

#### INTRODUCTION

The following study seeks to understand Paul's letter to the Philippians as an ancient letter of consolation ( $\hat{\epsilon}\pi \iota \sigma \tau \lambda \hat{\eta} \pi \alpha \rho \alpha + \mu \upsilon \theta \eta \tau \iota \kappa \hat{\eta}$ ). It requires little by way of introduction, except perhaps to alert the reader (1) to the difference between the ancient and modern notions of consolation and (2) to the working definition of genre that has been assumed.

According to modern usage there is little difference, if any, between consolation and sympathy. To console someone is for all practical purposes to sympathize with them in their loss. But the ancient Greeks and Romans carefully distinguished between these terms. Ancient consolers were by no means unsympathetic to those afflicted with grief; however, they understood their primary task to be not one of sharing in the grief of others, but one of removing that grief by rational argument and frank exhortation. Plutarch expresses the typical sentiment:<sup>1</sup>

For we do not have need of those who, like tragic choruses, weep and wail with us in unwanted circumstances, but of those who will speak to us frankly and instruct us that grief and self-abasement are in every circumstance useless, serving no purpose and showing no sense.

In extreme cases ancient consolation even took the form of open rebuke, as when Seneca upbraids Marullus:<sup>2</sup>

You are expecting some words of comfort? Receive a scolding instead! You are taking your son's death in a weak and unworthy manner.

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<sup>&</sup>lt;sup>1</sup> De ex. 599B: οὐ γὰρ συνδακρυόντων καὶ συνεπιθρηνούντων ὅσπερ χορῶν τραγικῶν ἐν τοῖς ἀβουλήτοις χρείαν ἔχομεν, ἀλλὰ παρρησιαζομένων καὶ διδασκόντων ὅτι τὸ λυπεῖσθαι καὶ τὸ ταπεινοῦν ἑαυτὸν ἐπὶ παντὶ μὲν ἄχρηστόν ἐστι καὶ γιγνόμενον κενῶς καὶ ἀνοήτώς.

<sup>&</sup>lt;sup>2</sup> Ep. 99.2: Solacia expectas? Convicia accipe. Molliter tu fers mortem filii.



#### 2 Consolation in Philippians

We shall discuss the ancient notion of consolation in more detail below in chapter 3. At this point, however, the reader should be aware that this study employs the term consolation throughout in the ancient sense of combating grief through rational means.

In identifying Philippians as an ancient letter of consolation I mean only that Paul wrote to the Philippians in order to console them (in the ancient sense of the term) and that his letter may be compared helpfully with other ancient documents, including but not limited to other letters, composed for similar consolatory purposes. In other words, I have focused on the broader and, at this point in the discussion, more fruitful questions of function and content and have left aside the question of form, which by most accounts, at least in modern biblical studies, is central to the definition of genre. I do not doubt that a fuller description of the genre of Philippians is possible. It also seems reasonable to me that Philippians might be discussed helpfully in terms of other modalities, say, as a "letter of friendship"  $(ἐπιστολὴ φιλική)^3$  – it was certainly the duty of friends to console one another - or as a kind of "Familienbrief." It is my view, however, that Philippians is first and foremost a letter of consolation and that these and any other generic descriptions identify what are at best secondary modes of discourse.

Special mention should be made of two works on ancient consolation upon which I have relied heavily: Rudolf Kassel, Untersuchungen zur griechishen und römischen Konsolationsliteratur (Zetemata 18; Munich: Beck, 1958) and J. H. D. Scourfield, Consoling Heliodorus. A Commentary on Jerome "Letter 60" (Oxford and New York: Clarendon Press and Oxford University Press, 1993). I have also taken direction on more than a few points

<sup>&</sup>lt;sup>3</sup> For a survey of the scholarship as well as a thoughtful critique of this view, see John Reumann, "Philippians, Especially Chapter 4, as a 'Letter of Friendship': Observations on a Checkered History of Scholarship," in John T. Fitzgerald, ed., Friendship, Flattery, and Frankness of Speech: Studies on Friendship in the New Testament World (NovTSup 82; Leiden, Brill, 1996) 83–106. The presence of friendship language, especially friendship clichés, in Philippians is striking and should be addressed in any comprehensive account of the letter. However, it has not always been duly noted that this language often pertains not to Paul's own relationship with the church, which is what we should expect if Philippians were a letter of friendship between Paul and the Philippians, but to relationships within the Philippian community.

