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ABSTRACT: This paper will explore the non-Western conceptions of legal argumentation from different law traditions compared with western traditions. We intend to take a broad view of the theoretical achievements in the study of non-Western legal argumentation in recent years, select essential and representative studies highlighting the accumulation of theoretical development of legal argumentation in non-Western scholarship in the recent period, and conclude with a summary and conclusion of the characteristics presented by these studies.

KEYWORDS: law traditions, legal argumentation, non-western, western

1. INTRODUCTION

The origin of legal argumentation can be traced back to the Sophists of ancient Greece, but as a theoretical branch of legal methodology research, it was formed in the European and American academic circles in the second half of the 20th century. Since its emergence, the theory of legal argumentation has gained much momentum and has become an important interdisciplinary field. Traditionally, legal argumentation has been mainly studied and analyzed in the context of Western legal traditions (Sartor 2005; Bongiovanni et al. 2018), such as the common law and civil law systems. However, in recent years, there has been a growing recognition of the need to explore and understand legal argumentation outside the scope of Western legal frameworks.

This paper will explore the concept of legal argumentation in different legal cultures and traditions compared to Western countries. It should be mentioned that when we talk about legal argumentation in this paper, it actually covers legal logic, legal reasoning, legal argument, legal thinking, and other related topics, and while there are some differences in the contents discussed in these topics, much of it is cross-cutting. It would be quite difficult to address every non-western country or region's legal argumentation study in one paper. Therefore, we intend to take a macro view of the theoretical achievements in the study of non-Western legal argumentation in recent years, select essential and representative studies highlighting the accumulation of theoretical development of legal argumentation in non-Western scholarship in the recent period, and conclude with a summary and conclusion of the characteristics presented by these studies.

The concept of the "West" initially arose from geography, but it evolved into an international political term with specific connotations as a result of colonialism and capitalism led by European and American nations. Historian William McNeill notes that "the West" primarily referred to the European region influenced by Britain and France during modern times due to their dominance in Europe. "Non-western," according to scholars like American legal scholar Harold J. Berman, denotes the historically developing culture of Western European peoples. This culture shared a common allegiance to the Roman Catholic papal hierarchy from the late eleventh to the early sixteenth century and experienced a series of national revolutions from the sixteenth to the twentieth century, which had repercussions throughout Europe. It also encompasses non-European societies that became part of Western culture through colonization or through religious, political, and cultural affinities.

Today, the Western world encompasses Western Europe, North America, and regions significantly shaped by Western political, economic, and cultural systems. These influences, driven by colonialism, imperialism, globalization, and the dissemination of Western ideologies and institutions, extend to fields like legal argumentation. In contrast, "non- Western" serves as a broad category to distinguish legal systems, traditions, or practices originating outside continental and North American realms. It embraces diverse cultural, religious, and philosophical perspectives, offering a framework to explore independent legal traditions. In this paper, our focus is confined to East Asia, the Middle East, and Africa.[1]

2. LEGAL ARGUMENTATION STUDY IN EAST ASIA

East Asia boasts a diverse range of legal traditions influenced by various factors, including historical, cultural, and political contexts. These legal systems draw from both indigenous legal traditions and external influences, such as continental civil law systems, common law principles, and Confucianism. Consequently, the study of legal argumentation in East Asia involves a comprehensive understanding of statutory laws, case law, legal precedents, and the cultural values that shape legal decision-making processes.

2.1 China's legal argumentation study

In China, the term "legal argumentation" is a Western import and, as a branch of legal theory, has a relatively short history, emerging only at the beginning of the 21st century. Notably, there exist two pivotal milestones that significantly contributed to the establishment and development of this field. The first occurred in 2002 when Shu Guoying introduced the translated work "A Theory of Legal Argumentation" authored by Robert Alexy (2002; originally published in 1991). This seminal work, stemming from Alexy's doctoral thesis initially published in 1978, is widely regarded as a foundational text within the theory of legal argumentation. Its introduction into the Chinese academia marked a significant juncture in the transfer of European legal argumentation theory to China. Not

[1] It is worth noting that some scholars also include Latin America in the non-Western category, but some legal argumentation theorists from Latin America believe that Latin America should belong to the Western category. For the sake of brevity, we have set aside the discussion of Latin America.

only did this text serve as a catalyst for the advancement of legal argumentation theory within China, but it also attained the status of an essential introductory resource for contemporary Chinese scholars exploring this domain. The second crucial moment occurred in 2005, when Nian Chun and Zheng Yongliu undertook the translation of Ulfrid Neumann's article titled "An Outline of Legal Argumentation" (Neumann 2005; Neumann 2004).

