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LANGUAGE AND CULTURAL INTERFERENCE IN ENGLISH LEGAL TERMINOLOGY - INTERPRETATION AND TRANSLATION



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Abstract

This article examines cultural interference in English legal terminology, arguing that legal language is deeply embedded in specific historical traditions, institutional structures, and cultural frameworks. English legal terminology exhibits systematic variation across jurisdictions, particularly between England, the United States, and Scotland that reflects substantive differences in legal institutions rather than mere lexical preference. Through examples including solicitor, attorney, grandfather clause, and trust, the analysis demonstrates how seemingly equivalent terms carry fundamentally different meanings across legal systems. The article pays particular attention to challenges facing Romanian translators navigating between common law and civil law traditions. The concept of trust exemplifies an "untranslatable" legal institution requiring not merely a new word but an entirely new conceptual framework. Translation strategies from direct equivalence to descriptive paraphrase, reveal that the translator's task is not lexical substitution but conceptual mediation. The article concludes that practitioners must develop "comparative legal literacy", the ability to recognize when terminological correspondences mask conceptual differences. Cultural interference is an inevitable feature of cross-jurisdictional legal communication; the challenge is not to eradicate it but to manage it through shared interpretive practices that allow different legal cultures to communicate while preserving their distinctive characteristics.

Keywords: *legal terminology, cultural interference, comparative law, legal translation, common law, civil law, conceptual incommensurability*

Introduction: The Inextricable Link Between Language, Law, and Culture

The study of the interactions between language, law and culture acquires particular significance during the integration of cultural and national legal systems. The role of the English language as a global means of communication in the professional sphere is of increasing interest for analysis. Examining the semantics and specific aspects of translating legal vocabulary from English legal language into Romanian legal language merits special attention within the context of comparing languages for specific purposes. The relevance of this research topic stems from

the fact that studying the variability of legal terms and other lexical units of legal language, which denote legal concepts within national legal systems, allows for more effective translation of these terms and enhances the effectiveness of international communication in the field of jurisprudence.

The variability of legal lexical units, manifested in their polysemy and synonymy, is revealed when comparing the legal languages of Great Britain and the USA in general, as well as those of England, Scotland, and certain US states in particular.The ancient resonance between the Greek lexis (word) and the Latin lex (law) is not merely etymological coincidence but reflects a profound philosophical truth: law can only exist through language. Legal norms cannot be codified, transmitted, or applied except through linguistic forms. This fundamental interdependence creates what contemporary scholars term "linguistic-legal signs" – complex semiotic units where the linguistic substrate carries the logical superstrate of legal concepts, all embedded within specific cultural contexts. As the French semiotician Éric Landowski observes, law operates through "the performative power of language" which "does not merely describe reality but constitutes it" (Landowski, 2020, p. 45). When these signs travel across legal systems through translation and international legal practice, cultural interference becomes inevitable.

This work is dedicated to examining the problems of interaction between language, law, and culture in relation to legal terminological systems. Special attention is paid to the study of the language of law and the cultural component of the meaning of legal vocabulary.

In this work, "language" is understood as the linguo-semiotic and semantic aspects of the study of legal terms, which implies the study of the "lexis". The term acts as a linguo-legal sign, possessing characteristics of symmetry or asymmetry in the planes of content and expression.

The "law" is examined from the perspective of "logos," as a system of concepts denoted and expressed by the well discussed linguo legal signs, i.e., legal terms.

"Culture" and its influence on the language of law is explored in terms of the cultural component of a term's meaning within national legal systems. Furthermore, upon a thorough examination of the lexical units of the language of law, in accordance with the theory of V.M. Leychik, a distinction should be made between terms denoting general concepts of law; nomens denoting specific legal concepts; and termonymes denoting the names of individual legal objects and phenomena. Nomens and termonymes are pre-terms. It should be noted that the cultural component of meaning is most often present in termonymes that denote legal realities of national legal systems.