<sup>&</sup>lt;sup>4</sup> Loveday Alexander, "Hellenistic Letter-Forms and the Structure of Philippians," *JSNT* 37 (1989) 87–101. For the category "Familienbrief," cf. Heikki Koskenniemi, *Studien zur Idee und Phraseologie des griechischen Briefes bis 400 n. Chr.* (Helsinki: Kirjakauppa; Wiesbaden: Harrassowitz, 1956) 104–14.



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from John Chrysostom's insightful *In Epistolam ad Philippenses commentarius* (*PG* 62.177–298). I regret that Troels Engberg-Pedersen's bold and insightful book, *Paul and the Stoics* (Edinburgh: T. & T. Clark; Louisville: Westminster John Knox Press, 2000), appeared too late to be used in this study.

The following study falls into two parts. Part I is entitled "Literary and rhetorical contexts." It consists of three chapters and treats in order: the integrity of Philippians, the "rhetorical situation" of Philippians, and ancient consolation as the possible genre of Philippians. Part II, which is entitled "Consolation in Philippians," consists of four chapters and is exegetical. It treats in order: Phil. 1:3–11; 1:12–2:30; 3:1–4:1; and 4:2–23. Needless to say, the exegetical studies in part II are selective, focusing on the consolatory *topoi* and arguments of Philippians.



# Part I

LITERARY AND RHETORICAL CONTEXTS



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#### THE INTEGRITY OF PHILIPPIANS

The literary integrity of Philippians is much debated and must be discussed prior to any study of the letter. It is particularly relevant to our study which argues that the prayer-report of Phil. 1:9–11 is programmatic for the argument of each of the alleged letter-fragments and gives to the canonical letter both a logical and a thematic unity. In this initial chapter we shall examine the case for partitioning. We shall argue that it has not been successfully made and that, on the evidence, it is reasonable to approach Philippians as a unity.

Modern critical reconstructions of Philippians have typically understood it to be a composite of three separate letters,<sup>2</sup> the first two of which at least were written while Paul was in prison. These are, in chronological order: Letter A (4:10–20), a short thank-you

<sup>1</sup> The literary integrity of Philippians was questioned by scholars in the nineteenth and early twentieth centuries, but most dismissed the question as inappropriate given Philippians' casual and letter-like quality. As the image of Paul the letter-writer changed, however, the allegedly disjointed nature of Philippians became a problem. The modern debate over the integrity of the epistle derives from four apparently independent studies published between 1957 and 1960: W. Schmithals, "Die Irrlehrer des Philipperbriefes," *ZTK* 54 (1957) 297–341; revised for *Paulus und die Gnostiker* (TF 35; Hamburg-Bergstedt: Herbert Reich, 1965) 47–87; Eng. trans., "The False Teachers of the Epistle to the Philippians," in *idem, Paul and the Gnostics* (Nashville: Abingdon, 1972) 65–122; J. Müller-Bardorf, "Zur Frage der literarischen Einheit des Philipperbriefes," *WZJena* 7 (1957–58) 591–604; B. D. Rahtjen, "The Three Letters of Paul to the Philippians," *NTS* (1959–60) 167–73; and F. W. Beare, *A Commentary on the Epistle to the Philippians* (London: A. & C. Black, 1959). Subsequent studies have added little to the case for partitioning. On the early debate, see the recent clarifications by David Cook, "Stephanus Le Moyne and the Dissection of Philippians," *JTS* 32 (1981) 138–42; V. Koperski, "The Early History of the Dissection of Philippians," *JTS* 44 (1993) 599–603.

<sup>2</sup> For the two-letter hypothesis, see Joachim Gnilka, *Der Philipperbrief* (HTKNT 10/3; Freiburg: Herder, 1968) 7–10; G. Friedrich, *Der Brief an die Philipper* (NTD 8; 15th edn.; Göttingen: Vandenhoeck & Ruprecht, 1981) 126–8. Gnilka: Letter A: 1:1–3:1a; 4:2–7, 10–23; Letter B: 3:1b–4:1, 8–9. Friedrich: Letter A: 1:1–3:1a; 4:10–23; Letter B: 3:1b–4:9.