While introducing Western legal reasoning theories, Chinese legal scholars also explored methods for constructing a theoretical system for legal reasoning. Zhang Baosheng is one of the leading scholars in the Chinese legal reasoning field, and his "Theory and Method of Legal Reasoning" (2000) is the first Chinese monograph on legal reasoning. He defined legal reasoning as the thinking process of specific subjects in legal practice, logically inferring and arguing new legal reasons from known legal and factual materials (Zhang 2000, p. 84). This type of thinking activity exists not only in judicial activities but also in legislation, law enforcement, and various legal practices and cognitive activities (p. 9). This definition clearly goes beyond the scope of reasoning defined in logic. In his view, studying legal reasoning has two aspects: the level of legal logic, which primarily investigates the external forms of legal reasoning activities, such as axioms, formulas, and symbolic systems; and the level of applying law, which studies the technical operational issues of legal reasoning (p. 7). Therefore, his legal reasoning methods are quite broad, including logical, scientific, philosophical, and empirical methods. Logical methods include traditional logical methods (deductive reasoning and inductive reasoning) and modern logical methods (fuzzy reasoning and probabilistic reasoning); scientific methods include natural scientific methods (natural scientific reasoning) and social scientific methods (economic analysis reasoning and social psychological reasoning); philosophical methods include dialectical logical methods (dialectical reasoning) and causation methods (causal reasoning); empirical methods (practical rationality methods) include common- sense reasoning, intuitive reasoning, analogical reasoning, and explanatory reasoning (p. 244). However, Zhang stated that his "Theory and Method of Legal Reasoning" is not a legal logic work but a philosophical work on legal reasoning (p. 10), thus clearly distinguishing legal logic from legal reasoning.

Of particular note is that, in contrast to formal reasoning, most Chinese legal argumentation theorists emphasize the primacy of practical reasoning. Although legal argumentation theorists worldwide generally hold similar views to Chinese legal argumentation theorists, the latter are closely related to the emphasis on the primacy of substantive justice over procedural justice. Practical reason refers to the experiential wisdom exhibited by judges and lawyers in the practical activities of specific cases and in courtroom debates. This type of wisdom differs from practical emotions and life emotions and is not achieved through formal logic (Zhang 2000, p. 49). Moreover, in introducing Western legal argumentation theories, scholars like Shu Guoying (Alexy 2002), Zhang Qingbo (Neumann 2014), and Jiao Baoqian (2005) have made contributions. Among them, Jiao (2006; 2010) published two monographs on legal argumentation, and his basic theoretical perspective is that legal argumentation is a kind of legal method for dealing with legal evidence. In his view, internal justification only needs to deduce the conclusion through deductive reasoning and does not require the method of legal argumentation. External justification is an argument against the major premise and therefore, requires legal argumentation as a legal method to prove it.

Legal substantive reasoning has become a major focus for Chinese legal argumentation theorists. Scholars holding this view usually divide legal reasoning into two types: formal reasoning and substantive reasoning (Zhang 2000, p. 244; Liang & Ke 2001). An extreme view argues that legal application is, in fact, a reasoning process for making judgments on cases based on legal norms, but in most cases, it is difficult to derive a conclusion that is taken for granted solely through formal logical reasoning. A more in- depth examination of normative content, legislative intent, and other complex social factors is often required. Therefore, legal reasoning is essentially a form of substantive reasoning, termed "legal substantive reasoning," where irrational factors may also play a role (Huang 2000). However, including irrational factors in legal reasoning is doubtful, and it may be more appropriate to use the terms practical reasoning or substantive reasoning; otherwise, legal reasoning lacks a rational foundation. A more moderate view holds that legal reasoning is a unified form of thinking and practical activity, and therefore, logic and experience are equally important (Zhang 2000, p. 240). Of course, Zhang Baosheng's view of logic is also a broad view of logic because he distinguishes logical methods into traditional logical methods (deductive reasoning and inductive reasoning) and modern logical methods (fuzzy reasoning and probabilistic reasoning) (Zhang 2000, p. 244). On this basis, Liang Qingyin and Ke Huaqing proposed a legal reasoning model that emphasizes formal reasoning and supplements it with substantive reasoning (Liang & Ke 2001).

