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Comment

*275 "THE SIMPSONS" AND THE LAW: REVEALING TRUTH AND JUSTICE TO THE MASSES

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I. Introduction

In Law, Lawyers, and Popular Culture, Lawrence Friedman argues that legal culture and popular culture share a symbiotic relationship, with popular culture transmitting distorted information about the law to a generally ignorant public. [FN1] Friedman notes that relatively few members of the general public read casebooks, statutes, or administrative rules, unless they themselves need access to the legal system. [FN2] He theorizes that, as legal culture becomes more Byzantine and removed from the mainstream, popular culture will remain the main source of legal information for the general public.

Unfortunately, it appears likely that members of the public will be even more reluctant to access the legal system after they have been exposed to the negative depictions of both the law and the legal actors often seen in the contemporary media. Furthermore, when this reluctance is considered in light of the fact that entertainment value is paramount in popular media, the prospects for an actual increase in the *276 general public's knowledge of the legal system seem even more dismal. References to the law in popular media, while pervasive, are not necessarily accurate. [FN3] Thus, the general public's ignorance of the legal system is reinforced.

If we assume that Friedman is correct, then it becomes important to look at the entertainment of the times in order to analyze the symbiotic relationship between popular culture and legal culture. One of the most popular contemporary television series that regularly addresses legal issues also happens to be a cartoon--namely, "The Simpsons." This comment will examine how courts, lawyers, and the police are depicted in various episodes of "The Simpsons," and argue that the series represents a grand form of satire in the respect that truth and justice are never attained through the efforts of traditional legal actors. Rather, truth and justice are attained only through the efforts of children, or by abusing, sidestepping, or simply ignoring the legal system. Part II provides some background information about "The Simpsons" and expands upon Friedman's theory in order to establish a framework of analysis. Part III examines the depiction of traditional and non-traditional legal actors in various episodes of "The Simpsons." Lastly, Part IV examines the interaction of satire and mass culture, concluding that "The Simpsons" represents a socially corrective form of satire that intends to affect social change--specifically, the improvement our legal system.

II. The Mass Appeal of "The Simpsons"

A. Background

"The Simpsons" has evolved into a full-fledged popular culture icon, which, through clever writing and humorous animation, has reflected and shaped American culture since the 1990s. The series features one of the most recognizable television families in the world and has featured numerous celebrity voice appearances. It has run for more than fourteen seasons, consisting of more than three hundred episodes, and it is still on the air as of this writing. In addition, the *277 series has been syndicated, and is broadcast in more than 60 countries. Including marketing and licensing-related apparel, it is also a highly valuable franchise, valued at nearly one billion dollars. [FN4]

"The Simpsons" started in 1987 as a collection of shorts on "The Tracey Ullman Show," and grew into its own series in 1989, thanks to the efforts of its producer, James Brooks, and its creator, Matt Groening. [FN5] For the cartoon's setting, Groening created the fictional town of Springfield, U.S.A. With complete control over the cartoon's setting, Groening, a former



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"underground" comic artist, made Springfield into a fantasy world that reflects the real world as if through a distorted funhouse mirror. Groening has said that he used the series as a vehicle to "jam in some countercultural messages," using the series' considerable popularity--along with Brooks' sway as an established producer--as a hedge against network interference or censorship. [FN6] As a result, New York Times film critic A.O. Scott argues that, by addressing important issues confronting America, "The Simpsons" has evolved into much more than a television series:

[N]othing has summed up the promise and confusion of American life in the post-cold-war era better than "The Simpsons." Nothing else has harnessed the accumulated energies and memory traces of the civilization with so much intelligence and originality. . . . [T]he show--brainy and populist, sophisticated and vulgar, gleeful in its assault on every imaginable piety and subversively affirmative of the bonds of family and community--has remained remarkably vital. [FN7] Clearly, "The Simpsons" has become a major source of satire in American popular culture.