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note sent immediately after the arrival of Epaphroditus with a gift from the Philippians; Letter B (1:1–3:1), a letter of reassurance sent upon the return of Epaphroditus; and Letter C (3:2–4:3), a polemical letter or *Kampfbrief* sent at some later date (perhaps after his release) when Paul had become more fully apprised of the theological dangers facing the Philippians. The remaining material in 4:4–9 and 4:21–3 is variously assigned, though usually 4:4–7 and 21–3 are assigned to Letter B.<sup>3</sup> Evidence adduced in support of this hypothesis falls into three categories: (1) various pieces of external evidence suggesting either directly or indirectly that Philippians is a composite; (2) internal evidence pointing to 3:2–4:3 as the fragment of a separate letter; and (3) further internal evidence pointing to 4:10–20 as another fragment. We shall consider these in order.

### External evidence that Philippians is a composite

The evidence for partitioning Philippians is primarily internal. Nevertheless, four pieces of external evidence have been adduced in support of the theory that Philippians is a composite. Three of these support the more general claim that Paul wrote more than one letter to the church at Philippi.<sup>4</sup> They are: (1) the listing of Philippians twice in the *Catalogus Sinaiticus*; (2) the mention of a "first epistle to the Philippians" in the *Chronographia* of the ninth-century Byzantine historian Georgius Syncellus; and (3) a reference by Polycarp at *Ad Phil.* 3.2 to Paul's "letters" (ἐπιστολάς) to the Philippians. Only the third of these, Polycarp's much-discussed plural, is of any historical value. It is uncertain, however, what

<sup>3</sup> See the table in Lukas Bormann, *Philippi. Stadt und Christengemeinde zur Zeit des Paulus* (NovTSup 78; Leiden: Brill, 1995) 110.

<sup>5</sup> A. S. Lewis, ed., *Catalogue of the Syriac MSS. in the Convent of S. Catherine on Mount Sinai* (Studia Sinaitica 1; London: C. J. Clay, 1894) 4–16.

<sup>7</sup> Ad Phil. 3.2: ὃς [Παῦλος] καὶ ἀπῶν ὑμῖν ἔγραψεν ἐπιστολάς, εἰς ἃς ἐὰν ἐγκύπτητε, δυνηθήσεσθε οἰκοδομεῖσθαι εἰς τὴν δοθεῖσαν ὑμῖν πίστιν.

<sup>8</sup> The double listing of Philippians in the *Catalogus*, which in its first mention is assigned the same number of stichoi (318) as Ephesians which immediately precedes

<sup>&</sup>lt;sup>4</sup> Rahtjen, "Three Letters," 167–8. Rahtjen's evidence is typically relegated to the footnotes, even by those who partition the letter: Gnilka, *Philipperbrief*, 11 n. 57; Schmithals, *Paul and the Gnostics*, 81 n. 59.

<sup>6</sup> W. Dindorf, ed., Corpus Scriptorum Historiae Byzantinae (Bonn: Weber, 1828) XII:651 (= 420.14 Mosshammer): Τούτου [Κλήμεντος] καὶ ὁ ἀπόστολος ἐν τῆ πρὸς Φιλιππησίους μέμνηται πρώτη ἐπιστολὴ εἶπὼν, μετὰ καὶ Κλήμεντος καὶ τῶν λοιπῶν συνεργῶν μου. Taken at face value this citation actually counts against the partition theory, since it assigns Phil. 4:3, Letter C according to the critical reconstruction, to ἡ πρὸς Φιλιππησίους πρώτη ἐπιστολή.



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contribution, if any, such evidence can make to the debate over the integrity of Philippians, since all parties readily admit the likelihood of additional correspondence.<sup>9</sup>

Recently Philip Sellew has introduced a fourth piece of external evidence that speaks more directly to the issue of partitioning. Noting that the pseudepigraphic *Epistle to the Laodiceans*, which draws upon Philippians for both its content and structure, contains no reference either to Letter C (Phil. 3:2–4:3 + 4:7–9) or to Letter A (Phil. 4:10–20) of the critical reconstruction, he concludes that the compiler of *Laodiceans* used a version of Philippians lacking both of these fragments and thus similar to Letter B (Phil. 1:1–3:1 + 4:4–6 + 4:20–3). There are at least two major problems with Sellew's analysis. 13

it, is an obvious case of parablepsis (note also the careless omission of 1 Timothy); B. Metzger, *The Canon of the New Testament* (Oxford: Clarendon, 1987) 221 n. 27; A. Souter, *The Text and Canon of the New Testament*, rev. edn. by C. S. C. Williams (London: Duckworth, 1954) 209 n. 3. Syncellus is unreliable and late; B. S. Mackay "Further Thoughts on Philippians," *NTS* 7 (1961) 162.

