Illustrated Judgments

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Abstract. Legal information institutes (LIIs) are publishers. Today, a new form of legal literature, that some have called "electronificated," needs to be addressed by the legal publishing industry. This paper wants to bring the new phenomenon of the growing use of a variety of non-textual elements in judicial opinions to the attention of LIIs.

At inception, LII web sites were strongly innovative. The challenge created by the multimedia nature of today's legal literature is one more opportunity for LIIs to show leadership as designers of tomorrow's legal information systems.

Keywords: Legal publishing, Non-textual elements in judgment, Long-term accessibility

> "Other writers may have the assistance of elegant typography and graphic illustration. The judge is armed only with the figurative pen." (Aldisert 2009, p. 2)

1. Introduction

The legal information institutes that join together to form the Free Access to Law (FAL) movement are legal publishers. They maintain publishing infrastructures, collect legal documents and make those documents accessible. Arguably, they are also more than this. They strive to innovate, to exploit new technological opportunities to transform the circulation of legal information. They campaign for and collaborate in promoting the right to access law. Nonetheless, as legal publishers, they have publishers' issues, one of which is coping with the transformation of legal literature as it employs more multimedia.

Today, media are evolving towards a mix of text, images, sounds and video. The phenomenon has been described at length. Studies, such as those led by Manovich, have provided good descriptions of new media, for example:

> "Today, as media is being "liberated" from its traditional physical storage media — paper, film, stone, glass, magnetic tape […]. A digital designer can freely mix pages and virtual cameras, table of contents and screens, bookmarks and points of view. No longer embedded within particular

> texts and films, these organizational strategies are now free floating in our culture, available for use in new contexts." (Manovich 2001, p. 83)

Our own experiences as media consumers shows us that newspapers, for instance, are no longer as they used to be. The Internet version of our morning paper is more media rich than the one that comes to our doorstep. The Internet edition of *La Presse* offers the usual editorial content but also search tools, video clips, almost real-time stock quotes, user's comments, rankings of content items and other features made possible only by the new digital media. Our paper is more alive when it is enjoyed on digital media.

Legal language cannot avoid being influenced by this trend. Professor Ethan Katsh was one of the first to anticipate the "electronification" of legal literature. As early as 1989, in his seminal book The Electronic Media and the Transformation of Law, Katsh wrote that we must be prepared for novel forms of output:

> "Textual information on paper will not disappear, and not every message will include text, pictures, motion, sound, and smell. But combinations that are now unfamiliar to us will begin to appear, and formats that have been restricted because of the technology of print and the limitations of existing cables will gradually surface." (Katsh 1989, p. 261-262)

More recently, the Conference of Court Public Information Officers (CCPIO) in the United States presented a report based on a survey about new media and the courts. The survey and resulting report identified five future trends; one of them is especially relevant with respect to the evolution of the legal literature:

> "Courts will continue to be primary content providers and develop more sophisticated multimedia communications capabilities. […] Courts will develop increased capabilities in the use of RSS, blogs, embedded video, social media, image sharing, microblogging and other multimedia technologies that facilitate direct connections with the public. The new media environment is changing public expectations." (CCPIO 2010, p. 89)

The judicial language evolution and its effect on publishers' work are the main objects of this paper.

2. Previous Examination of Illustrations in Judgments

Various authors have observed that the language of the law cannot avoid being influenced by its media. A comprehensive study of these relationships goes far beyond the ambitions of this short paper, but a good start to understanding them can be found in Professor Ethan Katsh's 1989 book: *The*

New Electronic Media and the Transformation of the Law[1]. In that book, his first, Katsh notes that the advent of the printing press influenced the law by permitting the expression of more conceptual, abstract thought. He further observes that: "[w]riting and print contributed to the growth of a legal process that became increasingly dependent on abstract thought by providing a tangible form to something invisible and intangible." (Katsh 1989, p. 253) Katsh also describes how the advent of the printing press started a process of separating illustrations and text, and how that separation serves the law, which requires abstraction to state generally applicable rules. Katsh observes that text-only documents still serve this need well today.

