

Dystopian Narratives and Legal Imagination: Tales of Noir Cities and Dark Law

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I. Introduction

Since compiling systemic sets of norms is at the center of both the utopian and the legal projects, there is an innate kinship between many legal and utopian expressions. The utopian mode was indeed characterized by "its pursuit of legal, institutional, bureaucratic and educational means of producing a harmonious society."¹

Utopia, according to such perception, is a form of ideal society that imposes order through law.² As J. C. Davis put it: "The utopian mode is one which accepts deficiencies in men and nature and strives to contain and condition them through organizational controls and sanctions."³

This paper is based upon a complementing premise, maintaining that there is also a meaningful linkage between normative systems that are products of law, and speculative delineations of dystopias. This linkage derives from the duality pertaining to the utopian/dystopian notion. Many legal systems draw from utopian imagination, since utopian expressions are closely linked to law's purpose—creating norms that reflect a vision of optimal societal existence. At the same time, each normative system draws from imagining dystopias, which are visions of societies in which the quality of life is extremely undesirable.⁴ According to such perception, the utopian imagination and the dystopian imagination are the opposite faces of one coin.⁵

Amid the aspiration for utopian future and the apprehension from a dystopian one, the present societal condition is located. Under the background of flawed reality, the utopian vision serves as an inspiration for achieving a better model of societal existence, and imagining the dystopian stimulates its pursuing.⁶

In the following, two dystopian articulations, Jean-Luc Godard's *Alphaville* (1965) and Ridley Scott's *Blade Runner* (1982), will be presented as offering a meaningful contribution to the legal imagination, by creating manifestations to law's potential function as both generator of highly undesirable future, and a means to resist it. In both, the dystopian elements are intermingled with imagery that evokes present-day patterns.⁷ In both films, narratives that employ metropolitan settings create a similar cautionary tale, according to which the metropolis—the pillar of liberal and rational social existence—turns into a dystopia. In both cases, law is presented as taking an active role in enabling and facilitating the dystopian regime.

The following section will describe how dystopian tales are different from utopian models. The third section will deal with *Alphaville*, a depiction of a dystopian technocracy where the rule of law is replaced by the rule of logic, employing what is declared to be metarationalization. The next section will present *Blade Runner*, which manifests a dystopia established and maintained by employing secretive, brutal law. The following section will analyze the complementing vision of urban disaster facilitated by law that the two films create. The concluding section will describe how dystopian narratives augment the legal imagination by producing images of disastrous societal existence, while casting light on the role law can play in establishing it and resisting it.

II. Utopian Schemes and Dystopian Tales

Although one of the main utopian modes is literary,⁸ Fredric Jameson suggests that utopian text is typically non-narrative.⁹ Even when it takes the form of prose fiction, like the originating text, Thomas More's *Utopia*,¹⁰ or Edward Bellamy's seminal *Looking Backward*,¹¹ its core is not a story that relates to a subject; rather than that the typical utopian text describes a mechanism or a scheme.¹²

Dystopian text on the other hand, even when it gives account of a mechanism, is generally constructed as a narrative, which is a depiction of what happens to a specific subject or character.¹³ Consequently, because of their storytelling form, dystopian texts produce a significant contribution for enriching and widening the scope and contents of the legal imagination. They challenge both the present and the imagined future, by reflecting and representing the fate of individuals.

This paper deals with narratives of dystopia that can be characterized by three elements. The first is that they relate to dystopias generated by human decision-making, and not by unavoidable catastrophes such as lethal epidemics, atomic or ecological disaster, hunger, or lack of resources; the second is that they reveal how law is a significant factor in constituting the dystopian situation; the third is that they illuminate the dystopia by focusing on the situation of a specific subject or character.

One of the oldest dystopian myths, the biblical story of Sodom and Gomorrah, aptly exemplifies the appearance of all the three elements in a dystopian tale. As Genesis tells us, the outcry against the grievous sins of Sodom and Gomorrah was so great that God decided to destroy the two cities.¹⁴ According to Jewish legends, the governance of the cities was constituted and maintained by their laws and their judges. Here is one vignette, from the ancient Book of Jasher, expounding how legal mechanisms were employed in order to control the entry to the cities: "And by desire of their four judges the people of Sodom and Gomorrah had beds erected in the streets of the cities, and if a man came to these places . . . if the man was less than the bed . . . six men would stretch him at each end And if he was longer than the bed then they would draw together the two sides of the bed at each end until the man had reached the gates of death And when men heard all these . . . they refrained from coming there."¹⁵

The Talmud lists four judges who represent the evil traits of Sodom. Each judge is linked to a narrative relating to the specific injustice inflicted by him.¹⁶ The Talmud and the Book of Jasher recount in detail several stories about Sodom and Gomorrah's abusive laws. According to one story a poor man came into Sodom to seek help and food. The Sodomite people's response was the enactment of a rule forbidding offering of food or drink to the poor man.¹⁷ Two young women defied the law, and fed the man. When they were caught, they were brought before the local judges. One was sentenced to death and was burned alive. The other girl was smeared with honey and hung from the city wall until she was killed by bees. Her screams in particular, tells the Talmud, are alluded to in the term "outcry," mentioned in Genesis as the reason for God's decision to destroy the cities.¹⁸

This story, alongside other narratives in Jewish lore, translates the "great outcry" succinctly mentioned by the narrator of Genesis into tangible situations. The cluster of complementing stories transform the short biblical report

about the evil cities that were destroyed by God's wrath into an elaborate cautionary tale, encapsulating the danger in erecting unjust regimes, supported by legal norms. They tell about a dystopia that was created by human governance; they present law—legislation and judging—as central in constituting the dystopian situation, and they manifest the dystopian character of the situation by relating the sufferance of individuals one can pity and identify with.

Moving to contemporary culture, innovative images of dystopia are abundant, and the warnings of "what will happen if . . ." seem more relevant than ever.¹⁹ However, the platforms of dystopian narratives have dramatically changed. Since the turn of the previous century, dystopian images have figured notably in cinema, mainly in films that are linked to the science fiction genre.²⁰ As Chris Darke explains: "[T]he dystopian scenario need not be the exclusive preserve of science fiction, but, with the genre's propensity for speculation, allegory and straightforward prophecy, it appeared as its natural home."²¹

Indeed, as Jameson noted, the use of dichotomy between utopia and dystopia became salient since science fiction.²² Science fiction films, observed Susan Sontag in her seminal essay (to which I will return later) "The Imagination of Disaster," serve to "reflect world-wide anxieties, and they serve to allay them."²³ The cinema, because of its capacity to charge the dystopian visions with evocative representational dimensions, became a natural habitat.

