

## **Ambiguities in the Language of Law: A Case Study of Selected Court Cases in Nigeria**

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**ABSTRACT:** *Language is legal practitioners' tool of trade. The intricate connection between both variables explains why law students at undergraduate level in Nigeria offer some General Studies Programme (GSP) courses in English. However, the scope of their GSP in language study is infinitesimal as some crucial areas in Systemic Functional Grammar such as study of ambiguities, covert/contextualised meanings and politeness etcetera which are crucial to logic and inferencing especially in English as a Second language situation like Nigeria is relegated. It is on this backdrop that this paper investigated ambiguities in selected Nigerian court cases with the view to exposing how meanings change in context.*

*This paper identified two main types of ambiguities: Latent and patent ambiguities. However, it focused only on patent ambiguities under which seven types of ambiguities: lexical, syntactic, grouping, phonological, contextual, grouping and punctuation ambiguities were identified. Of the various types, this paper only studied lexical and contextual ambiguities in eight purposively randomly selected court judgments.*

*The analysis undoubtedly revealed that court judgments are fraught with lexical and contextual ambiguities which could pose serious social-political, economic and security problems if not adequately handled by the judiciary. Therefore, this study recommends the inculcation of studies in Semantics and Pragmatics and some other vital aspects of Systemic Grammar into the General /elective English Studies Programme offered by law students in Nigeria.*

**Key Words:** *Ambiguities, General Studies Programme, Semantics, Pragmatics and Systemic Functional Grammar.*

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### **I. GENERAL INTRODUCTION**

Language is a system of communication. It is a means of exchanging thoughts and ideas. Beyond these functions, 'language is used to do things and the meaning of forms used to accomplish such act is highly dependent on the socio-cultural contexts' (Malinowski 1923; Firth 1968; Austin 1962). This presupposes that a word can denote more than one meaning if taken out of a specific context. It also means that language can be used to accomplish set goals in different socio-cultural contexts including the legal context where it functions as the medium of law.

According to Mey. (1963:1):

The law is a profession of words. Both written and spoken languages are important to the law profession. Through written language national constitutions come into existence, laws and statutes are enacted, and contractual agreements between private individuals are effected and judgements are written. Spoken language is equally indispensable to the legal process several speech acts are made in the form of interrogation of plaintiffs and defendants, the testimony of witnesses, the pleadings by attorneys, or the instructions from a judge to a jury.

Affirming the connection between language and the law, Denning (2004: 10), posits that 'words are vehicle of thoughts and are legal practitioners' tools of trade'. By this, he implies that legal professionals do several things with language. Some of which include: to advocate, to accuse, to convince, to judge, to vindicate, to abdicate, to adjudicate and sometimes to manipulate etc. Words are the means by which court personae (law officers, lawyers and judges) achieve their goals in the law court and are the means by which a lawyer addresses a judge and hopes to convince him of the correctness of his or her line of argument. In the same vein, lawyers and judges study and interpret statutes through a close study of the words therein and judges take decisions via a close study of written laws or records.

Apart from the fact that language is dynamic a medium of the law, sometimes the isomorphic nature of language and its capacity to be interpreted with more than one possible meaning complicates decision making in the legal process. When meaning a lexical item has different possible meanings there legal experts exploit this to

vindicate, implicate, and affirm a claim and sometimes to manipulate a fact.

Words act as referents to the intended meaning of the speaker. Thus, when a listener receives words, 'an aspect of his brain processes the meaning of the words and creates a set of referents that he thinks constitute the perceived meaning that the writer intends. Therefore, when people communicate with one another via a particular sign/code, it is inevitable that the set of referents one person may not match isomorphically to the referents the other person assigns to that same symbol. Therefore, human beings frequently fail to express their intentions plainly and clearly different meanings are assigned. The diagram below illustrates thus:

1. Prostitute appeal to pope -----Receiver A (Prostitute plea with pope)
2. Prostitute appeal to pope -----Receiver B (Popes love prostitute)