B. "The Simpsons," Popular Culture, and Legal Culture

Like traditional legal texts, depictions of the law in film and television are cultural artifacts. [FN8] However, the main objective of films *278 and television programs is not the portrayal or explanation of dispute resolution. To be sure, films and television programs usually are mere disposable entertainment for the masses. [FN9] Despite this fact, John Denvir argues that films (and, by implication, television programs) "reflect powerful myths that influence our reactions to issues we meet in real life, including legal issues," and that "perhaps the 'rule of law' is best viewed as one more myth competing for audience acceptance." [FN10]

So how does "The Simpsons" make the law appealing to not-so-captive audiences, and what does it say about the lay view of law in America today? One of the series' important strengths is its pervasive use of allusion. Allusion, which conjures up a series of associations by calling upon the viewer to make connections to ideas beyond those directly addressed in the episode, is deployed in the depiction of law on the series as well. The series' humor is often "highbrow," requiring a level of cultural literacy that some could consider elitist or exclusive. However, as Irwin and Lombardo assert in their discussion of allusion in "The Simpsons," "comprehension of an allusion combines the pleasure we feel when we recognize something familiar We derive pleasure from understanding allusions in a way we do not from understanding straight-forward statements." [FN11]

In "The Simpsons," allusions to celebrity trials like the O.J. Simpson trial [FN12] and the John Gotti trials [FN13] are veiled, but no doubt present. Thus, "The Simpsons" is a "repeat-viewing" series that invites its fans to watch each episode repeatedly in order to pick up on references that they may have missed during previous viewings. The series, however, maintains its freshness as only a cartoon could, because the only limitation upon it is that of imagination.

Whether intentional or not, the series' creators and writers have *279 created a comic commentary that mirrors the legal realist critique of our legal system. Denvir explains that the legal realists' goal is to unmask the human fallibility that is inherent in our legal system: "[T]he Realist tradition attempts to show that the 'rule of law' rhetoric of orthodox legal discourse often operates to mask the arbitrary political power wielded by judges and other state legal actors." [FN14]

By couching observations about our flawed legal system in humor and allusion, "The Simpsons" conveys its criticism in a digestible form. Thus, while the audience is laughing, "The Simpsons" is able to push a more serious agenda.

III. Finding Truth and Justice in Springfield - Despite the Law

A major theme throughout the series--one that is especially pronounced in episodes dealing with the law--is the fallibility of human-made systems governed by human-made rules. After more than thirteen seasons, "The Simpsons" has left virtually no subject untouched and, since law plays such a dominant role in society, it plays a major role in the series as well.

A. The Springfield Police

Chief Clancy Wiggum is the chief of the ever-bungling Springfield police department. Drawn to closely resemble a pig, Wiggum is plainly incompetent (e.g., talking into his wallet instead of his walkie-talkie) and condescending to the citizenry (e.g., not taking "9-1-1" calls seriously). [FN15] In one episode, the town's millionaire, Montgomery Burns, steals the Simpson family's 25 greyhound puppies in order to make a tuxedo out of them. [FN16] When the Springfield police are



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called in to investigate the scene of the crime, Wiggum is only somewhat concerned:

*280 Wiggum: Don't worry, folks, we'll find your wallet.

Marge: Dogs! Chief, you're getting powdered sugar all over my floor.

Wiggum: No I'm not, no I'm not. I'm, um, dusting for prints.

Marge: Oh.

In another instance, the townspeople, fed up with Wiggum's bungling efforts to capture a cat burglar, form a vigilante mob to affect "justice" and catch the burglar. In a scene reminiscent of the classic German film M, Homer Simpson, the patriarch of the Simpson family, leads a rowdy mob that ends up breaking more laws than it upholds. [FN17] Throughout this episode, the police are depicted as being too incompetent to solve the crime and protect the citizens of Springfield:

Homer decides to report the robbery of his house to the Springfield police.

Homer: Hello, Police? Are you sitting down? Good! I wish to report a robbery.

Wiggum: [bored] A robbery, right. Thanks for the report. [hangs up] That's another one, Lou. . .723 Evergreen Terrace. [Looks at a map with the robbery locations marked on it]

Well, there doesn't seem to be any pattern yet, but if I take this one and move it here. . .and I move these over here. . .hello! It almost looks like an arrow!

Lou: Hey, look, Chief: it's pointing right at this police station.

Wiggum: Let's get out of here! Local news anchorman Kent Brockman feeds the mass hysteria created by the cat burglar during his interview of a criminal law professor:

Kent: When cat burglaries start, can mass murders be far behind? This reporter isn't saying that the burglar is an inhuman monster like the Wolfman [a Wolfman graphic appears over his shoulder], but he very well could be. So, professor: would you say it's time for everyone to panic?

