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PRACTICE BEFORE U.S.-MEXICO BINATIONAL PANELS
UNDER CHAPTER NINETEEN OF NAFTA:
A PANEL DISCUSSION

JIMMIE V. REYNA,* MODERATOR; EDUARDO DAVID
GARCIA,** AND DAVID AMERINE***

Eduardo David: The case in which my firm was involved, *In re Flat Coated Steel Products From the United States*,¹ was the first final determination of the *Secretaría de Comercio y Fomento Industrial* (SECOFI) to be reviewed by a binational panel under Chapter 19 of North American Free Trade Agreement³ (NAFTA), or the *Tratado de Libre Comercio*, as it is known in Mexico.

SECOFI determined that U.S. steel producers were selling flat coated steel products below the home market price into the Mexican market. As a result, antidumping duties were imposed. On October 3, 1994, U.S. steel producers presented a petition before the Mexican NAFTA Secretariat requesting the formation of a binational panel to review this determination. A panel was formed, and written and oral arguments were presented by all interested parties. Notwithstanding the fact that the case had been fully briefed and argued, the panelists needed to spend substantial time in resolving several unexpected practical problems during the proceeding.

Many conflicts exist because of the differences between the Mexican civil code legal system and United States and Canada common law tradition. It is important to remember that Mexico negotiated its inclusion as a party of NAFTA with no precedents except the Canada-United States Free Trade Agreement (FTA).⁴ The dispute resolution mechanism provided in Chapter 19 of NAFTA is not substantially different from Chapter 19 of the Canada-U.S. Free Trade Agreement, which was originally conceived to operate under a common law system. Article 1904 of NAFTA sets the rules of procedure that any panel formed in Mexico, the United States or Canada must follow. Article 1904 also provides that the panel shall apply the substantive law of the forum, in this case Mexico, that would otherwise have been applied by the domestic court with jurisdiction to review a definitive administrative determination. Of

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1. *In re Flat Coated Steel Products From the United States*, No. Mex-94-1904-01, 1996 FATPD LEXIS 6 (North American Free Trade Agreement Binational Panel Review, September 27, 1996).

2. Secretariat of Commerce and Industrial Development.

3. North American Free Trade Agreement, Dec. 17, 1992, U.S.-Can.-Mex. (effective Jan. 1, 1994) 32 I.L.M. 605 (1993).

4. Canada-United States Free Trade Agreement, Jan. 2, 1988, U.S.-Can., 27 I.L.M. 281 (1988).

course, procedural regulations designed to operate under a common law system present practical problems if they are adopted for use in a legal proceeding which is mainly based on civil code systems. A threshold problem for the Mexican panelists in *Flat Coated Steel* was applying their understanding of NAFTA procedural rules which differ substantially from the general procedural rules that have historically applied to litigation in Mexico.

Another problem arose when Mexican lawyers representing the parties cited principles of Mexican law or used Mexican legal terms. It is very difficult to present an argument which is intended to target both Mexican and North American panelists when Mexican attorneys feel compelled in their briefs to cite basic principles of Mexican law such as those found in Articles 14 and 16 of our Constitution.⁵

As an example, the Mexican legal principle of *motivación* [motivation] and *fundamentación* [foundation] is basic to and clearly understood by a Mexican attorney. However, if such a principle were to be translated literally, "motivation and foundation for application" would not make any sense to a North American attorney. It must be remembered that this principle of law is one of the pillars of Mexican constitutional law, and its legal implications are drilled into the heads of Mexican law students from the beginning of their studies. Therefore, even if translated into English, the lack of Mexican legal foundation and rationale makes it difficult for non-Mexican panelists to fully understand the possible consequences of finding a violation of this important Mexican legal principle.

Another major issue involves the authority and powers of the panel. As established by Article 1904, Paragraph 1 of NAFTA, the panel replaces the competent judicial authority which normally would have reviewed the case. In Mexico, such judicial authority would be the Tax Courts.⁶ This raises the issue of whether the Mexican Tax Courts have the power to determine the competence of the binational panel, and of course if the binational panel would have the same powers as the Mexican Tax Courts would have. In interpreting Mexican law, one should rely not only on one article, but on the entire jurisprudential legal system of Mexico. The standard of review is established by Article 238 of the *Código Fiscal de la Federación* [Federal Fiscal Code]. This explains when a procedure is considered null and void. The options of the panel are either to confirm the determination or to remand it to the authority which would have to implement a determination.