- <sup>9</sup> Various explanations of Polycarp's plural have been offered. J. B. Lightfoot, ed., *The Apostolic Fathers* (London and New York: Macmillan, 1889) II/3:327, 348, argues that it is a plural used idiomatically for the singular. T. Zahn, *Introduction to the New Testament*, trans. from 3rd German edn., 3 vols. (New York: Scribners, 1909) I:535–6, suggests that it may refer to an early collection of Paul's letters to Macedonia and thus include the Thessalonian correspondence. Walter Bauer, *Die apostolischen Väter*, vol II: *Die Briefe des Ignatius von Antiochien und der Polykarpbrief* (HNT 18; Tübingen: Mohr [Siebeck], 1920) 287, wonders quite plausibly whether Polycarp has simply inferred the presence of additional letters on the basis of 3:1 and Paul's long-standing relationship with the Philippians. Rahtjen, "Three Letters," 167, believes that Polycarp had in his possession several letters from Paul to the Philippians, letters which he contends, on other grounds, were eventually compiled to form the canonical Philippians.
- <sup>10</sup> "Laodiceans and the Philippians Fragments Hypothesis," HTR 87 (1994) 17–28.
- 11 A critical text may be found in Rudolf Anger, Über den Laodicenerbrief. Eine biblisch-kritische Untersuchung (Leipzig: Gebhardt & Reisland, 1843) 155–65; J. B. Lightfoot, St. Paul's Epistle to the Colossians and to Philemon (London: Macmillan, 1892) 281–91; Eng. trans. in Wilhelm Schneemelcher, "The Epistle to the Laodiceans," in NTApoc II.42–6 (1992). It is debated whether Laodiceans, which survives in Latin and several late vernaculars, was originally composed in Greek or Latin. I agree with Sellew ("Laodiceans," 22), who follows Lightfoot (Colossians, 289–91), that Laodiceans was originally composed in Greek.
- <sup>12</sup> Anger, Laodicenerbrief, 155–65; Lightfoot, Colossians, 293–4; Adolf von Harnack, Marcion: Das Evangelium von fremden Gott (Darmstadt: Wissenschaftliche Buchgesellschaft, 1960; reprint of 2nd edn., 1924) Beilage 3, 140; cf. Sellew, "Laodiceans," 28.
- <sup>13</sup> For a more detailed discussion of these problems, see Paul A. Holloway, "The Apocryphal *Epistle to the Laodiceans* and the Partitioning of Philippians," *HTR* 91 (1998) 321–5, with response by Philip Sellew, "*Laodiceans* and Philippians Revisited: A Response to Paul Holloway," *HTR* 91 (1998) 327–9.



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First, it seems that *Laodiceans* does in fact contain a reference to the so-called Kampfbrief of Phil. 3:2-4:3. The relevant text is Laod. 13, which reads: Et quod [reliquum]14 est, dilectissimi, gaudete in Christo et praecavete sordidos in lucro, "And for the rest, beloved, rejoice in Christ and beware of those who are defiled in their pursuit of gain." A number of scholars see here a synthesis of Phil. 3:1 and 2, gaudete . . . praecavete repeating Paul's troubling γαίρετε . . . βλέπετε. 15 Lightfoot reconstructs the Greek: καὶ τὸ λοιπόν, ἀγαπητοί, χαίρετε ἐν Χριστῷ· βλέπετε δὲ τοὺς αἰσχροκερδεῖς. 16 Sellew rejects this interpretation on the grounds that the Vulgate translates the βλέπετε of Phil. 3:2 with videte not praecavete. 17 But this is beside the point, (1) because the Latin text of Laodiceans frequently departs from both the Vulgate and the Old Latin versions of Philippians, <sup>18</sup> and (2) because *Laodiceans* predates the Vulgate translation. <sup>19</sup> To the degree that the Latin translations of Philippians are relevant, a more pertinent question would have been how the Old Latin versions translate βλέπετε. At least one Old Latin version, Frede's Text Type I, derivable from Victorinus' Commentaries on Ephesians, Philippians, and Colossians, translates with the cognate caveo (cavete a canibus).<sup>20</sup>

<sup>14</sup> Mss: *Et quod est*. Anger, *Laodicenerbrief*, 163, supplies *reliquum*, as do Lightfoot, *Colossians*, 286, and Harnack, *Marcion*, Beilage 3, 137–8.