III. Alphaville: The Capital of Pain

Alphaville is the capital city of a remote planet. Lemmy Caution (Eddi Constantine), an American secret agent, arrives to the city from the Outerlands, apparently planet Earth. His mission is to find out what happened to Henry Dixon, an agent who had been sent to Alphaville and disappeared. In order to do that, he must find Professor von Braun (Howard Vernon)—the mind behind Alpha 60, the city's omnipotent megacomputer, which is in complete control on all of Alphaville.

Disguised as Ivan Johnson, a reporter from the *Figaro-Pravda*, Lemmy gradually finds out Alphaville's ways and rules, with the help of Natasha (Anna Karina), von Braun's beautiful daughter, whom he falls in love with. Lemmy finds Dickson (Akim Tamiroff), who before dying tells him that the city is a technocracy, where citizens are governed by computerized dictates and are ex-

ecuted for acting illogically. Dickson instructs Lemmy to destroy the machine. Lemmy then attends a gala reception that includes, as entertainment, the execution of citizens who had displayed emotions. After being trapped by von Braun's bodyguards, Lemmy is interrogated by Alpha 60, and then senior team members accompany him in a guided tour around the computer's nerve center. Later Lemmy confronts von Braun, who offers him the opportunity to stay in Alphaville and enjoy power and wealth. Lemmy refuses, kills von Braun, and then damages Alpha 60's control panels. The city runs into havoc. Lemmy finds Natasha and they flee in his car, which he navigates toward the Outerlands. During the trip, Natasha, for the first time in her life, gains the ability to feel, and tells Lemmy: "I love you."

Lemmy Caution explains why and how Alphaville is a dystopian society:

In the last four years, under the direction of von Braun and his assistants, Alphaville has developed itself at lightning speed, by following the orders of its electronic brains . . . Outsiders have been assimilated wherever possible . . . The others, who could not adapt, were simply put to death. I visited the execution theater where they were electrocuted in their seats while watching a show. The sits tipped up and deposited them into huge garbage cans, making way for the next to be executed.²⁴

Several critics referred from different angles to the dystopian nature of *Alphaville*. Allan Wollfolk sets the film alongside a well-known literary tradition of dystopian novels, such as Yevgeny Zamyatin's *We* (1924), Aldus Huxley's *Brave New World* (1932), and George Orwell's *Nineteen Eighty-Four* (1949), all depicting political oppression destructive to individual life.²⁵ Godard's conception of Alphaville, he maintains, "draws upon this tradition of manipulation and coercion of the most private activities."²⁶ Chris Darke describes the dystopia in Alphaville as a technocracy,²⁷ "society in which *techné* has overwhelmed *demos*, a computer-controlled society ordered according to the dictates of 'prudence, control and security.'²⁸ Clements maintains that the film presents "a dystopian nightmare world hostile to individuality, love and self-expression," warning against "computerized horrors of the city."²⁹ Lastly, Richard Roud sees the film as a study of the totalitarian state, and Alphaville as the Capital of Pain (*Capitale de la Douleur*),³⁰ where inhabitants have become the slaves of electronic probabilities.³¹

How was Alphaville constructed as "labyrinths of power, mazes at whose centre lies death"?³² What transformed it into a Capital of Pain? Answers in

the vein of “Artificial intelligence that has gone awry is responsible for all that misery” miss the gist of the matter: the machine is not accountable for the sufferance caused by its orders. As the plot gradually discloses, the dystopia is chiefly established and maintained by a regime that employs legal mechanisms that consist of two complementing elements.

The first is an intentional replacement of the rule of human law with what is perceived as the rule of logic; the second is the systematic tramping of individuality, emotions, and autonomy. These two complementing elements produce a social existence devoid of overt poverty, but at the same time devoid of creativity, self-fulfillment, and emotions that make life worth living.

It is somewhat vague how the rule of logic actually took control of Alphaville. In the original treatment of the film, the governing system of the city is described in the following: “In fact, the machine doesn’t actually govern, but it amounts to the same thing, for the city obeys all its orders—that is to say, its logical conclusions.”³³

The narrative suggests that the rule of logic is an application of Professor von Braun’s theory. The professor also works on further developments. During his last conversation with Lemmy, von Braun mentions that he and his associates are in the process of making themselves masters of new and fantastic technology. Yet it does not really matter if Alpha 60 is merely an avatar of von Braun, or if rather than being a master of his own creation, von Braun is entrapped by the rule of logic, like his daughter and all the rest of the citizens of Alphaville. The generators of the catastrophe are people; people that developed the Alpha system and maintain it, and people that shaped and honed the normative nature of Alphaville’s rule of logic.

The application of the rule of logic in Alphaville is absolute yielding to a vision—or a nightmare—of outmost efficiency. It seems that the pragmatic meaning of efficiency is determined by the computer, as are the means for optimally achieving it.

The range of Alpha 60’s rules is sweeping. It covers the most personal emotions and acts and the most imperative state acts. As explained to Lemmy by the chief engineer of the Alpha 60, “The function of Alpha 60 is the prediction of the data which Alphaville obeys. . . . Everything is determined by cause and effect.”³⁴ Consequently, the desirability of every act is modeled, according to the parameter of efficiency.³⁵ Emotions interrupt the computerized modeling, and there-

fore forbidden in Alphaville. One is not allowed to feel fear, because “one must not be afraid of logic.”³⁶ In fact, one is not allowed to have any other emotion, or to engage in artistic endeavors like writing or reading poetry, because Alpha 60 calculates such practices as lacking any value in promoting efficiency models.

As specified in the treatment, “[T]he city has developed in the last twenty years at an unheard-of rate, by following the orders of the machine.”³⁷ Von Braun can boast the rule of logic’s success in utilitarian terms, as he indeed does. Yet, interestingly, Alpha 60 also insists: “My judgment is just. I am working for the Universal Good.”³⁸

The rule of logic and alleged justice results in a society in which people are no more than “slaves to probability.”³⁹ The citizens’ status as mere computational objects transforms them into slaves. Their obedience is achieved by coerced indoctrination that goes on during their entire life, and by the ever-present inspecting gaze of Alpha 60.