Confirmation of the determination does not create a problem. But Article 238 only establishes what is to be considered as null and void, not what the authority should do in case the Fiscal Court declares the determination null and void. Therefore, Article 238 must be interpreted in conjunction with Article 239 of the C.F.F. which establishes what

5. Constitución Política DE LOS ESTADOS UNIDOS MEXICANOS [CONST] art. 14, 16.

6. "Código Fiscal de la Federación," [C.F.F.], D.O., 31 de Diciembre de 1981, art. 238.

effects a determination may have if it is declared "*lisa y llana*." There is no adequate translation for certain Spanish terms which I will explain. Depending upon the case, Article 239 states that a determination could be declared "*nula lisa y llana*" or "*para efectos*." "*Nula lisa y llana*" means that the determination is simply null and void; the authority may not remand the proceeding. "*Para efectos*" means that the authority must remand the proceeding. The problem was that if the panel declared a determination issued by the Mexican authority *lisa y llana*, the determination could not be remanded to restart the procedure. Only if the determination were declared "*para efectos*" could the determination be remanded to restart the procedure. In my opinion, the panel is empowered to declare an administrative determination completely null and void, *lisa y llana*, because it is supposed to act as the judicial authority of Mexico where the determination was issued.

The translations also created some problems during the filings of briefs and in the public hearings. Parties were supposed to provide the panel English versions of their briefs. Translating was difficult and in certain cases, burdensome. The problem was translating the documents so they could be understood by a U.S. panelist. A literal translation might misinterpret the meaning of a paragraph and perhaps the whole brief. Therefore, providing translations became a matter of great importance during the proceeding. During the hearing, translation was even more difficult despite having professional translators. Several times it was necessary to correct the translator because of terms that were very difficult to translate. Once again, a wrong translation might create confusion and perhaps misinterpretation by the panelists.

The process of service also creates problems. In Mexico, parties do not serve each other. Instead, it is a duty of the court to give notice. Therefore, the legal process of service of the panel was completely different from what is established in Mexican law.

Hearings presented another problem. Hearings in Mexico are completely different from those before binational panels. Hearings are conducted only to resolve questions of evidence, and the judge may make decisions about evidentiary questions without actually questioning the parties. On the other hand, the panel is permitted to interrupt the attorneys during presentations in order to resolve doubts or ask questions.

International trade attorneys in Mexico will have to adjust to new procedures because the number of cases to be resolved by panels will increase. The process of change is likely to take a long time and U.S. attorneys, Canadian attorneys, and designated panelists will have to adjust to the new procedures. The procedures will become easier and more expeditious once there is a better understanding of the law of the several countries participating in NAFTA.

Not only were there problems relating to procedures and interpretation of law; but there were also other practical problems that arose during the presentation of our briefs at the hearing. For instance, my law firm works as co-counsel with a U.S. firm. Explaining the Mexican law and drafting the brief with U.S. attorneys was very complicated. Because of

differences in legal systems and jurisprudence, a Mexican attorney's approach to interpreting an issue of law is considerably different than that of a U.S. attorney. It is difficult to make oneself understood by a U.S. attorney who does not have a similar legal background, and it is equally difficult to understand a U.S. attorney whose manner of thinking is completely different. As a result, drafting the briefs was time consuming and not cost-effective. Despite these problems, the process will become easier with more experience and a better understanding the two legal systems.

The empowerment of Mexican attorneys over non-Mexican attorneys also presented a problem. Only Mexican attorneys could appear before the panel. The panel members decided that only Mexican attorneys who are empowered to appear before the panel could participate in the proceeding, however, co-counsel were designated in our briefs.

The Mexican translation of the NAFTA rules were entirely literal and difficult to understand. Consequently, the U.S. translation of the record was used rather than the Mexican version. It is amazing how a word can change the whole meaning of an article.

There were also external problems, for example, the pressure from the media during the entire procedure. Many attorneys and panelists felt the pressure. The media was permitted to publish comments suggesting SECOFI lacked competence and was not empowered to issue the resolution. This generated tension and led to the resignation of several panelists. More confusion was created, and that is why a new hearing was required. Everybody had to prepare once again, and the case was not resolved for two years.

