

Introduction

Narrative and Metaphor in the Law

Michael Hanne and Robert Weisberg

Anyone who has even a passing acquaintance with the common law is aware that court trials, both criminal and civil, operate around pairs of competing narratives, with judges and juries tasked with assessing the validity of the stories told by opposing advocates. However, over the last thirty years or so, law scholars and practitioners have come to recognize that narrative flows in many directions and through every form of legal theory and practice.

Law professor Anthony G. Amsterdam and psychologist Jerome Bruner have summarized the role of narrative in the law as follows:

Law lives on narrative, for reasons both banal and deep . . . Clients tell stories to lawyers, who must figure out what to make of what they hear. As clients and lawyers talk, the client's story gets recast into plights and prospects, plots and pilgrimages into possible worlds . . . If circumstances warrant, the lawyers retell their clients' stories in the form of pleas and arguments to judges and testimonies to juries . . . Next, judges and jurors retell the stories to themselves or each other in the form of instruction, deliberations, a verdict, a set of findings, or an opinion. And then it is the turn of journalists, commentators and critics. This endless telling and retelling, casting and recasting is essential to the conduct of the law. It is how law's actors comprehend whatever series of events they make the subject of their legal actions.¹

On the larger scale, legal argument in the common-law tradition depends in considerable part on the longer narrative represented by legal precedent, that is, the linking by advocates or judges of the stories under consideration in the current case to decisions made by earlier judges in cases which they argue to be comparable and relevant to the current case. Legal philosopher Ronald

¹ Anthony G. Amsterdam and Jerome Bruner, *Minding the Law: How Courts Rely on Storytelling, and How Their Stories Change the Ways We Understand the Law – and Ourselves* (Cambridge, MA: Harvard University Press, 2000), p. 110.

Dworkin describes the line of judicial precedent as a continuing narrative authored by successive judges, best understood as a “chain novel.”² So, in the words of literary scholar and legal commentator Peter Brooks (a contributor to this volume), “narrative is inevitable and irreplaceable [in the law]: it is not an ornament, it is not translatable into something else.”³

Narrative, of course, combines the recounting of events (a mere chronicle or annal) with interpretation of those events; as such it is central to all legal processes and the many different kinds of legal story interwoven with each other to form the grand fabric of the law. The last three decades have seen a quite massive proliferation of courses, research, conferences, and publications relating to the part played by narrative in the theory and practice of the law. Most of the courses offered relate broadly to the practical need that attorneys appearing in court have for skills in storytelling and in demonstrating the weaknesses to be found in stories told by opposing counsel. One of the best-known examples over recent years has been the program at the University of Virginia Law School entitled “The Narrative Power of the Law,” directed by Peter Brooks. Another long-established course was that offered at New York University School of Law by Anthony Amsterdam and the late Jerome Bruner. These courses may be described as teaching “narrative competence” to (future) attorneys. In this sense, they offer an interesting parallel with courses currently on offer to professionals in other disciplines, such as those offered to present and future doctors by Rita Charon and the Program in Narrative Medicine, at Columbia University.⁴

Moreover, the practical relevance of narrative studies in the law has been taken up in a good number of legal conferences over the last few years, notably the biennial “Applied Legal Storytelling” Conference series in the United States and the United Kingdom. The most recent in this series took place at the Law School of Seattle University, July, 2015, focusing on such topics as: “the scientific research that explains how judges and jurors perceive and are persuaded by narrative. It will then turn to what stories are, what stories are not, and how to incorporate storytelling in all aspects of trial and litigation.”⁵ In addition, several fine books and articles centered on narrative in the law have been published over the last twenty years, drawing attention to the variety

² Ronald Dworkin, *Law's Empire* (Cambridge, MA: Harvard University Press, 1986), p. 229.

³ Peter Brooks, “Narrative transactions—Does the law need a narratology?” *Yale Journal of Law & Humanities*, 18 no. 1 (2006), 1–28.

⁴ <http://sps.columbia.edu/narrative-medicine>.

⁵ This is from the abstract of a paper presented by Supama Malempati, entitled “Constructing the case: Theory, theme, and persuasion from trial advocacy.” <http://lwionline.org/uploads/FileUpload/2015ASCFinalProgram.pdf>.

and complexity of the functions of narrative in the law, some of the most impressive being by Brooks and Gewirtz (1996), Binder and Weisberg (2000), Amsterdam and Bruner (2000), Brooks (2005), and Olson (2014).⁶ Several of these authors have contributed essays to this volume.