In addition, the litigation argumentation game based on the three parties of the complainant (plaintiff/prosecution), the respondent (defendant/accused), and the trier may be a special contribution of Chinese legal argumentation theorists. Litigation is a game of rights and obligations between the complainant and the respondent, and this assertion is generally not challenged. Litigation is a legal argumentation game conducted by the complainant and the respondent to maximize their legitimate interests, and this should not be questioned either. In fact, many artificial intelligence and law experts modeling automatic legal reasoning are based on this idea (Prakken 2015; Lodder 2016; Gordon 2018). Under the Anglo-American legal system, judges are only judges and not argumentation players because they do not have the right to search for evidence in the category of evidence provided by the complainant and the respondent to support their judgment. The continental legal system, especially the Chinese legal system, is different; judges have the right to search for evidence they consider necessary to justify their decisions. Therefore, under the continental legal system, especially the Chinese legal system, judges are also players in the litigation argumentation game (Xiong 2010).

2.2 Japan’s legal argumentation study

Japan is known for its rich cultural heritage and unique legal tradition, with a legal system that has evolved over the centuries. Throughout its history, Japan has undergone significant legal reforms, including the incorporation of Confucian principles, the influence of the Western legal system during the Meiji period, and the legal reforms that followed World War II. Therefore, Japan's legal argumentation is influenced by a combination of indigenous legal traditions, historical legacies, and contemporary legal reforms. Japan's legal argumentation is shaped by a complex interplay of historical, cultural, linguistic, and institutional factors.

In recent years, the intersection of legal argumentation and artificial intelligence (AI) has become a rapidly evolving field that presents a compelling confluence of traditional legal practices and cutting-edge technological advancements. Actually, the study of automated legal reasoning in Japan started in the 1980s. Kagayama (1989) introduces "legal expert system" research by using Japanese tort law as an example. According to Nitta and Sayoh (2020), in addition to the legal-expert system, as information and communication technologies and AI technologies have progressed, AI and law have broadened their view from legal-expert systems to legal analytics and, recently, a lot of machine-learning and text-processing techniques have been employed to analyze legal information. In this paper, they introduce the history of and the research activities on applying AI to the legal domain in Japan in their report. Among those researches, Hajime Yoshino's Logical Jurisprudence is an important concept in legal informatics. He developed Logical Jurisprudence as a new logical theory of law in which the viewpoints and methods of mathematical logic and logic programming are applied intensively and thoroughly to law, at abstract as well as concrete levels. This logical theory of law has been applied to construct an artificial intelligence of law and through this application activities, the theory itself has developed.

In the book Fundamentals of Legal Argumentation, the sub-section about legal argumentation in Japan also introduced the development of AI and Law reasoning models. Haraguchi, an artificial intelligence scholar at Tokyo Institute of Technology, introduced a system of order-sorted logic for analogical legal reasoning in Haraguchi (1996). Collaborating with Kakuta, an AI scholar at Hokkaido University, Sapporo, Haraguchi (1998) further advances a reasoning system based on Goal-Dependent Abstraction (GDA) to identify similarities based on specific objectives. Kakuta and colleagues (1997) also explore goal-dependent abstraction in the context of legal reasoning by analogy. Lately, Yamada et al. (2017) present a novel annotation scheme for annotating the argumentative structure of Japanese judgement documents, along with an annotated corpus. Hirata and Nitta (2022) introduce methods of analyzing legal documents such as negotiation records and legal precedents using computational argument theory in their book. These analytical methods demonstrate the application of logic-based AI methods in the legal field, and they contribute to the education and training of law students in logical ways of making arguments. Nguyen et al. (2023) examine challenges and opportunities in leveraging deep learning techniques for improving legal reasoning using PROLEG, identifying four distinct options ranging from enhancing fact extraction using deep learning to end-to-end solutions for reasoning with textual legal descriptions.

The study of AI and legal argumentation in Japan represents a fascinating exploration of the synergy between technology and jurisprudence. By delving into this burgeoning field, scholars, practitioners, and researchers gain insights into how Japan's legal professionals navigate the evolving landscape of AI-infused legal argumentation, ultimately contributing to the advancement of both legal scholarship and the practice of law in the digital age.

3. LEGAL ARGUMENTATION STUDY IN THE MIDDLE EAST

The Middle East's legal argumentation is deeply rooted in the region's historical and cultural heritage. With a history that encompasses empires, caliphates, and colonial powers, the legal landscape has been shaped by a blend of indigenous legal traditions and foreign legal influences. This intricate evolution has resulted in legal systems that incorporate Islamic law, customary practices, civil law principles, and modern legal reforms.

