0	1	1	1	0.88	1	1	1	1.00	1	0	0	0	0	0	0	1	0.50	0	1	1	0.67	0	0	0	0.00	4	9	8	21	0.39	3.76
Japan	1	1	0	0.67	1	1	1	1	0	1	1	1	0.88	1	1	1	1.00	0	0	0	0	0	0	0	1	0.25	1	1	1	0.67	0	0	0	0.00	4	3	5	12	0.14	3.72
Korea	1	1	0	0.67	1	1	1	1	1	1	1	1	0.88	0	0	1	0.33	0	0	0	0	0	0	0	1	0.13	1	1	1	0.67	0	1	1	0.33	8	5	6	19	0.33	3.33
Switzerland	1	1	0	0.67	1	1	1	0	0	1	1	1	0.63	1	1	1	1.00	0	0	0	0	0	0	1	1	0.25	1	1	1	1.00	1	0	0	0.33	2	3	5	10	0.08	3.96
Taiwan	1	1	0	0.67	1	1	1	0	0	1	1	1	0.50	1	1	0	1.00	0	0	0	0	0	0	0	1	0.38	1	1	1	0.67	0	0	0	0.00	6	6	1	13	0.17	3.04
Mean	**0.83**	**1.00**	**0.00**	**0.61**	**0.83**	**1.00**	**0.67**	**0.33**	**0.40**	**1.00**	**1.00**	**1.00**	**0.79**	**0.67**	**0.83**	**1.00**	**0.83**	**0.50**	**0.17**	**0.33**	**0.00**	**0.00**	**0.00**	**0.17**	**1.00**	**0.27**	**0.50**	**1.00**	**0.67**	**0.72**	**0.17**	**0.17**	**0.00**	**0.11**	**5.00**	**5.33**	**5.17**	**15.50**	**0.24**	**3.57**
Median	**1.00**	**1.00**	**0.00**	**0.67**	**1.00**	**1.00**	**1.00**	**0.00**	**0.00**	**1.00**	**1.00**	**1.00**	**0.87**	**1.00**	**1.00**	**1.00**	**1.00**	**0.50**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**1.00**	**0.25**	**0.50**	**1.00**	**1.00**	**0.67**	**0.00**	**0.00**	**0.00**	**0.00**	**5.00**	**5.50**	**5.50**	**15.50**	**0.24**	**3.67**

Scandinavian Legal Origin

Country	Gen.	Prof.	Legal rep.	**Prof.**	Filing	Service	Oppos.	Evid.	Final	Judg.	Notif.	Enf.	**Written**	Compl.	Judg.	On law	**Legal**	n.intro.	n.reject	Out-court	Pre-qual	Oral	Orig.	Authent.	Record	**Stat.**	Suspend	Compreh.	Interloc.	**Control**	Concil.	Serv. off.	Notif. off.	**Engage**	Filing	Trial	Enf.	Indep.	**Indep.**	**Form.**
Denmark	1	1	0	0.67	1	1	1	0	0	1	1	1	0.75	1	1	0	0.67	1	0	0	0	0	0	0	0	0.13	1	1	1	1.00	0	0	0	0.00	6	7	8	21	0.39	3.60
Finland	0	1	0	0.33	1	1	0	0	0	1	0	1	0.50	1	1	1	0.67	0	0	0	0	0	1	0	1	0.25	0	1	1	0.67	1	0	0	0.00	6	1	4	11	0.11	2.53
Iceland	1	1	0	0.67	1	1	0	0	0	0	0	1	0.38	1	1	1	1.00	0	0	0	0	0	1	0	1	0.38	1	1	1	0.67	1	0	0	0.33	5	2	2	9	0.06	3.47
Norway	1	1	0	0.67	1	1	1	0	0	1	1	1	0.75	0	1	1	0.67	1	0	0	0	0	0	0	0	0.13	1	1	1	1.00	0	0	0	0.33	8	4	1	13	0.17	3.71
Sweden	1	1	0	0.67	1	1	1	0	0	1	1	1	0.75	1	0	0	0.33	1	0	0	0	0	0	0	1	0.25	1	1	1	1.00	0	0	0	0.00	9	6	3	18	0.31	3.31
Mean	**0.80**	**1.00**	**0.00**	**0.60**	**1.00**	**1.00**	**0.60**	**0.00**	**0.00**	**1.00**	**0.60**	**1.00**	**0.63**	**0.40**	**0.80**	**0.80**	**0.67**	**0.80**	**0.00**	**0.20**	**0.00**	**0.00**	**0.20**	**0.00**	**0.60**	**0.23**	**0.80**	**1.00**	**1.00**	**0.87**	**0.40**	**0.00**	**0.00**	**0.13**	**6.00**	**4.20**	**4.20**	**14.40**	**0.21**	**3.32**
Median	**1.00**	**1.00**	**0.00**	**0.67**	**1.00**	**1.00**	**1.00**	**0.00**	**0.00**	**1.00**	**1.00**	**1.00**	**0.75**	**1.00**	**1.00**	**1.00**	**0.67**	**1.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**1.00**	**0.25**	**1.00**	**1.00**	**1.00**	**1.00**	**0.00**	**0.00**	**0.00**	**0.00**	**6.00**	**5.00**	**4.00**	**13.00**	**0.17**	**3.47**

	Gen.	Prof.	Legal rep.	**Prof.**	Filing	Service	Oppos.	Evid.	Final	Judg.	Notif.	Enf.	**Written**	Compl.	Judg.	On law	**Legal**	n.intro.	n.reject	Out-court	Pre-qual	Oral	Orig.	Authent.	Record	**Stat.**	Suspend	Compreh.	Interloc.	**Control**	Concil.	Serv. off.	Notif. off.	**Engage**	Filing	Trial	Enf.	Indep.	**Indep.**	**Form.**
Mean all countries	**0.70**	**0.90**	**0.15**	**0.58**	**0.99**	**1.00**	**0.76**	**0.30**	**0.22**	**0.76**	**0.53**	**0.99**	**0.71**	**0.63**	**0.73**	**0.68**	**0.68**	**0.36**	**0.09**	**0.62**	**0.18**	**0.13**	**0.35**	**0.18**	**0.73**	**0.33**	**0.45**	**0.82**	**0.85**	**0.71**	**0.13**	**0.45**	**0.23**	**0.27**	**6.49**	**5.76**	**5.42**	**17.66**	**0.30**	**3.58**
Median all countries	**1.00**	**1.00**	**0.00**	**0.67**	**1.00**	**1.00**	**1.00**	**0.00**	**0.00**	**1.00**	**1.00**	**1.00**	**0.75**	**1.00**	**1.00**	**1.00**	**0.67**	**0.00**	**0.00**	**1.00**	**0.00**	**0.00**	**0.00**	**0.00**	**1.00**	**0.38**	**1.00**	**1.00**	**1.00**	**0.67**	**0.00**	**0.00**	**0.00**	**0.33**	**6.00**	**6.00**	**5.00**	**17.00**	**0.28**	**3.63**

Tests of Means (t-stats)

