the post-Tanzimat, Ottoman judiciary as a legally pluralistic system. Each scholar has supported his/her argument with multi-jurisdictional cases, those that fell, in Rubin's words, into "grey areas" between the separate jurisdictions of the reform-era *nizamiye* and sharia courts. Both researchers independently found that in such legally ambiguous cases, litigants could choose the forum in which they wanted to have their case heard.[118].Of course, it is pertinent when considering this pluralism to recall that it was not only the *nizamiyye* courts that applied the *Mecelle* (Civil Code) of 1869. This Civil Code was also used in the sharia courts, as will be seen in Chapter Four. Further, it can be argued that "forum shopping", as Agmon and Rubin describe it, has its roots in earlier Ottoman practice.

Boğaç Ergene, for example, has shown in his studies of two Anatolian courts in the seventeenth and eighteenth centuries that court clients were not bound to the geographically proximate court. Geographical jurisdictions were not a part of the sharia courts network. Rather, individuals were free to (strategically) choose to which sharia court to take their cases.[119] In Hebron's court as well, in the late nineteenth century one can observe that litigants from outside the Hebron district brought their cases to be heard in Hebron, seemingly for the same reasons Ergene identified in Anatolian courts – strategy,

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[118] Iris Agmon, *Family & Court: Legal Culture and Modernity in Late Ottoman Palestine* (Syracuse: Syracuse University Press, 2006): 74. Avi Rubin, *Ottoman* Nizamiye *Courts: Law and Modernity*. (New York: Palgrave Macmillan, 2011).Chapter 2.

[119] Boğaç Ergene, *Local Court, Provincial Society and Justice in the Ottoman Empire: Legal Practice and Dispute Resolution in Çankırı and Kastamonu (1652-1744),* (Leiden: Brill, 2003), Appendix.