The author revisits the question in his second book, which was published in 1995: *Law in a Digital World*. He observes that "there will be ongoing pressures from the computer for law to accommodate itself to the visual and to employ new means to communicate." (p. 145) Law could, conceivably, resist, but according to Katsh:

> "What is more likely to occur, however, is that the law will join some other disciplines and professions in entering a more lighted and colorful environment. It will begin to discover uses for communicating visually, begin to employ graphical images more frequently, begin to see various advantages to visual communication, and, perhaps slowly, begin to adapt to a more visual model of law."(p. 152)

Katsh develops his analysis further by identifying uses for visual elements in legal discourse: for persuasion, expressing measures and monitoring activities, and for recording legal events.

Kenneth H. Ryesky published a well-researched paper describing a long list of uses of non-textual data in American case law (Ryesky 2002). His paper inventories no less than 50 types of illustrations, such as maps, product labels, accident scene schema, cattle brands, etc. in almost as many fields of law, including patent, estate and commercial transaction law. Ryesky observes that non-textual data of ever-growing complexity appear in judicial opinions with increasing frequency. He is in favour of non-textual additions. He writes:

> "The use of non-textual data in judicial opinions can thus be traced back quite far, and in many cases has been critical to fully imparting the meaning of the opinion. Information technologies now facilitate, as never before, the efficient and accurate incorporation and preservation of non-textual data into durable documents that can be efficiently and expeditiously made available to the bench, bar, and public at large." (p. 365)

In *Reconfiguring Law Reports and the Concept of Precedent for a Digital Age* (2007), Professor Peter W. Martin addresses the opportunities offered by the

[1] Those interested in learning more about this topic are invited to consult the extensive bibliography assembled by Prof. Katsh for his books. References to Prof. Katsh's books appear in the bibliography.

new digital media. He notes that up to now “the technology and economics of print law report publication have effectively limited precedent to text.” However, he also observes that “[t]he world to which law and therefore precedent must relate has color, shape, texture, sound, and movement.” (par. 73) According to Martin, there are numerous situations where clarity will be enhanced if opinions contain images and charts, complete with color (par. 78). Martin illustrates such a case by citing a US Supreme Court opinion in which a 16-minute police video was pivotal. The majority opinion effectively incorporated the clip by means of a link to a digital video file loaded onto the Supreme Court web site. Justice Scalia wrote: “we are happy to allow the videotape speak for itself” (Note 5, *Scott v. Harris*[2] cited by Martin).

On a practical level, even a renowned text book on judgment writing cannot avoid this ongoing change. In the 5th and most recent edition of *Judicial Opinion Writing*, Joyce J. George observes that in the past visual elements were poorly reproduced in opinions. However, this is to change, for including non-textual elements is becoming easier and the quality of reproduction is getting better:

> "Significant technological advancements have been made in the capabilities of electronic devices, including computers, digital cameras, cellular telephones, iPods, printers, video and audio equipment, and scanners. Adding supplementary materials to judicial writings will likely increase in future publications of case reports and legal periodicals because of the ease with which data may be transferred from one medium to another […]." (George 2007, p. 475)

George suggests that the presence of visual elements could entail risks, for instance, distraction, as well as benefits. According to her, illustrations must be clear and precise and must be used only when they contribute to better understanding of a decision.

3. Non-Textual Elements in Judgments

Insertion of maps, diagrams and drawings of disputed marks in judgments in Canadian court decisions can be traced back to the 19th century. For a long time this practice was very limited. Only occasionally were such illustrations included in decisions. However what used to be rare has become more frequent. Table 1 illustrates the growth in the number of decisions containing images according to estimates based on the CanLII compilation. More precisely, Table 1 shows the total number of decisions containing three or more images for each year[3]. The figures reveal very significant growth in the use of images, especially in recent years.

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[2] *Scott v. Harris*, 550 U.S. 372 (2007).