Alphaville’s narrative highlights the systematic employment of legal mechanism that nullifies individuality. The nullification of individuality is constituted by controlling the creation and modification of social meaning.⁴⁰ A pivotal scene in this regard is the spectacular execution of dissidents. Citizens unable to adapt and restrain emotions are executed as part of a festive spectacle. Soldiers with submachine guns shoot them into a swimming pool, where bikini-clad girls, with knives in their hands, jump into the water and stab them while the audience applauds.

The shocking effect of this scene mainly derives not from the cruelty of the “artistic” killings but from the chilling reactions of the spectators. They experience the event not only as reflecting acceptable and logical normative order and punitive norms, but also as high-class entertainment, that deserves the repetitive clapping.

As the film reveals, the shaping of social meaning is achieved by brainwashing that goes on during the entire lifespan of each citizen. Alpha 60’s doctrine and its orders are learned in schools. Educating the citizens never ceases. In a practice that brings to mind George Orwell’s *Newspeak*, the authorities produce and supply to each citizen a “Bible,” which is actually a *dictionary* of permissible vocabulary. It is ever-evolving, omitting daily words that are suspected of evoking emotion. Natasha explains the practice to Lemmy: “Well, nearly every day there are words which disappear because they are no longer allowed. In

their place one must put new words to correspond to the new ideas. And you know . . . in the last few months . . . some words have disappeared that I liked very much." Lemmy asks: "Which words?" and Natasha offers some examples: robin redbreast, to weep, autumn light, tenderness.

A key scene takes place when four policemen barge into Lemmy's hotel room and interrupt his emotional and subtle conversation with Natasha. The policemen order Lemmy to come with them to the Residents Control, but before they take him, they order Natasha: "Mademoiselle, Story number 842." Natasha complies. She relates a short narrative, actually an elaborated joke, which is entirely out of any overt relevance to the situation at hand.

The order to tell a story identified by a number, obviously belonging to a limited repertoire of official and permissible stories, is highly revealing. As widely noticed and researched, creating narratives and listening to narratives created by others has a central role of producing meaningful concepts of self and society.⁴¹ The forced story-telling, in front of the immobile and passionless faces of the cops, and without any comprehensible context, echoes not awareness of shared emotions but the opposite; it reflects social alienation and lack of self-awareness. The bizarre employment of narrative demonstrates the core of Alpha 60's failure. Its attempt to reduce the richness of human consciousness into binary terms of efficiency is doomed to fail, because of the inability of the machine to grasp the complex meaning of notions such as "story" or "joke."

This scene is important because it also echoes the liberating option, which is manifested by Lemmy's reaction to the story. Lemmy is the only free-thinking and free-feeling person in the scene. In spite of the ominous cops and in spite of the absurdity of the coerced story-telling, which he surely realizes, he can't help responding to the content of the narrative, and he does it full heartedly. The story is genuinely funny, and Lemmy doubles up laughing, demonstrating what a normal, natural human reaction to stories and to jokes looks like and feels like.

Lemmy is a private-eye in trench coat and ever-present cigarette, blending self-parody, poetry quotations, and half-chauvinistic half-chivalrous gestures. His intricate humanity is the source of his power and courage. He is the first in Alphaville to effectively defy the computer's authority. When Alpha 60 declares it is logical to condemn the insubordinate Lemmy to death, he simply re-

orts: "You can go and stuff yourself with your bloody logic!"⁴² Then he shoots the computer's control panels. Lemmy's main achievement is metamorphosing Natasha from a passionless peon into a sentient human being. As Wollfolk maintains, the film implies "that it is the liberation of the individual from repressive social forms that permits the spontaneous expressions of the spirit. Pitting the individual against such an obviously oppressive regime affirms the right and the power of the individual."⁴³

To conclude, *Alphaville* presents a civic world in which individual autonomy and freedom are forfeited by a political regime that perceives humans as disposables that are used for enhancing efficiency. The result is Capital of Pain, an existence characterized by sadness, isolation, and lack of solidarity and vitality.

Alphaville's rule of logic bespeaks one of the darkest rules humanity has experienced, and indeed several critics have noted that the film is scattered with references to Nazi Germany.⁴⁴ Through the perspective gained by setting *Alphaville* alongside the Nazi regime, the role of technology as a generator of dystopia becomes ancillary. Using Alpha 60's term, the menace to the "universal good" is not the miscalculations or the obtuse nature of advanced technology. The menace is created by people who control technology. Technology, very much like law, is a mere mechanism given to human manipulation. The real threat lies in the seizure of such forceful mechanisms, in the name of some all-embracing ideology or worldview. Technology was abused in *Alphaville* by the state, in the battle it proclaimed against each and every individual. As with the practices of Nazi rule, *Alphaville's* regime also misused the machinery of law. A potential precaution against recurrences of "*Alphaville* scenarios" in reality is the maintenance of alert legal imagination. One of the most important ways of preserving such imagination is continuous engagement with narratives that conceptualize law's failures.⁴⁵ Godard's dystopian fable is a fine example of such a narrative.

IV. *Blade Runner*: Where Law Is the Secret Maker

Ridley Scott's *Blade Runner* (1982)⁴⁶ resonates with *Alphaville* on several levels.⁴⁷ In stylistic terms, it is also a merger of science fiction and film noir, presenting an urban dystopia. Here again the dystopia is human made, and being preserved by legal tools.

Blade Runner gained much wider attention than *Alphaville*, and produced a rich body of diverse critique.⁴⁸ Some of it touched on issues relating to law. Attention was given, for example, to the definition of human implied by the film,⁴⁹ and to racism.⁵⁰ I will discuss the role of law in *Blade Runner* from a wider perspective, pointing to its position as a protagonist of a dystopia.

Let me start with telescoping the plot. Rick Deckard (Harrison Ford), a retired cop in 2019 Los Angeles, is forced back into active duty and ordered to capture several Replicants, humanlike androids with short life spans that have escaped space colonies and invaded Earth. Deckard finds and kills three Replicants. In the meantime, Roy Batty (Rutger Hauer), the leader of the fleeing group, reaches Eldon Tyrell (Joe Turkel), the head of the Tyrell Corporation that produced the Replicants, and kills him. Deckard falls in love with Rachael (Sean Young), Tyrell's assistant and a Replicant who was unaware of her true nature. Deckard confronts Batty, who almost overtakes him, but spares Deckard's life. In the last scene, Deckard and Rachel leave Deckard's apartment, probably to run away together.

Like *Alphaville*, *Blade Runner* is typically perceived to portray a dystopia,⁵¹ and it has become an iconic representation of the nightmarish future city.⁵² Yet, unlike *Alphaville*, where oppression and deep sadness are overt, a careful scrutiny is called for in order to determine what exactly renders the *Blade Runner's* city a dystopia.