3.1 Islamic legal argumentation study

Islamic legal argumentation study delves into the principles, methods, and techniques used in the interpretation and application of Islamic law, also known as Shari'ah. Shari'ah is the primary source of law in the Islamic legal system, and legal argumentation often revolves around its application in specific contexts and situations. Islamic legal argumentation encompasses a comprehensive system of legal reasoning that draws upon various sources of Islamic law, including the Quran, Hadith (sayings and actions of the Prophet Muhammad), consensus (ijma'), and analogical reasoning (qiyās). These sources, along with the principles of Islamic jurisprudence (usul al-fiqh), shape the methodology and approaches employed in legal argumentation within the Islamic legal tradition. Scholars and jurists engage in extensive analysis and interpretation of these sources to derive legal principles and rules, and to address contemporary legal issues within the framework of Islamic law.

Anver M. Emon studies pre-modern and modern Islamic legal history, the role of Shari'a both inside and outside the Muslim majority world, and the historiography of that field of knowledge production. His research often involves the study of legal reasoning, ethics, and the historical development of Islamic legal thought. He has explored how Islamic jurists engaged with legal sources to formulate legal rulings.

Especially, the volume Islamic and Jewish Legal Reasoning: Encountering Our Legal Other, edited by Emon, provides valuable insight for us to take a closer look at Islamic and Jewish legal reasoning. In this volume, scholars examine such issues as judicial authority, the legal policing of female sexuality, and the status of those who stand outside one's own tradition. The book examines the legal reasoning methods employed in these two traditions, highlighting how both Islamic and Jewish scholars engage with legal texts, precedent, and moral principles to derive legal rulings. It explores the historical development of these legal systems and the challenges and opportunities that arise when they encounter one another in various contexts. One of the central themes of the book is the notion of "encountering the legal other." It explores how Islamic and Jewish legal scholars have historically engaged with the legal traditions of the other community, either through dialogue, comparison, or the incorporation of ideas and practices from the other tradition.

Another essential work that can provide us with insight into Islamic legal reasoning back to ancient times is Malik and Medina: Islamic Legal Reasoning in the Formative Period. Abd-Allah studies the legal reasoning of Mālik ibn Anas (d. 179 H./795 C.E.) in the Muwaṭṭa' and Mudawwana. He presents a broad comparative study of legal reasoning in the first three centuries of Islam. It reexamines the role of considered opinion (ra'y), dissent, and legal ḥadīths and challenges the paradigm that Muslim jurists ultimately

concurred on a "four-source" (Quran, sunna, consensus, and analogy) theory of law. Instead, Mālik and Medina emphasize that the four Sunnī schools of law (madhāhib) emerged during the formative period as distinctive, consistent, yet largely unspoken legal methodologies and persistently maintained their independence and continuity over the next millennium.

As for the contemporary theory, Rahman et al. (2022) propose a new (dialogical) approach to the study of different forms of correlative reasoning, which in Islamic jurisprudence is known as qiyās in the monograph "Parallel Reasoning in Islamic Jurisprudence." They argue that qiyās represents a sophisticated form of dialectical reasoning, shedding light not only on epistemological aspects of legal argumentation in a broader sense, including common law and civil law legal reasoning, but also providing a detailed model of parallel reasoning applicable to diverse problem-solving scenarios. This approach goes beyond the conventional analogical reasoning explored in the contemporary philosophy of science and argumentation theory.

The book concludes by briefly discussing modern perspectives on analogies in common law, civil law, and parallel reasoning in general. Rahman and Iqbal conduct an exhaustive logical analysis of Abū Isḥāq al-Shīrāzī's two qiyās-based argumentation forms, which they aptly refer to as "inference by parallel reasoning." Drawing from Young's assertion that Islamic law rules and argumentation principles evolve through debate, Rahman and Iqbal illustrate the essential steps al-Shīrāzī believes are necessary for the effective application of qiyās in a debate setting.

In contrast to the traditional scholarly treatment of qiyās, which often assumes that a single jurist's comparison of similar cases goes unchallenged, Rahman and Iqbal reveal that successful qiyās deployment frequently hinges on a jurist mounting a comprehensive defense of their underlying assumptions about the two cases. This underscores the need for a more comprehensive exploration of the legal system when employing qiyās in jurisprudence.

3.2 Jewish legal argumentation study

Jewish legal argumentation, also known as Talmudic reasoning or halakhic discourse, is a field of study that explores the principles, methods, and intricacies of Jewish legal interpretation and analysis. It encompasses the rich tradition of Jewish scholarship and the diverse approaches employed in understanding and applying Jewish law.