Finally, a number of different contemporary schools and movements in legal theory have paid particular attention to narrative. The Law and Literature movement has highlighted the extent to which lawyers employ strategies drawn from creative writing, especially from narrative fiction, and, indeed, the extent to which those strategies can be analyzed using insights from literary theory. James Boyd White, whose remarkable book *The Legal Imagination* (1973) laid the foundations for the movement, wrote: “Might it not be suggested that the central act of the legal mind . . . is [the] conversion of the raw material of life . . . into a story that will claim to tell the truth in legal terms?”⁷ Other relatively recent movements, including Critical Legal Theory, Feminist Legal Theory, and Critical Race Theory, have raised issues concerning voice, perspective, and story ownership in conventional legal narratives and are centrally concerned with the configurations of power in and around those narratives. For an early broad discussion of these issues, see Richard Delgado’s article of 1989, “Storytelling for oppositionists and others: A plea for narrative.”⁸

These strands of law-and-narrative scholarship raise, and this volume will explore, very fundamental questions about whether there are qualities or functions inherent in narrative that can guide us in discerning – or predicting – its role in law. One view is that narrative is inherent in all human discourse, so that part of the exercise is to simply uncover what had to have been there all the time – the embedding of narrative in legal discourse. This is an exercise that is especially interesting in the face of the pretenses of the legal system that because of its claim of pure rationality and grounding in fact it does not need, or is undermined by, the possible distortions or emotionality of narrative. Another view is that if narrative is ubiquitous in law, the reason is that it is

⁶ Peter Brooks and Paul Gewirtz (eds.), *Law’s Stories: Narrative and Rhetoric in the Law* (New Haven, CT: Yale University Press, 1996); Guyora Binder and Robert Weisberg, *Literary Criticisms of Law*. (Princeton, NJ: Princeton University Press, 2000), esp. chapter 3, Narrative Criticism of Law; Peter Brooks, “Narrative in and of the law” in James Phelan and Peter J. Rabinowitz (eds.), *A Companion to Narrative Theory* (Malden, MA: Blackwell Publishing, 2005: 415–426; and Greta Olson, “Narration and narrative in legal discourse” in *Living Handbook of Narratology*. Hamburg: Hamburg University Press, 2014. www.lhn.uni-hamburg.de/article/narration-and-narrative-legal-discourse.

⁷ James B. White, *The Legal Imagination* (Chicago, IL: Chicago University Press, 1973), p. 859.

⁸ Richard Delgado, “Storytelling for oppositionists and others: A plea for narrative,” *Michigan Law Review*, 87 no. 8 (August, 1989), 2411–2441.

very purposefully recruited by legal actors to serve instrumental goals, as in making an advocate's argument about the facts at issue in litigation, or characterizing the trajectory of precedent. Still another view picks up the point about the pretense of objective rationality in law to suggest that narrative by its nature shows up in or is inserted in law as a disruptive force. One version of this view is that the rationality pretense is itself inherently conservative, either in the sense of preserving legal tradition or conservative in a broader political sense, so that literary figuration is generally progressive in its orientation or effect. The contestable nature of these perspectives makes narrative in law a very fertile field of study today.

METAPHOR IN THE LAW

The same thirty-year period has also seen quite a strong interest in metaphor and the law, with a number of conferences and publications. Nevertheless, the work done under the metaphor banner has been much more fragmentary. Perhaps one reason is that, while narrative is woven into the fabric of law in several different *contexts* (storytelling in advocacy, precedential reasoning, legal history, etc.), the basic nature of narrative does not fundamentally change among these contexts. By contrast, metaphor tends to operate separately and in distinct ways on several different *levels*. On one level, metaphors are commonly used to define justice in the grand sense in, for instance, the blindfold, scales, and sword associated with figures representing justice. On another level, metaphors are conventionally employed to convey standard concepts in legal practice, for example the contrast between a "chain of evidence" (where, if one link fails, the whole case collapses) and a "rope of evidence" (made up of many strands, where the failure of one or a few strands does not prevent it from supporting the "weight" of the case). And single metaphors may also be used in a tactical manner by an attorney, for instance to capture for the judge or jury a sense of the personality of a defendant ("a schoolyard bully") or of the actions of the opposing attorney ("a fishing expedition").