In conclusion, it is important to emphasize the differences between legal procedures of the NAFTA countries. The use of both U.S. and Mexican attorneys in this kind of procedure is advisable, even essential, because the panel will always be composed of panelists from Mexico and the United States or Canada. Also, it is very important for attorneys who will be involved in NAFTA panels to try to understand the legal systems of the other countries. Because of the difference between legal systems, the current procedures will tend to be longer than they may be in the future once better understanding is acquired. I think that it is important to have this kind of conference in order to improve the understanding of our respective laws which should eventually expedite the panel process.

David Amerine: One objective of NAFTA procedure is to limit the cost involved for the parties participating in reviews of administrative determinations. In that respect, the panel process has been a success. The second panel decision that was issued in a Mexican case involved the antidumping administrative review of an order of the International Trade Administration (ITA) of the U.S. Department of Commerce (DOC).⁷

7. *In re Porcelain-on Steal Cookware From Mexico*, No. USA-95-1904-01, 1996 FTAPD LEXIS 4, (NAFTA Binational Panel Review September 13, 1996).

The determination in dispute was issued by the ITA after four prior administrative reviews and imposed an antidumping margin of 27.96% on the Mexican exporter of porcelain on steel cookware to the United States. The Mexican company and U.S. competitor appealed the final results of the fifth administrative review to the binational panel. The panel began the process of review in May of 1995, held hearings in February, 1996, and a decision was issued in April, 1996.⁸ Liquidation orders were posted by the U.S. Commerce Department in September, 1996. All in all, it was a speedy process compared to the U.S. legal system. For the same parties we have an appeal of the final results from the fourth review of the same dumping order pending before the Court of International Trade (CIT). That case was argued in February, 1993, and today we are still waiting for the judge to issue a decision in that case. So in terms of providing for a speedy resolution, the NAFTA panel process certainly works.

One of the things that the experience with the FTA made clear was the importance of making sure that conflict of interest issues did not rise to a boiling point.⁹ The NAFTA Secretariat in all cases does a thorough job of trying to weed out those candidates that might have an interest in the case and therefore should not serve as a panelist. The problem is that the roster of eligible participants in a panel is limited to only a few practitioners and professors who might have some experience in the international trade field. When the list of the panelists is assigned to your particular case, it is common to find that the panelists selected for your particular proceeding are also representing other parties involved in virtually the same issues before the DOC, the CIT, or even the NAFTA panels. Clearly a panelist should not remain on a particular NAFTA panel whose decision is going to have a direct impact on an issue that is pending before the DOC, another panel, or even the CIT in New York.

There is always a fear that there are going to be unexpected resignations of panelists from proceedings which has happened. One of the problems is that under the NAFTA rules of procedure, the resignation of a panelist results in the suspension of all proceedings before the panel.¹⁰ If you are the party that just filed your case brief and suddenly the clock stops, the opposing side has an unlimited additional amount of time to prepare their reply brief. There is no recourse.

Translations are a very serious problem when a panel is composed of at least two, or possibly three, native Spanish speakers, and English is their second language. It is clearly important in writing briefs to be

8. 61 Fed. Reg. 30222 (1996).

9. Results of binational panels reaching their boiling point in the U.S. and Canada were reflected in the media. For examples see Lawrence Herman, *Lumber Case Leaves U.S. with Distrust of NAFTA Panels*, FIN. POST, August 29, 1996; Canadian Press, *Three Judges in Softwood Case Called Eunuchs*, VANCOUVER SUN, June 23, 1995.

10. NAFTA Rules of Procedure for Article 1904 Binational Panel Reviews, Rule 81; 59 Fed. Reg. 8,686 at 8698 (Feb. 23, 1994).

precise in the terminology you are using. One must agonize over the phraseology of every paragraph in each paper to make sure the meaning is translated into the proper context. In order to be certain that a position is not misrepresented when translated into Spanish, it is important to take the time to go through major redrafting processes, despite a text's apparent clarity in English.

There is no courthouse in Washington, D.C. that says, "NAFTA Panel." The location for the hearings depend upon what the Secretariat can find within budget. The Court of Appeals for the Federal Circuit has been the forum for a number of these panels, and it provides a very appropriate setting. However, there have been occasions when a courtroom is not available. The parties may have to appear before the panel in a hotel ballroom or hotel conference room, which certainly does not provide the austere judicial setting appropriate for a binational review of U.S. government action. This does not bestow confidence on the Mexican party to see a proceeding being conducted in such an informal setting.