	Gen.	Prof.	Legal rep.	**Prof.**	Filing	Service	Oppos.	Evid.	Final	Judg.	Notif.	Enf.	**Written**	Compl.	Judg.	On law	**Legal**	n.intro.	n.reject	Out-court	Pre-qual	Oral	Orig.	Authent.	Record	**Stat.**	Suspend	Compreh.	Interloc.	**Control**	Concil.	Serv. off.	Notif. off.	**Engage**	Filing	Trial	Enf.	Indep.	**Indep.**	**Form.**
Common vs. Socialist	-3.24[a]	-1.76[c]	0.00	-3.08[a]	0.00	0.00	0.67	2.04[b]	0.18	-3.12[a]	-2.87[a]	-0.61	-1.13	-0.68	-3.30[a]	-1.88[c]	-2.89[a]	0.48	-0.95	0.84	-1.56	-1.64	-0.81	-2.89[a]	0.09	-1.31	-4.80[a]	-2.20[b]	-0.39	-4.57[a]	0.83	2.15[b]	-0.22	1.87[c]	-2.36[b]	-0.55	-1.89[c]	-1.98[c]	-1.98[c]	-3.87[a]
Common vs. French	-1.24	-2.20[b]	-5.79[a]	-4.34[a]	0.00	0.00	1.19	-1.00	-4.67[a]	-4.90[a]	-7.21[a]	-0.98	-5.61[a]	1.01	0.32	0.86	-5.23[a]	-4.70[a]	0.05	1.88[c]	-1.65	-1.34	0.50	-3.69[a]	-5.17[a]	-3.21[a]	-1.31	-0.70	0.41	-0.41	0.98	-6.38[a]	-6.59[a]	-7.07[a]	-3.61[a]	-1.97[c]	-2.83[a]	-3.38[a]	-3.38[a]	-7.77[a]
Common vs. German	-1.12	-1.07	0.00	-1.31	2.84[a]	0.00	0.93	-0.08	-2.21[b]	-2.29[b]	-4.87[a]	-0.37	-2.53[b]	-0.65	-1.54	-2.18[b]	-2.29[b]	-0.55	-0.53	2.05[b]	0.37	0.00	1.88[c]	-1.65	-1.34	0.50	-0.79	-1.34	1.66	-0.54	-0.15	0.81	0.54	0.70	0.73	-0.04	-0.34	0.22	0.22	-1.74[c]
Common vs. Scandinavian	-0.88	-0.98	0.00	-1.10	0.00	0.00	1.21	1.49	0.63	-1.17	-2.05[b]	-0.34	-0.86	-1.82[c]	0.71	2.55[b]	0.34	0.00	0.78	0.34	0.77	1.20	-1.17	-1.22	-0.71	-1.77[c]	-1.45	1.55	0.49	0.42	-0.30	0.91	1.01	0.72	0.72	-0.86
Socialist vs. French	2.42[b]	0.63	-3.55[a]	-0.78	0.00	0.00	0.24	-2.75[a]	-3.36[a]	-0.18	-2.09[b]	0.00	-3.14[a]	-2.18[b]	-0.18	1.02	-0.57	0.28	1.22	-0.17	-2.37[b]	-2.25[b]	0.85	-1.05	-1.00	-1.27	3.48[a]	1.81[c]	1.44	3.38[a]	-0.16	-9.77[a]	-4.11[a]	-7.00[a]	-0.94	-0.84	-0.42	-0.94	-0.94	-2.49[b]
Socialist vs. German	1.71	0.00	0.00	1.71	1.71	0.00	0.37	-1.68	-1.96[c]	-0.60	-2.06[b]	0.00	-1.68	-0.17	0.73	-1.12	-0.28	-0.79	0.11	1.21	0.88	0.60	2.34[b]	0.40	-1.35	1.31	2.62[b]	0.00	1.68	4.12[a]	-0.73	-0.73	0.60	-0.57	2.41[b]	0.26	0.84	1.29	1.29	1.10
Socialist vs. Scandinavian	1.90[c]	0.00	0.00	1.90[c]	0.00	0.00	0.62	0.55	0.55	0.89	-0.14	0.00	0.65	0.86	0.89	0.06	0.80	-2.01[c]	1.02	1.70	0.80	0.55	1.16	1.23	0.41	2.07[b]	1.96[c]	0.00	-0.55	1.36	-1.96[c]	0.55	0.55	-0.79	2.10[b]	0.88	1.70	1.57	1.57	1.93[c]
French vs. German	-0.55	-0.38	2.17[b]	0.98	2.77[a]	0.00	0.25	0.42	0.47	-0.55	-1.10	0.00	0.35	1.32	1.07	-1.66	0.00	-1.11	-0.73	1.49	2.17[b]	1.76[c]	1.86[c]	1.09	-1.38	1.81[c]	-0.11	-1.10	0.57	-0.24	-0.73	5.28[a]	2.93[a]	4.09[a]	2.05[b]	0.84	1.05	1.56	1.56	2.37[b]
French vs. Scandinavian	-0.35	-0.35	1.98[c]	0.99	0.00	0.00	0.53	1.88[c]	2.24[b]	1.26	1.18	0.00	2.44[b]	-2.45[b]	0.62	1.98[c]	1.98[c]	1.60	0.76	1.78[c]	0.70	2.23[b]	-0.52	-1.01	-1.18	-1.25	-2.25[b]	6.56[a]	2.68[a]	3.55[a]	1.25	1.40	1.92[c]	1.72[c]	1.72[c]	2.82[a]
German vs. Scandinavian	0.13	0.00	0.00	0.13	-0.90	0.00	0.21	1.43	1.63	1.11	1.81	0.00	1.48	0.83	0.13	1.11	1.06	-0.98	0.90	0.45	0.00	0.00	-1.11	0.90	1.81	0.59	-0.30	0.00	-1.43	-1.51	-0.30	0.90	.	-0.21	-0.83	0.78	0.91	0.39	0.39	1.04

Tests of Medians (z-stats)

	Gen.	Prof.	Legal rep.	**Prof.**	Filing	Service	Oppos.	Evid.	Final	Judg.	Notif.	Enf.	**Written**	Compl.	Judg.	On law	**Legal**	n.intro.	n.reject	Out-court	Pre-qual	Oral	Orig.	Authent.	Record	**Stat.**	Suspend	Compreh.	Interloc.	**Control**	Concil.	Serv. off.	Notif. off.	**Engage**	Filing	Trial	Enf.	Indep.	**Indep.**	**Form.**
Common vs. Socialist	-3.00[a]	-1.73[c]	0.00	-3.08[a]	0.00	0.00	0.68	1.99[b]	0.19	-2.90[a]	-2.70[a]	-0.62	-1.51	-0.69	-3.04[a]	-1.84[c]	-2.81[a]	0.48	-0.96	0.84	-1.54	-1.62	-0.82	-2.72[a]	0.09	-0.92	-4.08[a]	-2.13[b]	-0.39	-4.22[a]	0.83	2.09[b]	-0.23	2.13[b]	-2.34[b]	0.18	-1.58	-1.64	-1.64	-3.50[a]
Common vs. French	-1.23	-2.15[b]	-4.89[a]	-3.78[a]	0.00	0.00	1.18	-1.00	-4.11[a]	-4.33[a]	-5.63[a]	-0.98	-4.67[a]	-3.43[a]	-4.51[a]	-1.17	-4.48[a]	1.01	0.33	0.86	-4.54[a]	-4.18[a]	0.06	-4.17[a]	0.12	-2.77[a]	-1.30	-0.70	1.60	-0.86	0.98	-5.23[a]	-5.34[a]	-5.60[a]	-3.04[a]	-1.61	-2.54[b]	-2.76[a]	-2.76[a]	-5.97[a]
Common vs. German	-1.12	-1.07	0.00	-1.29	2.65[a]	0.00	0.94	-0.08	-2.12[b]	-2.19[b]	-3.98[a]	-0.38	-2.00[b]	-0.65	-1.52	-2.10[b]	-2.17[b]	-0.55	-0.53	1.98[b]	0.38	0.00	1.83[c]	-1.62	-1.33	0.68	-0.79	-1.33	1.63	-0.47	-0.15	0.82	0.54	0.64	0.65	0.08	-0.66	0.20	0.20	-1.75[c]
Common vs. Scandinavian	-0.88	-0.98	0.00	-1.06	0.00	0.00	1.21	1.47	0.64	-1.16	-1.98[b]	-0.35	-0.30	-1.77[c]	0.71	2.41[b]	0.35	0.00	0.79	0.35	0.78	1.45	-1.16	-1.22	-0.71	-1.79[c]	-1.43	1.52	0.49	0.33	-0.30	0.77	1.30	0.73	0.73	-0.85
Socialist vs. French	2.32[b]	0.63	-3.23[a]	-0.98	0.00	0.00	0.24	-2.60[a]	-3.05[a]	-0.19	-2.03[b]	0.00	-2.78[a]	-2.11[b]	-0.19	1.02	-0.04	0.28	1.22	-0.17	-2.27[b]	-2.18[b]	0.85	-1.05	-1.00	-1.22	3.17[a]	1.77[c]	1.42	3.50[a]	-0.16	-5.93[a]	-3.62[a]	-5.02[a]	-0.44	-0.92	-0.30	-0.73	-0.73	-2.45[b]
Socialist vs. German	1.63	0.00	0.00	1.63	1.63	0.00	0.38	-1.61	-1.84[c]	-0.61	-1.92[c]	0.00	-1.60	-0.18	0.74	-1.12	-0.21	-0.80	0.11	1.20	0.80	0.61	2.12[b]	0.41	-1.32	1.27	2.62[b]	0.00	1.61	3.10[a]	-0.74	-0.74	0.61	-0.99	2.10[b]	-0.11	0.60	1.14	1.14	0.88
Socialist vs. Scandinavian	1.79[c]	0.00	0.00	1.79[c]	0.00	0.00	0.63	0.56	0.56	0.89	-0.14	0.00	0.40	0.87	0.89	0.06	1.22	-1.88[c]	1.02	1.62	0.81	0.56	1.15	1.21	0.63	1.95[c]	1.84[c]	0.00	-0.56	1.33	-1.84[c]	0.56	0.56	-1.21	1.35	0.62	1.78[c]	1.49	1.49	1.53
French vs. German	-0.56	-0.39	2.08[b]	1.07	2.58[a]	0.00	0.26	0.42	0.47	-0.55	-1.10	0.00	0.38	1.31	1.07	-1.63	-0.21	-1.10	-0.73	1.47	2.08[b]	1.72[c]	1.81[c]	1.09	-1.37	1.78[c]	-0.11	-1.10	0.57	0.16	-0.73	4.18[a]	2.71[a]	3.39[a]	2.01[b]	0.75	0.85	1.60	1.60	2.25[b]
French vs. Scandinavian	-0.35	-0.35	1.91[c]	1.07	0.00	0.00	0.54	1.83[c]	2.13[b]	1.25	1.17	0.00	2.05[b]	2.59[a]	1.25	-0.56	1.62	-2.32[b]	0.63	1.91[c]	1.91[c]	1.58	0.76	1.74[c]	0.71	2.17[b]	-0.52	-1.01	-1.17	-1.26	-2.16[b]	4.69[a]	2.51[b]	3.06[a]	1.15	1.50	2.00[b]	1.79[c]	1.79[c]	2.67[a]
German vs. Scandinavian	0.14	0.00	0.00	0.14	-0.91	0.00	0.22	1.36	1.50	1.10	1.63	0.00	1.57	0.84	0.14	1.10	1.18	-0.98	0.91	0.47	0.00	0.00	-1.36	0.91	1.63	0.48	-0.32	0.00	-1.36	-1.42	-0.22	-0.75	0.65	1.21	0.46	0.46	1.28