Professor: Yes I would, Kent. Wiggum, however, continues to bungle the case:

At a press conference, Chief Wiggum reports on the police's progress:

*281 WIGGUM: Ladies and gentlemen, ladies and gentlemen--please. We have a major break in the case. We recovered the burglar's handkerchief from one of the crime scenes. Now, one sniff of this baby, and our tracking dog will be hot on his trail. Gosh, look at me, I'm. . .sweating like a pig here. [wipes himself] Oh. . .aw man. . .that's better. All right, get the scent, boy. [dog sniffs it] Come on, get the scent. Now kill!

[Dog jumps at his throat]

Oh! Ow! Hey! Oh, my jugular, argh! Ooh! Any questions? The Townspeople are spurred into action and form a citizen's patrol. Initially they pick religious fundamentalist Ned Flanders at a town hall meeting, but Homer eventually steps into the role:

Flanders: I don't really have very much experience, but I'll. . .

Moe: Someone else!

Everyone: Yay! Someone else! Someone else! Someone else!

Homer: I'm someone else.

Lenny: He's right!

Homer: We don't need a thinker. We need a doer: someone who'll act without considering the consequences.

Everyone: Homer! Homer! Homer! After a few days on the job, Homer is invited to be a guest on Smartline, a Springfield television news show:

Kent Brockman interviews Homer.

Kent: Mr. Simpson, how do you respond to the charges that petty vandalism such as graffiti is down eighty percent, while heavy sack-beatings are up a shocking nine hundred percent?

Homer: Aw, people can come up with statistics to prove anything, Kent. Forty percent of all people know that.

Kent: I see. Well, what do you say to the accusation that your group has been causing more crimes than it's been preventing? Homer: [amused] Oh, Kent, I'd be lying if I said my men weren't committing crimes.

Kent: [pause] Well, touché. *282 Homer's mob enforces an absurd form of justice, roughing up innocent citizens while, at the same time, allowing the cat burglar to get away with more heists.

Ultimately, the identity of the cat burglar is uncovered by a senile old man, Grandpa Simpson, and the burglar, Molloy, is



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taken away by the authorities. As Wiggum is arresting him, however, Molloy charms the townspeople and almost convinces them to set him free. Wiggum, however, shoots down that idea by invoking the law, saying that those who break the law must go to jail. Immediately after Wiggum makes this statement, the town's Kennedy-esque Mayor Quimby hands Wiggum his monthly kickback in front of the townspeople and the news cameras. In the end, Molloy gets away, leading the town on a wild goose chase and leaving Wiggum and his men tied up.

The treatment of the Springfield Police Department in "The Simpsons" is hardly surprising, as it reflects a popular distrust of the police. But, as "Homer the Vigilante" illustrates, the creators of "The Simpsons" do not place a great deal of faith in mob justice either. Instead, Grandpa Simpson--a character that others usually do not listen to or take seriously--ultimately discovers the truth.

B. The Springfield Courts

The Springfield court system functions just as poorly as the Springfield police department. Indeed, the legal realist critique is even more pointed in three episodes of "The Simpsons" that prominently feature trials.

1. The Springfield Judges

One of the most beloved episodes of "The Simpsons" is one that revolves around Freddy Quimby, the nephew of Springfield's corrupt Mayor Quimby. In true Kennedy style (complete with Boston accent), Freddy Quimby is sued after he allegedly assaults a bungling French butler for pronouncing "chowder" incorrectly. [FN18] The only eyewitness is Bart Simpson, who had skipped school and snuck into the Quimby Compound. There, Bart observed the butler's Pink Panther-like mishaps that led to the butler's injuries. Thus, Bart faces a moral *283 dilemma: if he comes forward to tell the truth, then he will have to admit that he skipped school, and he will be sent to a Christian military school by Principal Skinner, who also happens to be on the jury for the Quimby trial.

Bart seeks advice from his parents, but receives little help. Homer, who also is on the jury, is oftentimes asleep or simply not paying attention. When Bart approaches his mother Marge with his dilemma, she spaces out and tells an unrelated tale about her uncle, who was "taken down" by seventy-five U.S. Marshals.

