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GENRE, ICONOGRAPHY AND BRITISH LEGAL FILM

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There is now a huge range of work to be found in the field of law and film. The scholarship varies enormously both in terms of quality and its approach. One thing that is marked within the research that has been conducted is the initial centrality of work emanating from the United States. This is undoubtedly a reflection, in part, of the significance of Hollywood, to the global film audience. Historically little attention has been devoted to material produced 'locally', whether within Europe or beyond. Such has been the dominance of Hollywood that academic work within the field has tended to concentrate on products of American cinema. As scholars we must come clean at this point—much of the work we ourselves have previously conducted has focussed largely upon American cinema and output. As we observed in 2001:

It needs to be noted at the outset that the focus is entirely on films originally made for the cinema, rather than television movies, and is dominated by American made films. In a sense this latter point reflects the cultural hegemony achieved by the American film industry. Within Europe it is Britain

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These materials vary from the pedagogical, see, e.g., Chris Ashford, Law, Film and the Student Experience, 4 WEB J. CURRENT LEGAL ISSUES (2005) available at http://webjcli.ncl.ac.uk/2005/issue4/ashford4.html (last visited July 4, 2007); John Denvir, What Movies Can Teach Law Students in LAW AND POPULAR CULTURE (Michael Freeman ed. 2004); Robert Laurence, Last Night While You Prepared for Class I Went to See Light of Day: A Film Review and a Message to My First Year Property Students, Annotated for My Colleagues, 39 J.LEGAL EDUC. 87 (1989); Guy Osborn, Borders and Boundaries: Locating the Law in Film, in LAW AND FILM (Stefan Machura & Peter Robson eds. 2001); to the analytical, see, e.g., Orit Kamir, Judgment by Film: Socio-Legal Functions of Rashomon, 12 YALE J.L. & HUMAN. 39 (2000); Naomi Mezey, & Mark C. Niles, Screening the Law: Ideology and Law In American Popular Culture, 28 COLUM. J.L. & ARTS 91 (2005); IÑIGO DE MIGUEL, THE MATRIX, LA HUMANIDAD EN LA ENCRUCIJADA [Humanity at the Crossroads] (2005). The texts noted above are merely examples. A full and updated bibliography of all writing on law and film is being prepared for the second edition of STEVE GREENFIELD, GUY OSBORN & PETER ROBSON, FILM AND THE LAW (Hart Publishing, forthcoming 2008).

^{2.} See, e.g., PAUL BERGMAN & MICHAEL ASIMOW, REEL JUSTICE (2006); ANTHONY CHASE, MOVIES ON TRIAL: THE LEGAL SYSTEM ON THE ŞILVER SCREEN (2002); STEVE GREENFIELD, GUY OSBORN & PETER ROBSON, FILM AND THE LAW (2001).

that has found its market most saturated with American films.³

There have, however, been moves in recent years, particularly with scholars such as those engaged with the European film network 'Image et Justice', to redress the balance somewhat by considering the output of national cinema within our own native jurisdictions. 4 This Article uses the categorisation of 'Britishness' to identify initially both the canon of somewhat neglected British Law films and the attempts that have been made to encourage and protect the British film industry. In addition, the Article will reengage with the genre debate within law and film by offering a different perspective that draws upon this Britishness. approach is one based upon the notion of iconography, rather than the content and flow of the narrative. It does this against the backdrop of both the British film industry generally and its law film product, and illustrates that the British law film, or at least the images and objects it deals with, has a perhaps hitherto underacknowledged importance.

I. BRITISHNESS & FILM: PROTECTION AND REPRESENTATIONS

Whilst the British film industry has a long and significant role in the birth of cinema, for a host of cultural; linguistic and economic reasons, Britain has been an obvious, easy and willing market for films produced in the United States.⁵ At times this has led to the enactment of protective measures. For example, the Cinematograph Films Act 1927 had as its focus an aim of encouraging the production of British film, by establishing an obligation to show a specified quota of British films.⁶ A British film was defined as one made by a British subject or company and that all studio scenes needed to be filmed in studios within the British Empire. However, the Act did not stipulate that the company need actually be in British hands. The Act was part of general protectionist policy as competition from Germany and the United States displaced Britain's share of the overall world export

^{3.} Greenfield et al., *supra* note 2, at 1. *See also* Geoffrey Nowell-Smith & Stephan Ricci, Hollywood and Europe: Economics, Culture, National Identity 1945-1995 (1998).

^{4.} Image et Justice started as a primarily European network with representatives from England, France, Germany, Italy and Scotland at initial meetings. Its scope has already broadened to include other countries, extending as far as Israel. Image et Justice, www.imagesofjustice.com (last visited Jul. 14, 2007).

^{5.} With a first public cinema exhibition in 1896 and a British manufacturer inventing the first film projector to be placed on the open market in the same year, Britain can be seen as being a crucial part of the birth of cinema. See SARAH STREET, BRITISH NATIONAL CINEMA (1997).

^{6.} Cinematograph Films Act, 1927, 17 Geo. 5 (U.K.).

trade from the level of 35.8 percent in 1890 to 23.8 percent in 1921-25.⁷ This strategy achieved some success in the 1930s with the share of British films distributed rising from 4.4 percent in 1927 to 24 percent in 1932.⁸ However Britain was, during the 1930s, the most lucrative external market for the United States with some 30 percent of the income of Hollywood coming from Britain.⁹

More recent policies have attempted to stimulate production rather than restrict imports. This latter approach would be doomed to failure now. Aside from the lawfulness of restrictions in an era of largely free trade, the global distribution features of the Internet would make it physically as well as legally impossible. This dominance has obvious implications for the health of the domestic film industry. Whilst it may well be possible to identify the importance and structure of the domestic industry, applying the concept of a national identity may be more difficult. At the same

The Department for Culture, Media and Sport ("DCMS") considers applications for certification as a British Film, this is either done under Schedule 1 of the Films Act or alternatively as part of a co-production. Schedule 1 provides that there are three specific criteria; (i) the nationality of the film maker must be UK, EU or EEA; (ii) 70 percent of the production costs must be spent within the UK, and, (iii) 70 percent of labour costs must be spent on citizens of UK, EU or EEA. The co-production qualification effectively revolves around situations where the film is produced under a bi-lateral co-production treaty. DCMS British Film Certificates, http://www.culture.gov.uk/what_we_do/Creative_industries/film/british_film_certificates.htm (last visited August 14, 2007).