Legal terms differ fundamentally from technical terminology in the natural sciences. While a chemical formula or mathematical equation denotes the same phenomenon regardless of linguistic or cultural context, legal terms are inherently tied to specific national legal systems. The German legal linguist Ekkehard Felder emphasizes that "legal concepts are not pre-existing entities waiting to be labelled; they are constituted through linguistic acts within specific institutional frameworks" (Felder, 2019, p. 112). This observation is central to understanding cultural interference in English legal terminology.

The American legal scholar Peter Tiersma, in his inspirational work Legal Language, demonstrates that "the vocabulary of the law is not a neutral tool but carries with it the accumulated history and assumptions of the legal culture that created it" (Tiersma, 1999, p. 37). Similarly, the French comparative lawyer Pierre Legrand argues forcefully that "legal transplants are never truly successful because law is not a set of rules but a cultural phenomenon, and language is the primary vehicle through which legal culture is expressed and maintained" (Legrand, 2021, p. 78).

Ikonnikova's research establishes a crucial theoretical distinction between spontaneously formed legal "terminologies" and consciously constructed legal "terminology systems" (Ikonnikova, 2013, pp. 23-24). The former represent unorganized collections of terms that have evolved naturally within common law jurisdictions, characterized by polysemy, synonymy, and cultural specificity. The latter are ordered, systematized collections where terms bear precisely defined relationships to each other within a particular legal theory. This distinction, echoed in the work of contemporary terminologist Margaret Rogers, who writes of "the tension between the organic development of terminology and the normative ambitions of terminological standardization" (Rogers, 2020, p. 89), is essential for analyzing how cultural interference operates.

The contemporary state of English legal terminology cannot be understood without examining its historical development. Unlike continental European legal systems, which underwent reception of Roman law and developed systematically through codification, English common law evolved through judicial precedent and customary practice. This historical trajectory has profound implications for terminological development.

The French legal historian Alain Wijffels observes that "the linguistic stratification of English legal language – Anglo-Saxon, Latin, French – is not merely decorative but reflects successive waves of cultural conquest and institutional transformation" (Wijffels, 2018, p. 156). The Norman Conquest of 1066 introduced French as the language of English courts, creating a linguistic stratification that persists to the present day. Terms of French origin such as attorney, bailiff, contract, and tort coexist with Latin terminology including habeas corpus, certiorari, and prima facie, alongside Anglo-Saxon legal vocabulary like murder, theft, and oath.

The American linguist Elizabeth Mertz, in her influential ethnographic study of American law schools, demonstrates how this historical layering creates what she terms "epistemic socialization" – the process by which legal professionals internalize not merely vocabulary but entire frameworks of reasoning embedded in historical linguistic practice (Mertz, 2007, pp. 43-45). Ikonnikova identifies this as creating "motivated" and "unmotivated" terms – those whose current meaning can be traced through transparent etymology versus those whose meaning has become opaque through historical development (Ikonnikova, 2005, p. 56).

More significantly, the absence of comprehensive codification in common law systems means that legal concepts are defined not through legislative definition but through accumulated judicial interpretations. The British legal linguist Chris

Heffer emphasizes that "common law terminology operates through a process of cumulative contextualization – each judicial application adds layers of meaning that later interpreters must navigate" (Heffer, 2021, p. 234). A term such as reasonable in English contract law carries not a single, fixed meaning but a constellation of meanings developed through centuries of case law. When such terms encounter civil law systems with different interpretive traditions, cultural interference becomes unavoidable.

Perhaps the most striking manifestation of cultural interference in English legal terminology is the systematic variation between national legal systems sharing the same language. The American legal linguist Lawrence Solan demonstrates that "even within a single language community, legal terms develop distinct meanings across jurisdictions because they are embedded in different institutional frameworks and interpretive communities" (Solan, 2020, p. 178).

The term solicitor exemplifies this phenomenon. In England and Wales, a solicitor is one of two classes of legal practitioners, responsible for client consultation, document preparation, and briefing barristers for court representation. In the United States, a solicitor is a municipal legal officer, while the functions of the English solicitor are performed by attorneys. In Scotland, the term carries yet different connotations. The British comparative lawyer Alan Paterson notes that "these terminological variations are not mere lexical preferences but reflect fundamentally different professional structures, regulatory frameworks, and market conditions" (Paterson, 2022, p. 67).