So obviously, a comparison between narrative and metaphor reveals many differences and similarities. Whereas narratives are necessarily premeditated to some extent, a metaphor is often a flash of intuitive insight. But if we reprise the questions raised above about the inherent role of narrative in law and apply them to metaphor, the picture becomes very mixed. While some may think of metaphor as ornamental artifice, the notion that narrative is an unavoidable part of human discourse is perhaps even truer with metaphor, perhaps because metaphor is much more likely to be spontaneous than premeditated; indeed

its appearance in any kind of speech may be virtually compulsive. Metaphor may also therefore be less likely to be serving an instrumental goal – unless, ironically, it operates more subtly in that role: metaphor can act subliminally, and it can both highlight and hide. In any event, metaphor is just as subject to the concern that as a literary figure it might be manipulative or overly emotional – this perception is a long hangover from Justice Benjamin Cardozo’s much-quoted declaration that “[m]etaphors are to be narrowly watched, for starting as devices to liberate thought, they end often by enslaving it.”⁹ We can also reprise the question whether metaphor joins narrative as a typically disruptive or progressive force, a challenge to law’s rationality pretense. Further, the rival of metaphor is not necessarily abstraction – it can be another form of concreteness, that is, social science data.¹⁰

Narrative and metaphor may also be evaluated in different ways. We often use the term “stock narrative” for one that is used a great deal, but the term is more descriptive than pejorative. By contrast, we hear the very pejorative term “dead metaphors” for those that have lost their utility, their generative spark or strategic value. The live/dead distinction may be descriptively useful, but let us pause for a moment to consider what follows from it. In the particular context of judicial opinions, perhaps the most vivid metaphors are those used to carry out very vigorous disputes among justices,¹¹ but the more mundane metaphors are those that last and that guide or control future decisions. Perhaps the key factor is not a matter of life or death but whether a metaphor is so strong as to

⁹ *Berkey v. Third Avenue Railway*, 155 N.E. 58, 61 (N.Y. 1926).

¹⁰ Consider the concept of the Brandeis brief, as exemplified in *Muller v. Oregon*, 208 U.S. 412 (1908). There, then-lawyer Brandeis submitted a brief full of huge swaths of statistical data to demonstrate the harms of excessive working hours on women in a laundry. The Court relied on this data in upholding a state labor law against the employer’s challenge, which was based on airy abstractions about “liberty of contract.” But then consider a recent death penalty case. *Glossip v. Gross*, 135 S.Ct. 2726 (2015), Justice Breyer embeds a Brandeis-brief’s worth of data in his dissenting opinion. He uses numbers, graphs, and tables about arbitrary and racial and geographic disparities in the infliction of the death penalty, lack of funding for defense counsel, and increasing time between trial and execution (125 S.Ct. at 2255–94) to make the case that the capital punishment has become unconstitutionally cruel and unusual. In his opinion concurring with the majority, Justice Scalia responds to Justice Breyer with mocking invective full of literary tropes. As Scalia puts it, the defendant’s arguments have been made before, so “Welcome to Groundhog Day.” Justice Breyer and his fellow dissenters cite new disparity studies “as though they have discovered the lost folios of Shakespeare” and their arguments are “gobbldey-gook” (125 S.Ct. at 2746–47).

¹¹ In his dissent from *United States v. Windsor*, 133 S.Ct. 2675 (2013), the same-sex marriage case that struck down part of the Defense of Marriage Act, Justice Scalia denounced the majority opinion of his nemesis, Justice Kennedy, as a “jaw-dropping” decision, that has its “diseased root” and, now infamously, as “argle-bargle” (133 S.Ct. at 2698, 2709).

dominate and freeze a field of legal thought, to pull off a capture that prevents new fresh thinking.

