

# A Study of Dictionaries in U.S. and Latin American Courts

by Sergio D. Stone

Spanish language use in the legal profession is on the rise.<sup>1</sup> As a result, law firms, courts, and law libraries must equip legal practitioners with the proper resources to incorporate Spanish in the practice of law. A Spanish dictionary is an important research tool, whether an attorney is counseling Spanish-speaking clients in Colorado or drafting commercial agreements in Latin America. Law Review articles over the last decade have documented the growing reliance on dictionaries by the courts; however, this scholarship has focused primarily on English-language dictionaries.<sup>2</sup>

With dozens of foreign-language dictionaries to choose from and limited guidance provided by the academic literature, one might be tempted to use free online translation services, such as Babel Fish<sup>3</sup> or Google Translate.<sup>4</sup> However, these websites should not be relied on to accurately translate legal terminology. A recent investigation into Babel Fish's ability to translate legal phrases from Spanish to English reported very few successful translations.<sup>5</sup> Until reliable and affordable translation software appears, attorneys and judges will continue to rely on print and online dictionaries for their legal work in Spanish.

This article presents the results of a study by the author involving analysis of citations to Spanish dictionaries in U.S. Supreme Court and U.S. federal court opinions. Here, the term "Spanish dictionary" is used to refer to both exclusively Spanish-language dictionaries and bilingual Spanish-English dictionaries. With dozens of legal and general usage dictionaries on the market, the study's objective was to discover those dictionaries that U.S. courts relied on most often to translate and define Spanish terms. As a means of comparison with U.S. practice, the study also examined the citation practices of courts in three Latin American jurisdictions: Argentina, Costa Rica, and Mexico—countries that attract many U.S. visitors and significant foreign investment.

The results of the study are meant to serve as a guide for attorneys and law librarians when purchasing Spanish dictionaries. The article provides relevant contextual information to critically analyze a court's reliance on a specific dictionary. Although the article addresses the specific uses for which U.S. courts rely on Spanish dictionaries, the purpose of the article is descriptive; no attempt is made to defend or criticize the practice of relying primarily on dictionaries to define statutory or contractual terms.<sup>6</sup>

## Methodology

The study included analysis of the citations to Spanish dictionaries in opinions from the following judicial bodies: the U.S. Supreme Court (1795–2006);<sup>7</sup> the U.S. federal district courts and circuit courts of appeals (1900–2006);<sup>8</sup> the Supreme Court of Argentina (1995–2006);<sup>9</sup> the Supreme Court of Costa Rica (2000–06);<sup>10</sup> and the Supreme Court and collegiate appellate courts of Mexico (1995–2005).<sup>11</sup> The majority of the results focus on data collected from U.S. court opinions. The Appendix to this article lists all of the dictionaries cited by U.S. federal district courts and circuit courts of appeals since 1900, along with the number of citations, dates of citations, and specific jurisdictions that cited them.

The results include statistics on how U.S. courts have used Spanish dictionaries; for example, whether the dictionary was used to translate contracts or define foreign legal terms. Because of the small population of cases analyzed in the foreign jurisdictions, those results are simply a snapshot and are meant to provide only a rough comparison with the results from the American courts.

The study focused on four types of Spanish dictionaries: Spanish-language legal dictionaries, Spanish-language general usage dictionaries, bilingual legal dictionaries, and bilingual general usage dictionaries. Except for business or financial dictionaries, specialized dictionaries unrelated to law, such as medical or scientific dictionaries, were disregarded. In tabulating the results, separate editions of the same dictionary were treated as one single text. Colorado state courts were excluded from the study because of the lack of any citations to Spanish dictionaries.<sup>12</sup>



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## U.S. Courts

From 1795 through the end of 2006, the U.S. Supreme Court cited three legal Spanish-language dictionaries<sup>13</sup> and one general usage Spanish-language dictionary<sup>14</sup> on thirteen occasions. The Supreme Court first referred to a Spanish-language dictionary in 1838<sup>15</sup> and most recently in 1929.<sup>16</sup> Because no recent Supreme Court cases have relied on Spanish dictionaries, these citations are of interest primarily for historical purposes.