The central social institutions and conventions—such as marriage, employment, financial and leisure activities—exist in futuristic Los Angeles more or less according to well-known patterns. Familiar, even if notorious, sexist practices portrayed in the film echo existing ones. Male Replicants are designated to serve as warriors, and women are intended to provide sex. One female Replicant (Pris) is a “Basic pleasure model,” and another (Zhora) is a striptease dancer. The first sexual contact between Deckard and Rachael has been interpreted as rape,⁵³ or as coerced sex “difficult to distinguish from rape.”⁵⁴ These characteristics, alongside some other unpleasant factors, such as urban alienation and air pollution, do not turn the city into a future dystopia; though replete with similar problems, contemporary urban life is not generally viewed as dystopian.

More than that, the *Blade Runner* city is exciting, brimming with vitality, presenting a wide range of urban temptations and attractions. Restaurants,

night clubs, sushi stands, ethnic quarters, technology experts' stalls as well as mobile and stationary giant screens producing an ever-changing buzz of images and sounds encapsulating consumers' temptations are just some of the attractions. The urban space is characterized by constant intermingling of races and languages.⁵⁵ Ethnic pluralisms seems to be the norm. The crowds are huge and the flood of sights and sounds is overwhelming, but these are not representations of dystopia; rather than that, they present metropolitan vibrancy. As Stephen Rowley has noted, the *Blade Runner* city has all that today's Los Angeles is missing and all that makes New York an attractive and exciting place to live: “If vibrancy and vitality are what we are after, there is a lot to like about this fictional Los Angeles of 2019. It has plenty of street-level convenience retailing and restaurants. The nightlife looks fantastic. There is either a good public transport system, or everything is pretty close together—civilians seem to get around okay on foot.”⁵⁶

A reference to the urban delights of *Blade Runner* is offered by Wong Kin Yuen, who describes the striking resemblance between the streets of *Blade Runner* and the Times Square quarter in Hong Kong. *Blade Runner's* “Ridleyville” (as the city depicted in the film is coined by Yuen), as well as twenty-first century Hong Kong, represent the cityscape of the future, “that embraces racial and cultural differences”⁵⁷ and happily accommodates “shoppers, blue and white collar workers, tourists of all nationalities, and an ever-changing population of new immigrants (some of them illegal) . . . , rich and poor, young and old,”⁵⁸ all enjoying an “explosion of urbanism” in an “intercultural scenario.”⁵⁹

And yet, despite the exciting energy pulsing through it, *Blade Runner's* city is, after all, an oppressive environment. According to the reading suggested here, the central factor that renders the city into a dystopia is its subordination to invisible and arbitrary law, serving unknown masters and unclear purposes. Los Angeles of *Blade Runner* is another variation on Kafka's dark vision, in the center of which is law as a constant menace. The following opening of the film captures the core of the narrative:

Early in the 21st Century, THE TYRELL CORPORATION advanced robot evolution into the NEXUS phase—a being virtually identical to a human—known as a Replicant. The NEXUS 6 Replicants were superior in strength and agility, and at least equal in intelligence, to the genetic engineers who created them. Replicants were used Off-World as slave labor, in the hazardous exploration and colonization of other planets. After a

bloody mutiny by a NEXUS 6 combat team in an Off-World colony, Replicants were declared illegal on earth—under penalty of death. Special police squads—BLADE RUNNER UNITS—had orders to shoot to kill, upon detection, any trespassing Replicant, this was not called execution. It was called retirement.

The celebratory and concise style of this text echoes a quasi-constitutional mode. It encapsulates the permissible and the forbidden. It commences with a festive mentioning of the invention of the Replicants by a corporation. The next sentences reveal what separates Replicants from humans.⁶⁰ The Replicants, even if more intelligent than their creators, are defined and perceived as property. They are used as slaves on other planets. When necessity demands, they are put to death without trial: "After a bloody mutiny . . . Replicants were declared illegal on earth—under penalty of death. Special police squads—BLADE RUNNER UNITS—had orders to shoot to kill, upon detection, any trespassing Replicant."⁶¹

Normally, declaration of individuals as "illegal," subjecting them to the death penalty as well as assigning and authorizing police units for their capture, is a prerogative of governmental and legal authorities, such as legislators, prosecutors, and judges. In *Blade Runner*, if such authorities exist, they operate sub rosa, and their procedures remain hidden. The Replicants are sentenced to death and being executed without having been tried. Kafka's Joseph K, who famously faced a verdict without knowing what he has been accused of, comes to mind: "[It] is an essential part of the justice dispensed here that you should be condemned not only in innocence but also in ignorance."⁶²

Condemnation and execution without trial—the embodiment of injustice—is the primary element that overshadows the liveliness of the city and turns it into a dystopia.

Another element, that again intones the practices in *Alphaville*, is the forfeiture of the private sphere. Each individual is under surveillance, activated by moving light beams.⁶³ The permanent presence of the police and the enforcement authorities creates an ever-present externalization of policing and control.⁶⁴ The constant pursuit of data creates vulnerability, and the most vulnerable individuals are the Replicants.

If in *Alphaville* humans are transformed into slaves in order to fulfill the vision and instructions of the nonhuman computer, in *Blade Runner* nonhumans are created and molded in order to serve humans as slaves. In both cases, the

result is a dystopia in which legal mechanism is employed in order to facilitate exploitation. In *Blade Runner*, the pseudo-legal procedure determining one's status (human or Replicant) is the "Voight-Kampff test." The law facilitates the implementation of the test and the immediate execution that follows failing it.

