

**“THE MORALLY AMBIGUOUS CROWD”:  
THE IMAGE OF A LARGE LAW FIRM IN  
“ANGEL”**

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**INTRODUCTION**

Clifford Chance may imagine itself to be the largest law firm in the world but it is small compared with Wolfram and Hart, the law firm that appeared in the first episode of the television programme “Angel” and featured regularly thereafter during its five series.<sup>1</sup> The series, set mainly in Los Angeles, pits Angel, a 200 year old vampire, together with his friends who work at Angel Investigations, against a series of adversaries, including Wolfram and Hart, in a basic clash of good and evil.<sup>2</sup> This article will examine the way in which large law firms are portrayed in this series.

Although similar to other large law firms in many respects, Wolfram and Hart exists on a grander scale. The series is mainly concerned with the Los Angeles office of Wolfram and Hart but the firm, like Clifford Chance, has “offices in every major city in the world”.<sup>3</sup> However, unlike Clifford Chance, Wolfram and Hart’s offices extend beyond this world, since it exists in more than one dimension.<sup>4</sup> Moreover, rather than being a firm with only a relatively short history, Wolfram and Hart has lasted for at least a thousand

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<sup>1</sup> “City Of . . .”, 1001. (In this article I will follow the convention used in much of the academic literature about “Buffy the Vampire Slayer” of first giving the series number and then the episode number for each programme when referring to particular episodes.) “Angel” is a spin-off from the better-known series, “Buffy the Vampire Slayer”. “Buffy the Vampire Slayer” has already generated a considerable academic literature that includes discussion of the place of law in the series (see further A. Bradney “The Case of Buffy the Vampire Slayer and the Politics of Legal Education” in S. Greenfield and G. Osborn (eds.) “Readings in Law and Popular Culture” Routledge (In press), W. MacNeil “‘You Slay Me!’ Buffy as Jurisprude of Desire” (2003) 24 *Cardozo Law Review* 2421, A. Bradney “‘I Made a Promise to a Lady’: Law and Love in BtVS” (2003) 10 *Slayage: The Online International Journal of Buffy Studies* <<http://www.slayage.tv/>> and A. Bradney “Choosing Laws, Choosing Families: Images of Law, Love and Authority in ‘Buffy the Vampire Slayer’” (2003) 2 *Web JCLI* <<http://www.ncl.ac.uk/~nlawwww/>>. “Angel” ran for five series with a total of 110 episodes which, in the USA, were first broadcast between May 10<sup>th</sup> 1999 and May 19<sup>th</sup> 2004. This article is based on an analysis of the scripts for all of these episodes that are available on a variety of websites and on the videos sold in the United Kingdom.

<sup>2</sup> For a description of the characters and plot of “Angel” see R. Kaveney “She saved the world. A lot: An introduction to the themes and structures of *Buffy* and *Angel*” in R. Kaveney (ed.) “Reading the Vampire Slayer” (2004) (2<sup>nd</sup> ed.) Tauris Parke Paperbacks pp.58-77.

<sup>3</sup> “A Hole in the World”, 5015. One episode, “The Girl in Question” (5020), largely focuses on the Rome office of Wolfram and Hart.

<sup>4</sup> “Through the Looking Glass”, 2021; “Loyalty”, 3015.

years.<sup>5</sup> Nevertheless, despite its much greater size and longevity, Wolfram and Hart exhibits many of the features that are common to both Clifford Chance and other large law firms. Thus, for example, its lawyers have started out as high achievers at law school.<sup>6</sup> Progress within the firm is competitive with frequent reviews.<sup>7</sup> Salaries are high.<sup>8</sup> Even senior employees face dismissal if their results are not good enough.<sup>9</sup> The firm does *pro bono* work and it provides extensive health care facilities for its employees.<sup>10</sup> Comparisons between the fictional Wolfram and Hart and other large law firms should not be exaggerated. When people are sacked from Wolfram and Hart “they use actual sacks”.<sup>11</sup> Employment contracts that lawyers sign with the firm extend beyond death.<sup>12</sup> A lot of it’s “clients are demons, and . . . almost all of them are evil”.<sup>13</sup> Notwithstanding this, in many matters Wolfram and Hart represents a reasonable fictional approximation of a large law firm; not least in the fact that it is “a business” with “a bottom line”.<sup>14</sup>

Hitherto the analysis of the portrayal of large law firms in popular culture, like the analysis of law and lawyers in popular culture in general, has been an underdeveloped area of academic enquiry.<sup>15</sup> In the main enquiry into the work of lawyers in general and large law firms in particular has been enquiry into what these firms and lawyers actually do. However, the separate question of public perceptions about them and their work cannot be ignored because such perceptions inform public debate about the place of lawyers in society. What lawyers, particularly lawyers in large law firms, do in their work is an important question. What they are thought to do is another equally important question. The perceived legitimacy of the lawyer’s role turns on the answer to both these questions. Whilst the former question has received some consideration the latter has received scant attention.<sup>16</sup> This is unfortunate in relation to the analysis of the role that large law firms play in society because, as Flood has argued in relation to stories about lawyers, at

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<sup>5</sup> “Rain of Fire”, 4007. Holland Manners says of Wolfram and Hart “[o]ur firm has always been there. In one form or another” (“Reprise”, 2015). Elsewhere the firm is said to have been founded in 1791 (“Harm’s Way”, 5009).

<sup>6</sup> “Blind Date”, 1021; “Dead End”, 2018.

<sup>7</sup> See, for example, “Reprise”, 2015 and “Dead End”, 2018.

<sup>8</sup> “Sleep Tight”, 3006.

<sup>9</sup> “Deep Down”, 4001.

<sup>10</sup> “Blood Money”, 2012; “Dead End”, 2018.

<sup>11</sup> “Reprise”, 2015.

<sup>12</sup> “Reprise”, 2015; “Home”, 4022.

<sup>13</sup> “Conviction”, 5001.

<sup>14</sup> “Conviction”, 5001.

<sup>15</sup> For a recent example of work done on law and popular culture see S. Machura and P. Robson (eds.) *Law and Film* (2001) 28(1) *Journal of Law and Society*.