It is Bart's little sister, Lisa--who often serves as the voice of morality and reason in the series--who finally appeals to Bart's sense of right and wrong and, ultimately, the episode is resolved when Bart decides to listen to his conscience. Although Bart's tale is a fantastic one, it is confirmed when the absurdly clumsy butler trips over his cast, flies across the courtroom and falls out the window into a truck filled with rat traps. Despite the fact that Bart comes forward only after testimony is concluded, the judge allows Bart's testimony:

Bart again comes forward and the judge decides to reopen the trial.

Judge: Even though reopening a trial at this point is illegal and grossly unconstitutional, I just can't say no to kids. The judge's ruling is true to legal realist critique of "The Simpsons," which holds that legal rules may be bent for arbitrary reasons.

If the trial should be the public forum where the boundaries and contours of the law and public behavior are set, then popular culture's depiction of the truth being found elsewhere is problematic. The emphasis on truth lying outside of the legal system in "The Simpsons" reveals a public distrust of the deliberative process of trial, which demands that guilt be proven individually and procedurally. Rather, it takes the child Lisa's better, "purer" sense of right and wrong to coax out the truth.

2. The Springfield Plaintiffs' Lawyer

Since "The Simpsons" often plays on popular stereotypes, it is hardly surprising that a caricature of the plaintiffs' lawyer should appear in the series, as this stereotype is firmly rooted in popular *284 culture. [FN19] Springfield's ambulance-chasing lawyer, Lionel Hutz, carries nothing more in his briefcase than a newspaper and an apple core. Hutz is described as a "shyster" and an opportunist, who instinctively gets up every time he hears a siren. [FN20] Furthermore, Hutz is depicted in various episodes as being wholly unprepared for trials. [FN21] Hutz's actions during the Quimby trial display his incompetence brilliantly:



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Lionel Hutz makes a statement for the jury.

Hutz: Ladies and gentlemen, I'm going to prove to you not only that Freddy Quimby is guilty, but that he is also innocent of not being guilty. I refer you to my expert witness, Dr. Hibbert.

Hibbert: Well, only one in two million people has what we call the "evil gene." [holds up a card showing DNA] Hitler had it, Walt Disney had it, and Freddy Quimby has it. [chuckles]

Hutz: Thank you, Dr. Hibbert. I rest my case.

Judge: You rest your case?

Hutz: What? Oh no, I thought that was just a figure of speech. Case closed. [sits down quite satisfied] [FN22]

Although Hutz's character was developed substantially during the Quimby trial, it is first introduced near the end of the second season, [FN23] and the appearance of this shyster lawyer early in the series suggests *285 that such lawyers play a major role in the creators' worldview. In Hutz's first episode, Mr. Burns runs into a skateboarding Bart with his car. After Mr. Burns offers Bart a nickel as compensation, Bart is transported to Springfield General Hospital. There, Hutz approaches Homer and Marge at Bart's bedside. Lisa--again representing the voice of reason--asks Hutz directly if he is a "shyster." Hutz ignores her and says that he detects an opportunity to "ching-ching, cash in" on Bart's fraudulent injuries. Although Bart's family doctor gives him a clean bill of health, Hutz's crooked doctor says otherwise.

Homer is enticed by the prospect of a million-dollar damages award, and the Simpson family is finally convinced to go forward with the trial when they visit Hutz's office, which is located in a shopping mall. At his office, Hutz displays the artifacts of prestige designed to give the layperson comfort: degrees from Harvard, Yale, Oxford, MIT, the Sorbonne and the Louvre. Impressed, Homer finally puts Hutz on retainer when Hutz clinches the deal by throwing in a cheap string of faux pearls.

During the subsequent trial, Burns, flanked by five lawyers, counters Bart's false testimony with some false testimony of his own. Burns reads his statement from a piece of paper, convincing no one. Afterwards, Burns is outraged and explodes at his lawyers, whom he calls a collection of "overpriced, under-brained, glorified notary publics."

In the end, the truth is revealed through unsavory means, as Burns wines and dines Homer and Marge--without their lawyer present--at his manor. During dinner, Burns offers the Simpsons \$500,000 to settle the case but, when Burns leaves the Simpsons alone for a moment, he spies on them and learns from their conversation that Bart's injuries are fraudulent. The next day at trial, one of Burns' lawyers calls Marge to the stand and exposes the ruse through a series of alternately badgering and patronizing questions, leaving the Simpsons with no money award at all.