Among the district courts and circuit courts of appeals, the study revealed eighty citations to thirty-two Spanish dictionaries in sixty-two court opinions (*see* Appendix). Of the thirty-two dictionaries cited, eight were legal dictionaries and twenty-four were general usage. The courts quoted nineteen bilingual dictionaries and thirteen Spanish-language dictionaries. No opinions referenced any topical legal Spanish dictionary, such as those devoted to law enforcement, criminal law, or immigration. Print dictionaries constituted the majority of citations; however, two court opinions used online dictionaries.<sup>17</sup> Because 65 percent of the dictionaries were cited only once, a firm consensus on the best dictionaries remains elusive. (For information about the five most frequently cited dictionaries, *see* the sidebar below.)

Two Tenth Circuit decisions, both involving criminal prosecutions, have cited bilingual general usage dictionaries. *U.S. v. Bustillos-Muñoz*<sup>18</sup> used the *Larousse Concise Spanish-English, English-Spanish Dictionary*<sup>19</sup> to translate a term from a Spanish version of a *Miranda* warning. The court in *U.S. v. Chavez-Ceja*<sup>20</sup> relied on *Cassell's Spanish-English, English-Spanish Dictionary*<sup>21</sup> to translate a police officer's request to search a defendant's vehicle.

No bilingual legal dictionaries appeared among the top ten cited works; notably absent were *Dahl's Law Dictionary: Spanish-English, English-Spanish*<sup>22</sup> and *Butterworths Spanish/English Legal Dictionary*,<sup>23</sup> both of which are highly praised by practitioners and librarians.<sup>24</sup> The courts' reluctance to cite bilingual legal dictionaries echoes recent European scholarship lamenting the lack of bilingual law dictionaries that use sound lexicographic and comparative law principles, especially Spanish-English dictionaries.<sup>25</sup> A recent survey of bilingual legal dictionaries by European scholars

failed to identify any Spanish-English bilingual dictionaries as rigorous comparative academic works.<sup>26</sup>

The district courts accounted for thirty-four of the opinions; six separate circuit courts of appeals (First, Third, Fifth, Ninth, Tenth, and Customs & Patents Appeals) accounted for twenty-eight opinions. District courts from the following ten jurisdictions referenced Spanish dictionaries: Puerto Rico, New York, Illinois, Nebraska, New Mexico, Kansas, Florida, Oregon, Texas, and Virgin Islands. Half of the opinions originated in the District Courts of Puerto Rico and the First Circuit Court of Appeals. Considering the size of the Latino population in California, the results revealed surprisingly few California District Court and Ninth Circuit cases.

Chronological analysis of the data revealed a recent significant increase in the number of citations to Spanish dictionaries, with almost 60 percent of all citations occurring from 1990 to 2006. The first six decades of the last century produced only fifteen citations. The 1970s and 1980s generated nineteen citations, in comparison to forty-six citations from 1990 to 2006. Moreover, the number of citations in the first six years of this current decade (twenty-four) already has surpassed the total from the 1990s (twenty-two).

### Dictionary Function

Table 1 identifies seven broad categories of dictionary usage by U.S. district and circuit courts of appeals. Spanish-to-English translations of witness testimony and documents entered into evidence constituted nearly half of all citations. For example, courts have relied on general usage dictionaries to verify the adequacy of *Miranda* warnings given in Spanish to criminal suspects.<sup>27</sup> Almost one-third of Spanish dictionary usage related to translations of statutes, court rules, jury instructions, and international agreements.<sup>28</sup> The third most frequent use of dictionaries involved translating contract terms from Spanish to English, or vice versa.<sup>29</sup>

### Dictionary Selection

Legal scholars have criticized the courts for failing to adequately justify their selection of English-language dictionaries.<sup>30</sup> Similarly, only opinions from two courts addressed the rationale for

Acquisition Information for the Most Frequently Cited Dictionaries by U.S. Courts