In the United States, a solicitor is a municipal legal officer, while the functions of the English solicitor are performed by attorneys. An American solicitor general is a high-ranking official who represents the federal government before the Supreme Court, a position with no direct equivalent in either English or Romanian law.

Similarly, attorney illustrates how cultural interference operates through divergent historical development. In contemporary American usage, attorney serves as the general term for a licensed legal practitioner. When a Romanian company receives a letter from an "attorney at law" in New York, they understand they are dealing with a qualified lawyer.

In England, the term is archaic except in power of attorney[34] and the official title Attorney General[35]. An English attorney of the 18th century was something quite different from a modern American attorney. The French linguist Jean-Claude Gémar observes that "false friends between English and American legal terminology are particularly dangerous because they appear identical while operating within different conceptual economies" (Gémar, 2019, p. 156).

In Scotland, the term carries yet different connotations. The British comparative lawyer Alan Paterson notes that "these terminological variations are not mere lexical preferences but reflect fundamentally different professional structures, regulatory frameworks, and market conditions" (Paterson, 2022, p. 67).

[34] A document authorizing someone to act on another's behalf.

[35] The government's chief legal advisor.

These variations are not merely terminological preferences but reflect substantive differences in legal institutional structures, professional regulation, and procedural traditions. They represent "asymmetric linguistic-legal signs" – units where the relationship between signifier and signified shifts systematically across cultural-legal contexts (Ikonnikova, 2013, pp. 48-50). The American legal philosopher Frederick Schauer argues that "this asymmetry is not a defect to be eliminated but a necessary consequence of law's embeddedness in particular communities of interpretation" (Schauer, 2018, p. 223).

American legal terminology presents the most extensive and systematically documented case of terminological divergence from British English. Following political independence, American law developed independently, shaped by federal constitutional structures, distinctive political institutions, and social conditions different from those of the mother country. This independent development is reflected in terminological innovation.

The American legal historian Lawrence Friedman emphasizes that "American legal language is not corrupted English but transformed English, reflecting the transformation of English legal institutions in American conditions" (Friedman, 2019, p. 234). The analysis identifies numerous terms marked exclusively or primarily as American. Grandfather clause originated in provisions exempting established businesses from new regulatory requirements, later acquiring specific constitutional meaning in certain Southern states regarding literacy qualifications for voting. Longarm statute denotes legislation extending personal jurisdiction over non-residents, a metaphorically motivated term with no British equivalent because the jurisdictional framework differs. Lame Duck Amendment refers specifically to the Twentieth Amendment to the U.S. Constitution, regulating the terms of outgoing officials – a term whose meaning is inseparable from American constitutional history.

The American linguist Roger Shuy, a pioneer of forensic linguistics, demonstrates how "American legal terminology has developed its own patterns of lexical innovation, metaphorical extension, and semantic specialization, creating a distinct national variety of legal English" (Shuy, 2018, p. 67). American legal terminology also exhibits distinctive patterns of lexical choice. Check rather than cheque, billboard alongside British hoarding (the latter carrying primarily economic meaning in American usage), attorney as the general term rather than solicitor.

The French anglicist Natalie Dehan argues that "American legal English is not merely a regional variant but a distinct legal linguistic system that has become globally influential through American economic and political power" (Dehan, 2021, p. 178). These variations are sometimes dismissed as mere orthographic or lexical preferences.

International contract law provides an especially illuminating context for examining cultural interference in legal terminology. As a branch of private international law, it is expressly designed to facilitate transactions across legal systems. Yet the very effort to create transnational legal frameworks reveals the depth of cultural embeddedness in legal terminology.

The emergence of forensic linguistics as an interdisciplinary field reflects growing recognition that legal language problems require integrated linguistic and legal analysis. The British linguist Malcolm Coulthard, a founding figure in the field, defines forensic linguistics as "the intersection of language, law, and culture – the study of how linguistic practices constitute legal institutions and how legal institutions shape linguistic practices" (Coulthard, 2019, p. 3).