For whatever reason, by contrast to the curricular presence of narrative, there are, to our knowledge, no courses that focus exclusively on metaphor in the law, though there have been a few major conferences, each of which has generated its own published volume. One important conference, “Using Metaphor in Legal Analysis and Communication,” was held at Mercer University in 2006, and included a presentation by one of the contributors to the present volume: Michael R. Smith’s “Levels of Metaphor in Persuasive Legal Writing,”¹² and David T. Ritchie’s “The Centrality of Metaphor in Legal Analysis and Communication: An Introduction.”¹³ A more recent conference was “Law’s Metaphors,” held at Southampton University Law School, in September 2015, with papers published the following year.¹⁴ Convenor of the conference David Gurnham makes the useful distinction between: metaphors used *in law*, metaphors *for the law*, and law as a metaphor *for other things*.¹⁵ One of the most original and wide-ranging papers in that collection is by Andreas Philippopoulos-Mihalopoulos, entitled “Flesh of the Law: Material Legal Metaphors,” which identifies some of the many ways in which metaphor figures in legal discourse. In regard to the risk that a metaphor will capture and stultify a field of thought, he asserts that “we operate with metaphors on a preconscious level, namely a level where language is accepted unquestioningly. We are so conditioned by the ruling metaphors of law that a) we do not question them and b) we allow them to carry on determining the way we stand in relation to the law, since we cannot even imagine a different way.”¹⁶ This observation lies behind a discussion undertaken in this volume, in Conversation 4, about whether a shift of metaphor on a particular legal topic may generate innovative thinking, where we can do thought experiments (or speak-experiments) to isolate the relevant literary variable. Indeed, one can imagine an even bolder thought experiment: try to write a judicial opinion – or even a statute – without any metaphors at all.

Articles on the role of metaphor in law published in the last fifteen years have ranged over many topics: the increasing use of aural metaphors in

¹² The proceedings were published as *Mercer Law Review* 58 (Spring 2007).

¹³ David T. Ritchie, “The Centrality of Metaphor in Legal Analysis and Communication: an Introduction,” *Mercer Law Review* 58 (Spring 2007): 839–843. That David Ritchie should not be confused with L. David Ritchie, who has contributed to this volume.

¹⁴ Special issue of the *Journal of Law and Society*, 43 no. 1 (March 2016).

¹⁵ David Gurnham, “Law’s metaphors: Introduction,” *Journal of Law and Society*, 43 (2016), 1–7, 2.

¹⁶ Andreas Philippopoulos-Mihalopoulos, “Flesh of the Law: Material Legal Metaphors,” *Journal of Law and Society*, 43 (2016), 45–65, 49.

American legal discourse to challenge the traditional dominance of visual metaphors;¹⁷ the part played by metaphors as models in legal theory;¹⁸ the prevalence of sporting and warring metaphors in judicial opinions;¹⁹ the critique of the overuse of the “war” metaphor in relation to terrorism;²⁰ the distinctive metaphors favored by practitioners in mediation;²¹ and the competing metaphors in constitutional theory.²² Two of the most significant articles are by authors represented in the present volume, Katharine Young and Linda Berger. Young’s article examines the implications of using a range of different metaphors for human rights;²³ Berger’s studies the power of metaphor in legal persuasion.²⁴

There have been only a few attempts by law scholars to depict the full range of ways in which metaphor features in legal theory and practice. Outstanding books on metaphor in/and the law include: Milner S. Ball’s, *Lying Down Together: Law, Metaphor, and Theology* (1985),²⁵ Haig A. Bosmajian’s *Metaphor and Reason in Judicial Opinions* (1992),²⁶ and Steven L. Winter’s *A Clearing in the Forest: Law, Life, and Mind* (2001).²⁷

There can be little doubt that narrative and metaphor interact, and so one key goal of this volume is to explore the roles played by narrative and metaphor *in combination* in all aspects of the law. Very early on, historian Louis O. Mink asserted the equality of the two, stating: “Narrative is a primary cognitive instrument – an instrument rivalled only by theory and metaphor as irreducible

¹⁷ Bernard J. Hibbits, “Making sense of metaphors: Visuality, aurality, and the reconfiguration of American legal discourse,” *Cardozo Law Review* 16 (1994), 229–356.

¹⁸ Finn Makela, “Metaphors and models in legal theory,” *Les Cahiers de droit*, 52 nos. 3–4, (September–December 2011), 397–415.

¹⁹ Elizabeth G. Thornburg, “Metaphors matter: How images of battle, sports, and sex shape the adversary system,” *Wisconsin Women’s Law Journal* 10 (1995), 225–281.

²⁰ Louis Henkin, “War and terrorism: Law or metaphor,” *Santa Clara Law Review*, 45 (2005), 817–827.

²¹ John Haynes, “Metaphor and mediation.” Unpublished manuscript. Available on www.mediate.com/articles.

²² Vicki C. Jackson, “Constitutions as ‘Living Trees’? Comparative constitutional law and interpretive metaphors,” *Fordham Law Review*, 75 (2006), 921–960.