After a consultation process in 2005, the DCMS published a document detailing a new test to establish criteria and enable identification of 'culturally British' films that might attract tax relief. Cultural Test for British Films, DCMS, Creative Industries, Film Branch (November 2005) available at http://www.culture.gov.uk/what_we_do/Creative_industries/film/culturaltest_britishfilm.htm (last visited June 29, 2007).

11. However, determining what is meant by a 'British film' may be problematic in itself. As Cooke notes:

British cinema is a broad term which could be seen to encompass the network of production, distribution and exhibition of films in Britain. We immediately come up against a problem here, though. Just as films made in Britain are not shown only in Britain, films that are distributed and exhibited in Britain are clearly not just British films.

Lez Cooke, British Cinema: Representing the Nation, in JILL NELMES, AN INTRODUCTION TO FILM STUDIES (Routledge, 1st ed. 1996).

^{7.} STREET, supra note 5.

^{8.} *Id*.

^{9.} Id.

^{10.} The UK Film Council, initially the British Film Commission, was constituted to attempt to stimulate the British film industry and film culture. Part of its remit is to 'encourage and support inward investment feature films' and 'promoting UK talent'. UK Film Council's Key Aims and Priorities, http://www.ukfilmcouncil. org.uk/information/aboutus/keyaims/ (last visited August 14, 2007). In Britain today in order to be eligible for UK Film Council funding, or to obtain tax relief for film production a project needs to be wholly or substantially capable of qualification as a British Film under the terms of the Films Act 1985. Qualifying as a British Film and Tax Relief, http://www.ukfilmcouncil.org.uk/filmmaking/filmingUK/taxreliefbritfilms/ (last visited August 14, 2007).

time, another allied issue relates to how we deal with films about the British legal system that are not British made. In cultural terms it might be thought less crucial that we make a distinction between the source of material about British issues and institutions. This depends on one's view of the extent to which cinema reflects the values of Britishness, and whether there are any limits on who can perform this task. In terms of the above criteria, the vast majority of the films which are concerned with the British justice system are not too difficult to identify as British; in both the sense that the British Film Institute ("BFI") classifies films and in terms of their cultural significance. 12 The vast majority of the films about British justice noted below meet the tests effortlessly. They are films produced, and financed in Britain and are based on British fiction and real life events with British stars. What has altered over the years as we note below is the way in which the source material has shifted from fiction to real life.¹³

The complex nature of the equation of production can be seen in two landmark courtroom dramas. In *The Paradine Case* we have a film with a major American star in Gregory Peck, based on a novel by Robert Hichens.¹⁴ The director, Alfred Hitchcock was British—although from 1940 the next 40 years of his life was spent working in the United States.¹⁵ Is this a British or American construct? In *Witness for the Prosecution* the whole enterprise is an American confection, financed and shot in Hollywood.¹⁶ Two of its major protagonists, Marlene Dietrich and Tyrone Power were Hollywood stars. Furthermore the director, Billy Wilder, had worked for over 20 years in the United States after fleeing

^{12.} BFI FILM HANDBOOK 2005, 28-32 (Eddie Dyja, ed., 2004).

^{13.} Further, in order for films to qualify as co-productions for the purposes of obtaining relief, it will be difficult to rely on the definition of a British film in Schedule 1 to the Films Act 1985 and the likelihood is that such films will have to be made under the various official co-production treaties or the European Convention on Cinematographic Co-Production. DCMS Co-Production Agreements, http://www.culture.gov.uk/what_we_do/Creative_industries/film/co-production_agreements.htm (last visited August 14, 2007).

^{14.} Robert Hichens (a.k.a. Robert Smythe Hichens) 1864–1950 was the son of Canon F. H. Hichens of Canterbury, Royal College of Music, a freelance reporter, and short-story writer. His stories include The Green Carnation (1894), An Imaginative Man (1895), The Folly of Eustace (1896), Flames (1897), and Byeways (1897). The Garden of Allah (1904) and Bella Donna (1909) became silent films. Bella Donna (Twickenham 1934) was remade in England in 1934, with Conrad Veight and Cedric Hardwicke, and The Garden of Allah (Selznick International 1936) was licensed by David O. Selznick and starred Marlene Dietrich and Charles Boyer (1936). Bella Donna was again remade under the title Temptation (Universal 1946). Selznick produced Hichens' 1933 novel The Paradine Case (Selznick 1947).

^{15.} JOHN RUSSELL TAYLOR, HITCH: THE LIFE AND TIMES OF ALFRED HITCHCOCK (1996).

^{16.} WITNESS FOR THE PROSECUTION (UA/Theme/Edward Small 1957).

Germany.¹⁷ The Britishness stems from the location of the action in the British courts. This in turn is a product of the original play by the quintessentially English author, Agatha Christie.¹⁸ There are also British stars in the form of Charles Laughton and Elsa Lanchester. The fact that it might feel like an ersatz Hollywood product would seem to be a result of the original writing rather than any excessive "Hollywoodisation". The original play follows the same narrative and has much the same conclusion. Hence it would be misleading to attribute the denouement entirely to the Hollywood system. That said, the original play concludes with Leonard Vole lying dead on the floor of the courtroom and his exwife receives no promise of assistance from Sir Wilfred but intones to the empty Bench: "Guilty My Lord".¹⁹ Regardless of where a film is produced we need to consider the 'value' and merits of the film to the overall scholarship of law and film studies.

If the emblematic films to represent American justice through the decades are To Kill a Mockingbird (1960s), And Justice for All (1970s), The Verdict (1980s) and Primal Fear (1990s), then the search for British equivalents would perhaps produce, from a much smaller pool, Brothers in Law (1950s) and In the Name of the Father (1990s). This overview of British justice films draws on a much smaller pool of films as well as a much narrower portrayal of lawyers within British film. The number of films produced is not huge but this has to be seen within the context of the British film industry, and the issues that it has historically faced. What it does share, with the dominant worldview of justice that emerges from Hollywood is an increase in the scepticism of the justice system to work effectively.

There are some 25 British films produced in the past 65 years which are centred on either a trial or the formal legal process.²² Whilst this is a limited output from which to analyse trends—nonetheless it is possible to note that most of these films meet the criteria of being "courtroom dramas". That is to say they share the narrative, visual and speech conventions identified as comprising the basis for an identifiable group. It is worth at this point

^{17.} The Internet Movie Database, Biography for Billy Wilder, http://www.imdb.com/name/nm0000697/bio (last visited August 14, 2007).

^{18.} AGATHA CHRISTIE, WITNESS FOR THE PROSECUTION (1953).

