

A Judicial Empirical Study on the Protection of Voice Rights and Portrait Rights

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Abstract

As an important personality marker, how to protect the voice of a natural person has always been a focus of academic discussion. The second paragraph of Article 1023 of the Civil Code of China stipulates that the protection of the voice of a natural person shall refer to the provisions of the right of portrait, and clearly incorporates this new type of personality rights into the protection system of the Personality rights law. However, there is still no clear basis on how to protect the voice of a natural person. Through empirical research on 101 judicial judgment documents related to voice rights disputes in China, it was found that there are unclear definitions of legal relationship elements for reference and application of voice rights protection in judicial practice; There are a series of issues such as unclear scope of reasonable use and unclear liability determination and bearing methods after damage to sound rights and interests. The protection of voice rights and interests is a systematic project. The application of this protection rule not only needs the support of Article 1023 of the Civil code, but also needs coordination and cooperation with other similar personality rights protection rules, reference to the application of subject and object, responsibility bearing form innovation and other aspects, so as to build a perfect judicial application system of voice rights and interests protection.

Keywords

Voice Rights; Portrait Rights; Judicial Evidence.

1. Introduction

With the continuous development of internet technology and the continuous leap of storage media, the scope of sound transmission is also expanding. Intelligent voice applications are used in various aspects such as food, clothing, housing, and transportation, resulting in an increasing number of incidents of infringing on personal voice. Citizens' self-protection awareness of sound is also constantly increasing, but currently, China has not independently protected sound rights, That is to say, the voice right is not regarded as an independent and specific Personality rights. Once the voice infringement occurs, it can only be remedied through the general Personality rights, that is, according to Article 1023 of the Civil code, by referring to the legal provisions applicable to the portrait right. Therefore, this article explores the civil law protection of sound rights and interests from a judicial perspective, and can provide legal remedies for natural persons when their sound rights and interests are violated, in order to better safeguard citizens' sound rights and interests.

2. An Analysis of the Similarities and Differences between Voice Rights and Portrait Rights

2.1. The Commonality between Voice Rights and Portrait Rights

Among the existing concrete Personality rights in China, the right of portrait is often mentioned in the same breath as the right of voice. There are certain commonalities between voice and portrait. Firstly, sound and portrait have differences compared to other biological features such as fingerprints and lips. Portrait is a close-up of a person's external features, with different combinations of facial features and facial features, resulting in each person having a different portrait; Moreover, due to the different width and thickness of the vocal cords, there are also differences in the timbre of the sound emitted by each person, which makes the sound unique and creates a problem of using sound like a portrait. At this time, how to effectively protect sound rights has become an urgent problem to be solved. So, compared to the small differences in biometric features such as fingerprints and lips of each individual, the differences in sound and portrait are more significant. Secondly, both sound and portrait are recognizable. Influenced by factors such as gender, language habits, and living conditions, each person's voice in daily life is recognizable. Different people's voices have different language characteristics, and differences in appearance also lead to a certain degree of recognition among different individuals. Both voice and image can become identity recognition tools with significant features. Once again, both sound and portrait have property value. With the development of network technology in recent years, the property value of sound has become increasingly high. Sound can be allowed to be used by others in some form, such as dubbing, singing voice copyright, etc. Portrait has also increased in property value with the continuous use in the commercial field. Both have high property value and should be protected by law, with clear restrictions and regulations. Finally, both sound and portrait have stability. Due to factors such as age and environment, compared to other biological characteristics, sound and portrait have significant differences. Adult growth and development have reached full maturity, so sound and portrait have a certain degree of stability and will not be easily changed. It is also relatively easy to protect their property value.

2.2. The Difference between Voice Rights and Portrait Rights

Firstly, the protection objects of sound rights and portrait rights are different. The object of sound rights protection is sound, while the object of portrait rights protection is the external image of the portrait owner. There is an essential difference between the two objects. Secondly, the material foundations of sound rights and portrait rights are different. Although both voice and portrait can recognize personality traits, portrait is a visual and tangible external image that is expressed through facial features or other features of the body, and has uniqueness; And the identification of personal identity through sound and sound is often achieved through the emission of different sound waves from their vocal cords, as well as other voiceprint features. It is a sound wave that cannot be seen, touched, or heard, and does not possess portrait rights. Once again, the expression forms of voice rights and portrait rights are different. The main manifestation of sound rights is that natural individuals express their works through intellectual creation and use recording, imitation, and other means, which belongs to auditory expression; Portrait rights mainly use painting, photography, and other methods to depict the appearance, form, and other external images of natural persons, which is a manifestation of visual effects. It is composed of spiritual rights and commercial material rights. Secondly, sound rights and interests are not directly copied and disseminated in a certain form. Generally, they can be presented without the help of a certain carrier. Sound recording, video recording and other means are only a means of preserving sound, while portraits are closely linked with carriers. For example, personal portraits must be presented to the public through photography,

photography, sculpture or painting, Therefore, individuals must rely on certain material carriers to display portrait characters. Finally, the patterns of behavior that infringe on the rights of voice and portrait are different. The infringement of portrait rights is manifested in the unauthorized production and use of portrait rights, malicious damage or defacing of others' portraits, etc., while the infringement of sound rights is mainly manifested in imitation, unauthorized use, etc.