²³ Katharine Young and Jeremy Perelman, “Rights as footprints: A new metaphor for contemporary human rights practice,” *Northwestern Journal of International Human Rights* 9 no. 27 (2010), 27–58.

²⁴ Linda L. Berger, “Metaphor and analogy: The sun and moon of legal persuasion,” *Journal of Law and Policy*, 22 (2013–2014), 147–195.

²⁵ Milner S. Ball, *Lying Down Together: Law, Metaphor, and Theology* (Madison, WI; London: University of Wisconsin Press, 1985).

²⁶ Haig A. Bosmajian, *Metaphor and Reason in Judicial Opinions* (Carbondale, IL: SIU Press, 1992).

²⁷ Steven L. Winter, *A Clearing in the Forest: Law, Life, and Mind*, (Chicago, IL: University of Chicago Press, 2001).

ways of making the flux of experience comprehensible.”²⁸ Our determination traces back to our observation that parallel assertions were made by thinkers from a range of disciplines about thirty years ago for the role of narrative and of metaphor as fundamental devices by which we interpret experience and organize our thoughts and actions.

On the one hand, Hayden White (history), Jerome Bruner (psychology), Roger Schank (cognitive science), Fredric Jameson (literary theory), Theodore Sarbin (psychology), and others asserted the fundamental role of narrative as a device by which human beings structure and give sense to experience. In Jameson’s words, narrative is “the all-informing process . . . the central function or *instance* of the human mind.”²⁹ On the other hand, such scholars as George Lakoff (linguistics), Mark Johnson (philosophy), Andrew Ortony (cognitive science), Raymond Gibbs (psychology, another contributor to the present volume), and others were making equally grand claims for the fundamental role of metaphor. In the words of Lakoff and Johnson, “our ordinary conceptual system, in terms of which we both think and act, is fundamentally metaphorical in nature.”³⁰

The way in which modern narrative studies and modern metaphor studies burgeoned separately but alongside each other at this time is nicely epitomized by the holding of key conferences in successive years at the University of Chicago, entitled “Metaphor: The Conceptual Leap” (1978) and “Narrative: The Illusion of Sequence” (1979), with papers from these two conferences being subsequently published as *On Metaphor* (1979)³¹ and *On Narrative* (1980–1981).³² These two volumes serve in many ways as the foundation rocks on which modern metaphor studies and narrative studies have been built.

Thinkers in other fields to hazard opinions on the relationship between narrative and metaphor include: philosopher Paul Ricoeur, who asserted that they were both examples of “semantic innovation”³³ and economic theorist Deirdre (formerly Donald) McCloskey, who insisted that they function in complementary fashion: “there seem to be two ways of understanding things;

²⁸ Louis O. Mink, “Narrative form as a cognitive instrument” in Robert H. Canary and Henry Kosicki (eds.), *The Writing of History: Literary Form and Historical Understanding* (Madison, WI: University of Wisconsin Press, 1978), pp. 129–149, 131.

²⁹ Frederic Jameson, *The Political Unconscious: Narrative as a Socially Symbolic Act* (Ithaca, NY: Cornell University Press, 1981), p. 13.

³⁰ George Lakoff and Mark Johnson, *Metaphors We Live By* (Chicago, IL: Chicago University Press, 1980), p. 3.

³¹ Sheldon Sacks (ed.), *On Metaphor* (Chicago, IL: University of Chicago Press, 1979).

³² W.J.T. Mitchell (ed.), *On Narrative* (Chicago, IL: University of Chicago Press, 1981).

³³ Paul Ricoeur, *Time and Narrative*, vol. 1, trans. Kathleen McLaughlin and David Pellauer (Chicago, IL: Chicago University Press, 1984), p. ix.

either by way of narrative or by way of metaphor,” and that the relationship between them is “antiphonal” (that is: they sing to each other).³⁴

As we have noted previously, research on narrative in the law and research on metaphor in the law have tended to run in parallel with each other. Nevertheless, it should be pointed out that James Boyd White’s *The Legal Imagination*, which we have already referred to as one of the earliest sources of interest in narrative and the law, gives almost equal attention to metaphor. Steven L. Winter’s *A Clearing in the Forest* likewise explores the interaction of narrative and metaphor in the law. Three of the contributors to the current volume, Laurence Rosen (a legal anthropologist), Linda L. Berger (a scholar in legal rhetoric) and L. David Ritchie (a communications specialist), have all from their various disciplinary standpoints explored aspects of the law employing the narrative perspective and the metaphor perspective in combination.³⁵