The inequality between sign and signified as depicted above, gives room for ambiguities-several meanings and interpretations of a word. When this occurs in a legal case, a judge will have to interpret the meaning of such a word in order to establish the intention of the parliament. McMenamain (2002:71) commenting on the problem of language of the law noted that 'speakers and writers do not always directly match words with meaning'. By this, he means that people do not-always get the same meanings from a word. There is an isomorphic relationship between word and meaning/intention of the law draftsmen. The encoder (lawdraftsman) sometimes uses words that do not directly refer to the intended meaning of the parliament and the decoder (a judge) sometimes uses golden rule interpretation. Golden rule statutory interpretation approach is one of the methods of interpreting statutes. It is a pragmatic method of deciphering meaning of ambiguous words in legal constructions. It entails deciphering meaning of ambiguous words through due cognisance of their semantic and pragmatic meanings.

On the other hand, to the reader or interpreter of the written law has his own problem. He must answer the question: What does the speaker want me to understand by this statement or this decision? Consequently, 'speakers and writers' inability to match words with the intention of the encoder leads to misunderstanding, miscommunication and which if not properly interpreted by the judge for their proper meanings as intended by the legal draftsmen might lead to misinterpretation. Thus, a meticulous legal interpretation requires systemic functional analysis.

### **1.1Statement oftheProblem**

In spite of the robust literature on theidiosyncraticnature of the courtroom language, there exist only a few studies that exemplify ambiguities court judgment. The focus generally has been on the syntactic and stylistic features of legalese. Hence, contextual meaning,that is, how judges construe extra/special meanings for regular English words in legislation has not been fully explored

The interpretationof implicit/intended meaning is crucial to the judges, as they are not only expected to interpret the letters but the spirit behind the legislation.Therefore, this study argues that apart from focusing on the syntactic and stylistic features inherent in legalese there is need to investigate multiplicity of meanings that arise due to variation in context of use.

### **1.2 A Review of the Language of Law**

Sharon (2003) commenting on the nature of language of law opines that there is no language of the law separate from the general language of the people but what exist is that legal language has its distinctiveness.Denning (2010) agrees that the language of law is distinct. He says often times it lacks precision. By this, Denning implies that legal language lacks exactness as it confuses law subjects who are in dire need of meaning of the law to know their fate. Supporting this position, Schane (2006:1) describes how lawyers write. He says:

We lawyers do not write plain English. We use eight words to say what could be said in two. We use arcane phrases to express commonplace ideas. Seeking to be precise, we become redundant.Seeking to be cautious, we become verbose. Our sentences twist on, phrase within clause within clause, glazing the eyes and numbing the minds of our readers. The result is a writing style that has, according to one critic, four outstanding characteristics.It is "(1) wordy, (2) unclear, (3) pompous, and (4) dull. (Schane (2006) quoting Professor Richard, W)

Jordan (2002:17) agreeing to the foregoing, says the language of legal discourse is distinct because most people who have had difficulty in interpreting insurance documents and have tried to decipher the underlying meanings over tax forms cannot dispute the challenge of trying to unravel legalese. He buttresses his position with the humorous skit in the extractbelow. A lawyer would not simply offer someone an orange in everyday terms. Instead, he might say:

I hereby give and convey to you, all and singular, my estate and interest, right, title, claim and advantages of and in the said orange, together with its rind, skin, juice, pulp, and pips and all rights and advantages therein and full power to bite, suck, or otherwise eat the same or give the same away with or without the rind, skin, juice, pulp and pips, anything hereinbefore or herein after or in any other means of whatever the

nature or kind whatsoever to the contrary in anywise notwithstanding."(Jordan, Sherilyn (2002) Forensic Linguistics: the Linguistic Analyst and Expert quoting from The Tulsa Tribune, October 6,1959, as quoted in O' Barr, 1981, p. 391

Chimombo and Roseberry,1998; Gibbons, (1999) reported that lexical and syntactic complexity are preponderant in legalese and they explained that this is necessitated by the need for extreme precision and the avoidance of ambiguity for the accurate interpretation of a statement by a later court. There is use of highly technical lexicon as evident in the use of rare words, ordinary words with specific legal meanings, the use of Latin (e.g. habeas corpus) and French (voir dire), and formal phrases (e.g., approach the bench) (Gibbons, 1999; O'Barr, 1981).