Title	Author/Editor	Publisher	Price	ISBN
<i>Cassell's Spanish-English, English-Spanish Dictionary</i>	Anthony Gooch	Macmillan/Wiley Publishing, 1978	\$22	9780025229105
<i>Diccionario de la Lengua Española</i> , 22nd ed.	Real Academia Española	Editorial Espasa Calpe, 2001	Available online: <a href="http://www.rae.es">http://www.rae.es</a>	8423968146
<i>New Revised Velázquez Spanish &amp; English Dictionary</i> (out of print)	Mariano Velázquez de la Cadena	New Century Publishers, 1985	varies	0832902659
<i>Oxford Spanish Dictionary: Spanish-English, English-Spanish</i> , 3rd ed.	Beatriz Galimberti Jarman	Oxford University Press, 2003	\$49.95	9780198604754
<i>Webster's New World International Spanish Dictionary</i> , <sup>1</sup> 2nd ed.	Roger Steiner	Wiley Publishing, 2004	\$49.95	9780764576430

1. This reference previously was published as *Simon & Schuster's International Dictionary English-Spanish, Spanish-English*.

choosing a particular dictionary. The Ninth Circuit, in *Gherebi v. Bush*, labeled the *Diccionario de la Lengua Española*<sup>31</sup> as “the authoritative dictionary of the Spanish language.”<sup>32</sup> A decision from the Federal District Court for Puerto Rico described the *Diccionario Enciclopédico Unión Tipográfica Editorial Hispano Americana*<sup>33</sup> as “well known and quite complete” and the *Diccionario de la Lengua Española* as “conservative, but reliable.”<sup>34</sup>

Courts often relied on general usage bilingual dictionaries, rather than legal ones, to translate and define legal terminology from one language to another. For instance, a U.S. district court in Illinois employed a bilingual general usage dictionary, *Cassell’s Spanish-English, English-Spanish Dictionary*, instead of a bilingual legal dictionary, to translate a word from an Argentine letter rogatory.<sup>35</sup>

### Foreign Courts: Argentina, Costa Rica, and Mexico

The analysis of Argentine, Costa Rican, and Mexican court opinions revealed 448 citations to thirty-one separate dictionaries. Table 2 lists the ten most often cited dictionaries from 1995–2006.<sup>36</sup> More than 60 percent of all citations were to the *Diccionario de la Lengua Española*, published by the Real Academia Española (Spanish Royal Academy), the leading authority in Spanish lexicography.<sup>37</sup>

In contrast, the *Diccionario de la Lengua Española*, first published in 1726, constituted only 11 percent of the citations in U.S. federal courts. The twenty-second edition of the *Diccionario de la Lengua Española*, released in 2001, also is available online at <http://www.rae.es>. Although the Spanish Royal Academy’s dictionary was dominant, the three foreign jurisdictions used fifteen other general usage dictionaries. The Latin American courts cited only one bilingual legal dictionary<sup>38</sup> and two bilingual general dictionaries.<sup>39</sup> Interestingly, the only two dictionaries cited by all three jurisdictions were from Spain: the *Diccionario de la Lengua Española* and the *Diccionario Razonado de Legislación y Jurisprudencia*,<sup>40</sup> by Joaquín Escriche, an influential nineteenth century work.

The foreign judiciaries cited frequently to Spanish-language legal dictionaries, in contrast to U.S. courts, which primarily refer-

enced bilingual general dictionaries. Only one of the top ten cited works in U.S. courts was a legal dictionary, the *Diccionario de Derecho Usual*,<sup>41</sup> whereas legal dictionaries constituted 60 percent of the most cited texts in the three Latin American courts. U.S. courts relied on Spanish dictionaries primarily for translating evidentiary testimony and documents, whereas foreign courts used dictionaries principally to define terms in codes and statutes.<sup>42</sup>