The enslavement and sometimes killing of the Replicants is represented not as defensive acts but as a plain manifestation of force, as crude violence backed by invisible law. Following Derrida, the Voight-Kampff procedure means employing the law as a system producing criteria that exclude some "subjects" from the protection of the law, or from the discourse related to justice, morality, and rights.⁶⁵ In his "Force of Law," Derrida analyzes the marking of certain subjects (such as animals) and pushing them outside the frameworks of the law: "There are still, many 'subjects' among mankind who are not recognized as subjects . . . The opposition between just and unjust has no meaning in this case."⁶⁶ The Voight-Kampff procedure, and the immediate killing of those who fail it, are manifestations of the system Derrida describes, a system of setting criteria that exclude subjects from the protection of the law, or from the discourse related to justice, morality, and rights. Human history is abundant with examples of such oppressive practices, and indeed similarities between the exploitation and oppression of Replicants in *Blade Runner* and other forms of exploitation and oppression have been mentioned in a number of contexts.⁶⁷ More than that, the city is subjected to an all-encompassing and aggressive law. Human activity, on earth and outside of it, takes place within the boundaries it defines. Yet it is not disclosed how and by whom this law is enacted or determined. Again, the situation resonates Joseph K's suspicions in regard to the nature of the law he faces: "There can be no doubt that . . . there is a great organization at work. An organization which . . . has at its disposal a judicial hierarchy of high, indeed the highest rank, with an indispensable and numerous retinue of servants, clerks, police and other assistants, perhaps even hangmen."⁶⁸

Individuals in the city of *Blade Runner*, whether defined and labeled as humans or Replicants, are, like Joseph K, subjected to a furtive "great organization" that has at its disposal legal and governmental mechanisms. Rules are imposed by unknown jurisdiction and activated by authorities that derive their mandate from yet another concealed source.

Roy Batty, assuming that Dr. Eldon Tyrell, the head of the corporation creating the Replicants, is empowered to turn him into a "human," entitled to a life

span that is not predetermined, confronts Tyrell. "It's not an easy thing to meet your maker," he tells him. Tyrell refuses Roy. He tells him: "Death. Well, I'm afraid that's a little out of my jurisdiction." Tyrell's choice of the word "jurisdiction," which is taken from a legal semantic field, is loaded. Roy Batty's implied assumption is that the key to his salvation is in the hands of the one who is able to "make" Replicants. Nevertheless, Tyrell is not the real creator of Roy. The real maker is the one who has the power to allow the creation of life and to determine its length. The true maker is the one who grants the Tyrell Corporation the power and the authority to create.

The Tyrell Corporation is in fact authorized to act within a certain jurisdiction. Roy would have had a better chance of getting what he desperately seeks if he could have access to the authority that enabled Tyrell to create Replicants—but such access is unavailable. The identity and nature of the metamaker, who uses the law as a tool, remains elusive.

Roy Batty's situation is worse than that of the man who wishes to enter the law in Kafka's *The Trial*. The latter spends his life passively and futilely at the law's doorstep. However, during his life he is entertaining the hope of somehow, someday, entering the law.⁶⁹ Roy Batty has no such hope, since he is unaware of the link between his predicament and the hidden maker.

To reiterate, *Blade Runner* presents an urban dystopia chiefly established and maintained by legal mechanisms that operate along two axes.

The first is the rule of secret, brutal law, which is in constant pursuit of data regarding each individual, through the use of privacy-invading surveillance. Individuals, on the other hand, have no access to even the most basic information regarding the law. The other is employing the power of law, first in order to create exploitable beings, and then to mark them as nonhuman or nonbeing. *Blade Runner*, then, is an acute warning against institutional, violent employment of authorized power, and against abusing legal instruments by using them as tools for exclusion of certain subjects from the domain mastered by law.

V. Urban Disasters Facilitated by Law

As has been noted by several scholars, *Alphaville* and *Blade Runner* reveal some apparent similarities.⁷⁰ In cinematic terms, both merge the aesthetics and

mood of film noir with those of science fiction. The term "noir," while still denoting a cinematic genre, is now employed metaphorically, to signify a harsh human existence that takes place in a recognizable, mundane setting, usually urban.⁷¹ As Prakash elaborates, "In these portrayals, the city often appears as dark, insurgent (or forced into total obedience), dysfunctional (or forced into machine-like functioning), engulfed in ecological and social crises, seduced by capitalist consumption, paralyzed by crime, wars, class, gender and racial conflicts, and subjected to excessive technological control."⁷² The noir genre, whether by the black and white cinematography (which is used in *Alphaville*) or by employing stylistic measures that enhance the interplay between the seen and the unseen (as is done in *Blade Runner*), insinuates that what meets the eye is not necessarily a credible reflection of reality.⁷³ The human condition is depicted in film noir as something we can see and perceive only partially and dimly.⁷⁴

The perception that what we see is always segmental, and that justice, fairness, and clear vision of reality are basically unattainable, are among the main properties of the genre. In this respect, the film noir is considered "realistic."⁷⁵

Science fiction representations and ideas, on the other hand, are usually set in spaces that are clearly far beyond the contemporary, and are distinguishable by their highly futuristic characteristics. Consequently, the juxtaposition of science fiction and noir modes creates distinctive articulations. The noir atmosphere loads the science fiction dystopias with credibility, relevance, and depth. It transfers them from the domain of clichéd tropes like "Come quickly, there's a monster in my bathtub" or "They must be vulnerable or something"⁷⁶ into new fields of nuanced, multileveled evolving crises, attributable to human behavior and not to unavoidable calamities like earthquakes or floods. The noir mode leads toward a denser imagination of disaster, by adding themes and subtexts that link the depicted dystopias to political (in a wide sense) situations, choices, and decisions. Accordingly, the role of law, whether as a safeguard against dystopia or as instrumental in bringing it about, stands out, as it does in both *Alphaville* and *Blade Runner*.

Another important feature the two films share is their similar urban setting. In "The Work of Art in the Age of Mechanical Reproduction," Walter Benjamin famously alluded to the affinities between cinema and the modern city, and to the ways in which cinematic techniques illuminate certain facets of the me-

tropolis. Benjamin wrote: "Our bars and city streets, our offices and furnished rooms, our railroad stations and our factories seemed to close relentlessly around us. Then came film and exploded this prison-world with the dynamite of the split second, so that now we can set off calmly on journeys of adventure among its far-flung debris."⁷⁷ Cinema acts as a mediator that recomposes the urban sights and experiences, and casts light on the city's hidden infrastructure. As both *Alphaville* and *Blade Runner* reveal, law is a central component of this infrastructure. Its presence looms in the bars, streets, offices, and roadways of the cities the films present. It is reflected in the daily life of the citizens of Alphaville, who are subjected to the rule of covert law, which constantly invades and manipulates their privacy and autonomy; and the presence of similarly oppressive law emerges from the urban darkness of *Blade Runner*, where legal instruments exclude some beings.

The breadth of the city facilitates the presentation of myriad persons and activities that together create a rich picture of political, social, and commercial life, presented through the urban perspective. The two films emphasize the force and validity of Benjamin's early intuition. The cinematic portrayals of dystopian cities create acute pictures of disturbed urban life, while offering sharp critiques that diagnose the roots of the city's maladies and catastrophes, and perhaps some remedies. Law is a fundamental factor in regard to both.