15 Anger, Laodicenerbrief, 162, calls Laod. 13b an "Anspielung an Phil. 3, 2, viell. mit Rücksicht auf V. 7 f"; cf. Lightfoot, Colossians, 291; Karl Pink, "Die pseudopaulinischen Briefe II," Bib 6 (1925) 190. This kind of synthesis is typical of Laodiceans (e.g., Laod. 6 [Phil. 1:13 and 8]; Laod. 7 [Phil. 1:19–20]; Laod. 9 [Phil. 2:1–2]; Laod. 15–16 [Phil. 4:8–9]).

16 Colossians, 294; cf. p. 291. Harnack's reconstruction, παραιτεῖσθε τοὺς αἰσχροκερδεῖς (Marcion, Beilage 3, 139), makes no sense to me, since praecavete clearly does not translate παραιτεῖσθε ("decline" or "avoid," typically rendered with some form of devito [1 Tim. 4:7; 2 Tim. 2:23] or recuso [Acts 15:11]).

17 "Laodiceans," 23 n. 17.

<sup>18</sup> Lightfoot, *Colossians*, 291, has collected the evidence.

<sup>19</sup> By 393 Jerome can report (*De vir. ill.* 5 [*PL* 23.650A]): Legunt quidam et ad Laodicenses, sed ab omnibus exploditur; cf. Theodore Mopsuestia, apud Rabanus Maurus, In Epist. ad Col. (*PL* 112.540B = H. B. Swete, Theodore of Mopsuestia on the Epistles of Paul [Cambridge: At the University Press, 1880] I:301): Unde quidam falsam epistolam ad Laodicenses ex nomine beati Pauli confingendam esse existimaverunt; nec enim erat vera epistola. Pink, "Die pseudo-paulinischen Briefe II," 192, and Metzger, Canon, 183, place the terminus a quo at the middle of the third century. Sellew holds a similar view: "[Laodiceans] was apparently translated [from Greek into Latin], along with the rest of the Corpus Paulinum, as part of a process not yet completely understood, namely, the production of the pre-Vulgate, Old Latin version or versions" ("Laodiceans," 22).

Hermann Josef Frede, Epistulae ad Philippenses et ad Colossenses, in idem, ed.,
Vetus Latina: Die Reste der altlateinischen Bibel (Freiburg: Herder, 1966–71) XXIV/
1:179. Cf. Victorinus, In Epist. Pauli ad Phil. (PL 8.1217C; Albrecht Locher, ed.,



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A similar translation (*cavete canes*) is cited by Ambrose<sup>21</sup> and Augustine.<sup>22</sup>

The second problem with Sellew's analysis is that it fails to consider adequately the kinds of redactional criteria that would have led the compiler of Laodiceans to include some and exclude other material from Philippians. So, for instance, Sellew fails to observe: (1) that Laodiceans, like its companion Colossians (cf. Col. 4:16), was composed as if written from prison;<sup>23</sup> (2) that Philippians was chosen as a model for Laodiceans because it too was a prison letter; (3) that most of the material excerpted from Philippians pertains either directly or indirectly to Paul's imprisonment;<sup>24</sup> and (4) that Phil. 3:2–4:3 (Letter C of the critical reconstruction) contains nothing of Paul's imprisonment and so would naturally have been passed over.<sup>25</sup> Similarly, he fails to observe that everything specific to Paul's relationship with the Philippians has been omitted from Laodiceans. Thus the thanksgiving period of 1:3–11, which speaks of the Philippians' long-standing partnership in the gospel, is quickly passed over, as are Timothy's travel plans in 2:19-24 and the report on Epaphroditus in 2:25-30.26 It is not surprising that the "thank-you note" of 4:10-20, which reiterates the omitted material in 1:3-11, and speaks at length of the gift carried by Epaphroditus, is also omitted on these grounds.