<sup>16</sup> The literature on large law firms is mainly American; see, for example, R Nelson “Partners With Power: The Social Transformation of the Large Law Firm” (1988) University of California Press and M. Galanter and T. Palay “Tournament of Lawyers: The Transformation of the Big Law Firm” (1991) University of Chicago Press. However, some work has been done in the United Kingdom; see, for example, R. Lee “Firm Views: Work of and Work in the Largest Law Firms: Research Study No 35” (1999) The Law Society.

times, “the unreal becomes a stand-in for the real”.<sup>17</sup> The picture of Wolfram and Hart painted in “Angel” both reflects and reinforces popular images of, amongst other things, the moral nature of those who work in such enterprises. These images in turn have their impact on a variety of issues from the trust accorded to such firms when it comes to matters such as self-regulation to the question of who might wish to work for such firms. This is not to argue that viewers of “Angel” are naïve, simply accepting whatever images of lawyers in large law firms that are put before them. The whole question of the reception of television series by their audiences is a complex matter and it is clear that audiences can be sophisticated in the way in which they respond to images and arguments that they view.<sup>18</sup> However, for the purposes of this article, it is sufficient to note that the images of lawyers in a large law firm to be found in “Angel” are of interest because they are part of the cultural *mélange* that constitutes the context in which a variety of individual and social decisions about law and lawyering are made. “Angel” is of particular interest because, unlike many other programmes and films about lawyers, it takes a largely negative view taken of the lawyers that appear within it.<sup>19</sup>

### Lawyers’ Work in “Angel”

When Wolfram and Hart are first introduced into “Angel” they describe themselves as a “full service law firm. . . It is our job to see to it that our clients lives run more smoothly”.<sup>20</sup> Their client in the first episode of “Angel”, Russell Winters, is a wealthy businessman with property holdings for whom they are arranging a merger with Eltron, a mutual trust. Winters tells Angel “I pay my taxes. I keep my name out of the paper, and I don’t make waves. And in return I can do anything I want.” The “anything” extends beyond his business deals. Besides being a businessman, Winters is also a vampire who murders young women. Alongside their other work for him Wolfram and Hart organise alibis for him so as to conceal his murders. After Angel has rescued Winters’ latest intended victim from him, the firm employs private investigators to search for Angel. When Angel confronts Winters, Wolfram and Hart’s representative tells Angel they will take action against him for harassing their client. After Angel has killed Winters the lawyer’s immediate reaction is not to report the matter to the police but is, instead, to arrange an internal meeting in Wolfram and Hart to discuss the fact that there is “a new player in town”, specifying that the senior partners in the firm should not be notified. This first episode typifies many of the ways in which lawyers’ work is to be portrayed in the series. The firm is

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<sup>17</sup> J. Flood “Shark Tanks, Sweatshops, and the Lawyer as Hero? Fact as Fiction” (1994) 21 *Journal of Law and Society* 396 at p.402.

<sup>18</sup> See further J. Tulloch “Television Drama: Agency, Audience and Myth” (1990) Routledge Part Three.

<sup>19</sup> Thus Greenfield notes the “historically generally positive screen image of lawyers (S. Greenfield “Hero or Villain: Cinematic Lawyers and the Delivery of Justice” (2001) 28 *Journal of Law and Society* 25 at p.26). On the general portrayal of law and lawyers in film generally see S. Greenfield and G. Osborn “Where Cultures Collide: The Characterisation of Law and Lawyers in Film” (1995) 23 *International Journal of the Sociology of Law* 107.

<sup>20</sup> “City Of. . .”, 1001.

aggressive in pursuit of its ends, hierarchical, willing to engage in a wide range of legal and illegal activities, and entirely ruthless.

As a “full-service law firm”, Wolfram and Hart is wholly unconcerned with obedience to ethical codes of conduct for lawyers or, indeed, the law itself. In “Blind Date” Lindsey McDonald, a lawyer with Wolfram and Hart, is congratulated by a fellow employee for the successful defence of a client, Vanessa Brewer, accused of murder. “I cannot believe you got her off on all charges. Not since *Ostrosky v California* have I seen such devious legal manoeuvring.”<sup>21</sup> Both Lindsey and the firm at large know Brewer to be guilty of the charges and also know that other clients of theirs will want to use her services in the future. Although they ignore codes of conduct themselves, Wolfram and Hart are happy to use such codes aggressively in pursuit of success in litigation. Thus, in “Five by Five”, Lindsey tells an opposing lawyer, “[w]itness tampering is a serious allegation, councilor. And I will be filing a grievance for this remark with the ABA this afternoon.”<sup>22</sup> Another lawyer in Wolfram and Hart, Lilah Morgan, tells a client, “I am a lawyer. I don’t care about the law.”<sup>23</sup> Moreover, Wolfram and Hart is not only unconcerned about obedience to either rules of conduct or law; it is also unconcerned about its clients if its clients’ interests clash with its own. Wolfram and Hart are happy to arrange for an important client, Tony Papazian, to break out of prison but when, instead of quietly disappearing, he tries to murder the police officer in open public, the firm terminate their relationship with him, not because his behaviour is wrong, but because Wolfram and Hart “can’t risk that kind of exposure”.<sup>24</sup> Law, rules of conduct and client loyalty do not motivate Wolfram and Hart; self-interest does.

Many of Angel’s adversaries are evil in the ordinary sense that they, for example, seek illicit wealth or that they take pleasure in inflicting pain on others.<sup>25</sup> Despite one character’s description of them as “[a] law firm technically. . . more like ‘Evil Incorporated’”, Wolfram and Hart’s position is more complex.<sup>26</sup> Lawyers from Wolfram and Hart do engage in actions that are evil in a very simple sense. Lilah Morgan, for example, hires men to kidnap and rape a girl she believes she can train as an assassin for Wolfram and Hart, believing such treatment will make the girl “stronger”.<sup>27</sup> Equally, the firm seeks wealth. In “Blood Money” the firm does *pro bono* work for the East Hills Teen Centre, a shelter for runaway teenagers, as part of a plan to steal two million dollars.<sup>28</sup> More generally, however, Wolfram and Hart’s relationship with that which is immoral and evil is more complex than this.

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<sup>21</sup> “Blind Date”, 1021.

<sup>22</sup> “Five by Five”, 1018.

<sup>23</sup> “Lullaby”, 3009.

<sup>24</sup> “Sense and Sensitivity”, 1006.

<sup>25</sup> See, for example, Lee DeMarco in “The House Always Wins” (4003) and Billy Blim in “Billy” (3006).