VI. Conclusion: The Imagination of Disaster alongside the Imagination of Law

In "Imagination of Disaster" Susan Sontag argued that science fiction films are not really about science or technology; they are about disaster, which is one of the oldest subjects in art.⁷⁸ In many such films the calamity is depicted as "urban disaster on a colossally magnificent scale,"⁷⁹ originated by nonhuman forces such as gigantic robots or monsters invading from outer space. On a primary level of interpretation, such films produce fantasies about conducting a righteous "good war" that "poses no moral problems" and "admits no moral qualifications."⁸⁰ However, closer scrutiny reveals that the deeper roots of the standard motifs used in the films are the primeval fear of depersonalization, of humanity's being "taken over" by arbitrary powers, and the dread of sinking into unstoppable catastrophe and unbearable dystopia. The heroic triumphs in

science fiction, claims Sontag, hardly present satisfactory answers to such deep fears. The standard motifs of rescuing humanity by savior-scientists and their like typically lack meaningful cultural or social criticism, and thus cannot be linked easily to profound confrontation with the deep existential threats and dreads intoned by the narrative of imminent catastrophe. As she concludes, the imagery of disaster in science fiction film is above all the emblem of "the inadequacy of most people's response to the unassailable terrors that infect their consciousness."⁸¹

The reading suggested here delineates one way of addressing the ever-lurking fears of disaster. It juxtaposes the imagination of disaster with the legal imagination. The two narratives transcend the common patterns of science fiction cinema, and create a new trope that elucidates the nature of potential civic disaster and some feasible defenses. Reiterating the three elements that characterize dystopian narratives dealt with here is useful to explain how they manage to do that.

Firstly, both films describe dystopias that were created by human actions, decisions or choices, and not by circumstances beyond human control. *Alphaville* and *Blade Runner*'s Los Angeles are perceived as dystopias because they are subjected to all kinds of regulation, control, and surveillance that carry a dehumanizing effect.

Secondly, as was elaborated in the previous sections, the presence or absence of law is a primary factor that consolidates the dystopia. In *Alphaville* all that is not perceived as rational or efficient (such as display of emotions or creating art) is banned and punished. Human judgment is relinquished, and replaced by authorizing extralegal and extrahuman metarationalization, which is given unconditional discretion and power. In *Blade Runner* secret law subjects each individual to control and surveillance. The power of law is used first in order to facilitate the creation of exploitable beings, and then to define them as non-human or nonbeing. In both films, to use Jameson's description of the city in *Blade Runner*, which applies to *Alphaville* as well, the entry and exit to the dystopian territory is highly controlled by law: "all of it sealed into an inside without an outside."⁸² Together the two representations produce a complementing caution against excessive and abusive use of law, and cast light on the essential role law can play in establishing a dystopia or preventing it.

Thirdly, both films exemplify the dystopian nature of the situation by nar-

ratives that focus on specific characters. As mentioned, the presence of stories differentiates utopian expressions from dystopian expressions. Utopian typical text, explains Jameson, “does not tell a story at all; it describes a mechanism or even a kind of machine, it furnishes a blueprint rather than lingering upon the kinds of human relations.”⁸³ A dystopian text, on the other hand, is generally a narrative, often focusing on the fate of an individual and on human relations. Both films appositely demonstrate this point. They are not abstract models of “bad” societies, as opposed to utopian texts that are often models of ideal society. They derive their thrust from narratives about individuals. Both describe the dystopian condition by focusing on tales of men and women caught in almost impenetrable webs of power, with no access to legal remedies.

The nature of *Alphaville*'s dystopia becomes lucid through the exploits of its two central characters, Lemmy and Natasha, and their emerging love. Natasha's inability to experience emotions is symptomatic of *Alphaville*'s disaster. Lemmy's attempts and finally his success in waking her dormant emotional capacity are a response that through the personal alludes to the collective calamity. Lemmy's actions and choices, and mostly his blunt defying of the rule of logic, carry a redemptive quality. It is compelling enough not only to evoke humanity and love but also to subvert the foundations of *Alphaville*'s dystopia and redeem all.

A similar course takes place in *Blade Runner*. The nature of the dystopia becomes perceptible through Deckard, who proceeds from emotional alienation into regaining his ability to feel. The climax of the course is his reciprocal love of Rachel, an individual declared by law “illegal” and doomed to execution. As noted by David Ryan, in the dystopia of *Blade Runner*, Deckard's growth allows for the redemptive nature of all humans.⁸⁴ As in *Alphaville*, the redemption derives from defying the legal dictate.

To conclude, both films exhibit how dystopian imagination augments the legal imagination. The two narratives illustrate dystopia as an urban disaster, which is expressed as gradual abrasion of humanity. The abrasion is facilitated and supported by legal mechanisms, devoid of independent values or stable moral codes. Such law is used solely as a tool for translating the political will of its masters into normative language. As the cinematic tales suggest, if a chance of recovery looms, it is through the emergence of empathy that evokes dis-sidence.

Notes

1. J. C. Davis, *Utopia and the Ideal Society: A Study of English Utopian Writing 1516–1700* (Cambridge: Cambridge University Press, 1981), 371.
2. Gregory Claeys and Lyman Tower Sargent, “Introduction,” in *The Utopia Reader*, ed. Claeys and Sargent (New York: New York University Press, 1999), 1.
3. Davis, *Utopia and the Ideal Society*, 370. A different issue that is associated to this notion is the place of law in human utopia. According to one approach, utopia, by nature, is lawless, since in utopia human beings live in constant harmony and there are no conflicts that must be settled by using legal regime. Another variation of this approach contends that law inevitably restricts liberty because of its coercive nature. Consequently, law is incompatible with utopia because of law's inherently problematic attributes, and society is ideal if there are no laws. According to the differing approach, “The utopian mode is distinguished by its pursuit of legal, institutional, bureaucratic and educational means of producing a harmonious society” (ibid., 371). (Utopia, according to such perception, is a form of ideal society that imposes order through law. For elaboration on this issue, through the perspective of literary expressions, see Shulamit Almog, “Literary Legal Utopias: Alexander's Visit to Kasiah and Law at the End of Days,” *Utopian Studies* 12, no. 2 (2001): 164.
4. According to Lyman Tower Sargent's definition, dystopia is “a non-existing society described in considerable detail and normally located in time and space that the author intended a contemporaneous reader to view as considerably worse than the society in which the reader lived.” See L. T. Sargent, “The Three Faces of Utopianism Revisited,” *Utopian Studies* 5, no. 1 (1994): 1, 9. For elaboration on the history of the term, see C. Darke, *Alphaville* (Urbana: University of Illinois Press, 2005), 23–27.
5. Darke, *Alphaville*, 23.
6. Almog, “Literary Legal Utopias”; Miguel A. Ramiro Avilés, “On Law and Utopia: A Reply to Shulamit Almog,” *Utopian Studies* 14, no. 1 (2003): 132; Shulamit Almog and Amnon Reichman, “On Law and Utopia: Rules vs. Principles?—A Comment on Ramiro Avilés's Reply,” *Utopian Studies* 14, no. 1 (2003): 143. Be that as it may, even those who envisage utopian as lawless may find the utopian and the dystopian imagination a useful vehicle for improving the present law.
7. Interestingly, in both films aesthetics plays an important role in representing the dystopian condition. *Alphaville*, which was filmed in Paris during the mid-sixties, presented the urban sites as a fusion of science fiction and film noir signifiers. *Blade Runner* juxtaposed digital effects with metropolitan sites. See A. O. Scott, “The Way We Live Now—Metropolis Now,” *New York Times*, August 6, 2008. Available at http://www.nytimes.com/2008/06/08/magazine/08wwln-lede-t.html?_r=0.