The duality in the depiction of lawyers in modern popular culture is evident. On the one hand, the lawyer is the shyster who exploits the legal system. On the other hand, the lawyer is the noble, heroic advocate fighting against a corrupt legal system. Gone are the days of To Kill a Mockingbird's Atticus Finch, who vigorously defends his *286 client against hopeless odds with integrity and the power of argument. [FN24] When the public perceives lawyers to be feeding off of "human misery," as Friedman puts it, it is no wonder that they are more commonly depicted as "vile, money-mad, heartless sharks." [FN25] Even though lawyers can be seen winning just acquittals in current films and television shows, this is a small comfort to a profession so often maligned in popular culture.

3. The Springfield Jury

Allusions to the classic film Twelve Angry Men [FN26] are evident in "The Boy Who Knew Too Much." [FN27] In that episode, the Quimby trial is delayed only as a result of Homer Simpson's lone holdout vote. Instead of acting from some noble motivation, however, Homer holds out in order to continue his sequestration in a hotel with free cable. Homer's reasons are totally unlike the ethical considerations of the holdout juror, Davis, in Twelve Angry Men. Davis passionately convinces his fellow jurors to vote for an acquittal in a capital murder case, because he sees holes in the prosecution's case. Davis upholds justice through the legal system by taking the "reasonable doubt" standard seriously. A commitment to the legal system, or perhaps to a higher law, is what drives juror Davis.

By contrast, it becomes clear that the lure of a hotel stay with free cable is what drives juror Homer Simpson: The Jury has retired to the Jury Room at the Quimby trial to vote on Freddy



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Quimby's fate:

Jasper: Why bother voting? He's guilty.

Flanders: Well, we might as well make it official.

Homer: What does "sequestered" mean?

Skinner: If the jury is deadlocked they're put up in a hotel together so they can't communicate with the outside world.

Homer: What does "deadlocked" mean?

*287 Skinner: It's when the jury can't agree on a verdict.

Homer: Uh huh. And "If?"

Skinner: A conjunction meaning "in the event that" or "on condition that."

Homer: So if we don't all vote the same way, we'll be deadlocked and have to be sequestered in the Springfield Palace Hotel.

. .

Patty: That's not going to happen, Homer. Jasper: Let's vote. My liver is failing.

Homer: . . . where we'll get a free room, free food, free swimming pool, free HBO - Ooh! "Free Willy!"

Skinner: Justice is not a frivolous thing, Simpson. It has little if anything to do with a disobedient whale. Now let's vote!

Homer: Uh, how are the rest of you voting?

Everyone: Guilty.

Homer: OK, fine. How many S's in "innocent?"

Everyone: Aw.

Homer: I'm only doing what I think is right. I believe Freddy Quimby should walk out of here a free hotel.

This scene draws its humor from the common perceptions that jury duty is a bore and a burden, that jurors do not take their duty seriously, and that laypeople do not understand legal jargon. Thus, it calls into question the integrity of the jury system itself.

IV. Conclusion: The Role of Satire in "The Simpsons" and Society

Satire is an elevated form of comedy that is often designed to affect social change. [FN28] Satire achieves its socially corrective purpose by holding a mirror up to our society and ourselves, and demanding that we improve both. Authors use satire to rebel against an over-codified *288 society and to liberate themselves from a 'stultified' world. [FN29] Indeed, satire has the coercive power to attack hidden "absurdities" in social custom, unmasking fallacies and undermining the hypocrisy of our society. [FN30]

"The Simpsons" is a pop culture icon, which, by Groening's own acknowledgement, has been heavily influenced by the American countercultural movement of the 1960s. While lampooning the law and legal actors, the series depicts a range of problems confronting the American legal system. The series' commentary is certainly comical, but it goes further than mere comedy to "unmask" the flaws in our social systems. The series ventures into the realm of socially corrective satire; it is not only reflective of a flawed legal system, but also represents an attempt to change the system as well. "The Simpsons" uses the age-old form of satire to convey modern and relevant messages regarding the failings of American society, especially with regard to the legal system.

Ultimately, "The Simpsons" pushes a legal realist agenda. In Springfield, legal rules are meaningless, trivial and easily sidestepped. In the legal realist tradition, the creators and writers of the series present a fictional world where there are no absolutes rooted in religious or natural law, and where justice is realized only through the abuse or circumvention of the legal system. For the citizens of Springfield, these are the only methods of finding truth and justice. "The Simpsons" is effective because it reflects commonly held beliefs about our legal system. It broadcasts to legal professionals the message that they have room to improve, and that it is incumbent upon them to examine the underlying causes of such criticism. Otherwise, the joke will continue to be on them.