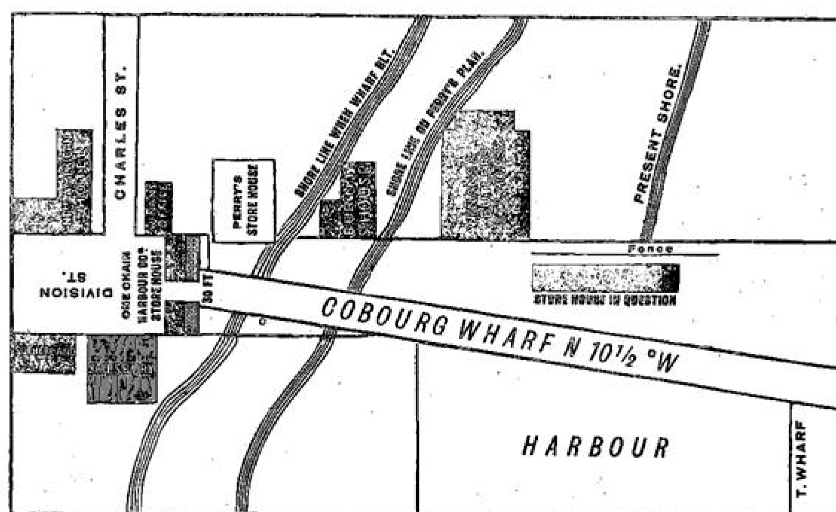
[3] The CanLII compilation includes nearly 1 million judgments from 1876 to 2011. Only judgments including three or more images were taken into account to avoid counting judgments including trivial graphical elements such as, for instance, a

Before 1980	80s	90s	After 2000
1879 : 1	1980 : 21	1990 : 13	2000 : 274
1883 : 1	1981 : 16	1991 : 17	2001 : 310
1948 : 1	1982 : 18	1992 : 26	2002 : 343
1950 : 1	1983 : 18	1993 : 34	2003 : 399
1959 : 2	1984 : 15	1994 : 36	2004 : 451
1973 : 1	1985 : 16	1995 : 25	2005 : 450
1974 : 1	1986 : 20	1996 : 57	2006 : 535
1976 : 4	1987 : 7	1997 : 38	2007 : 808
1977 : 7	1988 : 17	1998 : 136	2008 : 1578
1978 : 10	1989 : 12	1999 : 172	2009 : 1546
1979 : 17			2010 : 1588

Table 1: Decisions per year with more than three graphical elements.

The figures presented in Table 1 reveal that judicial language was not strongly influenced by the dissemination of photography in the 20th century. Judicial authors were also cautious at first with respect to the possibilities offered by new word-processing software. It is only in very recent years that the number of judgments with images has skyrocketed. It takes time to tame and adopt new technological possibilities.

The non-textual elements that judges choose to add to their reasons are varied. The earliest non-textual elements found in the CanLII compilation go back in the 19th century. The drawings used in *Standly v. Perry*[4] by the Supreme Court of Canada's judges efficiently clarify the stakes in a dispute concerning the ownership of a piece of land gained from alluvial deposits; see Figure 1.



courts' coat of arms. It must also be noted that the dataset is not the same for every year of the sample. The CanLII compilation became comprehensive only in 2002. Consequently, for all the earlier years the number of illustrated judgments is largely underestimated.

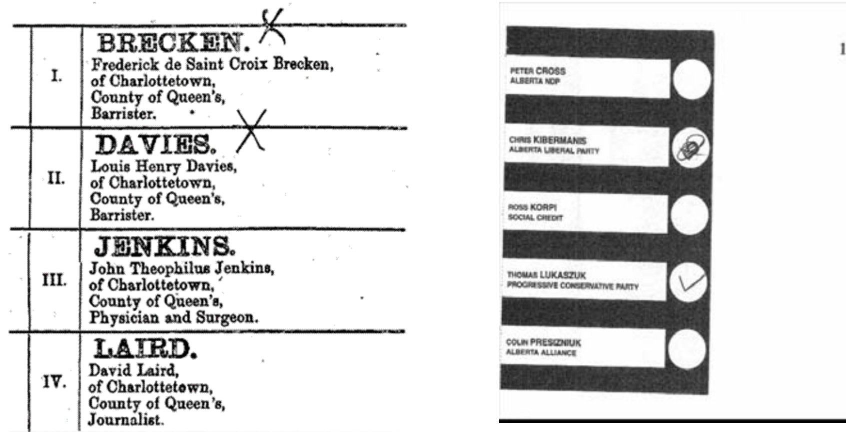
[4] *Standly v. Perry*, 3 S.C.R. 356, 1879 CanLII 3 (S.C.C.).

Figure 1: From *Standly v. Perry*[5]

Pictures used to be hard to reproduce in reasons distributed to parties. However, this became much easier in the nineties. Some judges did not hesitate to use as many illustrations as needed to clarify their analysis of a factual situation. Figure 2 shows a picture of an unhappy fisherman who had to crawl under his boat's new roof despite the seller's promises that he was buying a roof under which he would be able to fish standing up.