^{19.} *Id*

^{20.} TO KILL A MOCKINGBIRD (U-I 1962); AND JUSTICE FOR ALL (Columbia/Malton 1979); THE VERDICT (TCF/Zanuck-Brown 1982); PRIMAL FEAR (UIP/Paramount/Rysher 1996); BROTHERS IN LAW (British Lion/The Boultings 1957); and IN THE NAME OF THE FATHER (Universal/Hell's Kitchen/Gabriel Byrne 1993).

^{21.} Peter Robson, Lawyers and the Legal System on TV: The British Experience, 2 INT'L J.L.CONTEXT, 333, 351 (2006).

^{22.} See Appendix.

specifying these features in a little more depth. Simply to select a group of films as "trial centred" is the first step. However it is possible to identify more shared characteristics than simply a courtroom setting.

There are 22 (out of the 25) 'law' films that have as their centrepiece a courtroom trial.²³ The Paradine Case and Witness for the Prosecution follow the 'classic' courtroom drama narrative conventions.²⁴ Most have the same straightforward structure with a background and build-up phase. There is a trial set-up of varying length, inevitably a problem encountered by the main protagonist and often an absence of evidence or witnesses. The matter is almost always resolved through some deus ex machina. There is then a short period of reflection on the meaning of the trial and what the future holds, for those involved, before the credits.

In some instances such as *The Winslow Boy* and *Trial and Error* the trial takes place offscreen.²⁵ The actual courtroom sequence can occasionally appear as a very minor part of the action as in *Dance with a Stranger* and *Vera Drake*.²⁶ There are also a few films which contain a courtroom sequence but which have a focus away from the law and legal system. Thus, for instance *A Fish Called Wanda* incorporates a courtroom element as a comic device that involves one of the main protagonists, barrister Archie Leech (John Cleese).²⁷ However the film is not significantly concerned with the legal process but is a farce centring on the escapades of a disparate group involved in a jewel-theft caper. As a consequence it is not covered in our analysis. In addition, films such as *Bridget Jones's Diary*²⁸ may contain legal personnel but are not focussed upon the law and again we merely note them here.

The classification of British law films splits neatly into two types. Firstly we have films, principally based on fictional events which were encountered from the 1940s through to 1970.²⁹

^{23.} Id.

^{24.} THE PARADINE CASE, *supra* note 14; WITNESS FOR THE PROSECUTION, *supra* note 16.

^{25.} THE WINSLOW BOY (British Lion/London Films 1948); TRIAL AND ERROR (Entertainment/New Line/Larger Than Life 1997).

DANCE WITH A STRANGER (Goldcrest/NFFC/First Picture Co. 1985); VERA DRAKE (Alain Sarde/UK Film Council/Inside Track Productions/Thin Man Films/Ingenious Film Partners 2004).

^{27.} A FISH CALLED WANDA (MGM 1988).

^{28.} Bridget Jones's Diary (Universal/Studio Canal/Miramax/Working Title 2001).

^{29.} In the first fictional *tranche* we find a range of films including courtroom dramas. They exhibit the characteristics of the genre. It is, however, worth refining the classification of the films a little further. In addition to noting that the basis of the material shifts between fiction to reality, the content and style of the films are worth observing. Thus it is possible to discern further elements in terms of the extent to which the films were thrillers (such as THE GIRL IN THE NEWS (TCF 1940), and THE BLIND GODDESS (Gainsborough 1947)) whilst others were

Thereafter the overwhelmingly dominant theme for law films has been miscarriages of justice based on real events. The concern with miscarriages of justice from 1970 onwards was to an extent presaged in *King and Country*. Here we have a situation not where the system has convicted the wrong man but rather where the legal test itself is distorted. There is a sense in which the system fails to do justice towards the accused. In the film an upper class officer in the British Army of the First World War changes from casual disdain to despair as he defends the hopeless cause of a shell-shocked private who is being sacrificed to maintain discipline in the trenches. ³¹

The distinction is not entirely watertight but it does broadly cover the style and themes encountered in British law films. 32 Furthermore some of the films from the earlier period were concerned with serious social issues rather than merely being cheap to produce courtroom "whodunnits" which had dominated British law films of the 1930s.³³ The point, though, is the contrast between modern ways of seeing matters and the prevailing orthodoxy. The miscarriages of justice which concerned British films from the 1970s were more concerned with the inadequacies of the legal system as a method of uncovering the truth. These might have dire consequences as in Ten Rillington Place.34 This was the story of a multiple domestic killer from Britain in the 1940s whose evidence helped convict the (probably) innocent husband of one of his victims and provided ammunition for capital punishment campaigners. Rather more oblique was the dramatisation of the trial of the last woman, Ruth Ellis, to be hanged in the United Kingdom. She was convicted for the killing of her violent and unfaithful lover.³⁵ The film, Dance with a Stranger implies that her failure to provide any kind of defense was a result of her suffering from 'battered women's syndrome'. 36 The killing was carried out apparently with the connivance and

concerned with social issues (see e.g., The Boys (Gala/Columbia 1961), and OSCAR WILDE (Vantage 1959)). Some have involved a combination of the two (see Eight O'Clock Walk (British Lion 1953), The Winslow Boy (British Lion/London Films 1948)). In addition we have a small number of light-hearted comedies (A Pair of Briefs (Rank 1961), and Brothers in Law (British Lion/The Boultings 1957)) that are neither thrillers nor involve weighty social policy matters.

- 30. King and Country (BHE 1964).
- 31. Id

- 33. THE BRITISH CINEMA BOOK (Robert Murphy ed., BFI Publishing, 2nd ed. 2002).
- 34. TEN RILLINGTON PLACE (Columbia/Filmways 1971).
- 35. Id.
- 36. DANCE WITH A STRANGER, supra note 26.

^{32.} Thus DR. CRIPPEN (Torchlight Productions 1962) tells the story of the trial of the murderous dentist and his efforts to flee with his secretary. Since the Crippen story is factual, well known, involves no obvious socially redeeming features, and it is told in flashback, this falls outside the standard distinction.

encouragement of another jealous man. The audience is aware of the unsympathetic figure cut by a woman who defied convention and who seemingly got what she deserved. Here was a hanging which would not have taken place, if a proper defence had been mounted.³⁷ The related notion of a public mood for revenge had tragic consequences in Let Him Have It. 38 The film is based on the 1952 case of the killing of a police officer. The 16 year-old who fired the shot was convicted and jailed for life. Contentiously his 19 year-old accomplice, who had a mental age of 9 was, however, hanged. In a poor run for the British legal system's image we also find the public mood figuring in the trial of a feckless young Irishman. This takes place during the IRA campaign against the British occupation of Ireland in the wake of the bombing of a public house popular with soldiers of the British army in Guildford in In the Name of the Father.³⁹ He was convicted on the basis of his own confession despite having sought to provide an alibi. This was verified but then hidden from the defence team resulting in his conviction. The only difference in this portrayal of the justice system is the presence of a committed lawyer, solicitor Gareth Peirce.40

We have here a whole range of British films concerned with the British justice system. This identification of national law films is important in itself for reasons of cultural identity in a hegemonic world. It is also worth considering what distinctive features and aspects of a national cinema might bring to wider debates about law and film. We suggest that by going back and re-examining debates about genre and law films we can provide a richer understanding of differences and similarities within the area. By focusing not simply on narrative aspects but also upon the iconography, our study also offers an illustration of the potential of the portrayal of the British legal system through the British law film to add to the contemporary international scholarship in the area of film and the law.