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[FN1]. Lawrence M. Friedman, Law, Lawyers, and Popular Culture, 98 Yale L.J. 1579, 1594 (1989).



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[FN2]. Id. (internal citations omitted).

[FN3]. Id.

[FN4]. Jenny Eliscu, Homer and Me, Rolling Stone, Nov. 28, 2002, at 50.

[FN5]. Id.at 57; A.O. Scott, Homer's Odyssey, N.Y. Times Magazine, Nov. 4, 2001, at 43.

[FN6]. Eliscu, supra note 5, at 58; Scott, supra note 5.

[FN7]. Scott, supra note 5.

[FN8]. See generally Friedman, supra note 1; John Denvir, Introduction to Legal Reelism: Movies as Legal Texts (John Denvir ed., Univ. of Illinois Press 1996).

[FN9]. Denvir, supra note 8, at xii.

[FN10]. Id. at x.

[FN11]. William Irwin & J.R. Lombardo, The Simpsons and Allusion, in The Simpsons and Philosophy: The D'oh of Homer 81, 85 (Irwin, Conard & Skoble eds., 2001).

[FN12]. The reference to the O.J. Simpson murder trial is made through a play on words involving the "Simpson DNA." The Simpsons: Who Shot Mr. Burns, Part II (1995).

[FN13]. Elementary school-aged Bart Simpson is wrongfully put on trial and falsely accused of being a mafia capo. The Simpsons: Bart the Murderer (1991).

[FN14]. Denvir, supra note 8, at xiii (discussing Gary Peller, The Metaphysics of American Law, 73 Cal L. Rev. 1151, 1226-40 (1985)).

[FN15]. The Simpsons: Mother Simpson (1995). Also, Wiggum ultimately helps Homer's mother, a wanted fugitive, escape a wrongful warrant for her arrest by tipping the Simpsons off to a looming house raid. Id.

[FN16]. The Simpsons: Two Dozen and One Greyhounds (1995).

[FN17]. The Simpsons: Homer the Vigilante (1994); cf. M (Paramount Pictures 1931).

[FN18]. The Simpsons: The Boy Who Knew Too Much (1994).

[FN19]. Friedman, supra note 1, at 1593 ("[I]f people think of lawyers as rapacious sharks, this is unlikely to be pure invention; probably something really swims out there in the water, sharp-toothed and greedy, which produces the fear and the loathing.").

[FN20]. The Simpsons: Bart Gets Hit By a Car (1991).

[FN21]. Other examples of Hutz's antics can be seen in The Simpsons: Tree House of Terror IV (1993) and the accompanying vignette, The Devil and Homer Simpson. In that episode, Hutz, while defending Homer against the Devil, argues that a contract for a donut that calls for Homer's soul is "binding and unbreakable." Before that, he assures the Simpson family that he has prepared for the trial by watching an episode of Matlock with the sound turned off. Also, in The Simpsons: Marge on the Lam (1993), Hutz agrees to baby-sit for the Simpsons after what he describes as a brilliant negotiation, on condition that he is called "Miguel Sanchez." Later on, Hutz is seen emptying his briefcase into the Simpsons' raging fireplace.

[FN22]. The Simpsons: The Boy Who Knew Too Much (1994).



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[FN23]. The Simpsons: Bart Gets Hit by a Car (1991).

[FN24]. To Kill a Mockingbird (Universal Pictures 1962).

[FN25]. Friedman, supra note 1, at 1599.

[FN26]. Twelve Angry Men (Metro-Goldwyn Mayer 1957)

[FN27]. The Simpsons: The Boy Who Knew Too Much (1994).

[FN28]. Charles A. Allen & George D. Stephens, Preface to Satire: Theory and Practice v, v (Charles A. Allen & George D. Stephens eds., 1962).

[FN29]. Ronald Paulson, Introduction to Satire: Modern Essays in Criticism ix, ix (Ronald Paulson ed., 1971).

[FN30]. Edgar Johnson, A Treasury of Satire, in Satire: Theory and Practice 31, 31 (Charles A. Allen & George D. Stephens eds., 1962).

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