a=Significant at 1% level; b=Significant at 5% level; c=Significant at 10% level.
n.a.=Not applicable
.=Missing

Appendix 2B : Collection of a check

This table classifies countries by legal origin and shows the professional vs. laymen, written vs. oral arguments, legal justification, and Engagement formalities indices for the case of collection of a check. All variables are described in Table 1.

Check - by legal origin	General jurisdiction court	Professional vs. non-professional judge	Legal representation is mandatory	Professionals vs. laymen	Filing	Service of process	Opposition	Evidence	Final arguments	Judgment	Notification of judgment	Enforcement of judgment	Written vs. oral elements	Complaint must be legally justified	Judgment must be legally justified	Judgment must be on law (not on equity)	Legal justification	Judge can not introduce evidence	Judge can not reject irrelevant evidence	Out-of-court statements are inadmissible	Mandatory pre-qualification of questions	Oral interrogation only by judge	Only original documents and certified copies are admissible	Authenticity and weight of evidence defined by law	Mandatory recording of evidence	Statutory regulation of evidence	Enforcement of judgment is automatically suspended until resolution of the appeal	Comprehensive review in appeal	Interlocutory appeals are allowed	Control of superior review	Mandatory pre-trial conciliation	Service of process by judicial officer required	Notification of judgment by judicial officer required	Engagement formalities	Filing and service	Trial and judgment	Enforcement	Independent procedural actions	Independent procedural actions (index)	Formalism index
English Legal Origin																																									
Anguilla	0	0	0	0.00	1	1	0	0	0	0	0	1	0.38	0	0	1	0.33	0	0	0	0	0	0	0	1	0.13	1	1	1	1.00	0	0	0	0.00	7	2	5	14	0.13	1.96
Australia	0	0	0	0.00	1	1	n.a	0	n.a.	0	0	1	0.50	0	1	0	0.33	1	0	1	0	0	0	0	0	0.25	1	1	1	0.67	0	0	0	0.00	2	3	6	11	0.05	1.80
Bahrain	0	1	0	0.33	1	1	1	0	1	1	0	1	0.75	1	1	1	1.00	1	1	1	0	0	1	1	1	0.75	1	1	1	1.00	0	1	0	0.33	8	4	6	18	0.24	4.40
Bangladesh	1	1	0	0.67	1	1	1	0	0	1	0	1	0.63	1	0	1	0.67	0	0	0	0	0	0	0	1	0.13	1	1	1	1.00	0	0	0	0.00	6	3	6	15	0.16	3.24
Barbados	0	1	0	0.33	1	1	0	0	0	0	0	1	0.38	0	0	1	0.33	1	0	1	0	0	0	0	0	0.25	0	1	1	0.67	0	1	0	0.33	4	2	6	12	0.08	2.37
Belize	0	0	0	0.00	1	0	0	0	0	0	0	1	0.38	0	0	0	0.00	0	0	1	0	0	0	1	1	0.38	0	1	1	0.67	0	0	0	0.00	4	1	4	9	0.00	1.42
Bermuda	0	1	0	0.33	1	1	0	0	0	0	0	1	0.38	0	0	0	0.00	0	0	1	0	0	0	0	1	0.25	0	0	1	0.33	0	1	0	0.33	5	6	4	15	0.16	1.78
Botswana	1	1	0	0.67	1	1	1	1	0	1	0	1	0.75	1	0	1	0.67	1	0	0	0	0	1	0	0	0.38	0	1	1	0.67	1	1	0	0.67	6	7	7	20	0.29	4.08
BVI	0	1	0	0.33	1	1	0	0	0	0	0	1	0.38	0	0	0	0.00	0	0	0	0	0	1	0	0	0.38	1	1	1	1.00	0	1	0	0.33	4	1	8	13	0.11	2.52
Canada	0	1	0	0.33	1	1	1	0	0	1	0	1	0.50	0	0	0	0.00	1	0	0	0	0	1	0	0	0.38	0	1	0	0.67	0	0	0	0.00	3	5	9	17	0.21	2.09
Cayman	1	1	0	0.67	1	1	0	0	0	0	1	1	0.63	0	1	0	0.33	0	0	0	0	0	0	0	1	0.25	0	1	0	0.67	0	0	0	0.00	7	5	5	17	0.21	2.75
Cyprus	1	1	0	0.67	1	1	0	0	0	1	0	1	0.63	1	1	0	0.67	0	0	0	0	0	1	0	0	0.38	0	1	0	0.67	0	1	0	0.33	12	6	4	22	0.34	3.68
Ghana	1	1	0	0.67	1	1	0	0	0	1	0	1	0.50	0	0	0	0.00	1	0	0	0	0	0	1	0	0.50	0	1	0	0.33	0	1	0	0.33	7	5	9	21	0.32	2.65
Gibraltar	1	1	0	0.67	1	1	1	0	1	1	0	1	0.75	0	1	0	0.33	0	0	0	0	0	0	0	0	0.13	0	0	0	0.33	0	0	0	0.00	8	1	7	16	0.16	2.39
Grenada	0	1	0	0.33	1	1	0	0	0	0	0	1	0.38	0	1	1	0.67	0	0	0	0	0	0	0	0	0.38	1	1	0	0.67	0	1	0	0.33	4	1	6	11	0.05	2.80
Hong Kong	0	0	0	0.00	1	1	0	0	0	0	1	1	0.63	0	0	0	0.00	0	0	0	0	0	0	0	0	0.00	0	0	0	0.00	0	0	0	0.00	4	2	7	13	0.11	0.73
India	1	1	0	0.67	1	1	1	0	0	1	0	1	0.63	1	1	1	1.00	0	0	0	0	0	0	0	1	0.38	0	0	0	0.33	0	0	0	0.00	8	8	6	22	0.34	3.34
Ireland	1	1	0	0.67	1	1	1	0	n.a.	1	0	1	0.57	0	1	0	0.33	0	0	1	0	0	0	0	0	0.13	1	1	0	0.67	0	0	0	0.00	8	4	7	19	0.26	2.63
Israel	0	1	0	0.33	1	1	1	0	1	1	1	1	0.88	0	1	0	0.67	1	1	0	0	0	0	0	0	0.50	0	1	0	0.67	0	0	0	0.00	6	7	6	19	0.26	3.30
Jamaica	1	1	0	0.67	1	1	0	0	0	0	0	1	0.38	0	0	1	0.33	0	0	0	0	0	0	0	0	0.25	0	1	0	0.67	0	0	0	0.00	4	3	4	11	0.05	2.34
Kenya	1	1	0	0.67	1	1	0	0	0	1	0	1	0.63	0	1	0	0.33	0	0	0	0	0	0	0	0	0.38	0	1	0	0.67	0	0	0	0.00	7	9	9	25	0.42	3.09
Malawi	1	1	0	0.67	1	1	1	0	0	1	0	1	0.63	0	1	0	0.33	1	0	0	0	0	0	0	0	0.25	0	1	0	0.67	1	0	0	0.33	3	4	5	12	0.08	2.95
Malaysia	0	1	0	0.33	1	1	0	0	0	0	0	1	0.50	0	0	0	0.00	1	1	0	0	0	0	0	0	0.50	0	1	0	0.67	0	0	0	0.00	4	6	12	22	0.34	2.34
Namibia	1	1	0	0.67	1	1	1	1	0	1	0	1	0.63	1	0	1	0.67	0	0	1	0	0	0	0	0	0.38	1	1	1	1.00	0	1	0	0.33	4	5	6	15	0.16	3.82
New Zealand	0	0	0	0.00	1	1	0	0	0	1	0	1	0.50	0	0	0	0.00	0	0	0	0	0	0	0	0	0.00	1	1	0	0.67	0	0	0	0.00	2	1	9	12	0.08	1.58
Nigeria	0	1	0	0.33	1	1	0	0	0	1	0	1	0.63	0	1	0	0.33	1	0	0	0	0	1	0	0	0.38	0	1	0	0.67	0	1	0	0.33	13	8	8	29	0.53	3.19
Pakistan	1	1	0	0.67	1	1	1	0	0	1	0	1	0.63	0	1	0	0.67	0	0	0	0	0	0	0	0	0.25	1	1	1	1.00	0	0	0	0.00	12	12	6	30	0.55	3.76
Singapore	0	1	0	0.33	1	1	0	0	0	0	0	1	0.38	0	0	0	0.00	1	1	0	0	0	0	0	1	0.50	0	1	0	0.67	1	0	0	0.33	7	7	6	20	0.29	2.50
South Africa	0	0	0	0.00	1	1	0	0	0	0	0	1	0.38	0	0	1	0.33	0	0	0	0	0	0	0	1	0.25	0	1	0	0.67	0	0	0	0.00	3	1	7	11	0.05	1.68
Sri Lanka	1	1	0	0.67	1	1	1	1	n.a.	1	0	1	0.86	0	1	0	0.67	0	0	0	0	0	1	0	0	0.38	1	1	0	1.00	0	0	0	0.00	8	3	6	17	0.21	3.78