II. A NEW WAY FORWARD FOR GENRE?

An ever present problem in the area of law and film lies in tackling what might be termed 'the genre question'. Given that it has been a controversial issue within film studies for a significant period it is a theoretical 'problem' that should be confronted by

^{37.} Id

^{38.} LET HIM HAVE IT (First Independent/Vivid/Le Studio Canal Plus/British Screen 1991).

^{39.} IN THE NAME OF THE FATHER, *supra* note 20 (Universal/Hell's Kitchen/Gabriel Byrne 1993).

^{40.} Id.

film and law scholars. The flexibility of genre allows the enquirer to set his or her own boundary to the limits of the enquiry without necessarily delving into any ideological morass. Contemporaneously it does offer the opportunity to break free from a purely descriptive, if interesting, dimension and explore the meaning and effect of film. Genre is indeed a double-edged sword. It is important to recognise that the entire debate over genre arose as a direct result of a desire to engage with (the products of) Hollywood cinema within part of the high/low culture debate:

As Gledhill [indicates], there were two main reasons for the appearance of genre and genres on the agenda of theorists, critics and teachers of film at this time. One was a desire to engage in a serious and positive way with popular cinema in general and with Hollywood in particular. The other was a desire to complement, temper or displace altogether the dominant critical approach used hitherto—auteurism.⁴²

This introduces a further problem. If the rationale was to engage with popular Hollywood products, what is the effect on and relationship to the products of a national cinema industry, in this case the British Film Industry?

As we have noted above the introduction of the idea of genre as a tool of classification and analysis developed to tackle the popular cinema of Hollywood. We would argue that it is vital for film and law scholars to engage with contemporary debates around genre in order to develop the scholarship. The concept of genre in relation to film may be used in two distinct ways. The first is to classify films into particular categories through film analysis identifying those components that make a 'cowboy film', a 'Western', and so on. This is in itself problematic as Tudor observes:

To take a *genre* such as a 'Western' and analyse it, and list its principal characteristics is to beg the question that we must first isolate the body of films which are 'Westerns'. But they can only be isolated on the basis of the 'principal characteristics' which can only be discovered *from the films themselves* after they have been isolated. That is, we are caught in a circle which first requires that the films are

^{41.} There is of course a danger, voiced by academics such as David Black, that film and law scholarship can merely venture into description without offering anything theoretical or applied. DAVID BLACK, LAW IN FILM: RESONANCE AND REPRESENTATION (1999).

^{42.} STEVE NEALE, GENRE AND HOLLYWOOD 10 (2000).

isolated, for which purpose a criterion is necessary, but the criterion is, in turn meant to emerge from the empirically established common characteristics of the films.⁴³

This dichotomy has exercised those working in the area of law and film who have had to start from scratch in trying to build up those characteristics that represent the taxonomy of the law film. This explains why one common approach is the utilization of film analysis that pulls out common threads drawing attention to similarities and differences between films. This work is vital in trying to determine what the components of a law film might be. Some of this scholarship has been extremely broad and ambitious in its outlook seeking to show law and/or lawyers as a dominant force within a wide range of films that at first analysis might seem to belong within a different area of classification. Our original starting point in 2001 for a working definition was as follows:

In order to qualify as a law film the following characteristic(s) must be present in some shape or form, the geography of law, the language and dress of law, legal personnel and the authority of law. This excludes films where "justice" is enforced outside of any legal framework e.g. war films, social dramas and family sagas.⁴⁵

Others have sought to delineate the border through a specific geographic or spatial boundary by using the term 'courtroom drama'. This in itself can be as problematic as applying the broad brush of 'justice' given that the 'film' courtroom has extended to a military tribunal or the jury room. Could we really accept that *Twelve Angry Men*⁴⁷ is not a law film by virtue of the fact that the action takes place almost completely within the confines of the jury room with an absence of lawyers? Though interestingly enough, and to add to the confusion, Lumet himself was concerned with issues beyond the justice system:

[A]s is so frequent in his films, Lumet here is far more interested in human character, in the nuances of the ways that people make up their minds about things (or think they do), than in the more obvious

^{43.} ANDREW TUDOR, THEORIES OF FILM 137-8 (1974).

^{44.} See e.g., Steve Greenfield & Guy Osborn, Film, Law, and The Delivery of Justice: The Case of Judge Dredd and The Disappearing Courtroom, 6 J. Crim. Just. & Popular Culture 35 (1999), available at http://www.albany.edu/scj/jcjpc/vol6is2/Greenfield.html (last visited July 5, 2007).

^{45.} GREENFIELD ET AL., supra note 2, at 24.

^{46.} See e.g., NICOLE RAFTER, SHOTS IN THE MIRROR: CRIME FILMS AND SOCIETY (2006), and BLACK supra note 41.

^{47.} TWELVE ANGRY MEN ((UA) Orion-Nova 1957).

spectacle of such legal melodramas as Kramer vs. Kramer or And Justice For All.⁴⁸

There are, of course many films that are concerned with the operation of the justice system which have little or nothing to do with the drama of the courtroom. The location of these in any taxonomy is a further point of interest. Indeed, commentators within what might be termed law and film scholarship have always regarded the true object of their inquiry as going well outside the courtroom and have analysed films as diverse as Casablanca, 49 It's A Wonderful Life 50 and The Man Who Shot Liberty Valance.51 We are not suggesting that there is anything flawed in this focus on the potential for non-courtroom films to cast light on the interests of scholars. It is, however, our contention that it is worth seeking to make a distinction between law films and non-law films for heuristic purposes. Just as the concept of what amounts to a British film may produce occasional 'misfits', nonetheless the categories can be of some value. By having a set of criteria for determining the category of 'law film' it allows analysis of changes in representations of issues within this body of film over periods of time.