Marius Victorinus. Commentarii in Epistulas Pauli ad Galatas ad Philippenses ad Ephesios [BT; Leipzig; Teubner, 1972] 58.30–1).

<sup>21</sup> Hexameron 5.6 (PL 14.222A; CSEL 32.1.144.10): cavete canes, cavete malos operarios.

<sup>22</sup> Ep. 79 (PL 33.273.8; CSEL 34.2.346.12): cavete canes; In psalm. 67.32.4 (PL 36.833.18; CCSL 39.892): cavete canes; cf. Donatien de Bruyne, Préfaces de la Bible Latine (Namur: Godenne, 1920) 240: admonet etiam ut caveant a pseudoapostolis. Cf. I. Wordsworth and H. I. White, Novum Testamentum Latine (Oxford: Oxford University Press. 1913–41) II:477.

<sup>23</sup> We may set aside the question whether there ever was an epistle to the Laodiceans, which is bound up with the question of the authenticity of Colossians. The compiler of *Laodiceans* simply took Col. 4:16 at face value.

<sup>24</sup> Of the nineteen or so verses excerpted from Philippians (1:2, 3, 12[?], 13, 18–21; 2:2, 12–14; 3:1–2[?]; 4:6, 8–9; 22–3), three of which are taken up with greetings and farewells (1:2; 4:22–3), at least seven directly pertain to Paul's imprisonment (1:12–13, 18–21; 2:12), while six others treat the readers' response to Paul's imprisonment (2:2 [cf. its rendering in *Laod.* 9], 13–14; 4:6, 8–9).

<sup>25</sup> It is also possible that the compiler of *Laodiceans* might have felt that the polemic of Phil. 3 was too pointed for his composition, the purpose of which was simply to fill the gap in the Corpus Paulinum indicated by Col. 4:16.

<sup>26</sup> Sellew, "Laodiceans," 26: "The discussion of Epaphroditus's illness at the end of Philippians 2 presumably had no relevance for the fictional audience in Laodicea."



# 12 Literary and rhetorical contexts

# Internal evidence pointing to Phil. 3:2–4:3 as a letter-fragment

The case for partitioning Philippians rests primarily on internal evidence pointing to 3:2–4:3 as a fragment of a separate letter. This evidence may be summarized in three claims: (1) that 3:2–4:3 reflects a different set of circumstances than 1:1–3:1; (2) that an abrupt shift in tone between 3:1 and 3:2 marks a redactional seam; and (3) that various formal elements and verbal clues in 2:14–3:1 signal the end of a Pauline letter. We shall examine each of these in order.

That 3:2–4:3 reflects a different set of circumstances than 1:1–3:1

According to Robert Jewett, the claim that 1:1-3:1 and 3:2-4:3 presuppose different circumstances is the "most powerful argument yet advanced against the literary unity of Philippians."<sup>27</sup> The claim has been formulated in two ways. Schmithals believes that the change lies with Paul, who in writing 3:2-4:3 was much better informed about the problems facing the Philippians than he had earlier been: "Paul could not so cautiously and so generally exhort [the Philippians] to maintain the unity of the faith, as he does in 1:27–2:18, if he had already available to him the information which he uses in passionate agitation in 3:2ff."<sup>28</sup> Müller-Bardorff, on the other hand, feels that changes have also occurred at Philippi: "in Wirklichkeit handelt es sich . . . nicht nur um einen Stimmungsumbruch seitens des Paulus, sondern im Vergleich zum Vorstehenden [= Phil. 1:27-2:16] um eine total veränderte Situation auch in der Adressatgemeinde."29 In chs. 1-2 Paul is concerned about problems still in the future: a possible schism (Spaltung), a dangerous theological tendency (Richtung).<sup>30</sup> But in 3:18 the problem is well defined and present: "Das võv V. 18 weist auf eine ganz bestimmte, gegenwärtige Situation hin."31 Bornkamm and Gnilka also point

 $<sup>^{27}</sup>$  Robert Jewett, "The Epistolary Thanksgiving and the Integrity of Philippians,"  $NovT\,12\,(1970)\,43.$ 

<sup>&</sup>lt;sup>28</sup> Schmithals, Paul and the Gnostics, 74.

<sup>&</sup>lt;sup>29</sup> Müller-Bardorff, "Frage," 591.

<sup>30</sup> Ibid

<sup>31</sup> Ibid.