In a 2011 Victoria and Albert Museum exhibition titled “Postmodernism—Style

and Subversion, 1970–1990,” stills and scenes from *Blade Runner* were presented as characterizing different themes of postmodernism. As the exhibition’s catalogue elaborates, the visuality of *Blade Runner* creates dystopian aesthetics by intertwining views of Western and Eastern megacities, science fiction icons, and forties aesthetics: *Postmodernism—Style and Subversion, 1970–1990*, ed. Glenn Adamson and Jane Pavitt (V&A Publishing, 2011), 38.

8. On utopian literature and its categorization, see Sargent, “The Three Faces of Utopianism Revisited.”
9. E. Jameson, *The Seeds of Time* (New York: Columbia University Press, 1994), 55–56.
10. T. More, *Utopia* (London: Penguin Books, 1965).
11. E. Bellamy, *Looking Backward—2000 to 1887* (Bedford, MA: Applewood Books, 2000).
12. On utopian literature and its categorization, see Sargent, “The Three Faces of Utopianism Revisited.”
13. Jameson, *The Seeds of Time*, 55–56.
14. Genesis 18:20–21.
15. *The Book of Yashar* (New York: Hermon Press, 1972), 51–52.
16. Sanhedrin, 109b.
17. *The Book of Yashar*, 52.
18. Sanhedrin, 109a. See also *The Book of Yashar*, 53–54.
19. R. Levitas, *The Concept Of Utopia* (New York: Philip Allan, 1990), 195.
20. For discussion of the links between science fiction and dystopia, see Raffaella Baccolini and Tom Moylan, eds., *Dark Horizons: Science Fiction and the Dystopian Imagination* (New York: Routledge, 2003).
21. Darke, *Alphaville*, 25.
22. Jameson, *The Seeds of Time*, 55.
23. S. Sontag, *Against Interpretation and Other Essays* (New York: Dell, 1967), 209.
24. J.-L. Godard, *Alphaville* (New York: Simon and Schuster, 1966), 53–54.
25. Allan Wollfolk, “Disenchantment and Rebellion in Alphaville,” in *The Philosophy of Science Fiction Film*, ed. Steven M. Sanders (Lexington: University Press of Kentucky, 2008), 200–201.
26. *Ibid.*, 202.
27. “Technocracy” is a term that evolved after World War I, denoting “rationalized, industrial democracy.” See Darke, *Alphaville*, 70.
28. *Ibid.*, 71.
29. David Clements, “From Dystopia to Myopia: Metropolis to Blade Runner,” report from the “Future Vision: Future Cities” conference held December 6, 2003, in London. Available at http://hem.passagen.se/replikant/dystopia_myopia.htm.
30. *Capital de la Doleur* is the title of the poetry volume the dying Dickson gives Lemmy. Faux-quotations from the book are used in the film to represent the

transforming power of art and emotions. The original title belongs to Paul Eluard. See P. Eluard, *Capital of Pain* (Boston: Black Widow Press, 2007).

31. Godard, *Alphaville*, 10–11.
32. *Ibid.*, 12.
33. *Ibid.*, 93.
34. *Ibid.*, 49.
35. In fact, such a model is suggested by the chief engineer of the Alpha 60, explaining how the orders of the machines are constituted: “An order is a logical conclusion. . . . We know nothing . . . we record... we calculate . . . and we draw conclusions.” *Ibid.*, 50.
36. *Ibid.*
37. *Ibid.*, 93.
38. *Ibid.*, 70.
39. *Ibid.*, 33.
40. For analysis of the links between legal norms and the creation of social meaning, see Lawrence Lessig, “The Regulation of Social Meaning,” *University of Chicago Law Review* 62 (1995): 943.
41. See, for example, Jonathan Culler, *Literary Theory: A Very Short Introduction* (Oxford: Oxford University Press, 1997), 83–94. See also Shulamit Almog, “From Sterne and Borges to Lost Storytellers: Cyberspace, Narrative, and Law,” *Fordham Intellectual Property, Media and Entertainment Law Journal* 13 (2002): 1.
42. Godard, *Alphaville*, 70.
43. Wollfolk, “Disenchantment and Rebellion in Alphaville,” 202.
44. Some examples are the numbers tattooed on the bodies of women and the name von Braun, which echoes the name of the German missile scientist Wernher von Braun. See: Darke, *Alphaville*, 76–77.
45. For an elaboration on the role of conceptualizing legal narratives, see Almog, “From Sterne and Borges to Lost Storytellers.”
46. The central text discussed here is *Blade Runner—Director’s Cut*. See *Blade Runner—Director’s Cut* (Ridley Scott, 1992). It should be noted that *Blade Runner* has several versions. Two of the others are the 1982 version (Domestic Cut), and the 2007 version (Final Cut). For elaboration, see S. Bukatman, *Blade Runner* (London: British Film Institute, 1997), 33–40.
47. Several scholars have mentioned the kinship between the films. See, for example, Bukatman, *Blade Runner*; Clements, “From Dystopia to Myopia”; Scott, “The Way We Live Now—Metropolis Now.”
48. For a short review of various critical comments, see David C. Ryan, “Dreams of Postmodernism and Thoughts of Mortality: A Twenty-Fifth Anniversary Retrospective of Blade Runner,” *Senses of Cinema* 43 (2007). Available at <http://sensesofcinema.com/2007/feature-articles/blade-runner/>.
49. See, for example, Marilyn Gwaltney, “Androids as a Device for Reflection on

Personhood," in *Retrofitting Blade Runner: Issues in Ridley Scott's Blade Runner and Philip K. Dick's Do Androids Dream of Electric Sheep?* ed. Judith B. Kerman (Bowling Green, OH: Bowling Green State University Popular Press, 1991), 32.