<sup>26</sup> “Blood Money”, 2012. Cordelia says as between lawyers and demons “[f]ine line, if you ask me” (“The Ring”, 1016). In another episode Cordelia tells Angel and Darla, another vampire, “you were just soulless blood-sucking demons, they’re lawyers” and Angel replies “[s]he’s right. We were amateurs” (“The Trial”, 2009).

<sup>27</sup> “Untouched”, 2004.

<sup>28</sup> “Blood Money”, 2012.

In “Blind Date” Holland Manners lectures his subordinate, Lindsey, on the firm’s role:

“It’s not about good and evil – it’s about who wields the most power. And we wield a lot of it here and you know what? I think the world is better for it.”<sup>29</sup>

The firm is not so much immoral as amoral; concerned only with playing an endless game. In “Reprise” Manners tells Angel “winning [for Wolfram and Hart] doesn’t enter into it. We – go on – no matter what.”<sup>30</sup> Similarly, Linwood tells his subordinate Lilah,

“[m]y beautiful wife and I raised two and a half million tonight in the fight against cervical cancer. Tomorrow, I’ll stall FDA approval of Parsonal, a very promising treatment for it. Unfortunately one of our clients has a competing drug – not nearly as good but – they’re our clients. We’re in a war you can never win, Lilah, full of sticky moral quandaries. The side you should choose should always be mine.”<sup>31</sup>

Lilah, like Manners, consistently denies the existence of simple moral goods:

“[F]unny thing about black and white – you mix it together and you get grey. And it doesn’t matter how much white you try and put back in, never gonna get anything but grey.”<sup>32</sup>

In the final episode of the fourth series, “Home”, whilst persuading Angel to take up Wolfram and Hart’s offer of control of their Los Angeles office, Lilah urges on Angel the “value of compromise.”<sup>33</sup> In a very early episode, “The Ring”, Lilah tells Angel “[s]ometimes you have to compromise.”<sup>34</sup> To Angel’s retort, “[l]ook the other way you mean when Wolfram and Hart are involved?” Lilah responds, “I prefer to think of it as picking battles you can win”. The firm never acknowledges any deontological notion good or evil. Hamilton, a liaison between Angel and the Senior Partners when Angel does take over management of the Los Angeles branch of Wolfram and Hart, advises Angel, “[t]hink about profits. It’s profits that let you keep this plucky little boatload of good above water.”<sup>35</sup> Even when attempting to bring about an apocalypse the firm acts in a business-like manner, seeking an alliance with a demon because the “[p]artners feel it might speed things along and save a few bucks”.<sup>36</sup>

The picture painted of Wolfram and Hart is one of a large powerful bureaucratic corporation. Its clients are almost always evil. Those it represents range from crooked members of Congress and Senate to crime lords and demons.<sup>37</sup> However, is it itself necessarily evil? In “Home”, having lost a series of confrontations with Angel and his associates, Wolfram

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<sup>29</sup> “Blind Date”, 1021.

<sup>30</sup> “Reprise”, 2015.

<sup>31</sup> “Forgiving”, 3017.

<sup>32</sup> “Habeas Corpses”, 4008.

<sup>33</sup> “Home”, 4022.

<sup>34</sup> “The Ring”, 1016.

<sup>35</sup> “Time Bomb”, 5019.

<sup>36</sup> “Habeas Corpses”, 4008.

<sup>37</sup> “Billy, 3006; “Power Play”, 5021; “Sense and Sensitivity”, 1006; “Loyalty”, 3015.

and Hart try to buy off Angel and his associates by offering them control of the Los Angeles branch of the firm. Lilah says to Angel, “[t]hink of what you can do with the resources of Wolfram and Hart at your fingertips, the difference that would make.”<sup>38</sup> It is, she suggests, an opportunity to “beat they system from inside the belly of the beast”. Eve, Angel’s liaison with the Senior Partners when he agrees to take over the Los Angeles office, tells Angel and his friends, “you’re on the inside now, and you can stop the worst of it. Maybe find some new solutions to some old problems”.<sup>39</sup> The idea implicit in these suggestions is that the firm itself is morally neutral; those who control it determine its moral direction. However, the careers that lawyers have in the firm and in particular the subsequent role of Charles Gunn, one of Angel’s friends who becomes a lawyer when they take over the Los Angeles office, contradicts this idea.

### **Working for Wolfram and Hart**

“Angel” examines in some detail the motivation of three lawyers who work for Wolfram and Hart, Lindsey McDonald, Lilah Morgan and Charles Gunn.<sup>40</sup>

Lindsey McDonald comes from a poor background:

“I’m talking dirt poor – no shoes – no toilet. Six of us kids in a room, and come flue season it was down to four. I was seven when they took the house. They came right in and took it – And my daddy was being nice, you know? Joking with the bastards while he signed the deeds.”<sup>41</sup>

His motivation in working for the firm is money and status:

“Either you got stepped on you got to stepping and I swore to myself that I was not going to be the guy standing there with a stupid grin on my face – while my life got dribbled away.”

He was picked to work for the firm because he was seen to have a “potential for seeing things how they are”. He works hard for the firm and displays great talent. However, despite his ability and success he is ambivalent about whether he can in fact see “things how they are”. In “Blind Date” Manners, Lindsey’s superior, tells Lindsey

“It’s your age. You’re a young man. You’ve hitched your wagon to our star. Oh, and it’s a bright star. But now you are starting to feel a little ‘Is that all there is.’”

Later Lindsey, when says that he wants “my own life”, Manners counsels him to accept that “[n]o-one has their own life. We are all part of something larger”. In return for accepting total commitment to the “something larger”, Wolfram and Hart, Lindsey is offered “a thundering raise and ungodly profits”. Lindsey accepts and becomes a junior partner with a “six-figure

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<sup>38</sup> “Home”, 4022.

<sup>39</sup> “Conviction”, 5001.

<sup>40</sup> A number of other lawyers appear in the programme, several in more than one episode, but their psychology is not explored in same depth.