Because of their shared civil law tradition, each Latin American court quoted dictionaries published in various jurisdictions, not just their own. The Supreme Court of Costa Rica cited publications from Argentina, Colombia, Spain, and Mexico. Likewise, the Supreme Court of Argentina relied on French, Spanish, and American dictionaries. The Mexican courts only cited the *Diccionario Jurídico Mexicano*<sup>43</sup> twice, despite its popularity with legal scholars.<sup>44</sup>

### Conclusion

Although U.S. courts indicated a clear preference in the past for *Cassell’s Spanish-English, English-Spanish Dictionary*; the *New Revised Velázquez Spanish & English Dictionary*<sup>45</sup>; and the *Diccionario de la Lengua Española*, one should not automatically assume that these works will remain the most cited indefinitely. Because of a lack of clearly articulated rationales for relying on specific Spanish dictionaries, federal and state courts may cite to an even greater number of dictionaries in the future. Attorneys and judges should concern themselves with demonstrating the appropriateness of using specific dictionaries in particular circumstances. The hope is that this article will assist with purchasing decisions and perhaps generate more informed discussions about the role of Spanish dictionaries in the legal system.

**Table 2**  
Ten Most Cited Dictionaries in the Courts  
of Argentina, Costa Rica, and Mexico, 1995–2006

Title	Citations	Jurisdictions
<i>Diccionario de la Lengua Española</i> (Real Academia Española)	272	Argentina Costa Rica Mexico
<i>Diccionario de Ciencias Jurídicas y Sociales</i> (Manuel Ossorio)	88	Argentina Costa Rica
<i>Diccionario Enciclopédico de Derecho Usual</i> (Guillermo Cabanellas)	11	Argentina Costa Rica
<i>Diccionario Jurídico Elemental</i> (Guillermo Cabanellas)	10	Argentina Mexico
<i>Diccionario Razonado de Legislación y Jurisprudencia</i> (J. Escriche)	6	Argentina Costa Rica Mexico
<i>Diccionario de Derecho Procesal Civil</i> (Eduardo Pallares)	6	Costa Rica Mexico
<i>Diccionario Enciclopédico de la Editorial Océano</i>	6	Costa Rica
<i>Diccionario de Sinónimos y Antónimos Editorial Océano</i>	5	Costa Rica
<i>Diccionario Enciclopédico Larousse</i>	5	Costa Rica Mexico
<i>Diccionario de Derecho</i> (Rafael de Pina Vara)	4	Mexico

**Table 1**  
Function of Spanish Dictionaries  
in U.S. Federal Courts, 1900–2006

Function	Citations	Percent
Translate testimony or documents in evidence	37	46%
Translate statutes, regulations, and treaties	24	30%
Translate contract terms	9	11%
Define nonlegal word or phrase	4	5%
Define civil law term	3	4%
Serve as pronunciation aid	2	3%
Translate letters rogatory*	1	1%
<b>Total</b>	<b>80</b>	<b>100%</b>

\* A letter rogatory is a formal request from a court to a foreign court for some type of judicial assistance.