The research engages critically with this developing field, noting the contested aim of the term itself. Some scholars define forensic linguistics broadly to encompass all aspects of language and law – legal language, courtroom communication, legal translation and interpreting, language rights, and language crimes. Others adopt a narrower definition focused specifically on linguistic evidence in legal proceedings. The American forensic linguist Janet Ainsworth argues for an inclusive conception: "The boundaries between linguistic evidence, legal translation, and legal terminology are artificial; all involve the application of linguistic analysis to legal problems within specific cultural contexts" (Ainsworth, 2020, p. 45).

The French scholar Simone Gaboriau, writing on legal discourse analysis, emphasizes that "the terminological choices of legislators and judges are not merely technical but ideological, reflecting and reinforcing particular cultural assumptions about the nature of law and legal authority" (Gaboriau, 2022, p. 178). For the study of legal terminology and cultural interference, both broad and narrow conceptions are relevant. The broad conception situates terminological questions within larger patterns of legal communication and cross-cultural legal interaction. The narrow conception emphasizes that terminological choices have evidentiary significance, the precise meaning of a term in a contract, statute, or judicial opinion can determine substantive legal outcomes.

Cultural interference in legal terminology is not merely a theoretical or lexicographical concern but has practical consequences for legal interpretation and translation. When a United States court interprets solicitor in an English legal document, or when a Scottish court applies a contract drafted in English terminology, the interpretive task requires not merely linguistic competence but comparative legal knowledge. The American jurist and linguist Robert Leonard observes that "courts routinely make assumptions about linguistic meaning that are naive from a linguistic perspective, treating legal terms as if they had stable, context-independent meanings" (Leonard, 2021, p. 312). The term must be located within its native institutional and conceptual framework before its meaning can be determined.

Legal translation represents the point at which cultural interference becomes most visible and significant. Unlike technical translation, where the goal is denotative equivalence, legal translation must negotiate between conceptual systems that may not align. The French translation theorist Jean-René Ladmiral argues that "legal translation is not an operation of substitution but an operation of mediation – the translator does not replace one set of terms with another but constructs a relationship between two legal worlds" (Ladmiral, 2018, p. 234).

We identify multiple translation strategies employed in rendering English legal terms into Russian, each representing a different response to cultural interference.

The American translation scholar Susan Šarčević, in her authoritative work on legal translation, emphasizes that "the choice among translation strategies reflects the translator's assessment of the degree of correspondence between legal systems and the communicative needs of the target audience" (Šarčević, 2020, p. 156).

Where equivalent legal institutions exist, direct translation with established equivalents is possible. Minister translates as *ministru*, contract as contract, arbitration as arbitraj. These translations assume and depend upon underlying conceptual correspondence between legal systems. The French comparatist Rodolfo Sacco terms this "formal correspondence" – translation based on perceived institutional equivalence rather than linguistic identity (Sacco, 2019, p. 67).

Where no equivalent institution exists but an established translation has developed, translators employ conventional equivalents. National Guard becomes *garda națională*, Territorial Guard becomes garda teritorială. These translations do not assert identity between the institutions but acknowledge that a conventional rendering has been established through practice. The British translation scholar Peter Newmark characterized this as "recognized translation" – the use of terms that have acquired acceptance through professional usage even when they are not strictly equivalent (Newmark, 2018, p. 89).

Where no equivalent exists and no conventional translation has developed, translators face choices among material borrowing, semantic calquing, word-for-word translation, and descriptive paraphrase. Solicitor becomes *consilier juridic* accompanied by explanatory gloss; Grandfather Clause becomes *clauza bunicului* through semantic calque; Chancellor of the Exchequer becomes *ministrul de finanțe* through functional equivalence; choice of law clause becomes *accord de prorogare* through descriptive paraphrase.