<sup>41</sup> “Blind Date”, 1021.

salary and a full benefits package”.<sup>42</sup> His subsequent work for the firm gains him the reputation of being “a guy who understands the big picture”.<sup>43</sup> Nevertheless, there continues to be an ambivalence in his relationship with Wolfram and Hart. He allows his personal feelings, including both his animosity for Angel and a developing attachment to the vampire Darla, to affect his judgement; something for which he is censured on several occasions.<sup>44</sup> When the firm seek to entrap Angel they keep Lindsey only partially informed of the plan because they do not fully trust him.<sup>45</sup> At the same time Lindsey finds himself detached from life. Faced with potential death, when Wolfram and Hart’s plan goes wrong, Lindsey finds that he “just doesn’t mind” about either the prospect of his own death or that of lawyers who work for Wolfram and Hart.<sup>46</sup> “Is that all there is” remains his question. Further promotion to the position of Co-vice-president Special Projects does little to improve Lindsey’s relationship with the firm.<sup>47</sup> Although the firm’s policy is not to kill Angel, Lindsey nevertheless tries to engineer this, using his new position and the resources of Wolfram and Hart. Learning of his actions, the firm tells him he is regarded as “expendable”.<sup>48</sup>

Lindsey is not a heroic figure. He does have qualms about the firm’s intention to have three children killed and is willing to conspire against the firm to prevent this happening.<sup>49</sup> However, more usually the firm’s actions leave him morally untroubled. In the few days before his final resignation from Wolfram and Hart, he is happy to suggest a way of protecting the assets of Western Pacific Power, a public utility who have, in his words, “looted 3.5 billion [dollars] since deregulation”.<sup>50</sup> A day later he outlines a strategy to enable Lycor, a company that has sold carcinogenic chocolate, avoid being sued. His inability to work for the firm lies in his unwillingness to accept that he does not have a “life of his own” and his desire for independence not any general repugnance for the firm’s actions.

When Lindsey finds that Darla does not and cannot reciprocate his feelings for her but has had sex with Angel, Lindsey attacks Angel. However, whereas previously he has used his training as a lawyer in his confrontations with Angel, arguing that lawyers they should always fight Angel on their “own turf”, this time he attacks Angel physically; his anger is purely personal, not a reflection of his employment, his new attitude being signalled by the fact he is no longer the be-suited lawyer but is, instead, dressed in jeans and cowboy boots, driving not a company car but a pick-up truck.<sup>51</sup>

A talented musician, whose skill is such as to draw the admiration of Angel’s friends even though they dislike him personally, Lindsey has been unable to continue performing after loosing his right hand in a fight with Angel.<sup>52</sup>

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<sup>42</sup> “Judgement”, 2001.

<sup>43</sup> “Untouched”, 2004.

<sup>44</sup> “Reunion”, 2001; “Dead End”, 2018.

<sup>45</sup> “Darla”, 2007; “Reunion”, 2010.

<sup>46</sup> “Reunion”, 2010.

<sup>47</sup> “Redefinition”, 2011.

<sup>48</sup> “Blood Money”, 2012.

<sup>49</sup> “Blind Date”, 1021.

<sup>50</sup> “Dead End”, 2018.

<sup>51</sup> “Sanctuary”, 1019; “Epiphany”, 2016.

<sup>52</sup> “DeadEnd”, 2018; “To Shanshu in LA”, 1022.

When Wolfram and Hart arrange for him to have a hand transplant he is able to perform again in public. Soon after this he leaves the firm, even though he has just been offered further promotion, because he is “bored with this crap”.<sup>53</sup> Subsequently he leaves Los Angeles in his pick-up truck with just a duffel bag and a guitar case. In the end he has decided, “[t]he key to Wolfram and Hart: don’t let them make you play their game – you gotta make them play yours”.<sup>54</sup> An individualistic, creative figure, Lindsey finds that working in the world of Wolfram and Hart, even with the money they pay him, still leaves him feeling his life is being “being dribbled away”.

By contrast with Lindsey McDonald, Lilah Morgan remains with Wolfram and Hart until and even after her death.<sup>55</sup> Like him she comes from a high-achieving academic background, having been law review editor whilst at law school, and her career matches his up until his departure from the firm.<sup>56</sup> Lilah, even more than Lindsey, exemplifies the ruthlessness of the way in which Wolfram and Hart work. In “Judgement” she tells someone,

“[y]ou have every right to review the contract. . . Of course if you don’t sign we’ll sue your ass of and kill your children. Just kidding, Donald. No-one wants a law suit.”<sup>57</sup>

In “Lullaby” she says, “[t]his [doing a translation] shouldn’t be fun, what it should be is done by morning – or I’ll have your family killed.”<sup>58</sup> When she secures promotion she decapitates her predecessor.<sup>59</sup> Like Lindsey, Lilah sometimes lets her personal feelings affect her judgement at work. In “Billy”, Lilah kills an important client of Wolfram and Hart because he has had her beaten up.<sup>60</sup> She has attachments outside the firm. In the fourth series of “Angel” Lilah pursues an affair with Wesley Wyndham-Price even though he is adversary of Wolfram and Hart. It is Wesley, not she, who eventually ends the affair and she continues to show affection for him even after the affair has finished.<sup>61</sup> Equally Lilah pays for her mother to live in a clinic and tries to comfort her mother, who appears somewhat senile, when her mother ‘phones her at work.<sup>62</sup> However, notwithstanding all of this, Lilah is more fully committed to Wolfram and Hart than Lindsey. She explains to Angel,

“I have been doing this [being a lawyer] a damn long time. I have had to be better, smarter, quicker than every man in Wolfram and Hart. . . It’s a survival thing. I made a lot of devil’s bargains and I stuck to them. As a result, I live somewhat dangerously, and quite comfortably. My mother, who no longer recognises me, has the best room at the clinic. I get up every morning, put on my game face and do what I have

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<sup>53</sup> “Dead End”, 2018.

<sup>54</sup> “Dead End”, 2018.

<sup>55</sup> “Calvary”, 4012; “Home”, 4022.

<sup>56</sup> “Dead End”, 2018.

<sup>57</sup> “Judgement”, 2001.

<sup>58</sup> “Lullaby”, 3009.

<sup>59</sup> “Deep Down”, 4001.

<sup>60</sup> “Billy”, 3006.

<sup>61</sup> “Habeas Corpses”, 4008; “Home”, 4022.