## Notes

1. See Jaksic, "In Arbitrations, Use of Spanish is Growing," 29 *National L.J.* 6 (March 19, 2007); Jaksic, "Spanish Classes Proliferating in Courts," 29 *National L.J.* 4 (Feb. 5, 2007); Shaffer, "As Hispanic Population Grows, Firms Learn Spanish," 27 *National L.J.* 6 (June 20, 2005).
2. Mersky and Price, "The Dictionary & the Man: the Eighth Edition of *Black's Law Dictionary*," 63 *Wash. & Lee L.Rev.* 719, 730 (2006); Miller and Hilsenteger, "The Proven Key: Roles and Rules for Dictionaries at the Patent Office and the Courts," 54 *Am. U. L.Rev.* 829, 832 (2005); Thumma and Kirchmeier, "The Lexicon Has Become a Fortress: the United States Supreme Court's Use of Dictionaries," 47 *Buff. L.Rev.* 227 (1999).
3. Babel Fish is available at <http://babelfish.altavista.com>.
4. Google Translate is available at [http://www.google.com/language\\_tools](http://www.google.com/language_tools).
5. Yates, "Scaling the Tower of Babel Fish: An Analysis of the Machine Translation of Legal Information," 98 *Law Libr.J.* 481, 494 (2006).
6. For criticisms of the use of dictionaries in U.S. courts, see Aprill, "Dictionary Shopping in the Supreme Court" 30 *Ariz. St. L.J.* 276, 304, 334; Sonpal, "Old Dictionaries & New Textualists," 71 *Fordham L.Rev.* 2177, 2197 (2003); Weinstein, "Against Dictionaries," 38 *U. Mich. J.L. Reform* 649, 656-65 (2005).
7. Lexis,® U.S. Supreme Court Cases, Lawyers' Ed. File Name: USLED.
8. Lexis, Federal Court Cases, Combined. File Name: COURTS. Dates Jan. 1, 1900–Dec. 31, 2006.
9. Corte Suprema de Justicia de la Nación República de Argentina. Case law website of the Supreme Court of Argentina, available at [http://www.csjn.gov.ar/documentos/cfal3/cons\\_fallos.jsp](http://www.csjn.gov.ar/documentos/cfal3/cons_fallos.jsp).
10. Sistema Costarricense de Información Jurídica (Costa Rica), available at <http://200.91.68.20/scij>. I searched opinions from the Sala Constitucional, Sala Primera, Sala Segunda, and Sala Tercera of the Corte Suprema de Justicia de Costa Rica.
11. Suprema Corte de Justicia de la Nación (Supreme Court of Mexico) IUS Database, available at <http://www.csjn.gob.mx/ius2006/Panel tesis.asp>. I searched only "jurisprudencia and tesis" that have potential to become binding precedent from the Novena Época, which commenced March 1995. For a discussion on the role of binding precedent in the Mexican legal system, see Stephen Zamora *et al.*, *Mexican Law* (Oxford University Press, 2004) at 84-87.
12. Colorado Supreme Court and Court of Appeals cases. Lexis, CO State Cases, Combined. File Name: COCTS.
13. Cornejo, *Diccionario Histórico y Forense del Derecho Real de España* (J. Ibarra, 1779); Escriche, *Diccionario Razonado de Legislación y Jurisprudencia* (Viuda y Hijos de A. Calleja, 1847); Alcubilla, *Diccionario de la Administración Española* (Arco de Santa María, 1887).
14. *Diccionario de la Lengua Castellana* (Real Academia Española, various 18th and 19th century eds.).
15. *Strother v. Lucas*, 37 U.S. 410, 442 (1838).
16. *Gonzalez v. Roman Catholic Archbishop of Manila*, 280 U.S. 1, 4, 15 (1929).
17. *U.S. v. De Jesus Ospina-Villa*, No. 00-CR-97-S(F) (W.D.N.Y. 2001) U.S. Dist.Lexis 12345, available at <http://www.nywd.uscourts.gov/decision/20010716.pdf>, citing *Activa Technical and Business Spanish Dictionary*, available at <http://www.activadic.com/Dicc/EnDic.htm>; *Gherebi v. Bush*, 352 F.3d 1278, 1292-1293 (9th Cir. 2003), citing three online dictionaries: *American Heritage Spanish-English, English-Spanish Dictionary*, available at [http://education.yahoo.com/reference/dict\\_en\\_es](http://education.yahoo.com/reference/dict_en_es); *Diccionario de la Lengua Española*, available at <http://www.rae.es>; and *Diccionario Vox*, available at <http://www.diccionarios.com>.
18. *U.S. v. Bustillos-Muñoz*, 235 F.3d 505, 516 (10th Cir. 2000).
19. *Larousse Concise Spanish-English, English-Spanish Dictionary* (Larousse, 1993).
20. *U.S. v. Chavez-Ceja*, No.98-3031. LEXIS 23284 (10th Cir. Sept. 21, 1998), available at <http://www.ck10.uscourts.gov/opinions/98/98-3031.pdf>.