If we are serious about analysing the portrayal of women or minority ethnic lawyers within the legal system then the range of relevant material must be restricted to those films that contain such issues. A discussion, for instance of *Casablanca* or *It's A Wonderful Life* is not germane to these debates. Such films are though a legitimate part of different debates concerning the notion of law as a separate self-contained system or the idea of community welfare as a guiding social principle. The fate of a working class woman operating her own code of morality in defiance of the system's proscriptions on abortion in *Vera Drake* is different as it fits within our definition as a guide to what amounts to a law film. This same dichotomy is found within British films on justice.

The operation of the justice system includes the apprehension (police work), deliberation (lawyers at trial) and disposition (the prison experience) phases of the legal process. These are

^{48.} Frank R. Cunningham, Sidney Lumet: Film and Literary Vision 109 (1991).

Shulamit Almog & Amnon Reichman, Casablanca: Judgment and Dynamic Enclaves in Law and Cinema, 42 OSGOODE HALL L. J. 201 (2004). CASABLANCA (Warner 1942).

LEGAL REALISM: MOVIES AS LEGAL TEXTS (John Denvir ed., 1996); It's A WONDERFUL LIFE (RKO/Liberty Films 1946).

^{51.} Id. THE MAN WHO SHOT LIBERTY VALANCE (Paramount/John Ford 1962).

^{52.} CASABLANCA, supra note 49; IT'S A WONDERFUL LIFE, supra note 50.

^{53.} *Id*

^{54.} GREENFIELD ET AL., supra note 2; VERA DRAKE, supra note 26.

traditionally dealt with quite separately within cinematic culture with police, trial and prison films having only limited overlap. Thus, it is reasonable to consider each of these phases separately. In simple terms, the deliberation phase involving lawyers does not feature in the vast majority of police or prison dramas and there is no sense, from popular culture, that the various phases interrelate. Unrealistic and unhelpful though this is, it is worthy of a separate study which is beyond the scope of our current inquiry. This would explore the connections between the various phases of what comes under the umbrella of the 'justice system' and the portrayal of institutional isolation encountered in popular culture. This separation between police work and the trial process is a consistent feature of a considerable body of films in Britain as well as the United States under the umbrella of courtroom drama or trial films.⁵⁵

Beyond this initial task of providing a taxonomy, genre has a second feature. It offers us the potential to explore the construction and reception of different kinds of film. This second use of genre has a far greater theoretical significance as it draws within its compass a broad range of (potentially) interlinking factors. Tudor suggests that: '[T]he genre concept is indispensable in more strictly social and psychological terms as a way of formulating the interplay between culture, audience, films and film makers'.56 In this way, genre is an analytical tool that can be used to explain the creation, reception and potential effect of a film or group of films. We have already been involved in this type of work within law and film scholarship.⁵⁷ This point has found resonance with the professional bodies who have claimed that the 'poor' visual image of lawyers has damaged the public perception of the profession.⁵⁸ There are however problems with ascribing public perception to cinematic portrayal on a simple level least not because of the difficulty in establishing exactly what 'message' is being received. Indeed, a related question might be: 'What is the subjective view of the writer or director and indeed does it matter to audience perception?'

^{55.} Only in the television series Law & Order (NBC television broadcast 1990 to present) do we have a very clear connection made although this was prefigured to an extent in Hill Street Blues (NBC television broadcast 1981-1987) in the 1980s.

^{56.} TUDOR, *supra* note 43, at 145.

^{57.} See e.g., Michael Asimow, Steve Greenfield, Guillermo Jorge, Stefan Machura, Guy Osborn, Peter Robson, Cassandra Sharp, and Robert Sockloskie, Perceptions of Lawyers: A Transnational Study of Student Views on the Image of Law and Lawyers, 12 INT'L J. LEGAL PROF. 407 (2005), and the ongoing work on the perceptions of first-year law students in both English and Scottish legal jurisdictions.

^{58.} Tonja Haddad, Silver Tongues on the Silver Screen: Legal Ethics in the Movies, 24 Nova L. Rev. 674 (2000).

One way to avoid the seeming impasse of the question of the characteristic of the law film and the vexed question of genre, is to find a different theoretical framework and apply it to a central core of films. Of course this argument appears somewhat circular, as it returns us to the question of which films to utilise. This, in turn, requires some sort of initial classification. It does, however, at least provide us with a point of departure and opportunity to explore the benefits of taxonomy from a different perspective.

There seems to be general agreement amongst those writing in the area that courtroom dramas or trial movies are within an accepted variety of 'law genre' and the central question is how far can the definition extend from the courtroom.⁵⁹ There are visual and plot conventions which are shared by a sufficiently large number of films over time to allow one to delineate what can be expected in a 'courtroom film' or 'trial movie'.⁶⁰ It is possible to

- 59. One clear sign that there are sufficient visual and oral features to constitute a subgenre comes from the fact that these films have been subject to filmic tributesboth light-hearted and slightly darker. In TRIAL AND ERROR (MGM/British Studios Limited 1962), for instance the whole development of the film is towards Morganhall's demonstration of his forensic skills. All we see is him standing up in court and dropping his papers and the subsequent acquittal of his client on the grounds of inadequate defense. What is promised and what fails to materialize is the cut and thrust of the courtroom drama. It is our knowledge of what is expected to occur in the missing phase that provides the impetus to the film. Without the existence of that knowledge the film would be a strangely empty affair. Similarly we can see the comic farce involving a serial Bar exam failer triumphing against all the odds in My COUSIN VINNY (TCF/Peter V. Miller Investment Corp. 1992) or an actor impersonating a lawyer to great effect in the third film entitled TRIAL AND ERROR (Entertainment/New Line/Larger Than Life 1997). All these rely on our understanding of what we know happens in courtroom dramas. Most recently the element of spoofing can be seen in LEGALLY BLONDE (TCF/MGM 2001) with its combination of an all female legal personnel [Prosecution, defense counsel, and judge] and inspired witness breakdown through counsel's special knowledge of trends in shoe fashion and hair perm technology. Finally we have a film—WILD THINGS (1998 Columbia/Mandalay) which appears to be an absolutely standard courtroom drama but where the whole set-up, prosecution and trial scene [with vindication through witness collapse] are completed inside 50 minutes. The standard elements are again all present and it is only in this coda phase that we discover that things are not as they seem. We think we are watching a courtroom drama but in reality we are not. The protagonists have used their knowledge of the courtroom drama to create a set-up which relies on the conventions of the courtroom drama to provide the narrative impulse for the subsequent mazy thriller. Only as the credits roll do we discover what has actually been happening and how the fake courtroom drama fits into the overall schema. The film makes sense because we think we know where it is going and how it is likely to play out. We have been fooled by our own excessive knowledge of the generic features of a courtroom drama.
- 60. THE ACCUSED (UIP/Paramount 1988); ADAM'S RIB (MGM 1949); AMISTAD (Dreamworks/HBO 1997); ANATOMY OF A MURDER (Columbia/Carlyle 1959); BROTHERS IN LAW (British Lion/The Boultings 1956); A CIVIL ACTION (Buena Vista/Paramount/Touchstone 1999); CLASS ACTION (TCF/Interscope 1990); CONDUCT UNBECOMING (British Lion/Crown 1975); DEFENSELESS (New Visions 1990); EIGHT O'CLOCK WALK, *supra* note 29; EVELYN (Pathe/First Look/Cinerenta/Irish Dream Time 2002); A FEW GOOD MEN (Columbia

analyse how these features have altered over time and make some measure of assessment of the portrayal of law and lawyers. This is the goal of many of those who have written in law and film particularly those who have focussed on gender and ethnicity.⁶¹

