

liberal democratic societies, and John Witte Jr assesses the future of the role of Shari'a in Western societies.

This volume will clearly be a useful and accessible accompaniment to all those college and university courses that take the two speeches as their entry into study of the debates and controversies around the development of social, cultural and religious diversity in Europe and North America. Helpfully the texts of the two speeches are included in full as appendices, including a transcript of the discussion following the Archbishop's.

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Muslim Marriages in Western Courts: Lost in Transplantation, by Pascale Fournier, Farnham UK, Ashgate, 2010, xx + 206 pp., £54.00 (hardback), ISBN 978-1-4094-0441-5

Pascale Fournier's focus on bride gift (*mahr*) in *Muslim Marriages in Western Courts* is rather narrower than the title suggests – although her data and analyses have constant implications for the broader field of Muslim marriage. Her study of *mahr* and its reception in selected Western countries (Canada, the US, France and Germany) is a model of how to deal with comparative law in a wider frame and, by extension, how to apply some serious thought to issues widely misinterpreted and manipulated by the media and politicians.

In one respect, this a serious book for lawyers by a lawyer, full of intriguing technicalities that will be of interest primarily to lawyers. What a non-expert does get out of this, though, is how difficult – if not impossible – it is simply to say that the private international law rules are thus, and the Islamic rules on *mahr* are thus, and the two together produce such-and-such a result. On the one hand, both sets of rules are not actually “sets” of rules but a multitude of rules – and that is before a particular judge has looked at a particular case before the court. So one ends up with frequent cases, for example, where, in a marital dispute, the wife actually prefers her husband to pronounce a unilateral repudiation (*talāq*) because that way she stands a chance of getting the remainder of her *mahr*. Interestingly, a German court has recently recognized an informal *talāq* precisely for that reason.

More interesting for a broader readership – research students and researchers – is the way in which Fournier categorizes the various approaches to solving the problems of the reception of *mahr* in European and North American law. She suggests that what is happening in courts in the four countries studied is that decisions are being reached on three different, often implicit, assumptions of principle – and the three assumptions that she maps function across the boundaries of the jurisdictions: it is not that one assumption can be identified with one country (adding to the general confusion and legal uncertainty). What they have in common is a consciously liberal approach. She calls one the Liberal-Legal Pluralist Approach, the second the Liberal-Formal Equality Approach, and the third the Liberal-Substantive Equality Approach. All are concerned with recognizing the autonomy of the individual, but, she says, the first effectively racializes the individuals, while the second genders them. Only the third can achieve something like fairness in the individual cases. As she says in the Conclusion (151), “courts ought to pay attention to distributional consequences rather than doctrinal consistency.” It is a principle that could very usefully

be applied to a number of other aspects of the reception of Islamically based regulations and customs.

Readers who are fascinated by the technical legal aspects should focus on chapters 2–4, where chapter 3 in particular explores the legal side of her three categories. For practical illustrations, in chapter 5 Fournier looks at how different settings and assumptions impact on a fictional couple, Samir and Leila, who pull and are pulled in various directions according to different local factors.

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Searching for Heaven in the Real World: A Sociological Discussion of Conversion in the Arab World, by Kathryn Ann Kraft, Oxford, Regnum, 2012, 142 pp., £21.99 (paperback), ISBN 978-1-908355-15-7

In 2009, I conducted interviews with Christian leaders in Syria and Jordan on the topic of family legislation in minority communities. In one of the churches, while waiting for admission to the head's office, I had a chat with the secretary. His views on gender roles, and particularly gender relations, were similar to those of Muslims in both countries; in short, children, homemaking and church for women, and economic support of the family for men.

While reading Kathryn Ann Kraft's book on Arab Muslims converting to Christianity, my experiences in 2009 come to mind. Kraft's description of Arab Muslims becoming Christians resembles the process of conversion to Islam for Westerners (mostly from a Christian background). The new faith community's acceptance or non-acceptance of the new converts has similar traits in the two convert groups. The ambivalent attitudes towards the converts on the part of the community they were born into also have similarities. It is important, however, to be aware that leaving Islam while living in a Muslim country has more serious implications for the individual than in Western countries, where the individual might be outlawed by his or her family and former community, but where violence in response to conversion is nearly non-existent. Although Kraft explicitly states that Muslims who embrace Christianity, who in Muslim society are regarded as apostates, are rarely killed, they are nevertheless frequently threatened (86). Moreover, it must be noted that the threats are not from the state, but from their families who feel their honour is at stake.

Kraft's study builds on extensive fieldwork with participant observation, interviews, and on-line contact. She gives quite detailed methodological information with adequate reflections. Her command of Arabic is an important factor. Her interviews were conducted in Egypt and Lebanon with Arab men and women from various Arab countries who had converted from Islam to Christianity. She captures the conversion mystery of searching for absolute fulfilment by discussing the various aspects of the conversion experience in terms of the converts' aspiration to find perfect "unity," "community," "belief" and "identity." She also speaks of the converts' disappointment when their idealized dream of the new religion does not match the reality. However, she avoids dealing with the conversion process in stages, in which disappointment plays a huge role.

In her discussion, she shows how Christian missionaries, particularly non-Arabs in the Arab world, tend to merge biblical and qur'anic narratives in their missionary activities. For example,