21. Gooch, *Cassell's Spanish-English, English-Spanish Dictionary* (Wiley Publishing, 1978).
22. Dahl, *Dahl's Law Dictionary: Spanish-English, English-Spanish: An Annotated Legal Dictionary*, 4th ed. (W.S. Hein, 2006).
23. Cabanellas and Hoague, *Butterworths Spanish/English Legal Dictionary* (Butterworth Legal Publishing, 1991).
24. See Monroy, "Book Note: *Dahl's Law Dictionary/Diccionario Jurídico Dahl*," 31 *Int'l L.* 1135 (1997) (praising *Dahl's Law Dictionary* as "authoritative" and for having "encyclopedic definitions"); Torres, "A Comparative Review of Spanish-English Legal Dictionaries," 86 *Law Libr.J.* 230, 232 (1994) (describing *Butterworths Spanish/English Legal Dictionary* as "best of the lot"); Avalos, "Legal Translations: Some Tips" (July 24, 1998), available at [http://www.law.arizona.edu/Library/Research/Guides/legal\\_translations.cfm?page=research](http://www.law.arizona.edu/Library/Research/Guides/legal_translations.cfm?page=research) (describing *Butterworths Spanish/English Legal Dictionary* as the "most comprehensive bilingual legal dictionary").
25. de Groot and van Laer, "The Dubious Quality of Legal Dictionaries," 34 *Int'l J. Legal Info.* 65 (Spring 2006).
26. de Groot and van Laer, "Bilingual and Multilingual Legal Dictionaries in the European Union: A Critical Bibliography" (May 15, 2005) at 29, available at <http://arno.unimaas.nl/show.cgi?fid=3130> (listing M.C. Oosterveld-Egas Reparaz's *Juridisch Woordenboek Nederlands-Spaans* as the only bilingual Spanish legal dictionary that is a high-quality comparative work).
27. See *U.S. v. Ovalle*, 2003 U.S. Dist. LEXIS 1426 (S.D.N.Y.); *Bustillos-Muñoz*, *supra* note 18 at 516.
28. See *Mangual v. Rotger-Sabat*, 317 F.3d 45, 68 (1st Cir. 2003); *U.S. v. McClain*, 545 F.2d 988, 998 (5th Cir. 1977).
29. See *Walpex Trading v. Yacimientos Petrolíferos Fiscales Bolivianos* 890 F.Supp. 300, 303 (S.D.N.Y. 1995) (using Cabanellas's *Diccionario de Derecho Usual* to define *dolo* in a Bolivian contract); *Gherebi v. Bush*, 352 F.3d 1278, 1292-1293 (9th Cir. 2003) (relying on the *Diccionario de la Lengua Castellana* and to define terms in the Guántanamo Bay lease between the United States and Cuba).
30. Weinstein, *supra* note 6 at 656-57; Thumma and Kirchmeier, *supra* note 2 at 262-64; Sonpal, *supra* note 6 at 2200.
31. Real Academia Española, *Diccionario de la Lengua Española* (Editorial Espasa Calpe, 2001), available online at <http://www.rae.es>.
32. *Gherebi*, *supra* note 17 at 1292.
33. Unión Tipográfica Editorial Hispano Americana, *Diccionario Enciclopédico U.T.E.H.A.* (Unión Tipográfica Editorial Hispano Americana, 1968).
34. *Adorno Lorenzana v. People of Puerto Rico*, 307 F.Supp. 1059, 1063 (D.P.R. 1969).
35. *Osario v. Harza Engineering Company*, 890 F.Supp. 750, 752-53 (N.D.Ill. 1995).
36. The study started its analysis of foreign court opinions in 1995 for two reasons. The Argentine Supreme Court website provides full-text of opinions only from 1995. Mexico's Ninth Judicial Epoch (Novena Época), which introduced major constitutional and judicial reforms, also commenced in 1995.
37. Arronda, "En Español/Diccionario Escolar de la Real Academia Española," 122 *Libr.J.* 68 (July 1, 1997).
38. Corte Suprema de Justicia (CSJN), 8/19/1999, "Actuaciones Relacionadas con la Exportación de Material Bélico," Causa n.10.338. Expediente: Competencia 51 XXXV p.24 (Arg.), citing Kaplan and Pombo, *Wiley's English-Spanish, Spanish-English Legal Dictionary*, 2nd ed. (New York Wiley Law Publications, 1997).
39. CSJN, 12/7/2005, "Daniel Enrique Maldonado y otros/recurso de hecho," Causa N.1174, Expediente M.1022 XXXIV, p.17 (Arg.), citing *Collins Spanish-English, English-Spanish Dictionary* (Harper Collins, 1993); CSJN Sala Tercera (Penal), 11/17/2003, Recurso de Casación, Exp. 99-009445-0042-PE, Res.2003-0 1031(Costa Rica), citing *Larousse Diccionario Pocket Español-Inglés, Inglés-Español*.
40. Escriche, *Diccionario Razonado de Legislación y Jurisprudencia* (Viuda e Hijos de A. Calleja, 1847).