TriStar/Castle Rock 1992); GUILTY AS SIN (Buena Vista/Hollywood 1993); IN THE NAME OF THE FATHER, supra note 20: INHERIT THE WIND (UA/Lomitas 1960): JAGGED EDGE (Columbia/Martin Ransohoff 1985); JUDGMENT AT NUREMBERG (UA Roxlom 1961); JUDGMENT IN BERLIN (Hobo/Bibo TV/January Enterprises 1988); JUST CAUSE (Warner/Fountainbridge 1995); KING AND COUNTRY, supra note 30; LEGAL EAGLES (Universal/Northern Lights 1986); LEGALLY BLONDE, supra note 59; LOSING ISAIAH (Paramount 1995); MIDNIGHT IN THE GARDEN OF GOOD AND EVIL (Warner/Malpaso/Silver 1997); MR. DEEDS GOES TO TOWN (Columbia 1936); MUSIC BOX (Guild/Carolco 1989); MY COUSIN VINNY, supra note 59; NUTS (Warner 1987); A PAIR OF BRIEF, supra note 29; PATHS OF GLORY (UA/Bryna 1957); PHILADELPHIA (TriStar/Clinca Estetico 1993); PRESUMED INNOCENT (Warner/Mirage 1990); PRIMAL FEAR, supra note 20; THE RAINMAKER (UIP/Constellation/American Zoetrope 1997); REVERSAL OF FORTUNE (Warner/Shochiku Fuji/Sovereign Pictures/Edward R. Pressman 1990); SUSPECT (Columbia/TriStar 1987); TO KILL A MOCKINGBIRD, supra note 20; TRIAL AND ERROR, supra note 25; THE VERDICT, supra note 20; THE YOUNG PHILADELPHIANS (Warner 1959); WE, THE JURY (All American Television/Atlantis Films Limited/CTV Television Network/USA Pictures 1996); and WITNESS FOR THE PROSECUTION, supra note 16. This is not an exhaustive list but centers on films readily available on video and DVD to which the public are likely to have access.

It might however be arguable that we could draw a distinction between courtroom dramas and trial movies with the former being further constricted by the need for a specific physical and geographical location. Thus we suggest that a courtroom drama is centered within a recognizable courtroom whilst a trial may take place within a different forum. See, for example, the claim that the boat in CAPE FEAR (Amblin Entertainment/Cappa Films/Tribeca Productions/Universal Pictures 1991) is the scene of a trial. See GREENFIELD ET AL., supra note 2, at Chapter 2. An obvious further set of examples is the Courts Martial films that are set in a different physical framework with a different set of procedural rules.

Some other British films with legal aspects include; MURDER (British International 1930); WE ARE NOT ALONE (Warner 1939); THEY MADE ME A FUGITIVE (Warner Alliance 1947); THE BLUE LAMP (Ealing 1949); KIND HEARTS AND CORONETS (Ealing 1949); PASSPORT TO PIMLICO (Ealing 1949); THE PRISONER (Facet/London Independent Producers 1955); A TALE OF TWO CITIES (Rank 1958); THE CRIMINAL (Merton Park 1960); THE BRIGAND OF KANDAHAR (Hammer Film Productions 1965); INADMISSIBLE EVIDENCE (Paramount/Woodfall 1968); HOUSE OF WHIPCORD (Miracle/Peter Walker 1974); McVICAR (The Who Films 1980); GANDHI (Columbia/Goldcrest/Indo-British/International Film Investors/National Film Development Corporation of India 1982); A TALE OF Two Cities (Burbank Films 1984); The Good Father (Channel 4/Greenpoint 1984); SID AND NANCY (Zenith/Initial 1986); PERSONAL SERVICES (Zenith 1987); BUSTER (Vestron/The Movie Group 1988); SCANDAL (Palace/Miramax/British Screen 1988); A FISH CALLED WANDA, supra note 27; ESSEX BOYS (Pathe/Granada 1989); THE KRAYS (Rank/Parkfield 1990); THE CRIMINAL (Christopher Johnson Company Limited/Palm Pictures/Storm Entertainment (Polygram/British Screen/Canal/Granada JACK AND SARAH TV/Mainstream 1995); BRIDGET JONES'S DIARY, supra note 28; and BRIDGET JONES—THE FINAL CONQUEST (Working Title Films/Universal Pictures/Miramax Films/Atlantic Television/Little Bird/Studio Canal 2004).

III. THE ICONOGRAPHY OF LAW

We are proposing here to focus upon the visual dimension of conventions rather than the narrative. The rationale is twofold. First, law has a wide range of distinctive imagery and visuality is imperative to the law.⁶² Outside of the architecture of the law and concerns over legal spaces and places, we have aphorisms that concern its very visuality, of the law being 'blind', of 'justice being seen to be done' and images such as the Goddess Justitia, displayed blindfolded at the Old Bailey. Indeed, the very issue of punishment itself has historically had a spectacular, and visual, resonance.⁶³ Secondly, outside of the legal system itself the concept of iconography has an established place within genre theory.⁶⁴ Originating in art history, Lawrence Alloway applied the idea to cinema and in particular to genre theory, in the 1960s:⁶⁵

The concept of iconography was widely used by genre theorists and critics during the course of the next decade. There were two main reasons for this. One was the extent to which, in Alloway's formulation at least, it dovetailed with a sympathetic interest in popular films. The other was the extent to which it could be used to stress the visual aspects of popular films (in keeping with the stress placed on style and *mis-en-scene* by auteurism, and in contrast to the emphasis placed on