Jordan (2002:5) noted that there is pervasive repetition in the language of the law. He comically exemplified this with the quote, "the truth, the whole truth, and nothing but the truth," or "to have and to hold") the repetition of words and couplets of similar words (such as seem to flout the Gricean conversational maxim of quantity (Chimombo and Roseberry, 1998).However, 'such couplets remain as a remnant of Old English oaths (O'Barr, 1981).As reported by Jordan (ibid) Chimombo and Roseberry(1998:88) illustrate the frequent use of co-reference in wills, such as the repetition of "this Will", to avoid any potential for ambiguity. Repetition in the language of law is a form of ritual that the law uses to drive home its meanings.

As a result of these inherent features of the language of law, ambiguity abounds in law texts. Ibanga (1996:224) asserts that ambiguity in legal constructions distorts meaning. It brings about 'semantic blur' which if not properly managed can lead to chaos and anarchy in the society. Therefore, this paper examines some unclear features of the language of law and presents some typical examples of lexical ambiguity in law texts.

### **1.3The Concept of Ambiguity**

Ambiguity (æmbɪ'ɡju:ɪtɪ) according to Collins English Dictionary means the possibility of interpreting an expression in two or more distinct ways; vagueness or uncertainty of meaning. Sebastian (2002:39) defines ambiguity as 'the possibility of a word having more than one meaning and a sentence allowing for several readings'. From the foregoing ambiguity means 'doubtfulness of meaning; indistinctness or uncertainty of meaning of an expression used in a written instrument law dictionary.org. It means the quality of being ambiguous. It denotes doubtfulness or uncertainty, particularly as to the signification of language, arising from its admitting of more than one meaning. It means indistinctness or uncertainty of meaning of an expression used in a written instrument'. There are different types of ambiguity.

#### **1.3.1Types of Ambiguity**

In law, there are two categories of ambiguity: latent and patent ambiguity. 'Latent ambiguity exists when the language used is clear and intelligible so that it suggests one meaning but some extrinsic fact or evidence creates a need for interpretation or a choice among two or more possible meanings'<http://legaldictionary.thefreedictionary.com/Ambiguity>. Latent ambiguity is evident when a court case involves two people bearing the same name, two school courses bearing the same course codes or two different ships bearing the same name. Latent ambiguities are resolved via reference to extrinsic factors.

On the contrary, 'patent ambiguity is one that appears on the face of a document or writing because uncertain or obscure language has been used' <http://legaldictionary.thefreedictionary.com/Ambiguity>. Therefore, ambiguities in the language of law, means the usage of language in such a way that readers and listeners, deduce several meanings different or similar to that intended by the maker (legislature).

#### **1.3.2Types of Linguistic Ambiguity**

Ambiguity can be classified into three, according to Farrar and Dugdale (1990:142). They include lexical, syntactical and contextual ambiguity.

**Lexical Ambiguity:** It arises from the range of possible meaning attributable to a single word. For instance the use of the word 'vehicle' in a statute that mandates that all vehicles must be registered with the department of motor vehicles, can be ambiguous If the statute does not define 'vehicles', then it will have to be interpreted if questions arises. A person driving a motorcycle might be pulled over and the police may try to fine him if his motorcycle is not registered with the state. If that individual argued to the court that a motorcycle is not a "vehicle," then the court would have to adopt an interpretation of the statute that best reflects the intention of the legislature. As such what does the legislature mean by 'vehicle' and whether the motorcycle fell within that definition and was covered by the statute.

**Syntactical Ambiguity:** It arises from the actual structure of a sentence, e.g. the statement "David met John and raised his cap" when simple sentences have more than one meaning because of the way they are structured, they pose a problem to the court in the above example, we may interpret the sentence in two or more ways (i.e. when David met John, he removed John's cap or when David met John, John removed his cap or when they

met, a cap was removed) This is a clear case of structural ambiguity and could be resolved by the contextual ambiguity.