41. Cabanellas, *Diccionario de Derecho Usual* (Editorial Heliasta, 1976).  
 42. See REDUCCIÓN SALARIAL, LA FALTA DE PAGO DEL AUMENTO CONCERTADO NO ACTUALIZA LA CAUSAL RECISORIA, Primer Tribunal Colegial de Trabajo del Tercer Circuito, Semanario Judicial de la Federación y su Gaceta, Novena Época, tomo XX, Octubre de 2004, Tesis III.1o.T.85 L, Página 2394. (Mex.) (relying on the *Diccionario de la Lengua Española* to interpret Article 51 of Mexico's Federal Labor Act).

43. Universidad Nacional Autónoma de México, *Diccionario Jurídico Mexicano* (Porrúa: UNAM: Instituto de Investigaciones Jurídicas, 2005).  
 44. See Avalos, *supra* note 24.  
 45. Velázquez de la Cadena *et al.*, *New Revised Velázquez Spanish and English Dictionary* (New Century Publishers, 1985). ■

Appendix

Citations to Spanish Dictionaries in U.S. District Courts and Circuit Courts of Appeals, 1900-2006

Dictionary	Cites	Dates Cited	Citing Jurisdictions	Type of Dictionary
<i>Cassell's Spanish-English, English-Spanish Dictionary</i>	13	1971-2002	1st Cir., 5th Cir., 9th Cir., 10th Cir., C.C.P.A. N.D.Ill., S.D.Fla., S.D.N.Y.	Bilingual general usage dictionary
<i>New Revised Velázquez Spanish &amp; English Dictionary</i>	12	1960-2005	1st Cir., N.D.Ill., D.N.M., D.P.R.	Bilingual general usage dictionary
<i>Diccionario de la Lengua Española</i> (Real Academia Española), available online at <a href="http://www.rae.es">http://www.rae.es</a>	11	1931-2003	1st Cir., 9th Cir., D.P.R.	Spanish-language general usage dictionary
<i>Oxford Spanish Dictionary: Spanish-English, English-Spanish</i>	4	2003-06	1st Cir., D.Neb., Bankr.D.Or., D.N.M.	Bilingual general usage dictionary
<i>Simon &amp; Schuster's International Dictionary English-Spanish, Spanish-English</i>	4	1996-2006	S.D.N.Y., D.P.R.	Bilingual general usage dictionary
<i>Collins Spanish-English, English-Spanish Dictionary</i>	3	1987-2006	1st Cir., 3rd Cir., S.D.N.Y.	Bilingual general usage dictionary
<i>Diccionario de Derecho Usual</i> (Guillermo Cabanellas)	3	1979-95	S.D.N.Y., D.P.R.	Spanish-language legal dictionary
<i>Vox Diccionario Manual Ilustrado de la Lengua Española</i> , available online at <a href="http://www.diccionarios.com">http://www.diccionarios.com</a>	3	1969-2003	9th Cir., D.P.R.	Spanish-language general usage dictionary
<i>American Heritage Spanish Dictionary: Spanish-English, English-Spanish</i> , available online at <a href="http://education.yahoo.com/reference/dict_en_es">http://education.yahoo.com/reference/dict_en_es</a>	2	2003, 2006	9th Cir., D.Neb.	Bilingual general usage dictionary
<i>Appleton's New Spanish-English &amp; English-Spanish Dictionary</i> (Arturo Cuyás)	2	1917, 1976	1st Cir., D.P.R.	Bilingual general usage dictionary
<i>Diccionario Jurídico según la Jurisprudencia del Tribunal Supremo de Puerto Rico</i> (Lebrón)	2	1979, 1985	D.P.R.	Spanish-language legal dictionary
<i>Activa Technical &amp; Business Spanish-English Online Dictionary</i>	1	2001	W.D.N.Y.	Bilingual general usage dictionary
<i>Concise American Heritage Larousse Spanish Dictionary</i>	1	1995	9th Cir.	Bilingual general usage dictionary
<i>Dahl's Law Dictionary Spanish-English, English-Spanish: An Annotated Legal Dictionary</i>	1	2000	1st Cir.	Bilingual legal dictionary
<i>Diccionario de Derecho</i> (Ribó Durán)	1	1990	D.P.R.	Spanish-language legal dictionary