Figure 2: The Unhappy Fisherman Case[6]

Facsimiles of documents have frequently been used to support reasons. In some cases, they appear essential, such as when a court has to assess the validity of ballots; see Figure 3.



I.	**BRECKEN.** X Frederick de Saint Croix Brecken, of Charlottetown, County of Queen's, Barrister.
II.	**DAVIES.** X Louis Henry Davies, of Charlottetown, County of Queen's, Barrister.
III.	**JENKINS.** John Theophilus Jenkins, of Charlottetown, County of Queen's, Physician and Surgeon.
IV.	**LAIRD.** David Laird, of Charlottetown, County of Queen's, Journalist.

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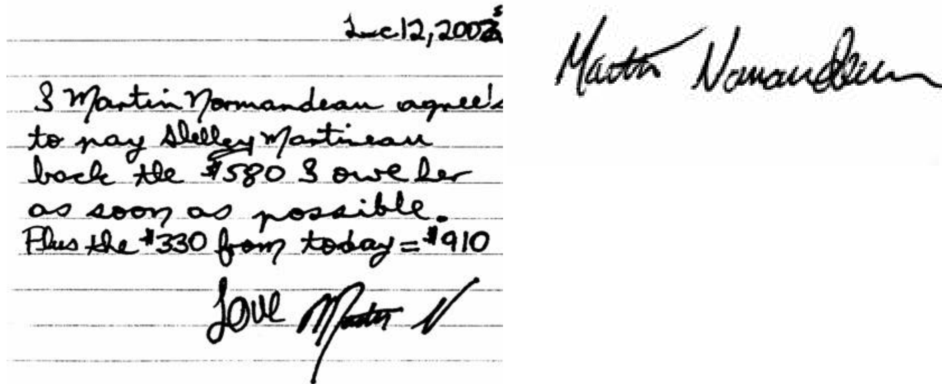
Figures 3a and 3b: In Fig. 3a, one of the five ballots reproduced in *Jenkens v. Brecken (Queen's County, P.E.I. elections case)*[7] in relation to the June 1882

[5] *Id.*, page 358.
[6] *Lachance c. 146190 Canada Inc*., 2003 CanLII 42894 (QC C.Q.).
[7] *Jenkens v. Brecken (Queen's County, P.E.I. elections case),* 7 S.C.R. 247; 1883 CanLII 25 (S.C.C.).

election in Prince Edward Island. In Fig. 3b, one of the 46 ballot facsimiles in *Lukaszuk v. Kibermanis*[8].

Cases involving contestation of signatures are also well served by showing the marks used for signing, as in Figures 4a and 4b.



Dec 12, 2002

I Martin Normandeau agree's
to pay Shelley Martineau
back the $580 I owe her
as soon as possible.
Plus the $330 from today = $910

Love Martin N

Figures 4a and 4b: *Martineau c. Normandeau*[9].

When a dispute involves plagiarism or alleged infringement of a copyrighted piece of music, it is useful to "hear" the facts. We did not find any sound clips embedded in Canadian judgments, but in the United States an academic research project has elected to fill this void. The *Copyright Infringement Project* at the UCLA and Columbia Law schools offers the possibility of comparing supposed original songs with allegedly infringing ones. On the Project's web site, a page let you consult reasons for judgment with links towards both pieces of music involved in the dispute[10]. This demonstration clearly illustrates the potential benefits of adding sound to the presentation of facts in disputes involving music.

The last step in the evolution of illustrated judgments is the addition of video clips in reasons. This has not been done yet in Canada. When the need has arisen to present videos, Canadian judges have chosen to refer to video clips' URLs as available at the time of the judgment. For instance, last year, SCC's judges cited a CTV news video clip in *Canada (Prime Minister) v. Khadr*[11]. In that case, the government's policy – its refusal to request M. Khadr's repatriation from Guantanamo – was established through reference to a press conference given by the Prime Minister and available in CTV television network's archives. Such a reference, while new in Supreme Court judgments, was not a first in Canadian decisions. In *Option Consommateurs c. Union*

[8] *Lukaszuk v. Kibermanis*, 2005 ABCA 26 (CanLII).

[9] *Martineau c. Normandeau*, 2003 CanLII 16001 (QC C.Q.).

[10] To judge for yourself whether the Bee Gee's "How deep is your love" is original, go to the UCLA/Columbia Law schools site and hear for yourself: http://cip.law.ucla.edu/cases/1980-1989/Pages/sellegibb.aspx (accessed 28 April 2011).