The difficulty with translations is even more apparent during oral argument. Problems arise during presentations of arguments before five panelists. In the Court of International Trade, there is just one judge and one can study his or her opinions to see where he or she is coming from. It is more difficult to obtain writings of NAFTA panelists who may not have issued any opinions. Some panelists write law review articles, or are in private practice. But you do not always know what particular viewpoint they have. With respect to the panelists from Mexico, where there is less experience and less institutional memory, it is even more difficult to know how a panelist is going to approach a panel proceeding.

The number of panelists presiding during a hearing presents problems. It is difficult to maintain a coherent stream of thought when interrupted by a single judge, and the problem is manifested when arguing before five panelists. In making one's presentation before the panel, it is extremely distracting to have a panelist interrupt and ask a question in Spanish. Even more disconcerting to the attorney is the realization after his question has been translated into English that the panelist has not understood a word of what he has been saying for the last five minutes. Unfortunately, lack of understanding of the numerous U.S. trade laws is more prevalent than desirable. There is no easy solution to this problem. The presenter must recognize that her listeners are not going to be familiar with the details of the English language, and the legal meaning of words and expressions that are second nature to her.

I have been involved in three Mexican cases: *Leather Wearing Apparel From Mexico*,¹¹ *Porcelain-on-Steel Cookware From Mexico*,¹² and *Gray*

11. *In re Leather Wearing Apparel From Mexico*, No. USA-94-1904-2, 1995 FTAPD LEXIS 13 (NAFTA Binational Panel Review April 11, 1995).

12. *In re Porcelain-on Steel Cookware From Mexico*, No. USA-95-1904-01, 1996 FTAPD LEXIS 4 (NAFTA Binational Review, September 13, 1996).

Portland Cement From Mexico.¹³ Mr. Reyna has suggested that the panel in *Leather Wearing Apparel From Mexico* may have created new law rather than simply applying U.S. law as the standard of review that is set forth in Chapter 19 would require. I disagree. The panel wisely and correctly, concluded that jurisdiction rested with the panel. A residual jurisdiction was provided to the CIT under 28 U.S.C. 1581(i) of the Customs Courts Act of 1980.¹⁴ The Act anticipated situations where there may be a proceeding, error of application, or administration of the law that did not fit neatly into the perceived preliminary or final determinations.¹⁵

In the case of *Leather Wearing Apparel*, the panel determined that the fundamental error was that the ITA failed to follow its own regulations regarding the initiation of the administrative review. The panel properly determined that the Mexican exporter should not be penalized for failure to participate in the proceeding because the proceeding itself was not initiated properly. The panel found that the remedies available under normal statutory jurisdiction were simply inadequate for that particular case, and unanimously rejected a motion to dismiss filed by the DOC. The DOC realized the easiest thing to do was to request the panel remand the case back to the agency so it could fix the error by allowing the respondents to submit their information. Ultimately, the ITA made a determination that there were no countervailing duties despite having originally determined a duty of thirteen percent based on "best information available" in its original determination. In that case, the panel provided a remedy for Mexican exporters that might have been more difficult to obtain from a U.S. court. That is not to say that respondents could not win on this issue in a U.S. court, but it is certainly fair to say that a resolution would have taken more time than required under the NAFTA panel process.

In the second case, *Porcelain-on-Steel Cookware* from Mexico, there was a split decision. The majority of the panel was very careful to couch its decision in terms of merely applying the same standard of review that a U.S. court would apply had it been reviewing a determination by the ITA. The result was that the panel decision deferred to the agency, and did not second guess the agency decision in any respect. One could argue that the NAFTA panel could become merely a rubber stamp for the agency action. That is a danger that the panel process could fall into; a routine pattern of simply accepting agency decisions without undertaking a careful review and independent examination of the evidence relied upon by the agency in reaching its determinations. The panel in the *Porcelain-on-Steel* case found four or five issues where it ruled in favor of the ITA. On one issue that the ITA opposed, the panel sent

13. *In re Gray Portland Cement From Mexico*, No. USA 95-1904-02, 1996 FTAPD LEXIS 4, (NAFTA Binational Panel Review, September 13, 1996).