A key aspect of Jewish legal argumentation is the concept of Halakha, which refers to the Jewish legal system and its comprehensive set of laws and regulations. Halakha encompasses a wide range of topics, including ritual observance, morality, civil law, and human relations. The focus of Jewish legal argumentation is the interpretation and application of Halakha, involving the analysis of legal texts, analogical reasoning, and engaging in debate to reach legal decisions.

One distinguishing feature of Jewish legal argumentation study is its reliance on an extensive system of commentaries and legal literature. Scholars engage in a deep examination of the Talmud, a compendium of legal discussions and debates, which forms the core of Jewish legal reasoning. The Talmud contains a multiplicity of perspectives and divergent opinions, allowing for a dynamic and evolving understanding of Jewish law.

Additionally, commentaries on the Talmud serve as important interpretive guides in legal argumentation.

The study of Jewish legal argumentation seeks to unravel the complexities of legal interpretation within Jewish law. It delves into the various methodologies employed by rabbinic scholars, such as textual analysis, logical reasoning, hermeneutics, and legal analogy, to derive legal rulings and principles from the biblical and Talmudic sources. Besides, it also examines the diverse opinions and debates within Jewish legal traditions, exploring the reasoning behind different legal perspectives and the mechanisms used to reconcile conflicting opinions.

Tooman's (2022) book The Torah Unabridged is a detailed examination of legal reasoning in the Hebrew Bible, grounded in a detailed philological analysis of the Hebrew texts. He examines the techniques biblical writers used in their appropriation, expansion, and manipulation of legal ideas within earlier biblical texts in order to apply the laws to moresituations,circumstances, and people.

Joseph E. David is the Professor of Law at Sapir Academic College in Israel and a Visiting Professor at the Program in Judaic Studies at Yale University and of Law at Yale Law School. His Areas of Expertise include law and religion, legal history, comparative law, legal philosophy, and jurisprudence. David (2021) focuses on the independency of legal reasoning and its relations to extra-legal modes of reasoning (e.g., logical reasoning, hermeneutical reasoning, etc.) in the Jewish jurisprudential tradition. This investigation's primary focus is the Midrashic paradigm, which permeates Talmudic literature and integrates exegesis, or scriptural reasoning, with judicial reasoning. The second area of emphasis will be the post-Talmudic theoretical debates concerning the reliability of autonomous legal reasoning as a reliable source of legal knowledge.

In his other paper, “Legal Reasoning (Ijtihad) and Judicial Analogy (Qiyās) in Jewish and Islamic Jurisprudential Thought", he examines legal reasoning and judicial analogy in medieval rabbinic thought from three aspects. He concludes that one cannot connect the justification of the use of judicial analogy with the rationalistic positions which sought to strengthen the power of reason. Instead, there is an inverse correlation between the use of reason as a possible source of religious knowledge and the justification of judicial analogy.

Jewish legal argumentation goes beyond the mere extraction of legal rulings. It explores the ethical, social, and philosophical underpinnings of Jewish law, as well as its practical implications for individual and communal life. Scholars in this field analyze legal principles, legal categories, and the historical development of legal concepts, aiming to understand the broader framework of Jewish legal thought.

The study of Jewish legal argumentation is not limited to scholars and jurists but holds relevance for individuals seeking to engage with Jewish law and its applications. It provides a pathway for understanding the moral and legal dimensions of Jewish teachings and offers insights into the complexities of legal decision-making within Jewish communities.

4. LEGAL ARGUMENTATION STUDY IN AFRICA

African societies have their own traditional legal systems, often referred to as customary law. These systems are based on local customs, traditions, and practices, and they can vary widely between different communities and ethnic groups. Customary law often covers issues such as family matters, land rights, and community disputes. Customary law continues to coexist alongside formal legal systems in many African countries.

It's important to recognize that the legal landscape in Africa is dynamic and can vary widely from country to country. Legal systems are influenced by historical, cultural, and social factors, and they continue to evolve as societies change and develop.

Therefore, African legal argumentation stands at the crossroads of diverse legal traditions, cultural norms, and historical narratives. As a continent characterized by a rich tapestry of linguistic, ethnic, and legal diversity, Africa's legal systems reflect the complex interplay between indigenous customs, colonial influences, and evolving contemporary practices. The study of legal argumentation in Africa delves into the techniques, strategies, and underlying principles that legal professionals employ to present their cases, persuade decision-makers, and navigate the intricacies of the continent's multifaceted legal landscape.