[11] *Canada (Prime Minister) v. Khadr*, 2010 SCC 3, par. 7.

canadienne[12], a Québec Superior Court judge had to decide whether the government had ordered the victims of the severe ice storm in 1998 to evacuate their homes or not. In the reasons, the judge cited Premier Bouchard's intervention on national television and he referred to the archived Radio-Canada video of that declaration[13]. Even though these visual documents were sufficiently important to be referred to, the judges did not see how to go farther and include these documents in their reasons.

Figure 5a : Prime Minister Harper's press point in Tokyo on Khadr's repatriation cited in *Canada (Prime Minister) v. Khadr*; Figure 5b: Premier Bouchard's declaration inviting citizens to take refuge cited in *Option Consommateur*[14].

In the Southern Hemisphere, a judge has been more daring: last year a New Zealand judge decided to embed advertisement clips from an online casino which had been presented on New Zealand television despite a law forbidding such a practice; see Figure 6. The video clips were directly embedded in the PDF document distributed by the court.

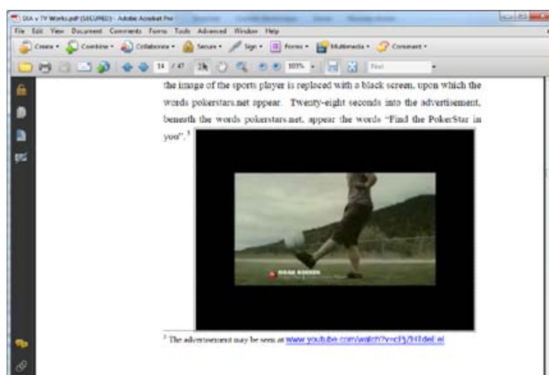


Figure 6: The PDF document for distribution of *DIA v. TV Works*[15].

[12] *Option Consommateurs c. Union canadienne*, 2005 CanLII 42425 (QC C.S.).
[13] *Option Consommateurs c. Union canadienne*, 2005 CanLII 42425 (QC C.S.), par. 47.
[14] News clip for *Canada (Prime Minister) v. Khadr* : http://watch.ctv.ca/news/clip65783#clip65783 (see at 2 min. 37 sec.), and for *Option Consommateur* : http://archives.radio-canada.ca/environnement/catastrophes_naturelles/clips/1329/ (see at 3 min. 21 sec.).

As we have seen, the form of reasons for judgment is evolving. Illustrations are not new, but they are becoming much more frequent. Non-textual elements that were once rare events are becoming very common. Multimedia elements, once static and crude, have become precise, realistic and even dynamic. While in the past judges were reluctant to use any kind of illustration for fear of misinterpretation of poorly rendered graphic elements, these concerns have become less acute. The variety of non-textual elements will probably continue to grow. There is no doubt that very soon, 3D virtual reality products offering the capacity to move in a scene and to go around an object will be exploited to illustrate sets of facts that would otherwise be difficult to describe.

Good as they may be, these "enrichments" of judicial language can pose challenges for those who want to make court decisions available to the public and to the legal professions.

4. Publishing Practices

Three main types of publishers have to be considered: self-publishing courts, traditional commercial publishers and legal information institutes. The first have special responsibility for ensuring the long-term accessibility of all material used in judgments. The second are still struggling with basic non-textual elements in judgments, but are presently improving. The legal information institutes, since they are younger, are generally faring better than the commercial publishers but still have challenges to overcome.

4.1. COURTS

The Canadian courts which are maintaining web sites for dissemination of their judgments have largely managed to deliver the graphical elements they contain. In some cases, this is relatively easy because the judgments are made available in PDF, but when courts make the added effort to offer an HTML version, the publishing procedures still support embedded images and they are available to users. Video clip embedding and publishing is another story. Let us begin by looking at how the U.S. Supreme Court has proceeded when videos have been part of their judgments.

In his 2007 paper, Peter Martin describes how the U.S. Supreme Court decided to link to a video clip in the reasons for *Scott v. Harris*[16] (See Martin 2007). The approach chosen by the court was to refer to the actual URL of the video on the U.S. Supreme Court web site. Later, in 2008, the Court used the same approach for *Kelly v. California*[17]. The fact that the video is made available on the Court web site guaranties its future availability, and this is

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[15] *DIA v. TV Works*, District Court of Auckland, CR 08004505568-620, June 23 2010 (Judge D.J. Harvey).