14. Customs Court Act of 1980, Pub. L. No. 96, 417, 94 Stat. 1727.

15. *Royal Business Machines v. U.S.*, 669 F.2d 692 (1982).

the case back to the agency to correct a clerical error. It was interesting that the clerical error raised by a respondent was vigorously contested by the agency. The ITA said that they didn't have to fix clerical errors and the panel should not be concerned with the issue. The panel determined that there was another intervening decision from the Court of Appeals for the Federal Circuit which rejected the DOC practice of only addressing errors that were raised to the agency before the preliminary determination. The DOC would not address clerical errors that were discovered after the preliminary determination. In a similar situation, the Court of Appeals for the Federal Circuit held the agency erred in not correcting clear errors wherever raised. In *Porcelain-on-Steel*, the panel adopted the same position and allowed the DOC to correct the errors, thereby reducing the dumping margin by twenty-five percent of the ITA's final results of review.

Professor Jorge Vargas: Some of the problems that have been underlined suggest a lack of sufficient understanding of the Mexican legal system. U.S. attorneys need to learn more about the Mexican legal system in the same fashion that Mexican attorneys and academicians need to learn more about the U.S. legal system.

Prior to NAFTA, Mexico had virtually no experience in solving international trade disputes through binational panels or international arbitration panels. Until 1988, Mexico adopted a highly territorialist position. Mexico entered virtually no international trade agreements. This explains the fact that Mexico continues to have problems in finding proper ways to adjudicate international disputes using international panels.

Antidumping questions present a very new issue that Mexico is just beginning to confront. There is little professional experience in Mexico to handle this type of an international dispute. Very few law firms have the expertise, or the professional experience to address these trade dispute questions. On the other hand, U.S. attorneys have had experience in this area since early this century.

Finally, it is important to address Mexico's legal education. If you look at the academic curriculum of most law schools in Mexico today, except possibly in the larger cities, you will find that there are no courses on antidumping, on NAFTA law, on international trade, on conflict of laws, or on enforcement of judgments. This explains the problem that Mexico confronts.

In conclusion, Mexico is beginning to be inspired by American statutes in these areas and, as a result, there is an americanization of Mexican law. This is a very intriguing issue that should be addressed in future discussions by this Institute.

Jimmie Reyna: There are not as many professionals in Mexico in trade matters with the depth of experience as there are in the United States, but there is a growing number of professionals and a growing number of law firms in Mexico that do have experience in this area. There are practitioners in Mexico who do have a firm grasp of antidumping procedures and of international trade law in general. There has also been an effort in the past two years to provide training courses, seminars and

conferences by *Universidad Nacional Autonomo de Mexico*¹⁶ (UNAM) and SECOFI to help raise the level of knowledge about these matters in Mexico. In January, 1996, SECOFI, with several universities, had a seminar that extended over a period of about three months. Every Friday afternoon and all day Saturday, the participants showed up at UNAM and attended this conference. It was extensive and in depth. The participation and the interest by the people that were in attendance was very impressive. There are other conferences, including some that this Institute is organizing in Mexico. Many law students coming out of law school are writing their theses on the World Trade Organization (WTO) and on GATT.

David: Mexico has ten years of experience dealing with issues of antidumping and subsidies. Between 1986 and 1990 there were around twenty cases. The clients were not usually represented by attorneys, rather by economists or internal financial people. This means that Mexican attorneys didn't have a great opportunity to participate in these cases. Between 1992 and 1994, the devaluation created an increase in dumping cases. The number of cases increased by about 150%. My firm in that year handled about thirty-five cases of dumping which, by Mexican standards, was amazing. Of course, U.S. firms also participated in that and we learned a lot from those U.S. firms. The process emphasized that Mexican legal practice is completely different from U.S. legal practice. It is very difficult in Mexico to have an attorney specializing exclusively on dumping cases. Law firms will not make money if they have attorneys only in the area of dumping cases, instead they must diversify their practices. Almost all dumping attorneys are corporate attorneys who have become dumping or trade attorneys because we did not have a trade law tradition in Mexico. Before 1996, almost 99% of the products exported to Mexico today could not be imported. It was either licensed or it was prohibited. That means a radical change in the last ten years in Mexico that involves a change in the legal practice in our country.

Because administrative authorities are concentrated in Mexico City, attorneys in Monterrey and Guadalajara have not had the chance to participate in dumping cases even though the main centers of production of the country are in Monterrey and Guadalajara.