- 62. See our review of this in Greenfield et al., supra note 2, at 31 et seq., and in particular the work of Peter Goodrich, Languages of Law: From Logics of Memory to Nomadic Masks (1990), and Martin Jay, Must Justice Be Blind?: The Challenge of Images to the Law, in Law and the Image: The Authority of Art and the Aesthetics of Law (Costas Douzinas & Lynda Nead eds., 1999). See also, Martin Jay, Downcast Eyes. The Denigration of Vision in Twentieth Century Thought (1994) [hereinafter Downcast Eyes].
- 63. See MICHEL FOUCAULT, DISCIPLINE AND PUNISH (1975).
- 64. This Article concentrates on the visual and only deals with general narrative trends. We have noted the shift from fictional "whodunits" to real life miscarriages of justice. A detailed narrative project could tie recognizable features in the narrative to ideas about genre that are drawn from literary theory. For example, in courtroom films we have identified:
 - (i) The background and build-up phase
 - (ii) The trial set-up—David v. Goliath or similar
 - (iii) The problem—the missing evidence/witness; the subverted witness
 - (iv) The unexpected resolution—new evidence; change of heart of crucial protagonist [occasionally this is itself subverted—particularly in courts martial]
 - (v) The coda—the brief post trial phase
 - These structural elements are encountered in such a significant number of films that we can stop the projection at any time and pretty much tell what is going to happen and how the conflict will be resolved.
- 65. NEALE, supra note 42, citing Lawrence Alloway, On the Iconography of the Movies, MOVIE 7, 1, 4-6 (1963).

character, plot and theme by more literary-minded theorists and critics).⁶⁶

Visual conventions are crucial within film, and iconography focuses in particular upon three basic aspects of imagery according to McArthur: (1) imagery surrounding the physical aspects of actors and characters; (2) images emanating from the milieu within which the characters are constructed and (3) images connected with the technology at the actor's disposal.⁶⁷ Whilst McArthur developed this idea for gangster films, if we apply this scheme to law films it provides us with some interesting material.⁶⁸

It seems to us that we can adapt these three categories for our purposes as follows:

1. The imagery surrounding the physical aspects of the principal actors and characters; this includes dress, physical presence, poise, attitude to other characters. The relationships between the key non-legal personnel and the legal personnel.

Within the British Law films noted herein, there are some clear examples of the importance of this dimension. The barrister's wig left casually on the passenger seat of Gareth Pierce's car in *In the Name of the Father*, and lingered upon by the camera.⁶⁹ Indeed, dress can be seen as a key element within the British law film given the particular uniform prescribed for advocates. This can be seen in *Witness for the Prosecution* and *Brothers in Law*, where the regalia of the law are used to good effect.⁷⁰ Thus, Roger Thursby gets his chance to appear in court in *Brothers in Law* only because his colleague has lost his wig and would not be 'recognised' in court by the judge.⁷¹ Without this trivial sartorial detail a barrister is invisible. This notion of dress, that we have discussed elsewhere, ties into the second category as the milieu of the law itself is riven with iconographic imagery.⁷²

2. Images emanating from the milieu within which the characters are constructed. The courtroom itself and any allied surroundings such as law offices, judges' chambers and the jury room.

^{66.} NEALE, *supra* note 42, at 15.

^{67.} *Id*

^{68.} Neale makes the point that it is not clear whether McArthur intended his scheme to be applied to other genres, but we would argue that a number of common resonances between the gangster and the law film make this a line worth pursuing. NEALE, *supra* note 42.

^{69.} IN THE NAME OF THE FATHER, supra note 20.

^{70.} WITNESS FOR THE PROSECUTION, supra note 16; BROTHERS IN LAW, supra note 20.

^{71.} Brothers in Law, supra note 20.

^{72.} See GOODRICH and also DOWNCAST EYES, supra note 62.

The tradition of the opening shot and subsequent establishing shots involving the majesty of the courtroom setting either at the opening of the film or during the film can be see in a whole swathe of films, both British and American. It is perhaps harder to think of films where such shots are absent. From the 1950s and 60s with 12 Angry Men, 8 O'Clock Walk and Brothers in Law through the 1980s and 90s with Jagged Edge, Class Action and Philadelphia and more recently with A Civil Action, Legally Blonde and Evelyn such shots inform the audience when we are watching a courtroom drama. Thus trial mode is normally established visually. Conventions also influence the ways in which the substance of trials is presented—the tentative jury arrival; the view from the jury; counsel looming near the witness under pressure; the closing speeches usually close to the jury and the empty courtroom while the jury is deliberating.

From the 'scales of justice' to the occlusion of the law (justice blindfolded), from the pomp and pageantry that surround the legal process and the legal players, legal imagery is forcefully used by film makers. This may take the form of establishing shots of the court building, close-ups of legal images, all designed to illustrate the solemnity of the law and the seriousness of the business taking place in the hallowed courtroom. This is especially clear in British law films given the traditional focus on ceremony within legal procedures in Britain, and can be seen in many of the films. Certainly *Brothers in Law* utilises these at the Assizes and elsewhere, although often the pomp and ceremony is 'pricked' by the humour or incompetence of the lawyers.⁷⁵

3. In replacement of the McArthur's technology we have identified the use of, and relationship to, the process of law itself. This seems to us to be the most apt comparison given that it is application of law that is the 'tool' at the lawyer's disposal.

'Technology' for the lawyer equates to legal process, and how the lawyer uses the tools of his trade within his job. In particular here we might see the misuse, or abuse, of legal process. We have previously identified this point in terms of 'going beyond the law to achieve justice'. Most notably we have used Fonda's portrayal of Abraham Lincoln in *Young Mr. Lincoln* as a prominent example

^{73.} Jessica Silbey, Patterns of Courtroom Justice, in LAW AND FILM, supra note 1.

^{74.} TWELVE ANGRY MEN, supra note 47; EIGHT O'CLOCK WALK, supra note 29; BROTHERS IN LAW, supra note 20; JAGGED EDGE, supra note 60; CLASS ACTION (TCF/Interscope 1990); PHILADELPHIA, supra note 60, A CIVIL ACTION, supra note 60, LEGALLY BLONDE, supra note 59, and EVELYN, supra note 60.

^{75.} BROTHERS IN LAW, supra note 20.

of this.⁷⁶ However we can see it too in the British trope—especially in *In the Name of the Father* with Emma Thompson (Gareth Pierce) introducing evidence obtained outside of the traditional legal process and using the High Court as a vehicle to voice her concerns in breach of any number of legal protocols.⁷⁷

We can also expect the witness to be subject to cunning examination on the witness stand. It is here that cases are won and lost. The collapse of the witness and the final fatally damning admission are the crux of the courtroom drama. This is what law in trial movies is about whether it be in criminal issues—Witness for the Prosecution and Guilty as Sin—or civil matters—The Blind Goddess or Class Action. The style may be dramatic or it may be low key. The central role of the lawyer cross-examining and the limited role of the judiciary in this process are a constant.