**Contextual Ambiguity:** They include all those ambiguities that result from the ways words, phrase and sentences are used in a particular context, e.g. word like “fair” and “reasonable” contain a value element in the example given in syntactic ambiguity, the contextual resolution of the state would be that, since David met John, John removed his cap to show respect to David.. Other types of ambiguity have also been identified by linguists. They generally exist as subtypes of Syntactic or Lexical ambiguity. They include the following:

**Scope Ambiguity:** It is under debate whether this type of ambiguity is a form of syntactic or lexical ambiguity, or whether it represents a unique class of ambiguity. An example of this type of ambiguity is: Prostitutes appeal to Pope.

**Phonological Ambiguity:** This is a subtype of Lexical ambiguity that occurs when a set of sounds can be interpreted in more than one way. In essence, it is a type of ambiguity that arises at the level of the surface structure rather than the deep structure. Example: psychotherapist = psycho therapist.

**Punctuation Ambiguity:** This can be considered as a mix of syntactic and lexical ambiguity. The ambiguity in this case is also in the surface structure rather than the deep structure. Example: I want you to notice you hand me the glass.

**Grouping Ambiguity:** This is a type of Syntactic ambiguity that is ambiguous because it is unclear whether a modifier in a sentence modifies only one or several objects. Example: Ambiguity of cross-reference. Hand me the red and yellow balls. (Hand me the red ball and the yellow ball, Hand me the balls that are red and yellow)

**Referent Ambiguity:** This is essentially an ambiguity of referent when using pronouns. Example: Bob kicked Tom, and he broke his leg. The ambiguous word in this sentence is ‘he does it refer to Bob or is it referring to Tom? The possible interpretations open to the above sentence could be that:

- i. Bob kicked Tom and broke Tom’s leg, or
- ii. Bob kicked Tom and got his own leg broken.

### **Framework of Analysis**

The theories used for the analysis of the data are systemic functional grammar and contextual theory respectively.

### **Systemic Functional Grammar**

Systemic Functional Grammar (SFG) is a model of grammar propounded by M.A.K Halliday (1961). This grammatical approach views language as the tool for expressing meanings and as a vital instrument for performing various functions in different social contexts and situations. The focus of SFG is to attempt to explain and describe the organisation of the ‘meaning-making resources’ of a communication event (Halliday and Matthiessen, 2004) .Thus, SFG sees every linguistic choice that speakers make as set of systems containing structures, that enable language users make unlimited set of meanings (Bloor and Bloor, 2004) and perform diverse functions with language. On this premise, semantics and pragmatics are selected to achieve the objectives of this study. Semantics is selected to account for propositional meanings, while pragmatics for non-propositional meanings in the judgement. At this point, we shall discuss language functions from the point of view of SFG.

### **Language, a Functional Tool**

As far as SFG is concerned, language is a functional tool. It is a bi-functional tool for ‘saying’ and ‘doing’. The idea that language is used to do things was propounded by (Malinowski 1923; Firth 1968; Austin 1962).Explaining; the functions of language, Halliday (1975) posited that language has developed in response to three kinds of social-functional ‘needs.’ The first is to be able to construe experience in terms of what is going on around us and inside us. The second is to interact with the social world by negotiating social roles and attitudes. The third and final need is to be able to create messages with which we can put together our meanings in terms of what is New or Given, and in terms of what the starting point for our message is, commonly referred to as the Theme. Halliday (1978) calls these language functions metafunctions, and refers to them as ideational, interpersonal and textual respectively. A piece of language can function as any of these and can perform the three functions simultaneously.

This present study focuses on textual function of language, that is, how language is used in creating a text (appellate court judgement). Hence, it is crucial that we define the concept ‘text’ from the purview of Systemic Functional Grammar.

**2.3.1.2. The Concept of Text:** According to Halliday and Hassan (1976) the concept ‘text’ is defined as ‘any instance of language, in any medium, that makes sense to someone who knows the language’. The above

definition denotes that a text is a stretch of discourse bound together by cohesive devices (cited in Jaszcolt 2002:166).

Texts emanate from every social situation. According to Kress (1985:18), texts are constructed with specific purposes by one or more speakers or writers, and meanings find their expressions in a text in concrete situation of social exchange. Therefore, description of language seems to be inadequate without immediate and direct relation of linguistic forms to the social context. Thus, form and function of language are intricately connected as the study of one depends on the other.