50. See, for example, M. K. Booker, *Alternate Americas: Science Fiction Film and American Culture* (Westport, CT: Praeger, 2006), 183.

51. See, for example, Douglas E. Williams, "Ideology as Dystopia: An Interpretation of Blade Runner," *International Political Science Review* 9, no. 4 (1988): 381; Andrew Milner, "Darker Cities: Urban Dystopia and Science Fiction Cinema," *International Journal of Cultural Studies* 7 (2004): 259; and Michael Webb, "'Like Today, Only More So': The Credible Dystopia of Blade Runner," in *Film Architecture: Set Designs from Metropolis to Blade Runner*, ed. Dietrich Neumann (Munich: Prestel, 1996), 44–47.

52. Stephen Rowley, "False LA: Blade Runner and the Nightmare City," in *The Blade Runner Experience: The Legacy of a Science Fiction Classic*, ed. Will Brooker (London and New York: Wallflower Press, 2005), 203.

53. Lessig, "The Regulation of Social Meaning," 960.

54. Williams, "Ideology as Dystopia."

55. There are other approaches which indicate that *Blade Runner* manifests a racial problem. See R. Dyer, *White* (London: Routledge, 1997), 213; and Kaja Silverman, "Back to the Future," *Camera Obscura: A Journal of Feminism and Film Theory* 27 (1991): 109.

56. Rowley, "False LA," 21.

57. Wong Kin Yuen, "On the Edge of Spaces: Blade Runner, Ghost in the Shell and Hong Kong's Cityscape," *Science Fiction Studies* 27, no. 1 (2000): 80.

58. *Ibid.*

59. *Ibid.*

60. For elaboration, see Almog Shulamit, "When a Robot Can Love—Blade Runner as a Cautionary Tale on Law and Technology," in *Human Law and Computer Law: Comparative Perspectives*, ed. Mireille Hildebrandt and Jeanne Gaakeer (Dordrecht: Springer, 2013), 181.

61. See the screenplay: Hampton Fancher and David Peoples, *Blade Runner—Screenplay* (1981), 1. Available at http://www.dailyscript.com/scripts/blade-runner_shooting.html.

62. F. Kafka, *The Trial* (New York: Modern Library, 1961), 50.

63. Herb A. Lightman and Richard Patterson, "Blade Runner: Production Design and Photography," *American Cinematographer* 63, no. 7 (1982): 684, 723.

64. Judith B. Kerman, "Technology and Politics in the Blade Runner Dystopia," in *Retrofitting Blade Runner*, 18.

65. Jacques Derrida, "Force of Law: The Mystical Foundation of Authority," *Cardozo Law Review* 11 (1989–90): 920, 951.

66. *Ibid.*

67. Francavilla compares the oppression of Replicants to the exploitation of the

Aztec Indian, the American Indian, African Slaves, and Jews during World War II. See Joseph Francavilla, "The Android as Doppelgänger," in *Retrofitting Blade Runner*, 9. Kerman sees parallels between the destruction of Replicants and the creation of concentration camps and the dropping of the atomic bomb during World War II. See Judith B. Kerman, "Introduction," in *ibid.*, 1.

See also: Peter J. Hutching, "From Offworld Colonies to Migration Zones: Blade Runner and the Fractured Subject of Jurisprudence," *Law Culture Humanities* 3 (2007): 381.

68. Kafka, *The Trial*, 51.

69. *Ibid.*, 234–36.

70. See, for example, Clements, "From Dystopia to Myopia"; Scott, "The Way We Live Now—Metropolis Now." While Clements indicates the similarity between the films in suggesting a bleak view of the future, using what he describes as an 'imaginary future,' Scott emphasizes their functional use of the city as a "cautionary tale."

71. For elaboration, see Gyan Prakash, ed., *Noir Urbanisms: Dystopic Images of the Modern City* (Princeton: Princeton University Press, 2010), esp. Prakash, "Introduction: Imagining the Modern City, Darkly," 1.

72. *Ibid.*

73. For elaboration, see Shulamit Almog and Amnon Reichman, "Ethics, Aesthetics, and Law: The Third Man's Three Prongs," *Studies in Law, Politics, and Society* 46 (2008): 169.

74. See, in this regard, Bukatman's introduction on the role of seeing in *Blade Runner*: Bukatman, *Blade Runner*, "Introduction: On Seeing, Science Fictions and Cities," 7–12.

75. Realism in general is tightly connected to the film noir genre. See C. Richardson, *Autopsy: An Element of Realism in Film Noir* (Metuchen, NJ: Scarecrow Press, 1992), 2.

76. One of Sontag's examples in "The Imagination of Disaster." See Sontag, *Against Interpretation and Other Essays*, 209.

77. Walter Benjamin, "The Work of Art in the Age of Its Reproducibility," in *Walter Benjamin: Selected Writings*, ed. Michael Jennings (Cambridge: Belknap Press of Harvard University Press, 2002), 117. For a discussion of other thinkers who identified intricate links between films and metropolis, see Gilloch Graeme, "Urban Optics: Film, Phantasmagoria and the City in Benjamin and Kracauer," *New Formation* 61 (2007): 115. For other discussions of Benjamin's theorizing of the affinities between modern cities and cinema, see *The Cinematic City*, ed. David B. Clarke (New York: Routledge, 1997); James Donald, "Light in Dark Spaces: Cinema and City" in *Imagining the Modern City* (Minneapolis: University of Minnesota Press, 1999), 63–64; Mark Shiel and Tony Fitzmaurice, eds., *Cinema and the City* (Oxford: Blackwell, 2001); and Mark Shiel and Tony Fitzmaurice, eds., *Screening the City* (New York: Verso, 2003).

78. Sontag, *Against Interpretation and Other Essays*, 213.

79. Ibid., 214.
80. Ibid., 219.
81. Ibid., 224.
82. See Jameson, *The Seeds of Time*, 157.
83. Ibid., 56.
84. Ryan, "Dreams of Postmodernism and Thoughts of Mortality?"