IV. CONCLUSION

Film and law scholarship continues to grow and diversify. This diversification can be seen not only in terms of the growth of its material base, but also by its increasing incorporation of aspects of film theory. Because of sheer weight of numbers, and dominant position in the marketplace, it is undoubtedly the case that the portrayal of the American justice system dominates. We have demonstrated here that there are important national alternatives that are worthy of excavation and analysis. That in itself is a worthwhile project. By adding these to the oeuvre, the entire body of law films becomes wider and more reflective, and allows a more measured and sophisticated analysis. This is intimately connected to the first dimension of genre theory, further delineating the field of study. Identification of national films brings new ideas about the genre of the law film into consideration. The second thread of genre theory, the deliberate construction of the law film by the filmmaker, can also be investigated with a new perspective. This opens up opportunities to consider the relationship between audience and legal film, something that looks at the effects of such media and that has already been attempted on a small scale and which warrants further analysis.⁷⁹

This then brings us back to a central contention in our work and, on a micro-level, a key issue within this specific piece. Part of what we have illustrated above shows a paradox. On the one hand we see a limited number of British films, and British law films, and

^{76.} YOUNG MR. LINCOLN (TCF 1939).

^{77.} IN THE NAME OF THE FATHER, supra note 20.

^{78.} WITNESS FOR THE PROSECUTION, *supra* note 16; GUILTY AS SIN, *supra* note 60; THE BLIND GODDESS, *supra* note 29, and CLASS ACTION, *supra* note 60.

^{79.} See Asimow et al., supra note 57.

the attempts made to protect and safeguard these very artefacts. At the same time, we see the importance of the iconography of the British law film, both in terms of the 'British', but also its wider relevance and use in other law films, particularly from the United States. Indeed, this very iconography becomes a staple of the American film and often 'the British dimension' is used as a signifier within the avowedly Hollywood law film. beyond the narrative and concentrates on the visual, so whilst the British law film might appear as a minor footnote to the catalogue of law films, in fact its importance is far greater than perhaps expected. Its trajectory can be charted through a specific application of a line within genre theory, to illustrate that perhaps Colin Welland was merely just slightly ahead of his time, when he announced in a Hollywood Oscar ceremony of 1982 that 'The British are Coming'. 80 Not this time aggressively to conquer with our cultural excellence but rather to use British law films to open up and analyse a new strand of theoretical investigation within law and film scholarship.

Jane Black, They Came, They Saw, But Will They Conquer?, BBC NEWS ONLINE, March 16, 1999, http://news.bbc.co.uk/1/hi/entertainment/the_oscars_1999/293 581.stm.

APPENDIX: BRITISH LAW FILMS: COURTROOM DRAMAS & RELATED (LISTED CHRONOLOGICALLY)

THE GIRL IN THE NEWS (TCF 1940); starring Margaret Lockwood, Emlyn Williams; Director, Carol Reed.

THE BLIND GODDESS (Gainsborough 1947); starring Michael Dennison, Eric Portman; Director, Harold French.

THE PARADINE CASE (Selznick 1947); starring Gregory Peck; Ann Todd; Charles Laughton; Director, Alfred Hitchcock.

THE WINSLOW BOY (British Lion/London Films 1948); starring Robert Donat, Cedric Hardwicke, Margaret Leighton; Director, Anthony Asquith.

MADELEINE (GFD/David Lean 1949); starring Ann Todd, Leslie Banks; Director, David Lean.

THE FRANCHISE AFFAIR (ABP 1950); starring Michael Denison, Dulcie Gray; Director, Lawrence Huntingdon.

CARRINGTON V.C. (British Lion/Romulus 1953); starring David Niven, Margaret Leighton; Director, Anthony Asquith.

EIGHT O'CLOCK WALK (British Lion 1953); starring Richard Attenborough, Derek Farr, Cathy O'Donnell; Director, Lance Comfort.

BROTHERS IN LAW (British Lion/The Boultings 1956); starring Ian Carmichael; Richard Attenborough, Nicholas Parsons; Director, Roy Boulting.

LIBEL (MGM/Comet 1959); starring Dirk Bogade, Olivia de Havilland, Paul Massie; Director, Anthony Asquith.

OSCAR WILDE (Vantage 1959); starring Robert Morley, John Neville; Director, Gregory Ratoff.

THE TRIALS OF OSCAR WILDE (Warwick/Viceroy 1960); starring Peter Finch, John Fraser, Lionel Jeffries; Director, Ken Hughes.

A PAIR OF BRIEFS (Rank 1961); starring Michael Craig, Mary Peach, Brenda de Banzie; Director, Ralph Thomas.

VICTIM (Rank/Allied Filmmakers/Parkway 1961); starring Dirk Bogarde, Sylvia Sims; Director, Basil Dearden.

THE BOYS (Gala/Columbia 1961); starring Jess Conrad, Dudley Sutton, Richard Todd; Director, Sidney J Furie.

TRIAL AND ERROR (MGM/British Studios Limited 1962); starring Richard Attenborough, Peter Sellers; Director, James Hill.

DR. CRIPPEN (Torchlight Productions 1962); starring Donald Pleasance, Corale Browne, Samantha Eggar; Director, Robert Lynn.

TERM OF TRIAL (Romulus 1962); starring Laurence Olivier; Director, Peter Glenville.

KING AND COUNTRY (BHE 1964); starring Dirk Bogarde, Tom Courtenay; Director, Joseph Losey.

HOSTILE WITNESS (UA/Caralan/Dador 1968); starring Ray Milland, Sylvia Sims; Director, Ray Milland.

TEN RILLINGTON PLACE (Columbia/Filmways 1970); starring Richard Attenborough, John Hurt; Director, Richard Fleischer.

DANCE WITH A STRANGER (Goldcrest/NFFC/First Picture Co. 1984); starring Miranda Richardson, Ian Holm, Rupert Everett; Director, Mike Newell.

LET HIM HAVE IT (First Independent/Vivid/Le Studio Canal Plus/British Screen 1991); starring Christopher Eccleston, Tom Courtenay; Director, Peter Medak.

IN THE NAME OF THE FATHER (Universal/Hell's Kitchen/Gabriel Byrne 1993); starring Daniel Day Lewis, Emma Thompson, Pete Postlethwaite; Director, Jim Sheridan.

WILDE (BBC 1997); starring Steven Fry, Jude Law, Tom Wilkinson; Director, Brian Gilbert.