Linda Berger offers this overview of the function of narrative and metaphor:

Metaphor and narrative reassure us that things hang together, providing a sense of coherence to the patterns and paths we employ for perception and expression. Without the metaphorical process that allows us to gather them up, group them together, and contain them, our perceptions would scatter like marbles thrown on the ground. Without the ability to tell stories that link discrete events together, place them into a storyline with a beginning and an end, and compose a coherent accounting, our lives would be constructed on “One Damn Thing After Another.”³⁶

In this collection, we aim to show even more strongly how things “hang together” by combining the narrative perspective and the metaphor perspective.

THE NARRATIVE/METAPHOR NEXUS PROJECT

The conference in early 2016 at Stanford University Law School which spawned the papers collected in this volume is the fourth of a series of five conferences, collectively entitled The Narrative/Metaphor Nexus,³⁷ exploring

³⁴ Donald McCloskey, “Storytelling in economics” in Cristopher Nash (ed.), *Narrative in Culture: The Uses of Storytelling in the Sciences, Philosophy and Literature* (London; New York, NY: Routledge, 1990), pp. 5–22.

³⁵ Lawrence Rosen, *Law as Culture: an Invitation* (Princeton, NJ: Princeton University Press, 2006); Linda L. Berger, “The lady or the tiger: A field guide to metaphor and narrative,” *Washburn Law Journal*, 50 (2010–2011), 275–318; L. David Ritchie, “Everybody goes down’: Metaphors, stories, and simulations in conversations,” *Metaphor and Symbol*, 25 (2010), 123–143.

³⁶ Berger, “The lady or the tiger,” 275.

³⁷ The website narrativemetaphornexus.weebly.com offers an overview of these conferences and the publications generated by them.

the nature of the narrative-metaphor connection in each of a range of disciplines, from medicine to politics to the law to education. Michael Hanne, one of the editors of this volume, has helped to convene all of these gatherings. Hanne has argued that employing narrative and metaphor in combination allows us to see issues with “binocular vision” (that is, stereoscopically, through the lens of narrative and the lens of metaphor together).

These explorations across several disciplines have revealed considerable commonality among them in their use of narrative and metaphor. So, for instance, there is a tendency for the disciplinary discourse in all fields to be captured by conventional metaphors and stock narratives, which limit innovation in thought and practice. There are, moreover, many striking points of overlap between disciplines, for instance, with medical metaphors being employed by political leaders and metaphors of warfare being found in medical discourse. Indeed, the question arises in more than one of the papers for the present volume as to whether medical metaphors such as “crime as disease” and military metaphors such as “the war on drugs” have value in the legal context.

Nevertheless, there are many examples of divergence among the disciplines. So, in a number of fields, medicine and education, for example, interest in the role of narrative is particularly strong, and study of the role of metaphor is less developed and more fragmentary. We suggest that this has occurred for somewhat the same reasons as the priority given to study of narrative in the law – the many kinds of narrative in all three disciplines are more readily seen as accumulating into a coherent whole than is the case with the rather disparate array of metaphors.³⁸

In other disciplines, politics, for example, the study of metaphor is more advanced. This may well be because it is so difficult to bring the many narratives at play in even a single political context together for analysis. Moreover, the main texts employed in the study of political discourse are the speeches, interviews, and writings of political actors and it is relatively easy – and very fruitful – to identify metaphor patterns in such texts.³⁹

³⁸ See: Michael Hanne: “The binocular vision project: An introduction” in “Binocular Vision: Narrative and Metaphor in Medicine,” special issue of *Genre: Forms of Discourse and Culture*, 44 no. 3 (Fall 2011), 223–237 and the website of the upcoming conference “Look Both Ways: Narrative and Metaphors in Education” <https://named2017conference.com/>.

³⁹ See, for instance: Jonathan Charteris-Black, *Politicians and Rhetoric: The Persuasive Power of Metaphor* (Basingstoke; New York, NY: Palgrave Macmillan, 2005) and, more broadly, Michael Hanne, “An introduction to the ‘Warring with Words’ project” in Michael Hanne, William D. Crano, and Jeffery Scott Mio (eds.), *Warring with Words: Narrative and Metaphor in Politics* (New York, NY: Hove: Psychology Press, 2015), pp. 1–50.