Spanning from the northern reaches of the Sahara to the southern tip of the continent, African legal argumentation encapsulates the varied legal philosophies that have shaped societies over centuries. At its core, this field of study is an exploration of how legal professionals construct narratives, weave together cultural contexts, and employ legal reasoning to seek justice, resolve disputes, and assert rights. Whether in bustling urban courtrooms, rural village councils, or informal community gatherings, legal argumentation serves as a vital thread connecting traditional practices with modern legal frameworks.

Some scholars have conducted in-depth research on justice systems and legal reasoning and argumentation in Africa. Obiora and Ndidi's (2001) book Understanding Africa: Traditional Legal Reasoning, Jurisprudence & Justice in Igboland as a Basis for Culturally Rooted and Sustainable Development, is an important introduction to the rich cultural heritage in the African continent. This book shows how traditional social, cultural, political and economic values; religious beliefs and practices; and traditional moral and legal reasoning, can be a basis for sustainable development.

The articles by Ouguergouz (2003) and Onazi (2014) collectively shed light on the multifaceted landscape of legal reasoning in Africa, particularly within the context of African legal traditions and their interactions with Western legal paradigms. Ouguergouz 's work primarily centers on the African Charter on Human and Peoples' Rights, dissecting its implementation across diverse African jurisdictions. It unveils the intriguing overlap between Western conceptions of human rights and Africa's indigenous legal systems, thereby offering valuable insights into non-Western legal reasoning within the realm of human rights discourse.

Similarly, Onazi's collection of essays (2014) delves into various facets of legal reasoning within Africa, encompassing themes such as indigenous legal systems, customary law, and the interface between traditional African legal practices and modern legal frameworks. A common thread running through these essays is the critical perspective they bring to the fore regarding legal pluralism and legal reasoning within the African context.

Furthermore, both collections make a concerted effort to reverse this trend by introducing readers to key issues, questions, concepts, and dilemmas that form the foundation of African legal theory. They aim to illuminate the potential inherent in African legal theory and subject its fundamental concepts and principles to rigorous critical examination. The overarching goal is to better understand the extent to which African legal theory can contribute meaningfully to discussions addressing the complex challenges encountered by African and non-African societies alike.

In this broader context of exploring African legal theory and its potential contributions, Badru and Eegunlusi's work (2015) adds a distinctive dimension by scrutinizing the colonial legacy of empiricist-positivist legal reasoning within postcolonial African states. They advocate for the incorporation of African metaphysical epistemology into the postcolonial legal justice framework in Africa. This proposal is rooted in the alignment of African metaphysical epistemology with the cosmological and ontological perspectives held by significant portions of African populations. By doing so, it complements the Western empiricist-positivist legal reasoning, recognizing the coexistence and mutual enrichment of these two legal reasoning paradigms within the African context. In essence, it offers a framework that both acknowledges and addresses the limitations of Western legal reasoning, particularly in terms of objectivity.

These articles collectively engage in a comprehensive exploration of African legal theory, highlighting the interface between indigenous legal systems and contemporary legal frameworks while recognizing the need to re-evaluate the role of African legal theory in addressing the multifaceted challenges faced by African and non-African societies.

African legal argumentation is a captivating exploration of legal traditions in constant dialogue with societal values, historical legacies, and contemporary dynamics. By delving into the complexities of this field, scholars, practitioners, and researchers gain insights into how legal professionals navigate the multifaceted legal terrain of Africa, ultimately contributing to the development, reform, and understanding of the continent's legal systems.

5 CONCLUSION

These research efforts provide valuable insights into non-Western legal reasoning and argumentation from different cultural, regional, and religious perspectives. They contribute to an understanding of legal pluralism, highlight the complexity of non-Western legal systems, and provide critical analysis of the methods of reasoning employed in different non-Western legal traditions. They highlight the similarities, differences, and interactions between these legal traditions through a comparative analysis of non-Western legal argumentation and Western legal argumentation in China and elsewhere. They delve into the historical, cultural, and philosophical foundations of non-Western legal reasoning and its engagement with Western legal concepts. Although non-Western legal argument theory is still developing, it has great potential to enrich legal scholarship by incorporating different perspectives and expanding the theoretical foundations of legal argumentation. We believe that to develop a clear understanding of the non-Western legal argumentation and the law which it embodies, one must study it within the context of their social, cultural, political and legal history. Further research and interdisciplinary collaboration are needed

to deepen our understanding of non-Western legal argumentation theory and its implications for legal practice, justice, and cross-cultural legal dialogue.

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