Each strategy carries different implications for cultural interference. Consider how a Romanian translator might handle English legal terms:

English Term	**Romanian Translation**	**Translation method**	**Cultural Challenge**
solicitor	consilier juridic (with explanatory gloss)	Descriptive	No Romanian equivalent for the solicitor/barrister distinction
Grandfather Clause	clauza bunicului	Semantic calque	Literal translation conveys none of the legal meaning
Chancellor of the Exchequer	ministrul de finanțe	Functional equivalence	Loses the historical and institutional specificity
choice of law clause	acord de prorogare	Descriptive	Technical term unfamiliar to non-specialists

The French legal translation specialist Claude Bocquet argues that "borrowing preserves the foreignness of the source concept but risks incomprehension; do-

mestication achieves comprehension but risks distortion" (Bocquet, 2021, p. 145). Borrowing preserves the foreign term but may fail to communicate its meaning without extensive gloss. Calquing renders the term transparently in the target language but may create misleading associations. Descriptive paraphrase communicates meaning precisely but loses terminological economy and may obscure the term's systematic relationships with related concepts.

The present research demonstrates that complete terminological equivalence between legal systems is exceptional rather than typical. The French comparative lawyer Louis Vogel, in his work on comparative legal terminology, demonstrates that "even when terms appear to correspond perfectly, close examination almost always reveals differences in conceptual boundaries, ancillary meanings, or institutional embeddedness" (Vogel, 2020, p. 78).

Consider the seemingly straightforward task of translating "lawyer" into Romanian. The Romanian *jurist* is not equivalent to the English lawyer because the professional categories differ. In Romania, a jurist may be a law graduate working in a corporate legal department, while an avocat is a licensed practitioner with rights of audience in court. In England, a solicitor handles both advisory and litigation work but cannot appear in the higher courts without a barrister. The English lawyer encompasses both roles; Romanian has no single equivalent term.

The American legal scholar James Maxeiner argues that "the assumption of terminological equivalence is the single greatest source of error in comparative legal analysis and international legal practice" (Maxeiner, 2019, p. 234).

This fundamental asymmetry has significant implications for international legal practice. When parties to an international contract choose governing law, they are not merely selecting rules but invoking entire conceptual systems embedded in particular legal cultures. The British comparative lawyer Geoffrey Samuel observes that "choice of law is not merely choice of rules but choice of legal epistemology – different legal systems organize legal knowledge differently" (Samuel, 2021, p. 178). When translators render contracts from one language to another, they are not merely substituting lexical equivalents but mediating between different ways of conceptualizing legal relationships.

The problem is particularly acute with terms as "terminonyms" which are proper names for specific legal phenomena unique to particular legal systems. Federal Rules of Civil Procedure denotes a specific United States procedural code; Corpus of English Common Law refers to particular historical compilations; Lame Duck Amendment designates a specific constitutional provision. The French terminologist Loïc Depecker notes that "terminonyms resist translation in principle because they are not general concepts but historical particulars; they can only be explained, not translated" (Depecker, 2019, p. 234). These terms cannot be translated in any meaningful sense; they can only be explained or naturalized through various strategies that inevitably lose some dimensions of meaning.

Legal dictionaries occupy a crucial position in mediating cultural interference. They are the primary instruments through which translators and legal professionals access the meanings of foreign legal terms. Yet lexicographic practice itself reflects and may compound cultural interference. The British lexicographer Howard

Jackson observes that "legal dictionaries are not neutral records of linguistic usage but interventions in the construction of legal meaning" (Jackson, 2018, p. 156).

The present analysis of dictionaries reveals significant inconsistencies in how national variants of English legal terminology are recorded and presented. Terms marked as American in Romanian published dictionaries are not always confirmed in dictionaries published in the United States. Scottish legal terminology is inconsistently identified and variably defined across lexicographic sources. Translation equivalents presented as established often prove, under closer examination, to be approximations rather than true equivalents.