Language performs many functions and one of such functions identified by Halliday (1976) is that it is a tool for creating a text. Text creation is a complex phenomenon. Jaszcolt (2002 *ibid*) explains this phenomenon aptly and we shall review it briefly. He explains that a text is created from four text-forming resources which are (a) semantic relations (b) discourse structure (c) inter-sentential structure and (d) inter-sentential cohesion. Component (a), semantic relations functionally unify the text; it interacts with the discourse structure. The discourse structure that is (i) contextual structure internal to the sentence and (ii) the macrostructure components in a text that classify it as conversation, narrative, lyric, commercial correspondence and so forth combines with inter-sentential structure and inter-sentential cohesion to create a text. However, for the purpose of this study, contextual structure internal to the sentence in the form of the illocutionary and perlocutionary meaning of the utterance and the macrostructure components in a text that classify them as polite or impolite utterances performed by participants in the appellate judgement are employed to explain the various acts performed in the speech event under study.

Explaining further, Jaszcolt (2002) citing (Halliday 1967 and Halliday and Hassan 1976) defines the components of contextual structure as: (i) the theme system (the theme-rheme structure), and (ii) the information system which concerns the units of information rather than units of structure, that is, what is given information and what is new information (topic).

## **Methodology**

The data of the study are eight purposively selected ambiguities from identifiable Nigerian court judgments wherein they were observed. Each data was tagged excerpt and analysed individually.

### **1.7 Analysis of Data**

#### **Excerpt A**

Lexical ambiguity exists with the word 'instrument'. In ordinary parlance it denotes the following: tools, gadgets, appliance etcetera. However, in the court judgement: *Etajata v Ologbo* (2007) 16 NWLR (pt. 1061) 445 – 668 'Instrument' was given a meaning gathered from section 2 of the Land Instrument Registration Law of Bendel State to mean "a document affecting land in the state whereby one party confers, transfers, limits, changes or extinguishes interest in land in favour of another party, any right of title to or in the state and includes:

- (a) an estate contract;
- (b) a certificate of purchase;
- (c) a power of attorney under which any instrument may be executed
- (d) a deed of appointment or discharge of trustees containing expressly or impliedly a vesting declaration and affecting any land to which section 27 of the Trustee Law extends but does not include a will".

The lexical and contextual ambiguity above is as a result of the fact that the word 'instrument' is never totally defined or is left purposely unclear and meant to be analysed based on how it used in context.

Similarly, the word 'burden' ordinarily denotes a load, a heavy item placed on a person or thing to be carried or dragged along. However, the word 'burden' as in burden of proof when used in law means duty to prove the existence of certain facts without which the case of that party may fail, *Danjuma v S.C.C (Nig.) Ltd* (2017) 6 N.W.L.R (pt. 1561) 175.

In the same vein, another situation of lexical ambiguity is present in the lexical item 'issue'. In simply every day in English use, it denotes 'an important topic that people are discussing or arguing about. Much more, in law, it signifies a case for determination before the court which the facts are contained in the statement of claims or defense support. Furthermore, is a point or points where disputants conflict and which require resolution by court. It could also refer to the arguments set-up by parties about specific points. When more than a party has arguments to prove simultaneously, it is said that they have joined issues.

#### **Excerpt B**

Another instance of lexical and contextual ambiguity is evident in the meaning of the word academic. In every day usage, academic means the following scholarly, educational, intellectual, bookish et cetera. Beyond the foregoing, 'academic' in legal parlance as evident in *Dahiru v A.P.C* (2017) 4 N.W.L.R (pt. 1555) 218 means a suit which is merely theoretical and makes an empty sound and of no practical utilitarian value to the plaintiffs even if the judgment is given in his favour. A suit is academic, if it is not related to practical situation

of human nature and humanity. Once a suit no longer has live issues for determination, such a suit can be said to be 'academic'. Therefore, the courts are enjoined not to waste judicial time on it.