St. Vincent	1	1	1	1.00	1	1	0	n.a.	0	0	0	0	0.43	0	1	0	0.67	0	1	0	0	0	0	0	0	0.38	0	1	0	0.67	0	1	0	0.33	5	4	6	15	0.16	3.63
Swaziland	1	1	0	0.67	1	1	1	1	0	0	0	1	0.63	1	1	1	1.00	0	0	0	0	0	0	0	0	0.25	1	1	1	1.00	0	0	0	0.00	4	6	5	15	0.16	3.70
Tanzania	1	1	0	0.67	1	1	1	1	n.a.	1	0	1	0.86	1	1	0	0.67	0	0	0	0	0	0	0	0	0.50	0	1	0	0.67	0	1	0	0.33	6	3	5	14	0.13	3.82
Thailand	0	1	0	0.33	0	1	0	0	0	1	1	1	0.50	0	0	0	0.00	0	0	0	0	0	0	1	0	0.38	0	0	0	0.33	0	0	0	0.00	8	5	6	19	0.26	3.14
Trinidad & Tobago	0	1	0	0.33	1	1	0	0	0	1	0	1	0.63	0	0	0	0.00	0	0	0	0	0	0	0	0	0.38	0	0	0	0.33	0	0	0	0.00	7	4	8	19	0.26	1.80
Turks and Caicos	0	0	0	0.00	0	1	0	0	0	0	0	1	0.25	0	0	0	0.00	0	0	0	0	0	0	0	0	0.38	1	1	1	1.00	0	0	0	0.00	6	2	10	18	0.24	1.86
UAE	1	1	1	1.00	1	1	1	1	1	1	0	1	0.88	1	1	1	1.00	1	0	0	0	0	0	0	0	0.13	0	1	0	0.33	0	0	0	0.00	13	8	6	27	0.47	3.81
Uganda	0	0	0	0.00	1	1	1	n.a.	0	0	1	1	0.71	0	1	0	0.67	1	0	0	0	0	0	0	0	0.38	0	1	0	0.67	0	0	0	0.00	7	2	7	16	0.18	2.61
United Kingdom	1	1	0	0.67	1	1	1	n.a.	0	0	1	1	0.71	0	1	0	0.33	0	0	0	0	1	0	0	0	0.13	0	1	0	0.67	0	0	0	0.00	2	5	5	12	0.08	2.58
USA	0	1	0	0.33	1	1	0	0	1	0	1	1	0.75	0	0	0	0.00	1	0	0	0	0	0	0	0	0.13	1	1	1	1.00	0	0	0	0.00	2	3	7	12	0.08	2.62
Zambia	0	0	0	0.00	1	1	0	n.a.	0	0	0	1	0.57	0	0	0	0.00	0	0	0	0	0	0	0	0	0.38	0	1	0	0.67	0	0	0	0.00	9	2	5	16	0.18	2.13
Zimbabwe	0	1	0	0.33	1	1	1	0	0	0	0	1	0.63	0	1	0	0.67	0	0	0	0	0	0	0	0	0.38	0	1	0	0.67	0	1	0	0.33	4	4	5	13	0.11	3.11
Mean	0.45	0.79	0.05	0.43	0.95	1.00	0.71	0.24	0.12	0.38	0.14	0.98	0.58	0.24	0.52	0.50	0.42	0.36	0.12	0.74	0.00	0.05	0.40	0.05	0.76	0.31	0.40	0.76	0.88	0.68	0.07	0.33	0.00	0.13	6.02	4.29	6.45	16.76	0.20	2.76
Median	0.00	1.00	0.00	0.33	1.00	1.00	1.00	0.00	0.00	0.00	0.00	1.00	0.63	0.00	1.00	0.50	0.33	0.00	0.00	1.00	0.00	0.00	0.00	0.00	1.00	0.38	0.00	1.00	1.00	0.67	0.00	0.00	0.00	0.00	6.00	4.00	6.00	16.00	0.18	2.64
Socialist Legal Origin																																									
Bulgaria	1	1	0	0.67	1	1	0	1	0	1	1	1	0.88	1	1	1	1.00	1	0	0	0	0	0	0	1	0.25	1	1	1	1.00	0	1	0	0.33	7	8	11	26	0.45	4.45
China	1	1	0	0.67	1	1	1	0	1	1	1	1	0.75	1	0	0	0.33	0	0	0	0	0	0	0	1	0.38	1	1	1	1.00	0	1	0	0.00	10	3	7	20	0.29	3.41
Croatia	1	1	0	0.67	1	1	0	0	0	1	1	1	0.75	1	1	1	1.00	0	0	0	0	0	0	0	1	0.25	0	1	0	0.67	0	0	0	0.00	8	6	6	20	0.29	3.62
Czech Republic	1	1	0	0.67	1	1	1	n.a.	n.a.	1	1	1	0.83	1	1	1	1.00	0	0	0	0	0	0	0	1	0.38	1	1	1	1.00	0	0	0	0.00	7	4	5	16	0.18	4.06
Estonia	1	1	0	0.67	1	1	0	0	0	1	0	1	0.75	1	1	1	1.00	0	0	0	0	0	0	0	1	0.38	1	1	1	1.00	0	1	0	0.33	8	4	6	18	0.24	4.36
Georgia	1	1	0	0.67	1	1	1	0	1	0	0	1	0.63	1	0	1	0.67	0	0	0	0	0	0	0	1	0.25	0	1	0	0.67	0	0	0	0.00	9	3	5	17	0.21	3.09
Hungary	1	1	0	0.67	1	1	0	0	1	1	0	1	0.75	0	1	0	0.67	0	0	0	0	0	0	0	0	0.13	1	1	1	1.00	0	0	0	0.00	6	5	6	17	0.21	3.42
Kazakhstan	1	1	0	0.67	1	1	1	0	1	1	0	1	0.75	0	1	0	0.67	1	0	1	0	1	1	1	1	0.50	1	1	1	1.00	1	1	0	0.33	12	17	12	41	0.84	4.44
Latvia	1	1	0	0.67	1	1	1	0	0	1	0	1	0.63	1	1	1	1.00	0	1	0	0	0	0	0	0	0.38	1	1	1	1.00	0	0	0	0.00	9	2	8	19	0.26	3.93
Lithuania	1	1	0	0.67	1	1	0	0	1	1	0	1	0.75	1	1	1	1.00	0	0	0	0	0	1	0	0	0.50	1	1	1	1.00	0	0	0	0.00	16	3	11	30	0.55	4.47
Poland	1	1	0	0.67	1	1	1	0	1	1	0	1	0.88	1	1	1	1.00	0	0	0	0	0	1	0	0	0.38	1	1	1	1.00	0	0	0	0.00	8	5	5	18	0.24	4.15
Romania	1	1	0	0.67	1	1	0	0	0	1	0	1	0.75	1	1	1	1.00	0	0	0	0	0	0	0	0	0.38	1	1	1	1.00	0	0	0	0.00	8	6	14	28	0.50	4.42
Russia	1	1	0	0.67	1	1	0	0	0	1	0	1	0.50	1	1	1	1.00	1	1	0	0	0	0	0	1	0.38	1	1	1	1.00	0	0	0	0.00	8	3	5	16	0.18	3.39
Slovenia	1	1	0	0.67	1	1	0	0	1	1	0	1	0.75	1	1	1	1.00	0	0	0	0	0	0	0	1	0.50	1	1	1	1.00	0	0	0	0.00	8	4	10	22	0.34	4.26
Ukraine	1	1	0	0.67	1	1	0	0	0	1	0	1	0.75	1	0	1	0.67	0	1	0	0	0	0	0	0	0.63	1	1	1	1.00	0	0	0	0.00	10	3	7	20	0.29	3.66
Vietnam	1	1	0	0.67	1	1	0	0	0	1	0	1	0.50	1	0	1	0.67	0	0	0	0	0	0	0	1	0.38	1	1	1	1.00	0	0	0	0.00	13	6	9	28	0.50	3.25
Mean	1.00	1.00	0.00	0.67	1.00	1.00	0.88	0.13	0.07	1.00	0.63	1.00	0.72	0.56	1.00	0.81	0.79	0.31	0.19	0.56	0.13	0.19	0.63	0.25	0.75	0.38	0.94	1.00	0.94	0.96	0.06	0.06	0.06	0.06	9.19	5.13	7.94	22.25	0.35	3.93
Median	1.00	1.00	0.00	0.67	1.00	1.00	1.00	0.00	0.00	1.00	1.00	1.00	0.75	1.00	1.00	1.00	1.00	0.00	0.00	1.00	0.00	0.00	1.00	0.00	1.00	0.38	1.00	1.00	1.00	1.00	0.00	0.00	0.00	0.00	8.00	4.00	7.00	20.00	0.29	3.99
French Legal Origin																																									
Argentina	1	1	1	1.00	1	1	1	1	n.a.	1	1	1	1.00	1	1	1	1.00	0	0	0	0	0	0	0	0	0.13	1	1	1	1.00	0	1	1	0.67	16	5	11	32	0.61	5.40
Belgium	0	1	0	0.33	1	1	1	0	0	1	0	1	0.75	1	0	0	0.33	0	0	0	0	0	0	0	1	0.13	0	1	0	0.67	0	1	0	0.33	5	4	7	16	0.18	2.73
Bolivia	1	1	1	1.00	1	1	1	1	0	1	1	1	1.00	1	0	1	0.67	0	0	0	0	1	0	1	1	0.38	1	1	1	1.00	1	1	1	1.00	18	11	7	36	0.71	5.75
Brazil	0	1	0	0.33	1	1	0	0	0	1	0	1	0.50	1	1	1	1.00	0	0	0	0	1	0	0	0	0.38	0	1	0	0.67	0	0	0	0.00	4	7	5	16	0.18	3.06
Chile	1	1	1	1.00	1	1	0	0	0	1	1	1	0.75	1	0	1	0.67	1	1	0	0	0	0	0	1	0.50	0	1	0	0.67	0	1	1	0.67	10	8	3	21	0.32	4.57
Colombia	1	1	0	0.67	1	1	1	1	1	1	1	1	1.00	1	1	1	1.00	0	0	0	0	0	0	0	0	0.38	0	0	0	0.00	0	1	1	0.33	14	14	9	37	0.74	
Costa Rica	1	1	0	0.67	1	1	1	1	1	1	0	1	1.00	1	1	1	1.00	0	0	0	0	1	0	1	1	0.50	1	1	1	1.00	0	1	1	0.67	8	9	4	21	0.32	5.48
Cote D'Ivoire	1	1	0	0.67	1	1	0	0	1	0	0	1	0.63	1	1	0	0.67	0	0	0	1	0	0	0	0	0.13	0	1	0	0.67	0	1	1	0.67	6	3	9	18	0.24	3.65
Dominican Republic	0	1	0	0.33	1	1	0	0	0	1	1	1	0.75	1	1	0	0.67	0	0	0	1	0	0	0	0	0.38	1	1	1	1.00	0	1	1	0.67	7	5	8	20	0.29	4.08