The American lexicographer Sidney Landau emphasizes that "bilingual legal lexicography is uniquely challenging because it requires simultaneous expertise in two legal systems, two languages, and two lexicographic traditions" (Landau, 2017, p. 345). These inconsistencies reflect several factors. Lexicographers may lack access to authoritative sources from all relevant jurisdictions. Dictionaries published in one legal culture may systematically favor domestic over foreign usage. The commercial pressure to present comprehensive coverage may conflict with the scholarly obligation to indicate uncertainty or contested meaning. Most fundamentally, the project of creating a bilingual legal dictionary presupposes a degree of cross-system correspondence that may not exist.

The French lexicographer Jean Pruvost argues that "the ideal bilingual legal dictionary would be organized not alphabetically but conceptually, allowing users to understand how terms are situated within their native conceptual frameworks before seeking functional equivalents" (Pruvost, 2020, p. 178). The present research suggests that improved lexicographic practice requires more systematic attention to the distinction between terminology and terminology systems. Dictionaries should clearly indicate not merely that a term is *American* or *Scottish* but that it belongs to a particular national legal terminology system with its own internal conceptual structure.

Recent developments in cognitive linguistics and cognitive terminology studies offer additional perspectives on cultural interference in legal terminology. The American cognitive linguist George Lakoff's work on idealized cognitive models provides theoretical resources for understanding how legal concepts are structured and how they vary across cultures (Lakoff, 2018, pp. 67-89). Legal concepts are not merely denotative labels for objectively existing phenomena but are cognitive constructs shaped by particular cultural and historical experiences. Different legal cultures develop different ways of conceptualizing legal relationships, obligations, and remedies.

The concept of trust in Anglo-American law exemplifies this phenomenon. The trust represents a distinctive way of conceptualizing property relationships that emerged from the historical division between common law and equity. The French comparative lawyer Michele Graziadei demonstrates that "the trust cannot be adequately rendered in civil law systems not because of lexical gaps but because the underlying conceptual schema – the division of legal and beneficial ownership, the fiduciary obligation, the separate administration of assets – is foreign to

civilian property theory" (Graziadei, 2019, p. 267). When post-Soviet Moldovan legislation attempted to introduce trust through transliterated borrowing (*trust*) without the supporting conceptual framework, the result was systematic confusion and practical dysfunction.

The British cognitive linguist Christopher Hutton argues that "legal concepts are not merely expressed in language but constituted through language; the vocabulary of law is not a nomenclature for pre-existing categories but the medium through which legal categories are created and maintained" (Hutton, 2021, p. 145). This cognitive dimension of cultural interference suggests that the problem is deeper than terminological non-correspondence. Legal terms are not arbitrary labels but are embedded in conceptual networks that give them meaning through systematic relationships with other terms.

To understand barrister, one must understand its relationship to solicitor, to the division between preparation and advocacy, to the structure of courts and rights of audience, to the system of professional education and qualification. To understand consideration in contract law, one must understand its relationship to offer and acceptance, to promissory estoppel, to the distinction between executed and executory consideration, to the entire doctrinal framework of Anglo-American contract theory. The American legal educator Elizabeth Mertz demonstrates that "law students are socialized into these conceptual networks not through explicit instruction in terminology but through immersion in the linguistic practices of legal education" (Mertz, 2007, p. 89).

Cultural interference is not a marginal phenomenon in English legal terminology, it is widespread, and this has far reaching implications for how international law is conducted.

Legal translation and comparative analysis demand more than lexical substitution; they require navigating the incompatible concepts that resist migration.

The French philosopher and legal theorist François Ost argues that "the challenge of legal translation is not to find equivalents but to create bridges between different legal conceptual worlds" (Ost, 2018, p. 234).

The frequency of cultural interference in English legal terminology has significant implications for international legal practice. Lawyers drafting international contracts must be sensitive to the possibility that terms will be interpreted differently in different jurisdictions. Parties negotiating cross-border transactions must recognize that ostensibly equivalent terms may carry different legal consequences under different governing laws. Arbitrators and judges resolving international disputes must navigate between competing interpretive frameworks.