<sup>62</sup> “Sleep Tight”, 3016; “Loyalty”, 3015.

to do. . . The game face – the one that I worked so hard to get – I became that years ago.”<sup>63</sup>

Lilah is a lawyer for Wolfram and Hart and, notwithstanding her attachments elsewhere, she has little in her life outside of being a lawyer for Wolfram and Hart. Whilst her affection for Wesley is genuine it does not prevent her from manipulating him during their affair in her attempts to fight Angel on Wolfram and Hart’s behalf.<sup>64</sup> Lilah’s accepts Manners dictum that one has to acknowledge that one is part of “something larger” and is wholeheartedly a lawyer for Wolfram and Hart, uncomplainingly accepting that her employment with them continues even after her death. “I knew what I signed up for.”<sup>65</sup>

The career of Charles Gunn, one of Angel’s friends, offers the clearest indication of the inherent moral nature of Wolfram and Hart. In the first series of “Angel” Gunn appears as a young man who is living on the streets and fighting vampires.<sup>66</sup> In the second series he starts to work for Angel Investigations.<sup>67</sup> Unlike Angel’s other friends Gunn has neither supernatural talents nor exceptional intelligence or knowledge. He is there when there is a need for “muscle”.<sup>68</sup> When Angel takes over the Los Angeles office of Wolfram and Hart Angel’s various friends from Angel Investigations are given control of divisions within the office. Gunn expects to be assigned to be in charge of security in accordance with his perception of his talents.<sup>69</sup> In fact Wolfram and Hart’s doctors use surgery to “enhance his mind with a comprehensive knowledge of law” and he becomes a lawyer.<sup>70</sup> Angel and his friends are apprehensive about this change although Gunn sees the matter more positively, protesting that “[l]ook it’s me here. They didn’t evil me up. All I got stuck in my head was the law.” Gunn is thus different to Lindsey and Lilah in that he becomes a lawyer in Wolfram and Hart having spent years fighting the clients who Wolfram and Hart represent. Gunn goes to work for Wolfram and Hart hoping to change its moral direction from within, believing that, “sometimes you gotta work the system before it works you”.<sup>71</sup>

Making immediate use of his new legal knowledge, Gunn is able both to secure a mistrial for Corbin Fries, a crime lord, who has threatened to set off a bomb if he is convicted and also delay the date for the retrial, meaning that Fries will have to reduce the scale of his criminal activities whilst he awaits retrial. Gunn “save[s] the day, without ever resorting to violence”.<sup>72</sup> In subsequent episodes Gunn continues to use his legal skills to help Angel.<sup>73</sup> In “The Cautionary Tale of Numero Cinco”, after Angel has signed documents that Gunn has drafted, he tells Angel

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<sup>63</sup> “Sleep Tight”, 3016.

<sup>64</sup> “Slouching Towards Bethlehem”, 4004.

<sup>65</sup> “Home”, 4022.

<sup>66</sup> “War Zone”, 1020.

<sup>67</sup> “Untouched”, 2004.

<sup>68</sup> “Are You Now or Have You Ever Been”, 2002.

<sup>69</sup> “Home”, 4022.

<sup>70</sup> “Conviction”, 5001.

<sup>71</sup> “Damage”, 5011.

<sup>72</sup> “Conviction”, 5001.

<sup>73</sup> “Just Rewards”, 5002.

“[a]s CEO and president of Wolfram and Hart, you have just bankrupted a company that dumps raw demon waste into Santa Monica bay, banished a clan of pyro warlocks into a hell dimension, and started a foster care programme for kids whose parents have been killed by vampires. Not bad for a day’s pay.”<sup>74</sup>

Angel and his other friends continually question whether they were wise to take control of Wolfram and Hart’s Los Angeles office but Gunn is the most optimistic of them in his attitude to the change. “[W]e’ve done more good here in a month than Angel Investigations did in a year” he tells Angel in “The Cautionary Tale of Numero Cinco” whilst later, in “Damage”, he says

“we’ve been able to do some serious good while we’re here. Lives saved, disasters averted, with all our fingers and souls still attached. End of the day I’m thinking we made the right choice”.<sup>75</sup>

Gunn, however, slowly begins to take on the values of the firm. In “Soul Purpose” Gunn and the others discuss the best way to deal with Lucien Drake, a warlock and cult leader:

“Gunn: . . . a cult this big has alliances, connections. If we confront them directly, it could be very bad for business.

Wesley: But if we eliminate their leader covertly.

Gunn: . . . then they spend the next billing cycle fighting themselves to hack out the new pecking order.

Angel: Uh-huh. . . So are we doing this because it is right. . . or because it is cost-effective?

Gunn: Uh, well, a little of both actually.”<sup>76</sup>

Gunn has taken to heart Eve’s stricture to remember, when thinking about Wolfram and Hart, that “[w]e’re a business, and we have a bottom line”.<sup>77</sup> More than this, Gunn feels his new knowledge and talents as a lawyer have given him a status he did not previously possess. When Angel threatens to resign from Wolfram and Hart after a client of theirs, who Gunn has been advising, murders five nuns in order to escape this dimension Gunn argues that they cannot and should not leave the firm. When Angel challenges him as why he is taking this view, “[a]nd I am sure that legal brain upgrade they gave you has got nothing to do with this”, Gunn acknowledges, “[w]e all got something out of this”.<sup>78</sup> Later, when he finds he is losing his legal knowledge, because the brain implant he has been given was only temporary, he finds that he does not want to “go back to who I was”.<sup>79</sup> In return for a permanent implant, which make him not “the ignorant street muscle. . . the high-school dropout” but instead “Charles Gunn, Attorney at Law”, he agrees to help get a shipment of merchandise, currently being held at

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<sup>74</sup> “The Cautionary Tale of Numero Cinco”, 5006.

<sup>75</sup> “The Cautionary Tale of Numero Cinco”, 5006; “Damage”, 5011.

<sup>76</sup> “Soul Purpose”, 5010.

<sup>77</sup> “Conviction”, 5001.

<sup>78</sup> “You’re Welcome”, 5012.