Formalism index table — Check by legal origin.

Check – by legal origin	Professionals vs. Laymen				Written vs. oral elements									Legal justification				Statutory regulation of evidence									Control of superior review				Engagement formalities				Independent procedural actions					Formalism index
	General jurisdiction court	Professional vs. non-professional judge	Legal representation is mandatory	Professionals vs. Laymen	Filing	Service of process	Opposition	Evidence	Final arguments	Judgment	Notification of judgment	Enforcement of judgment	Written vs. oral elements	Complaint must be legally justified	Judgment must be legally justified	Judgment must be on law (not on equity)	Legal justification	Judge can not introduce evidence	Judge can not reject irrelevant evidence	Out-of-court statements are inadmissible	Mandatory pre-qualification of questions	Oral interrogation only by judge	Only original documents and certified copies are admissible	Authenticity and weight of evidence defined by law	Mandatory recording of evidence	Statutory regulation of evidence	Enforcement of judgment is automatically suspended until resolution of the appeal	Comprehensive review in appeal	Interlocutory appeals are allowed	Control of superior review	Mandatory pre-trial conciliation	Service of process by judicial officer required	Notification of judgment by judicial officer required	Engagement formalities	Filing and service	Trial and judgment	Enforcement	Independent procedural actions (count)	Independent procedural actions	Formalism index
Ecuador	1	1	1	1.00	1	1	1	1	1	1	1	1	1.00	1	1	0	0.67	0	0	1	1	0	1	1	1	0.63	0	1	1	0.67	0	0	1	0.33	14	12	7	33	0.63	4.92
Egypt	1	1	1	1.00	1	1	0	1	1	1	0	1	0.75	1	1	1	1.00	0	1	0	1	0	0	1	1	0.50	0	0	0	0.00	0	0	1	0.33	6	2	9	17	0.21	3.79
El Salvador	0	1	0	0.33	1	1	1	1	0	1	1	1	0.88	1	1	1	1.00	1	1	1	1	1	0	1	1	0.88	0	1	1	0.67	0	1	1	0.67	8	4	4	16	0.18	4.60
France	1	0	0	0.33	1	1	1	0	0	1	1	1	0.75	1	1	1	1.00	0	0	0	0	0	0	0	1	0.13	0	0	1	0.33	0	1	1	0.67	3	1	6	10	0.03	3.23
Greece	1	1	0	0.67	1	n.a.	n.a.	1	n.a.	1	1	1	1.00	1	1	1	1.00	1	1	0	1	0	0	0	1	0.50	0	0	0	0.00	1	0	1	0.67	5	3	7	15	0.16	3.99
Guatemala	1	1	1	1.00	1	1	1	1	1	1	1	1	1.00	1	1	1	1.00	1	1	1	1	0	1	0	1	0.75	1	1	1	1.00	0	1	1	0.67	8	5	6	19	0.26	5.68
Honduras	1	1	0	0.67	1	1	1	1	1	1	1	1	1.00	1	1	1	1.00	0	0	1	1	0	1	1	1	0.63	0	1	1	0.67	0	1	0	0.33	13	12	7	32	0.61	4.90
Indonesia	1	0	0	0.33	1	1	1	1	1	1	0	1	0.88	1	1	0	0.67	0	0	1	1	0	1	0	1	0.50	0	1	1	0.67	0	1	0	0.33	11	10	8	29	0.53	3.90
Italy	0	1	1	0.67	1	n.a.	1	1	1	1	0	1	0.86	1	1	1	1.00	0	0	0	0	0	0	0	0	0.00	0	1	1	0.67	0	1	1	0.67	5	6	5	16	0.18	4.04
Jordan	1	1	0	0.67	1	1	0	1	0	1	1	1	0.75	0	1	1	0.67	0	0	1	1	0	1	0	1	0.50	0	0	0	0.00	0	1	0	0.33	12	9	11	32	0.61	3.52
Kuwait	1	1	1	1.00	1	1	1	1	1	1	0	1	0.88	0	1	1	0.67	0	0	0	1	0	0	0	0	0.13	0	1	1	0.67	0	1	1	0.67	9	3	5	17	0.21	3.88
Lebanon	1	1	1	1.00	1	1	0	1	0	1	1	1	0.75	0	1	1	0.67	0	0	1	1	0	1	1	1	0.63	1	1	1	1.00	0	1	0	0.33	8	11	8	27	0.47	4.85
Luxembourg	0	1	0	0.33	1	1	1	0	n.a.	1	1	1	0.71	1	0	1	0.67	0	0	0	1	0	1	1	1	0.50	0	1	1	0.50	0	0	0	0.00	5	9	8	22	0.34	3.56
Malta	0	0	0	0.00	1	0	1	0	1	0	1	1	0.63	0	0	1	0.33	0	0	1	0	0	1	0	1	0.38	1	1	1	0.67	0	0	1	0.33	6	2	5	13	0.11	2.44
Mexico	0	1	0	0.33	1	1	1	1	1	1	0	1	0.88	1	1	1	1.00	0	0	1	0	0	1	1	1	0.50	0	1	1	0.67	0	1	0	0.33	15	16	16	47	1.00	4.71
Monaco	0	1	0	0.33	1	n.a.	1	0	0	1	1	1	0.71	0	0	1	0.33	0	0	1	0	0	0	0	1	0.25	0	0	1	0.33	1	1	0	0.67	7	2	4	13	0.11	2.74
Morocco	1	1	1	1.00	1	1	1	1	1	1	1	1	1.00	0	1	1	0.67	0	0	1	0	0	1	1	1	0.50	0	1	1	0.67	0	1	1	0.67	9	4	4	17	0.21	4.05
Mozambique	1	1	0	0.67	1	1	1	0	0	1	1	1	0.75	1	1	1	1.00	0	0	1	1	0	1	0	1	0.50	1	0	1	0.67	0	1	1	0.67	4	7	7	18	0.24	4.49
Netherlands	0	1	0	0.33	1	1	0	1	0	0	1	1	0.63	0	1	1	0.67	0	0	0	0	0	0	0	1	0.13	0	1	1	0.67	0	1	0	0.33	11	4	6	21	0.32	3.07
Netherlands Antilles	1	1	0	0.67	1	1	1	1	0	1	1	1	0.88	1	0	0	0.33	1	0	0	0	0	0	0	1	0.25	0	1	0	0.33	0	0	0	0.00	8	7	9	24	0.39	2.85
Panama	1	1	1	1.00	1	1	1	1	1	1	1	1	1.00	1	1	1	1.00	1	0	1	1	0	1	0	1	0.63	1	1	1	1.00	0	1	1	0.67	18	11	15	44	0.92	5.84
Paraguay	1	1	1	1.00	1	1	1	n.a.	1	1	1	1	1.00	1	1	1	1.00	0	1	1	1	0	1	0	1	0.63	1	1	1	0.67	0	1	1	0.67	20	13	12	45	0.95	5.91
Peru	1	1	1	1.00	1	1	1	0	1	1	1	1	0.88	1	1	1	1.00	0	0	1	0	0	1	0	1	0.38	1	1	1	1.00	0	1	1	0.67	14	9	12	35	0.68	5.60
Philippines	1	1	1	1.00	1	1	1	1	1	1	1	1	1.00	1	1	1	1.00	0	0	1	1	0	1	0	1	0.50	0	0	1	0.33	1	0	1	0.67	13	7	8	28	0.50	5.84
Portugal	1	1	0	0.67	1	1	0	1	0	1	1	1	0.75	1	1	1	1.00	0	0	1	1	0	1	0	1	0.50	1	1	1	0.67	0	0	0	0.00	5	9	8	22	0.34	3.93
Senegal	1	1	1	1.00	1	1	1	1	0	1	1	1	0.88	0	1	1	0.67	0	0	1	1	0	1	1	1	0.63	0	1	1	0.67	0	1	1	0.67	13	8	9	30	0.55	4.72
Spain	1	1	1	1.00	1	1	1	1	1	1	1	1	1.00	1	1	1	1.00	0	1	1	1	0	1	0	1	0.63	0	1	1	0.67	0	1	1	0.67	9	5	6	20	0.29	5.25
Tunisia	1	1	0	0.67	n.a.	n.a.	n.a.	n.a.	n.a.	1	1	1	1.00	0	1	1	0.67	0	0	1	0	0	0	0	1	0.25	0	1	1	0.67	0	1	1	0.67	4	1	9	14	0.14	4.05