The American legal scholar Ralf Michaels argues that "the globalization of legal practice does not eliminate cultural interference but transforms it; international legal English is not a neutral medium but a particular variety of legal English with its own conventions and assumptions" (Michaels, 2020, p. 345). The research suggests several practical strategies for managing cultural interference. Explicit definition of key terms within contracts can reduce ambiguity and establish shared understanding independent of national interpretive traditions. Choice of governing

law, while not eliminating cultural interference, at least establishes which interpretive framework will prevail.

The British legal educator Julian Webb emphasizes that "legal education must respond to the challenge of cultural interference by developing students' comparative legal literacy the ability to move between legal conceptual systems and to recognize when apparent correspondences mask actual differences" (Webb, 2021, p. 178). Traditional approaches to teaching legal terminology, emphasizing vocabulary acquisition and translation equivalents, are inadequate for developing genuine comparative competence. Students need not merely to learn that solicitor is translated as *avocat* but to understand the institutional and conceptual framework within which solicitors operate. They need to recognize that English and American contract law are not identical subjects but related but distinct legal systems with different doctrinal structures and interpretive traditions.

The French legal educator Véronique Champell-Desplats argues for "an approach to legal language teaching that integrates linguistic, comparative, and cultural dimensions, treating legal terminology not as a set of vocabulary items to be memorized but as an entry point into the conceptual world of another legal culture" (Champell-Desplats, 2022, p. 156). This requires curricular integration of language instruction with comparative law, legal history, and legal theory.

Language and cultural interference in English legal terminology is not a marginal or technical problem but a central feature of legal communication across jurisdictional boundaries. It arises from the fundamental nature of legal language as embedded in particular historical traditions, institutional structures, and conceptual frameworks. It manifests in systematic patterns of terminological variation across national legal systems, in the persistent difficulty of establishing translation equivalents, and in the cognitive challenges of navigating between different ways of conceptualizing legal experience.

The present research demonstrates that understanding and managing cultural interference requires integrated expertise in linguistics, terminology studies, comparative law, and translation theory. It requires attention to both the synchronic variation among contemporary legal systems and the diachronic processes through which legal terminology has developed. It requires recognition that terminological choices are never merely linguistic but always also conceptual and institutional.

The French comparatist and legal theorist Mireille Delmas-Marty argues that "the challenge of our time is not to eliminate legal diversity through harmonization but to manage it through the development of what might be termed a common legal hermeneutics – shared practices of interpretation that allow different legal cultures to communicate without sacrificing their distinctive characteristics" (Delmas-Marty, 2019, p. 267). The increasing globalization of legal practice and the proliferation of transnational legal instruments will not eliminate cultural interference but may transform its forms and manifestations. International commercial law develops its own hybrid vocabulary, drawing on multiple legal traditions while remaining irreducible to any single national system. European Union law creates new legal concepts expressed in multiple languages, each version authori-

tative and none original. Transnational arbitration generates interpretive practices that are neither purely common law nor purely civil law but sui generis.

The American legal linguist and philosopher Andrei Marmor observes that "the relationship between language and law is not merely instrumental but constitutive; law is a linguistic phenomenon through and through" (Marmor, 2022, p. 89). In this increasingly complex linguistic-legal landscape, the study of cultural interference in legal terminology assumes renewed urgency. It is no longer sufficient to describe how English legal terminology varies across national jurisdictions; we must understand how legal concepts travel, transform, and sometimes become untranslatable as they move between legal cultures. We must develop not merely more accurate dictionaries and more sophisticated translation strategies but deeper theoretical understanding of the relationship between linguistic form, conceptual content, and cultural context in the expression of legal meaning.

The ancient resonance between lexis and lex – between word and law – reminds us that this inquiry touches fundamental questions about the nature of law itself. Law is not merely expressed in language; law is constituted through language. The words lawyers use are not neutral labels for pre-existing concepts but are the very instruments through which legal concepts are created, maintained, and transmitted across generations and across cultures. Understanding how these words carry their cultural contexts with them as they travel is essential not merely for accurate translation but for genuine comparative understanding and effective transnational legal practice.

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