<sup>79</sup> “Smile Time”, 5014.

customs, into the country. He does this knowing that “there would be consequences” to his agreement lying beyond dealing with the customs problem.<sup>80</sup> The consequences soon turn out to be, amongst other things, the death of his friend and former lover, Winifred Buckle.<sup>81</sup> Whilst Gunn realises his error and, in the remaining episodes of the series, uses his legal knowledge to fight Wolfram and Hart, the argument seems to be clear; in working as a lawyer for Wolfram and Hart Gunn lost sight of the distinction between good and evil.<sup>82</sup> In the final episodes of “Angel” Gunn is to return to being the heroic figure, eventually dying fighting as a street warrior.<sup>83</sup>

In different ways these stories about lawyers in Wolfram and Hart seem to demonstrate the impossibility of acting morally or even of achieving self-satisfaction if one works in a large law firm. Even Lilah, who appears most content with the job, can do this only at the expense of being nothing other than a lawyer whose dominant purpose in life is to “wield the most power”.<sup>84</sup> Attempting to subvert the system from within fails because,

“[a] place like that [Wolfram and Hart] doesn’t change. . . not from the inside. Not from the out. You sign on there, it changes you. Puts things in your head. Spins your compass needle round till you can’t cross the street without tripping the proverbial old lady and stepping on her glasses.”<sup>85</sup>

Even though Angel thinks he made,

“[m]ade some devil’s bargain to take over this company. Thought you’d use it to fight the evil of the world from inside the belly of the beast. Trouble is you’re too busy fighting to see you and yours are getting digested.”<sup>86</sup>

In the first series Angel told Lindsey, “you sold your soul for a fifth-floor office and a company car.”<sup>87</sup> In the final series Cordelia Chase, who has worked for Angel Investigations, tells Angel that

“[t]hey seduced you with all their fancy facilities, manpower. They threw a whole bunch of money at you, plied you with expensive toys and penthouses with spectacular views. . .”<sup>88</sup>

Dismissing his assertion that “we’ve done some great work here [at Wolfram and Hart]”, Cordelia tells him that has become “CEO of Hell, Incorporated”. In a world divided into good and bad large law firms are inherently bad and, even if some of the people who work for them are themselves not evil, “just opportunistic. They’ll go with the flow”, the direction of that flow is always,

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<sup>80</sup> “Underneath”, 5017.

<sup>81</sup> “A Hole in the World”, 5015.

<sup>82</sup> “Underneath”, 5017; “Time Bomb”, 5019.

<sup>83</sup> “Not Fade Away”, 5022.

<sup>84</sup> “Blind Date”, 1021.

<sup>85</sup> “Soul Purpose”, 5010.

<sup>86</sup> “Just Rewards”, 5002.

<sup>87</sup> “Blind Date”, 1021.

<sup>88</sup> “You’re Welcome”, 5012.

in the end, going to be evil.<sup>89</sup> Lawyers, at least lawyers in large law firms, are “the morally ambiguous crowd”.<sup>90</sup>

### **Wolfram and Hart and Large Law Firms**

The sheer fictionality of “Angel” may make it seem far-removed from the concerns of real-life large law firms. Real-life large law firms, unlike Wolfram and Hart, do not employ mind readers or demons or raise vampires from the dead.<sup>91</sup> Such law firms typically have corporations as clients rather than the individuals that Wolfram and Hart represent. Large law firms, unlike Wolfram and Hart, do not have a lot of criminal law business.<sup>92</sup> Television programmes that purport to be real-life accounts of the work of lawyers might be relevant to how lawyers are perceived by society at large, it could be argued, but “Angel” is nothing more than entertainment. However, against this it is necessary to consider the dramatic weight that the Wolfram and Hart must carry in the series. The firm is the counter-balance to Angel, an immortal vampire with supernatural strength, who is a “champion of the hapless human race”, who believes the world to be “harsh and cruel” but who nevertheless lives in the world as though it were “what it should be, to show it what it can be”, who does things because they are “the right thing to do...in spite of the fact that there is no shiny reward at the end of the day...other than the work itself” and who “still believes in being a hero”.<sup>93</sup> That, in a popular television series, a large law firm can be seen as being both a plausible opponent for, and a moral opposite to, such a figure says something about both power that such firms are commonly thought to possess and the place that their mores are assumed to occupy in the viewers’ consciousness.<sup>94</sup> Moreover, close examination of the programme shows that there is much in the behaviour of Wolfram and Hart and its lawyers that matches concerns that have been expressed about lawyers.

Whatever else it is, Wolfram and Hart is a business.<sup>95</sup> The relationship between the notion of law firms as professional partnerships and law firms as businesses has long been the subject of debate and disquiet. As long ago as

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<sup>89</sup> “Conviction”, 5001.

<sup>90</sup> “Reprise”, 2015. “Angel” is not unique in coming to this conclusion. Morawetz notes that lawyer jokes “imply that both lawyers *and* the profession itself are corrupt *ab initio*, and that neither is capable of salvation” (T Morawetz “Teaching Professionalism: The Issues and the Antinomies” in K Economides (ed.) “Ethical Challenges to Legal Education and Conduct” (1998) Hart Publishing p 228).

<sup>91</sup> “Blind Date”, 1021; “Origin”, 5018; “To Shanshu in LA”, 1022.

<sup>92</sup> See R. Lee “Firm Views: Work of and Work in the Largest Law Firms: Research Study No 35” (1999) The Law Society p.23. See also J. Lewis with J. Keegan “Defining Legal Business: Understanding the work of large law firms: Research Study No 27” (1997) at p.3.

<sup>93</sup> “City of . . .”, 1001; “Deep Down”, 4001; “The Cautionary Tale of Numero Cinco”, 5006.

<sup>94</sup> In so doing the series plays with and subverts a more traditional image of lawyers as being akin to vampires. On Dracula as a lawyer and the role of lawyers in “Dracula” see A. McGillivray “He Would Have Made a Wonderful Solicitor: Law, Modernity and Professionalism in Bram Stoker’s *Dracula*” in W. Wesley Pue and D. Sugarman “Lawyers and Vampires: Cultural Histories of Legal Professions” (2003) Hart Publishing.

<sup>95</sup> “Conviction”, 5001.

the 1920s Frankfurter, amongst others, lamented the rise in the USA of large firms that took business practice as their organisational ideal.<sup>96</sup> In the current era, in a study of large law firms, Galanter and Palay have argued both that “[f]irms have become more openly commercial and profit-oriented, ‘more like business’” and that, because of this, “legal elites. . . must address more informed, cynical and critical publics without. . . the mantle of altruistic professionalism”.<sup>97</sup> Such concerns also come from within the legal profession. Seneviratne notes that “[t]he majority of the legal profession [in the 1970s] did not consider law to be a business and felt a concern with markets and greater productivity would kill the idealism of the legal profession.”<sup>98</sup> Large law firms themselves seem to be aware of such criticism. Many engage in *pro bono* activities; so does Wolfram and Hart.<sup>99</sup> Wolfram and Hart’s *pro bono* work masks an attempt to steal two million dollars. Boon and Abbey have argued that large law firms use *pro bono* work as part of an attempt “to recapture practices strongly identified with emergence of professionalism” and thus to “re-establish or reinforce the integrity of the legal profession in the public mind”; indeed the Solicitors’ *Pro Bono* Group’s chief executive has been quoted as suggesting that engaging in *pro bono* work is a way of regaining public respect.<sup>100</sup> Whether, given the tiny fraction of large law firms’ resources that are invested in such work, this is a more or less cynical attitude than that of Wolfram and Hart is a moot point. For the purposes of this article it is enough to note the resonance that the commercial attitudes of Wolfram and Hart have with those of real-life large law firms.