Turkey	0	0	0	0.00	1	n.a.	1	0	n.a.	1	1	1	1.00	1	1	0	0.67	1	0	1	1	0	1	0	1	0.63	0	0	0	0.00	0	0	0	0.00	9	4	5	18	0.24	2.53
Uruguay	1	1	1	1.00	1	1	0	0	0	1	1	0	0.50	0	1	1	0.67	0	0	0	0	0	0	0	1	0.13	0	1	1	0.67	0	1	0	0.33	16	8	14	38	0.76	4.05
Venezuela	1	1	1	1.00	1	1	1	n.a.	1	1	1	1	1.00	1	1	1	1.00	1	0	1	0	0	1	0	1	0.50	1	1	1	1.00	0	1	1	0.67	20	9	12	41	0.84	6.01
Mean	**0.70**	**0.93**	**0.43**	**0.68**	**1.00**	**1.00**	**0.79**	**0.54**	**0.67**	**0.93**	**0.83**	**1.00**	**0.85**	**0.85**	**0.95**	**0.60**	**0.80**	**0.28**	**0.08**	**0.65**	**0.45**	**0.28**	**0.43**	**0.43**	**0.75**	**0.42**	**0.43**	**0.73**	**0.75**	**0.63**	**0.10**	**0.85**	**0.53**	**0.49**	**9.90**	**6.98**	**7.88**	**24.75**	**0.41**	**4.29**
Median	**1.00**	**1.00**	**0.00**	**0.67**	**1.00**	**1.00**	**1.00**	**1.00**	**1.00**	**1.00**	**1.00**	**1.00**	**0.88**	**1.00**	**1.00**	**1.00**	**0.83**	**0.00**	**0.00**	**1.00**	**0.00**	**0.00**	**1.00**	**0.00**	**1.00**	**0.50**	**0.00**	**1.00**	**1.00**	**0.67**	**0.00**	**1.00**	**1.00**	**0.67**	**9.00**	**7.00**	**7.50**	**21.00**	**0.32**	**4.10**
German Legal Origin																																								
Austria	1	1	0	0.67	1	1	1	1	0	n.a.	1	1	0.86	1	1	1	1.00	0	0	0	0	0	1	1	1	0.38	0	0	1	0.33	0	0	0	0.00	6	6	8	20	0.29	3.52
Germany	0	1	0	0.33	1	1	1	1	0	1	1	1	0.88	1	1	1	1.00	1	1	0	0	0	1	0	1	0.50	0	1	1	0.67	0	0	0	0.00	4	3	7	14	0.13	3.51
Japan	0	1	0	0.33	1	1	1	1	0	1	1	1	0.88	1	0	1	0.67	1	0	0	0	0	0	0	1	0.25	0	1	1	0.67	0	0	0	0.00	8	3	5	16	0.18	2.98
Korea	1	1	0	0.67	1	1	1	1	0	1	1	1	0.88	0	0	1	0.33	0	0	0	0	0	0	0	1	0.13	0	1	1	0.67	0	1	0	0.33	11	5	7	23	0.37	3.37
Switzerland	1	1	0	0.67	1	1	0	1	0	1	1	1	0.63	1	1	1	1.00	0	0	0	0	0	1	1	1	0.38	0	0	1	0.38	0	1	0	0.33	4	4	6	14	0.13	3.13
Taiwan	0	1	0	0.33	0	1	0	0	0	1	1	1	0.50	0	1	1	0.67	1	0	0	0	0	0	0	1	0.38	0	1	0	0.33	0	0	0	0.00	4	6	5	15	0.16	2.37
Mean	**0.50**	**1.00**	**0.00**	**0.50**	**0.83**	**1.00**	**0.67**	**0.33**	**0.20**	**1.00**	**1.00**	**1.00**	**0.77**	**0.33**	**0.83**	**1.00**	**0.72**	**0.67**	**0.17**	**0.33**	**0.00**	**0.17**	**0.17**	**0.17**	**1.00**	**0.33**	**0.17**	**0.67**	**0.67**	**0.50**	**0.00**	**0.33**	**0.00**	**0.11**	**6.17**	**4.50**	**6.33**	**17.00**	**0.21**	**3.15**
Median	**0.50**	**1.00**	**0.00**	**0.50**	**1.00**	**1.00**	**1.00**	**1.00**	**0.00**	**1.00**	**1.00**	**1.00**	**0.87**	**1.00**	**1.00**	**1.00**	**0.67**	**1.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**1.00**	**0.38**	**0.00**	**1.00**	**1.00**	**0.50**	**0.00**	**0.00**	**0.00**	**0.00**	**5.00**	**4.50**	**6.50**	**15.50**	**0.17**	**3.25**
Scandinavian Legal Origin																																								
Denmark	0	1	0	0.33	1	1	1	0	1	0	1	1	0.63	0	0	0	0.63	0	0	0	0	0	0	0	1	0.13	1	1	1	1.00	0	0	1	0.33	4	0	10	14	0.13	2.55
Finland	1	1	0	0.67	1	1	0	1	0	1	1	0	0.63	0	0	0	0.67	0	0	0	0	0	0	0	1	0.25	1	1	0	0.67	0	0	0	0.00	10	2	7	19	0.26	3.14
Iceland	1	1	0	0.67	1	1	0	1	0	1	0	1	0.63	1	1	1	1.00	0	0	0	0	0	0	0	1	0.38	1	1	1	1.00	0	0	1	0.33	6	3	5	14	0.13	4.13
Norway	0	1	0	0.33	1	1	0	1	0	1	1	1	0.75	0	0	1	0.67	0	0	0	0	0	0	0	1	0.13	1	1	1	1.00	0	0	0	0.00	5	3	4	12	0.08	2.95
Sweden	1	1	0	0.67	1	1	0	0	0	1	1	1	0.75	0	1	0	0.33	0	0	0	0	0	0	0	1	0.25	1	1	1	0.67	0	0	0	0.00	11	6	4	21	0.32	2.98
Mean	**0.60**	**1.00**	**0.00**	**0.53**	**1.00**	**1.00**	**0.80**	**0.20**	**0.00**	**1.00**	**0.40**	**1.00**	**0.68**	**0.20**	**0.60**	**0.80**	**0.53**	**0.80**	**0.00**	**0.20**	**0.00**	**0.00**	**0.20**	**0.00**	**0.60**	**0.23**	**0.60**	**1.00**	**1.00**	**0.87**	**0.00**	**0.40**	**0.00**	**0.13**	**7.20**	**2.80**	**6.00**	**16.00**	**0.18**	**3.15**
Median	**1.00**	**1.00**	**0.00**	**0.67**	**1.00**	**1.00**	**1.00**	**1.00**	**0.00**	**1.00**	**1.00**	**1.00**	**0.63**	**0.00**	**1.00**	**1.00**	**0.67**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**0.00**	**1.00**	**0.25**	**1.00**	**1.00**	**1.00**	**1.00**	**0.00**	**0.00**	**0.00**	**0.00**	**6.00**	**3.00**	**5.00**	**14.00**	**0.13**	**2.98**
Mean all countries	**0.63**	**0.89**	**0.17**	**0.57**	**0.97**	**1.00**	**0.76**	**0.34**	**0.30**	**0.73**	**0.52**	**0.99**	**0.71**	**0.51**	**0.77**	**0.62**	**0.64**	**0.36**	**0.11**	**0.63**	**0.18**	**0.16**	**0.42**	**0.22**	**0.76**	**0.36**	**0.49**	**0.79**	**0.83**	**0.70**	**0.07**	**0.49**	**0.20**	**0.25**	**7.97**	**5.34**	**7.17**	**20.48**	**0.30**	**3.53**
Median all countries	**1.00**	**1.00**	**0.00**	**0.67**	**1.00**	**1.00**	**1.00**	**0.00**	**0.00**	**1.00**	**1.00**	**1.00**	**0.75**	**1.00**	**1.00**	**1.00**	**0.67**	**0.00**	**0.00**	**1.00**	**0.00**	**0.00**	**0.00**	**0.00**	**1.00**	**0.38**	**0.00**	**1.00**	**1.00**	**0.67**	**0.00**	**0.00**	**0.00**	**0.33**	**7.00**	**5.00**	**7.00**	**18.00**	**0.24**	**3.52**