Appendix continued on next page.

## Appendix (continued)

Dictionary	Cites	Dates Cited	Citing Jurisdictions	Type of Dictionary
<i>Diccionario de Derecho Privado</i> (Ignacio de Casso y Romero)	1	1979	D.P.R.	Spanish-language legal dictionary
<i>Diccionario de Legislación y Jurisprudencia</i> (Joaquín Escriche)	1	1942	3rd Cir.	Spanish-language legal dictionary
<i>Diccionario de Términos Jurídicos</i> (Ignacio Rivera Garcia)	1	1979	D.P.R.	Spanish-language legal dictionary
<i>Diccionario de Voces Indígenas de Puerto Rico</i>	1	1997	S.D.N.Y.	Spanish-language specialized dictionary
<i>Diccionario del Uso del Español</i> (María Moliner)	1	2005	1st Cir.	Spanish-language general usage dictionary
<i>Diccionario Enciclopédico Unión Tipográfica Editorial Hispano Americana</i>	1	1969	D.P.R.	Spanish-language general usage dictionary
<i>Diccionario Ideológico de la Lengua Española</i> (Julio Cásares)	1	1977	D.P.R.	Spanish-language general usage dictionary
<i>Dictionary of Legal Terms: Spanish-English, English-Spanish</i> (Louis A. Robb)	1	1982	1st Cir.	Bilingual legal dictionary
<i>Larousse Concise Spanish-English, English-Spanish Dictionary</i>	1	2000	10th Cir.	Bilingual general usage dictionary
<i>Larousse Gran Diccionario: Inglés-Español, Español-Inglés</i> (P. White and T. Alvarez García)	1	2003	9th Cir.	Bilingual general usage dictionary
<i>Larousse Pocket Dictionary: Spanish-English, English-Spanish</i>	1	2003	D.Kan.	Bilingual general usage dictionary
<i>Pequeño Diccionario Inglés-Español, Español-Inglés</i> (Garnier Hermanos)	1	1955	C.C.P.A.	Bilingual general usage dictionary
<i>Standard Spanish-English, English-Spanish Dictionary</i> (Emilio M. Martínez Amador)	1	1969	D.P.R.	Bilingual general usage dictionary
<i>University of Chicago Spanish-English, English-Spanish Dictionary</i> (Carlos Castillo)	1	2006	D.Neb.	Bilingual general usage dictionary
<i>Vox Compact Spanish-English Dictionary</i> (National Textbook Company)	1	1992	5th Cir.	Bilingual general usage dictionary
<i>Vox Diccionario Manual de Sinónimos y Antónimos</i>	1	2005	1st Cir.	Spanish-language general usage dictionary
<i>Williams Spanish-English Dictionary</i> (Edwin Bucher Williams)	1	1976	1st Cir.	Bilingual general usage dictionary
<b>Total</b>	<b>80</b>	—	—	—