Wolfram and Hart’s concern to act in a business-like manner is one point of contact with real-life large law firms; so is their lawyers’ attitudes towards morality. Wolfram and Hart’s lawyers consistently deny the relevance of ethics to the work that they do. This denial is either based on the premise that there are no clear ethical choices to be made or that ethics are irrelevant

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<sup>96</sup> J. Auerbach “Unequal Justice: Lawyers and Social Change in Modern America” (1976) Oxford University Press, pp.139-144. See also M. Galanter and T. Palay “Large Law Firms and Professional Responsibility” in R. Cranston (ed.) “Legal Ethics and Professional Responsibility” (1995) Clarendon Press at p.193.

<sup>97</sup> M. Galanter and T. Palay “Tournament of Lawyers” (1991) University of Chicago Press p.51 and p.75. See also Galanter and Palay (1995) *op.cit.* at 190.

<sup>98</sup> M. Seneviratne “The Legal Profession: Regulation and the Consumer” (1999) Sweet and Maxwell p.4.

<sup>99</sup> “Blood Money”, 2012. The Solicitors’ *Pro Bono* Group “includes 40 per cent of the top fifty law firms” (A. Boon and A. Whyte “Charity and Beating Begins at Home”: The Aetiology of the New Culture of *Pro Bono Publico*” (1999) 2 *Legal Ethics* 169 at p.183. See also Galanter and Palay (1995) *op.cit.* at p 198 and S. Browne “A Survey of *Pro Bono* Activity by Students in Law Schools in England and Wales” (2001) 35 *The Law Teacher* 33.

<sup>100</sup> A. Boon and R. Abbey “Moral Agendas: *Pro Bono Publico* in Large Law Firms in the United Kingdom” (1997) 60 *Modern Law Review* 630 at pp.631. See also D. Nicholson and J. Webb “Professional Legal Ethics: Critical Interrogations” (1999) Oxford University Press p.77. There are other motivations for engaging in *pro bono* work including the fact that corporate clients insist on law firms doing it as part of their own bid to demonstrate “corporate citizenship” (Boon and Whyte *op.cit.* p.190); “Clients put pressure on law firms to do *pro bono* work” *The Lawyer* 15<sup>th</sup> March 2004.

to their work.<sup>101</sup> Here again art mirrors reality. In Griffiths-Baker's study of the application of conflict of interest rules by solicitors she notes that large law firms regularly assert that the Law Society's rules on such matters are too simplistic for the commercial complexities of their large corporate clients whilst de Groot-van Leeuwen's conclusion, drawn from her interviews with Dutch lawyers, is that lawyers "escape from ethical reflection by phrasing all problems they encounter in purely legalistic terms".<sup>102</sup> Even the use by lawyers of professional codes of conduct can, on occasion, be seen as itself being an example of lawyers denying the application of ethics to their work.

"[Young attorneys] deal with moral ambiguity by relying on professional ethics rather than personal codes. As long as their behaviour breaks none of the canons of professional responsibility, they are absolved of guilt."<sup>103</sup>

Wasserstrom, in his analysis of legal ethics, argues that,

"the lawyer-client relationship renders the lawyer at best systematically amoral and at worst more than occasionally immoral in her dealings with the rest of humanity."<sup>104</sup>

As Wolfram and Hart put it the large law firm's job is simply "to see to it that our clients lives run more smoothly".<sup>105</sup> There are, of course, differences between what Wolfram and Hart will do for their clients and what other law firms will see as being proper. Wasserstrom, for example, observes that "[a] lawyer cannot bribe or intimidate witnesses to increase the likelihood of securing an acquittal" but Wolfram and Hart see no such limitations on their work.<sup>106</sup> Nevertheless, there is once again a resonance between the behaviour of Wolfram and Hart and concerns about the behaviour of large law firms.

Lindsey leaves Wolfram and Hart because he is "bored with this crap".<sup>107</sup> Clifford Chance and other large law firms seem to have similar problems with their employees. In Lee's analysis of large law firms he observes that "[t]here was a continual report from the partners interviewed that they were witnessing a change in attitude in the modern generation of solicitors coming through the system" with increasing numbers of solicitors leaving firms because they found the life-style unacceptable.<sup>108</sup> Part of the reason for this

<sup>101</sup> See, for example, "Habeas Corpses", 4008 and "Blind Date", 1021.

<sup>102</sup> J. Griffiths-Baker "Serving Two Masters: Conflict of Interest in the Modern Law Firm" (2002) Hart Publishing pp.123-131; L. de Groot-van Leeuwen "Lawyers' moral reasoning and professional conduct, in practice and education" in Economides *op.cit.* p.238

<sup>103</sup> R. Gramfield "The Politics of Decontextualized Knowledge: Bringing Context into Ethics Instruction in Law School" in Economides *op.cit.* p.312. Gramfield's work is based on interviews of both lawyers working in large law firms and lawyers working in other situations (Gramfield *op.cit.* p.308).

<sup>104</sup> R. Wasserstrom "Lawyers as Professionals: Some Moral Issues" in J. Callahan (ed.) "Ethical Issues in professional Life" (1988) Oxford University Press p.58.

<sup>105</sup> "City of . . .", 1001.

<sup>106</sup> Wasserstrom *op. cit.* p.60; "City of . . .", 1001.

<sup>107</sup> "Dead End", 2018.