Tests of Means (t-stats)

Comparison	GJC	PNJ	LRM	PvL	Filing	Service	Opposition	Evidence	Final arg.	Judgment	Notif.	Enforce.	Written	Complaint	Judg. just.	Equity	Legal just.	Not introduce	Not reject	Out-of-court	Pre-qual.	Oral interr.	Orig. docs	Authenticity	Mand. rec.	Statutory	Enforce susp.	Compr. review	Interloc.	Control	Pre-trial	Service off.	Notif. off.	Engagement	Filing&serv.	Trial&judg.	Enforce.	Indep. count	Indep.	Formalism
Common vs. Socialist	-4.32[a]	-2.05[b]	0.88	-3.29[a]	-0.88	-1.32	0.84	0.53	-5.01[a]	-4.12[a]	-0.61		-3.38[a]	-2.43[b]	-3.75[a]	-2.21[b]	-4.19[a]	0.31	-0.67	1.29	-2.41[b]	-1.71[c]	-1.51	-2.33[a]	0.09	-1.55	-4.08[a]	-2.20[b]	-0.62	-4.53[a]	0.12	2.15[b]	-1.64	1.45	-3.84[a]	-1.00	-2.41[b]	-3.38[a]	-3.38[a]	-5.24[a]
Common vs. French	-2.31[b]	-1.80[c]	-4.47[a]	-3.85[a]	-1.40	-0.83	-2.89[a]	-5.50[a]	-6.19[a]	-8.36[a]	-0.98		-7.97[a]	-6.95[a]	-4.90[a]	-0.90	-6.29[a]	0.79	0.67	0.86	-5.79[a]	-2.93[a]	-0.18	-4.47[a]	0.12	-2.71[a]	-0.18	0.38	1.54	0.82	-0.46	-5.51[a]	-6.73[a]	-7.42[a]	-4.49[a]	-3.79[a]	-2.58[a]	-4.63[a]	-4.63[a]	-7.52[a]
Common vs. German	-0.21	-1.25	0.54	-0.59	1.12	0.00	0.20	-0.49	-0.50	-3.06[a]	-5.87[a]	-0.37	-2.73[a]	-0.49	-1.43	-2.40[a]	-2.25[b]	-1.45	-0.32	2.05[b]	0.00	-1.12	1.12	-1.12	-1.34	-0.37	1.12	0.49	1.39	1.84[c]	0.67	0.00	0.00	0.30	-0.11	-0.20	0.16	-0.11	-0.11	-1.12
Common vs. Scandinavian	-0.61	-1.14	0.49	-0.79	-0.49	0.00	-0.43	0.19	0.80	-2.79[a]	-1.45	-0.34	-1.35	-1.94[c]	0.80	2.55[b]	0.00	0.49	0.88	0.49	0.77	1.22					-1.22	-0.80	-1.70[c]	0.61	-0.29	0.00	0.02	-0.85	1.25	0.53	0.33	0.33		-1.03
Socialist vs. French	2.57[b]	1.12	-3.38[a]	-0.21	0.00	0.00	0.73	-2.84[a]	-4.55[a]	1.12	-1.61		-3.05[a]	-2.38[b]	0.90	1.52	-0.12	0.28	1.22	-0.60	-2.37[a]	-0.67	1.35	-1.22	0.00	-0.74	3.89[a]	2.42[b]	1.60	4.07[a]	-0.44	-7.96[a]	-3.48[a]	-6.47[a]	-0.57	-1.68[c]	0.07	-0.92	-0.92	-1.36
Socialist vs. German	3.81[a]	0.00	0.00	3.81[a]	1.71	0.00	1.11	-1.03	-0.83	0.00	-1.81[c]	0.00	-0.73	0.93	1.71	-1.12	0.55	-1.51	0.11	0.93	0.88	0.11	2.00[c]	0.40	-1.35	0.67	5.41[a]	2.70[b]	1.68	7.13[a]	0.60	-1.68	0.60	-0.70	2.39[b]	0.42	1.30	1.78[c]	1.78[c]	3.23[a]
Socialist vs. Scandinavian	3.11[a]	0.00	0.00	3.11[a]	0.00	0.00	0.40	-0.34	0.57	0.00	0.86	0.00	0.93	1.42	3.11[a]	0.06	1.71	-2.01[c]	1.02	1.42	0.88	1.02	1.21	0.53	0.62	2.35[b]	1.96[c]	0.00	-0.55	1.36	0.55	-1.96[c]	0.55	-0.95	1.44	1.38	1.34	1.95[c]	1.95[c]	2.81[b]
French vs. German	0.96	-0.68	2.06[b]	1.40	2.77[a]	0.66	0.92	2.05[b]	-0.68	-1.10	0.00		1.24	3.09[a]	1.07	-1.96[c]	0.78	-1.95[c]	-0.73	1.49	2.17[b]	0.55	1.20	1.20	-1.38	0.96	1.20	0.29	0.42	1.02	0.80	3.09[a]	2.52[b]	3.58[a]	1.87[c]	1.58	1.19	1.88[c]	1.88[c]	2.72[a]
French vs. Scandinavian	0.45	-0.62	1.88[c]	1.05	0.00	0.00	-0.05	1.43	3.08[a]	-0.62	2.22[b]	0.00	2.55[b]	3.70a	2.75[a]	-0.86	2.32[b]	-2.45[b]	0.62	1.98[c]	1.98[c]	1.35	0.96	1.88[c]	0.70	2.05[b]	-0.73	-1.35	-1.26	-1.64	0.73	2.48[b]	2.30[b]	3.09[a]	1.23	2.41[b]	1.29	1.94[c]	1.94[c]	2.45[b]
German vs. Scandinavian	-0.30	0.00	0.00	-0.30	-0.90	0.00	-0.45	0.45	1.00	0.00	2.71[b]		1.17	0.45	0.81	1.11	0.99	-0.45	0.90	0.45	0.00	0.90	-0.13	0.90	1.81	1.51	-1.51	-1.43	-1.43	-3.32[a]	0.00	-0.21	0.00	-0.21	-0.57	1.58	0.29	0.44		-0.02