### **Excerpt C**

The phrase, 'Proof beyond reasonable doubt' is a case of structural ambiguity. Outside the legal context the hearer could infer below:

- prove beyond all doubts
- prove, beyond all shadow of doubt.

Now the truth in legal denotation is that it simply means establishing the guilt of the accused person with compelling and conclusive evidence. It is the degree of compulsion which is consistent with a high degree of probability, (*Hassan v State* (2017) 5 N.W.L.R (pt. 1555) S.C 1). In other words, it does not mean prove all doubt but means prove the doubt reasonably.

In *Blaise v. F.R.N* (2017) 6 N.W.L.R (pt. 1560) C.A. 90, Section 84(4) of the Evidence Act 2011 as amended – required a certificate to be issued by a person occupying a responsible position in relation to the operation of the relevant device or management of the relevant activities as the case may be. The certificate is to identify the document containing the statement and describe the manner in which it was produced and give particulars of any device involved in the production of the document.

The court held a certificate not to be designing of a fanciful piece of documentation that has to be issued by some separate authority presumably authenticated or authorized by some academic of public institution in order to qualify as a certificate under section 84 (4) of the Evidence Act. Rather, all that really matters is for the matters stated in the certificate to be stated to the best of the knowledge of the person stating it and belief of the matter in consideration between the parties to the dispute. The above conditions required by the Act were viewed as ambiguous and self-defeating. The court per Oho, JCA at page 132, Paras D-F stated:

The mere fact that compliance is demanded as a matter of law with the provisions of section 84 and its sub-provisions on admissibility of computer generated documents, does not mean that we should as well consign the use of ordinary common sense required for doing most things to the dustbin. There is no way a thing to the dustbin. There is no way in the circumstances of this case that the EFCC would be in any position to produce a certificate stating the status of the computer from which the complainant/petitioner generated exhibit 'A' in the United Arab Emirate (UAE). It must be borne in mind that the said exhibit 'A' having being forwarded to EFCC and not printed from its computers that by asking the EFCC to produce a certificate of compliance with the section is to seek the performance of a feat by the EFCC which is clearly unattainable.

From the foregoing, the meaning of a certificate was broadened to include any statement made by a person to the best of his knowledge and belief to be correct and necessary issued by an institution and authenticated by a person with authority to do so.

The construction of the word 'or' in section 19 of the Corrupt Practices and Other Related Offences Act 2000 (now section 22 of the Corrupt Practices and Other Related Offences Act, 2003) Cap. C. 31 Laws of the Federation of Nigeria, 2004) is used disjunctively. In the instance case, the prosecution did not choose the alternative of conferring corrupt advantage on another public officer. Rather, the courts were with respect to conferring corrupt advantage upon oneself, the conclusion of the trial court that in saying that the appellant was guilty from whichever way it was looked at was wrong, misconceived and perverse. The court construed the word 'or' disjunctively and not conjunctively as such two separate offenses existed and must be proved separately and conclusively beyond reasonable doubt to ground any conviction.

### **1.8 Conclusion**

Without any doubt, the language of law is indeed distinct: it is dull, technical, verbose, and ambiguous. This paper considered ambiguity in some Nigerian legislation. Legislation may contain uncertainties for a variety of reasons: Words are imperfect symbols to communicate intent. They are ambiguous and change in meaning over time. Unforeseen situations are inevitable, and new technologies and cultures make application of existing laws difficult. Uncertainties may be added to the statute in the course of enactment, such as the need for compromise or catering to special interest groups.

The language of law is said to be ambiguous because it contains words that can be given different meanings and words with special meanings. This feature undoubtedly marks out this genre. Meaning in legalese are often deliberately manipulated and controlled by legal experts in order to defend or prosecute in favour of their clients. Deciphering meaning in this context requires more than linguistic analysis of words, phrases, clauses or sentences. On the premise of the foregoing, this paper recommends that legal students should have a course on general studies programme that can equip them on the intricacies of the complementary relationship between semantics and pragmatics in decoding the justifiable meanings of ambiguity in the language of the law. This demands designing a course that will enable legal students have a good grasp of foregrounded, contextualised and covert or implicit meanings.

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