<sup>108</sup> Lee *op. cit.* pp.52-53. See also R. Lee "'Up or Out' – Means or Ends? Staff Retention in Large Firms" in P. Thomas (ed.) "Discriminating Lawyers" (2000) Cavendish Publishing.

lies in factors like long working hours but, more widely, Kronman has argued that in the context of ,

“the explosive growth of the country’s leading law firms, which has changed forever the practice of lawyers in them and created a new, more openly commercial culture”

that there thus arises “a crisis of morale. It is the product of growing doubts about the capacity of a lawyer’s life to offer fulfilment to the person who takes it up.”<sup>109</sup> Notwithstanding the high salaries they offer, large law firms do not automatically attract the recruits that they need. Galanter and Palay note that in the 1960s the number of law graduates seeking to enter large law firm practice in the USA “dropped precipitously”, partly because graduates sought other occupations that gave them deferment from the Vietnam War draft and partly because of “disdain for corporate practice”.<sup>110</sup> Once again large law firms are aware of such problems. In his study of the US firm that he calls Spencer, Grace and Robbins, Lazega notes that:

“[i]n the presentation of the firm to prospective law students, and in partners’ discourse about their firm, it was stressed that members cared about their personal and family life.”<sup>111</sup>

How deeply felt such sentiments are is a matter for conjecture. Holland Manners tells Lindsey

“your hard work isn’t all they [the senior partners] notice. It’s also important to have healthy attachments outside the office. Now I know our roles here don’t allow much time to socialize. Find the time.”<sup>112</sup>

Despite this comment Manners’ stress on the importance of Lindsey being fully committed to “the larger whole” of Wolfram and Hart seems to be a much more accurate description of his view of the life of a lawyer in a large law firm.<sup>113</sup>

“[P]eople within contemporary practice organizations think of themselves (and are treated) less as independent professionals and more as instruments or employees of organizations.”<sup>114</sup>

Having just had a pistol held to her head in the course of her employment, Lilah find that her superior Linwood’s main concern it to reprimand her for not keeping him fully informed of developments rather than to express concern about her safety.<sup>115</sup> A partner in Spencer, Grace and Robbins reports that, notwithstanding the firm’s rhetoric, “[y]ou get very little emotional reward or support [within the firm]”.<sup>116</sup> Once again the connections between

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<sup>109</sup> A. Kronman “The Lost Lawyer” (1993) Harvard University Press p.4 and p.2.

<sup>110</sup> Galanter and Palay (1991) *op. cit.* pp.55-56.

<sup>111</sup> E. Lazega “The Collegial Phenomenon: The Social Mechanisms of Cooperation Among Peers in a Corporate Law Partnership” (2001) Oxford University Press p.70.

<sup>112</sup> “Reunion”, 2010.

<sup>113</sup> “Blind Date”, 1021.

<sup>114</sup> M. Kelly “Lives of Lawyers: Journeys in the Organizations of Practice” (1996) University of Michigan Press p.2.

<sup>115</sup> “Forgiving”, 3017.

<sup>116</sup> Lazega *op. cit.* p.98.

Wolfram and Hart and real-life large firms are clear. Sennett has suggested that one of the problems of contemporary life lies in the worry that a parent cannot:

“offer the substance of his work life as an example to his children of how they should conduct themselves ethically. The qualities of good work are not the qualities of good character.”<sup>117</sup>

This problem is not limited to large law firms but it is nonetheless a question for large law firms. It may only be lawyers in Wolfram and Hart who “pull . . . [their] firstborn out of company care to offer it up [as sacrifice]” when appraisal comes round but in Lee’s study of large law firms “the balance between family life and working life was a topic which everyone freely discussed as a matter of concern”.<sup>118</sup>

### “Angel”, Lawyers, Large Law Firms and Self-Regulation

The picture painted of Wolfram and Hart and those that work for it in “Angel” is of consequence for all lawyers. Lawyers, like other professional groups, occupy an unusual position in society. Their assertion of a right to self-regulation is reflective of a more general contention that the nature of their work is, in significant ways, different to modes of production found more generally within society. Their work, it is said, is done, at least in part, for the public good and involves some end that is important in itself.

“[T]he continuing legitimacy of a profession’s social role derives from the nature of the good which it secures for citizens and on its effectiveness in securing that good. Health is the good pursued by the medical profession and, it is usually asserted, justice is the good pursued by the legal profession.”<sup>119</sup>

The provision of such goods involves those who provide them in considering more than the commercial interests of either themselves or their clients; on this basis a whole range of professional privileges are therefore said to be justified.<sup>120</sup> Such suggestions are not accepted lightly and, even if accepted, are, as is illustrated by the current “Review of the Regulatory Framework for Legal Services in England and Wales”, subject to continual re-examination.<sup>121</sup> The rise of the large law firm has added to doubts about the veracity of the proposition that the work of lawyers is different from other work done in the commercial sector.<sup>122</sup> The impact that large law firms have had on debate is two-fold. First, because they are organized differently from either small law firms or lone practitioners a series of specific questions about how they relate to the professional ideal arise. Secondly, their size and commercial value means that they “present a powerful image of legal

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<sup>117</sup> R. Sennett “The Corrosion of Character” (1998) W. Norton p.21.

<sup>118</sup> “Reprise”, 2015: Lee *op. cit.* p.59.

<sup>119</sup> A. Boon and J. Levin “The Ethics and Conduct of Lawyers” (1999) Hart Publishing p.22.

<sup>120</sup> Boon and Levin *op. cit.* p.50.

<sup>121</sup> “Report of the Review of the Regulatory Framework for Legal Services in England and Wales” (The Clementi Report) (2004).

<sup>122</sup> See, for example, Galanter and Palay (1995) *op. cit.* p.193.

practice which influences the perception of the public and policy makers”.<sup>123</sup> Thus the image of large law firms can easily become the image of lawyers in general. This image may not be accurate, Maimoon, McEwen and Mather comment on the “sharp cleavage between attorneys with corporate or business clients and those with individual clients”, but, nevertheless, it cannot be ignored.<sup>124</sup> For this reason the portrayal of Wolfram and Hart in “Angel” is of consequence to all lawyers and all law firms. The Law Society of England and Wales recently ran an advertising campaign which was designed to enhance the image of the profession under the slogan “my hero, my solicitor”.<sup>125</sup> The example of Wolfram and Hart as the evil large law firm elides easily into the proposition that all law firms are, if not evil, at least untrustworthy and certainly not heroes. An age that finds Wolfram and Hart a more plausible characterisation of lawyers than Atticus Finch from “To Kill a Mocking Bird” may not be one that will continue to accept the legitimacy of lawyers’ claims for self-governance.

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<sup>123</sup> Boon and Levin *op.cit.* p.77.

<sup>124</sup> R Maimoon, C. McEwen and L. Mather “The Future of the Legal Profession in Practice” (1999) 2 *Legal Ethics* 71 at pp.73-74.

<sup>125</sup> 6<sup>th</sup> September 2004 <<http://www.lawsociety.org.uk/newsandevents/pressreleases.law>>