[16] *Scott v. Harris*, 550 U.S. 372 (2007).

[17] *Kelly v. California*, 129 S. Ct. 564 (2008).

good. The downside of this approach is that now, only a couple of years later, both citations – and the URL of a file on the Court's web site – lead to nowhere because the Court web site has been redesigned and the videos' locations have changed. Still, the Court has control over the availability of the videos. The videos are not where they used to be, but they are not lost.

The approach chosen by Canadian courts when referring to videos in judgments is more risky. In both examples provided above, the references were to Internet addresses on third party sites. The video where Premier Bouchard was allegedly inviting people to leave their houses is still available, but it has been moved and is not very easy to find (see footnote 6 in the decision). As a result, the citation in the judgment does not lead anywhere. The Supreme Court of Canada's judges were slightly luckier since the URL inserted in their ruling still leads to the news clip they intended to refer to. However, one may wonder for how long. Furthermore, the publisher of this video, the CTV television network, clearly warns its users that it makes no warranties that any content will be provided on an interrupted basis[18].

Making use of Youtube does not ensure long-term accessibility either. In the *Grant (Re)* [19] affair, a Québec's administrative tribunal was asked to revoke the permit of a corner inspector who physically attacked a referee at a boxing event in Montréal. The facts were established for the tribunal by presenting a video of the fight then available on Youtube. In presenting their reasons, the commissioners explicitly referred to the Youtube video (par. 2). However, the video is not available anymore. It was first brought down for license violation: "This video has been removed due to terms of use violation" then, more recently, the user who had published the video lost its Youtube account "This video is no longer available because the YouTube account associated with this video has been terminated. Sorry about that." So, for all intents and purposes the video has vanished.

We are at the very beginning of use of videos in judgments. The short experience acquired so far reveals many problematic strategies for attaching videos to judgment reasons. The technology will continue to evolve and will probably make it much easier in the future to use video material in reasons. However, a couple of lessons can be drawn from the strategies described in this paper. First, a court must keep control over all the material attached to the distributed reasons, otherwise the cited material could just disappear forever. In practice, courts must keep an archival copy of any relevant clip of video or sound that cannot be included in a judgment. These files must be made available on a specially designed section of their web site. The approach chosen by the U.S. Supreme Court provides a good example of what may be

[18] CTVglobemedia, now part of Bell Canada, Terms and Conditions: http://www.bell.ca/web/common/en/all_regions/pdfs/ctv/bell_media_terms.pdf (accessed April 28 2011), see DISCLAMER.
[19] *Grant (Re)*, 2009 CanLII 2248 (QC R.A.C.J.).

done[20]. Another good practice could be to refer to a general resource with a specific name and other metadata instead of its current URL. This way, a future user will be able to search for the video instead of just hitting a broken link. In countries where a neutral citation system exists, the schema proposed for identifying multimedia elements by the Canadian Citation Committee could be useful[21]. Finally, embedding video elements in PDF could be a good intermediary solution. This said, more work is required to identify the most suitable formats for ensuring long-term accessibility.

4.2. COMMERCIAL PUBLISHERS

Commercial publishers of printed publications were for a long time concerned only with "the laws that's fit to print." Such publishers' concerns may relate to the difficulty of reproducing colours, and large documents, such as plans and maps, present their own challenges. For publishers of printed material, the quality of the reproduction of pictures and their legibility remains problematic but this can be surmounted. However, sounds and video clips will remain out of reach for this trade. The only solution for making these non-printable materials available, and also to offer access to large size documents, will probably be to refer readers to a companion Internet resource offering the stability required for long-term accessibility. This said, printed publications have long been reproducing schemas and facsimiles when judgments use them and they will certainly continue to do so[22].

Canadian commercial publishers of legal databases have been less careful with regard to non-textual elements in judgments. This is understandable. The technical infrastructure of these databases was designed at the end of the sixties and in the seventies. In those times, computers were about crunching numbers, and it was deemed already remarkable to get them to do more than that, such as to be of help in retrieving texts. As a consequence, because the technology of time was not capable of manipulating images in documents, the images included in older judgments, such as those in old Supreme Court of Canada decisions, are missing from the commercial legal databases in Canada. Sometimes, the reader will be alerted by an editor's note, such as "Please see paper copy for illustration" or "Graphic not reproduced." However, occasionally the images will be missing without any sort of note to warn the reader[23].