Amerine: I agree completely with Professor Vargas that, to the extent Mexico is going to be a full participant in the NAFTA process, education is going to be a key need for the legal establishment in Mexico.

This is a terrible shame. I rue the day that Mexico finds itself having to adopt U.S. dumping laws as a benchmark for its competition policy. The U.S. dumping law has grown so complex in the last twenty years, through probably good-faith efforts on the part of those in Congress and defenders of the status quo, that it has become a non-tariff barrier in the grossest form. It is very sad to see that dumping law has been institutionalized in the context of Chapter 19 as part of NAFTA and

16. National Autonomous University of Mexico.

there is an attempt to extend it to Chile and the South. We should be very cautious about approaching antidumping as the be-all and end-all of competition law, not just for Mexico but for the entire northern hemisphere.

Juan Zuñiga: Mr. Reyna suggested that there may be jurisprudence developed out of the binational panel decisions. Will that jurisprudence apply only to future panel decisions or are you implying that they might go further to the court decisions when those decisions do not go to binational panel review?

Reyna: The binational panel decisions are binding on governments, but they are not to be binding on other panels. NAFTA expressly states that panel decisions are not to form precedent. Despite this, there are panels citing other panel decisions to some of the decisions or determinations that they make. Some panels are already indicating that they are relying on the reasoning or determinations that were made by prior panels. From that perspective it could be said that we can see the beginning of a NAFTA jurisprudence. Also, the U.S. act¹⁷ that implemented the NAFTA makes reference to the fact that binational panel decisions should not have a binding effect on other judicial decisions, so the inference is that, unless checked, U.S. courts may look to binational panels as a basis for their decisions. This question has existed since 1986 when the U.S.-Canada binational panel process was formed.

Juan Zuñiga: My question to Mr. Holbein is related to the negotiation process. Many of these issues about constitutionality and jurisprudence were considered over the past several decades in the European Union and some of the European court decisions have had extraterritorial effect in the nations that are members of that Union. Did you consider some of those issues when you were negotiating first the Canadian Free Trade Agreement, and then NAFTA?

James Holbein: First, I agree that the jury is out on the jurisprudence question. Because the system is designed so that each panel's decision applies only to the determination before it, there was an attempt by the negotiators to insure that panel decisions would be very limited in scope and apply only to each determination. That way if a panel made a wrong determination, its effect is limited and the damage is controlled. Although the binational panels are citing CIT decisions, I do not think the CIT has yet cited a binational panel decision. This goes back to the constitutional question. Yes, there was some thought during the negotiation of the Canada-U.S. Free Trade Agreement about the constitutionality of the panel review process, but it was very much a last minute provision, and in the implementing legislation it was considered necessary to include the provision about constitutional challenge to specifically deal with that.

Reyna: Parties in binational panels that are referring to cases decided by other jurisdictions. For example, some parties in Mexican antidumping binational panel reviews cite to cases in the United States. So you see

17. NAFTA Implementation Act, Pub. L. No. 103-182, 107 Stat. 2057 (1993).

that cross-citing is going on already. I think that there is enough out there to say that there is the beginning of what could develop into NAFTA jurisprudence. And whether that is good or not is a future debate.

Rebecca Perez: Do you think there is a need to amend the standard of review set out in Article 238 of the Mexican *Código Fiscal de la Federación*, and if so, what would you propose?

Reyna: I understand that there is a plan to amend the last paragraph of Article 238 which gives the tribunal fiscal sua sponte authority. They are planning to eliminate it or amend it to say that it does not apply to binational panel reviews.

David: Mexico has to change its dumping law as part of the WTO negotiations, and it is going to change a lot of trade law, including the review standard in Article 238 of the C.F.F. My firm has participated in the review of the proposed law, and it is very difficult to interpret Article 238 without taking into consideration the whole tax code, mainly because of the Mexican legal tradition whereby we only interpret articles of law in accordance with other articles if they are related. I think that is going to create a lot of confusion in future NAFTA panels.

Reyna: One of the things that arises immediately when you get a U.S. lawyer and a Mexican lawyer together is that they realize their ignorance about each other's laws. One of the purposes of the U.S.-Mexico Law Institute is to have an interchange, so that though we may be ignorant about each other's laws, we at least attempt to raise the level of knowledge and respect that we have for each other's laws.