Tests of Medians (z-stats)

Comparison	GJC	PNJ	LRM	PvL	Filing	Service	Opposition	Evidence	Final arg.	Judgment	Notif.	Enforce.	Written	Complaint	Judg. just.	Equity	Legal just.	Not introduce	Not reject	Out-of-court	Pre-qual.	Oral interr.	Orig. docs	Authenticity	Mand. rec.	Statutory	Enforce susp.	Compr. review	Interloc.	Control	Pre-trial	Service off.	Notif. off.	Engagement	Filing&serv.	Trial&judg.	Enforce.	Indep. count	Indep.	Formalism
Common vs. Socialist	-3.78[a]	-2.00[b]	0.88	-3.27[a]	-0.88	0.00	-1.31	0.85	0.54	-4.20[a]	-3.64[a]	-0.62	-3.31[a]	-2.33[b]	-3.38[a]	-2.14[b]	-3.66[a]	0.32	-0.67	1.28	-2.31[b]	-1.68[c]	-1.49	-2.24[b]	0.09	-1.55	-3.61[a]	-2.13[b]	-0.63	-4.23[a]	0.12	2.09[b]	-1.62	1.42	-3.82[a]	-0.73	-1.61	-3.10[a]	-3.10[a]	-4.37[a]
Common vs. French	-2.25[b]	-1.77[c]	-4.02[a]	-3.51[a]	-1.39	0.00	-0.83	-2.76[a]	-4.58[a]	-5.12[a]	-6.14[a]	-0.98	-6.12[a]	-5.52[a]	-4.33[a]	-0.90	-5.17[a]	0.79	0.67	0.86	-4.89[a]	-2.80[a]	-0.18	-4.02[a]	0.12	-2.76[a]	-0.18	0.38	1.52	0.43	-0.46	-4.72[a]	-5.41[a]	-5.73[a]	-3.98[a]	-3.32[a]	-2.14[b]	-4.01[a]	-4.01[a]	-5.87[a]
Common vs. German	-0.22	-1.24	0.54	-0.55	1.12	0.00	0.20	-0.50	-0.51	-2.82[a]	-4.49[a]	-0.38	-2.40[b]	-0.50	-1.41	-2.29[b]	-2.15[b]	-1.44	-0.33	1.98[b]	0.00	-1.12	1.12	-1.12	-1.33	-0.47	1.12	0.50	1.38	1.95[c]	0.67	0.00	0.00	0.26	-0.11	-0.50	-0.08	-0.38	-0.38	-1.09
Common vs. Scandinavian	-0.62	-1.14	0.49	-0.79	-0.49	0.00	-0.43	0.19	0.80	-2.60[a]	-1.43	-0.35	-1.54	-1.89[c]	0.81	2.41[b]	0.00	0.49	0.88	0.49	0.78	1.39					-0.83	-1.22	-0.81	-1.75[c]	0.61	-0.29	0.00	-0.04	-0.78	1.18	0.81	0.17	0.17	-1.02
Socialist vs. French	2.45[b]	1.12	-3.10[a]	-0.63	0.00	0.00	0.73	-2.67[a]	-3.82[a]	1.12	-1.61		-2.82[a]	-2.28[b]	0.90	1.50	-0.08	0.28	1.22	-0.61	-2.27[b]	-0.68	1.34	-1.21	0.00	-0.98	3.47[a]	2.32[b]	1.58	4.11[a]	-0.44	-5.45[a]	-3.17[a]	-4.90[a]	-0.55	-1.94[c]	0.05	-0.55	-0.55	-1.29
Socialist vs. German	2.97[a]	0.00	0.00	2.97[a]	1.63	0.00	1.10	-1.03	-0.84	0.00	-1.72[c]	0.00	-1.16	0.94	1.63	-1.12	0.68	-1.47	0.11	0.94	0.89	0.11	1.87[c]	0.41	-1.32	0.58	3.53[a]	2.37[b]	1.61	3.88[a]	0.61	-1.61	0.61	-0.71	2.14[b]	-0.11	0.97	2.04[b]	2.04[b]	2.58[a]
Socialist vs. Scandinavian	2.60[a]	0.00	0.00	2.60[a]	0.00	0.00	0.41	-0.35	0.58	0.00	0.87	0.00	1.26	1.38	2.60[a]	0.06	1.26	-1.88[c]	1.02	1.38	0.87	1.02	1.62	1.21	0.63	2.14[b]	1.84[c]	.	-0.56	1.33	0.56	-1.84[c]	0.56	-0.71	1.21	1.69[c]	1.54	1.95[c]	1.95[c]	2.48[b]
French vs. German	0.96	-0.69	1.99[b]	1.55	2.58[a]	0.66	0.93	1.96[c]	-0.69	-1.10	0.00		1.26	2.83[a]	1.07	-1.90[c]	0.79	-1.89[c]	-0.73	1.47	2.08[b]	0.56	1.20	1.20	-1.37	1.20	1.20	0.28	0.42	1.44	0.80	2.83[a]	2.38[b]	3.10[a]	1.98[c]	1.52	1.19	2.01[b]	2.01[b]	2.74[a]
French vs. Scandinavian	0.45	-0.63	1.83[c]	1.22	0.00	0.00	-0.05	1.41	2.78[a]	-0.63	2.13[b]	0.00	2.48[b]	3.26[a]	2.56[b]	-0.86	1.74[c]	-2.32[b]	0.63	1.91[c]	1.91[c]	1.33	0.96	1.83[c]	0.71	2.07[b]	-0.73	-1.33	-1.25	-1.73[c]	0.73	2.35[b]	2.19[b]	2.77[a]	1.16	2.39[b]	1.36	2.06[b]	2.06[b]	2.17[b]
German vs. Scandinavian	-0.32	0.00	0.00	-0.32	-0.91	0.00	-0.47	0.47	1.00	0.00	2.12[b]		1.23	0.47	0.82	1.10	0.87	-0.47	0.91	0.47	0.00	0.91	-0.14	0.91	1.63	1.43	-1.42	-1.36	-1.36	-2.35[b]	0.00	-0.22	0.00	-0.22	-0.66	1.51	0.75	0.75	0.75	0.37

a=Significant at 1% level; b=Significant at 5% level; c=Significant at 10% level.
n.a.=Not applicable
.=Missing