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[20] See "Video Resources" under Opinions on the U.S. Supreme Court web site or http://www.supremecourt.gov/media/media.aspx (accessed 28 April 2011).

[21] Pelletier F., Poulin D. and Felsky M., Canadian Guide to the Uniform Preparation of Judgments, par. 37-40, available at: http://www.informationjuridique.ca/ccc-ccr/docs/guide.prep_en.pdf (accessed April 28 2011).

[22] A good illustration of this fact can be found in the case *Jenkens v. Brecken (Queen's County, P.E.I. elections case)*, 7 S.C.R. 247; 1883 CanLII 25 (S.C.C.), already mentioned.

[23] See *William Hamilton Manufacturing Co. v. Victoria Lumber & Manufacturing Co*, (1896) 26 S.C.R. 96; 1896 CanLII 44 (S.C.C.). On Quicklaw, the image is missing and there is no mention. On WestlawCanada, a mention "Graphic not reproduced" has been added.

More recently, commercial publishers have started to insert graphical elements in their electronic documents, but with mixed results. The illustrations that follow show various degrees of success.

Figure 7: *Robinson c. Films Cinar inc.*[24] The first image is the original, the second is the one reproduced by Quicklaw and the third appears on WestlawCanada.

Some commercial publishers are doing well with new content. However, overall, commercial publishers will have to revise their legacy holdings to introduce missing illustrations. Legal information institutes, being newer in the field, do not face this burden. Yet, they must be careful to avoid facing a similar fate of a legacy of missing videos in a couple of years.

4.3. LEGAL INFORMATION INSTITUTES

Legal information institutes are much younger than commercial database operators, and they have the benefit of having developed their infrastructure with web technologies from inception. Clearly, in our context, being young helps. Many legal information institute web sites already support the inclusion of images in HTML decision pages. This is certainly the case for CanLII. Lexum re-coded the back-end of its publishing system for CanLII in 2005-2006 to, among other things, include support for images. Images in judgments can also be seen on BAILII, AustLII, HKLII and many more.

The simplest strategy for a starting LII to make sure that images are accessible to its users could be to add a PDF version of the published documents to the basic HTML version. That way, when a judgment contains images, users can visit the corresponding PDF version and obtain a complete judgment with all its illustrations. More experienced LIIs will set up their conversion process to the HTML format in such a way as to always keep all illustrations.

[24] *Robinson c. Films Cinar inc.*, 2009 QCCS 3793 (CanLII).

Another case of enrichment is the growing number of links to Internet addresses to be found in the texts of decisions. At this point, over 4,000 decisions on CanLII contain links to Internet addresses. Most of these links point to cited legal documents that can be found elsewhere. However, here again, one must favour providing more meta-information or proper legal citation, rather than a simple URL that could be obsolete tomorrow. Links to other types of material, such as an infringing picture or an illegal web page or web site are not well served by sole inclusion of an URL. If the information cited via a link is important for the legibility of the reasons, the court must consider saving a copy of it and adding it to its public multimedia repository; then the LII will have to follow suit.

With regard to more dynamic content, such as sound and video clips, LIIs still have to present solutions. In Canada, when a video clip is cited in a judgment there is only a reference to its "then" current location. The approach followed today by all publishers in Canada is far from optimal. Everybody reproduces the judgment with the URL of the cited resource and nothing more. There is room here for leadership on the part of the LIIs. In these situations, the LII could contact the source of a cited video and try to obtain a copy of it. The LII could then publish the video independently with proper attributions and add it to its databases. Citation and meta-data schemes can be devised for such multimedia material. This kind of approach would make accessibility much less dependent on knowledge of the exact location of the document. Its accessibility would be based on its "findability:" the possibility of conducting a successful search for it. A national LII could be the best place to establish such a repository of multimedia documents included in judgments.

5. Conclusion

In order to ensure long-term availability of multimedia judgments, the Free Access to Law movement will have to develop knowledge and technical capacities to be able, among other things, to identify the best formats for achieving long-term accessibility of the various kinds of multimedia documents. Tomorrow's Free Access to Law web sites will no longer be limited to textual information but will have to offer and support a mix of text, images and video. This seems to be the direction of all communications, and legal and judicial language will not be an exception to the general evolution of communication.

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