3. Judicial Practice and Existing Problems in the Protection of Voice Rights and Portrait Rights

3.1. Judicial Practice on the Protection of Voice Rights and Portrait Rights

This article searches the cases related to voice rights and interests through websites such as China Judgment Document Network, FAXIN, and Peking University Magic Weapon, and according to relevant terms such as "voice rights and interests", "voice infringement", "voice interests", and "Article 1023 of the Civil code", and finds 101 cases related to voice rights and interests throughout the network. In order to better understand the Conservation status of voice rights and interests in China's judicial practice, this paper summarizes the cases of voice rights and interests in judicial practice before and after the implementation of the Civil code, so as to better compare them, and analyze the problems existing in the protection of voice rights and interests in existing legislative judicial practice.

Before the implementation of the Civil code, there were three main types of disputes concerning the rights and interests of voice. The first type is the commercial issue of artist voices. The brokerage company used the artist's voice rights to sign a voice authorization agreement with the other company, but during the performance of the agreement, there was a dispute between the two parties regarding the ownership of the artist's voice rights. They wanted to determine the ownership of the artist's voice rights through a court judgment. The second type is the additional voice clause in the labor contract. The parties and the company sign a labor contract and add an authorization agreement for the worker's voice and portrait in the contract, resulting in disputes between the two parties during the performance process. In such judicial decisions, judges have not effectively protected the voice rights and interests of the parties involved. The third type is unauthorized editing and use of others' voices. This type is also the most widely infringed type of sound in practice. In daily life, many people use others' voices to achieve their own goals without their permission, thereby infringing on the rights and interests of others' voices, resulting in civil infringement incidents. Such cases occur frequently, and judges judge that there are precedents to follow in such cases. Therefore, in such judicial judgments, the rights and interests of the parties are effectively protected. Through the exploration of judicial cases before the implementation of the Civil code, we can see that people lack the awareness of protecting their voice rights and interests, and the protection of voice rights and interests in judicial practice is very limited. In the past, the protection of voice rights and interests mainly existed in the field of intellectual property rights, and only the content of voice was protected, not the voice itself, which could not fully protect citizens' voice rights.

After the official implementation of the Civil code, through the search of relevant cases, it was found that the cases of voice rights protection mainly focused on short video. One of the typical cases is about the network tort liability dispute between Huang He and a technology company in Beijing. In this case, Song Bin uploaded two short videos containing Huang He's voice and portrait to Song Bin's personal Tike account without Huang He's consent, so as to improve the exposure of his account. In the later stage, he used fans to carry out live broadcast for profit. By June 20, 2021, The video is still on the shelf of his personal Tike number. The Tike number is certified to be under the name of a science and technology company in Beijing, which uses the plaintiff's portrait and voice for profit, and infringes on He's portrait rights and voice rights. In

the final judgment of the court, Huang He 's portrait rights and voice rights were effectively protected by law. Another case is a contract dispute between a certain Dong industrial Investment Co, Ltd. and its employee Wang Die. Wang Die authorized his portrait rights and voice rights to a certain Dong Industrial Investment Co., Ltd. in the contract. Later, during the performance of the contract, both parties provoked controversy. Finally, the court ruled to recognize Wang Die's portrait rights and voice rights.

3.2. Problems in the Protection of Voice Rights and Portrait Rights

3.2.1. Unclear Definition of Legal Relationship Elements

Personality rights embody human dignity and freedom, and are the rights that make people human. Everyone has equal rights. Therefore, the general subject of Personality rights is to a large extent the subject scope of some specific Personality rights. The Legal person is not automatically transformed from the entity in reality, but the conceptualization of the entity part recognized by the legislator's historical consciousness. In the process of the evolution of Personality rights, the scope of the right subject has also undergone a series of changes. At the beginning, there was inequality in social status, and only a few natural persons had Personality rights. Later, with the improvement of social democracy and the progress of social civilization, all people have equal status, and can also take up the weapon of Personality rights to protect their own personal dignity. Now, the owner of Personality rights The scope of the entity has been expanded to include the artificial "person" of a legal person. However, we should pay attention to the particularity of voice rights, and there is controversy over the existence of voice rights for special groups such as the deceased, celebrities, deaf mute, legal persons, virtual idols, etc. Ultimately, the scope of voice rights subject is still unclear. Only by clearly defining the subject of voice rights can disputes be resolved and the ownership of voice rights be confirmed. On the other hand, there is no unified standard in the academic community regarding the object of sound rights. The object reflects the scope of the research object, and the attribution of sound rights depends on what the object it protects. Therefore, in legislation, the subject and object of sound rights should be clearly defined.

3.2.2. The Scope of Reasonable Use is Not Clear

With the penetration of artificial intelligence technology into all aspects of society, the means of sound transmission are becoming increasingly incredible, and the scope of sound transmission is becoming wider, leading to an increasing number of sound infringement behaviors. Individuals upload their own sound information to relevant media, and this transfer process is within the user's own controllable range, but the results of uploading are unknown, Sound is in the network, and it is impossible to predict how it will be used afterwards, and it is impossible to guarantee whether one's own sound is truly safe. For example, the nationwide karaoke app can store users' voices and, with their consent, share sound data on public platforms. This method is simple, convenient, efficient, and feasible, and most importantly, free, providing more users with the option to record their voices. As the saying goes, the development of all things has both advantages and disadvantages. On the one hand, the improvement of technological level brings efficiency and convenience for people to enjoy, while on the other hand, intentional individuals will take advantage of technological loopholes, utilize people's dependence and trust in technology, and introduce technology into another bad stage, which is to use technology to carry out illegal and criminal activities. Artificial intelligence speech technology is becoming more mature, and criminals use this to synthesize, cut, and other means of processing the sound, confusing the audience, making users believe in the fake packaging of the sound content, and even committing fraud against their relatives and friends, damaging the economic and spiritual interests of users. In addition to infringing on people's economic and spiritual interests, if criminals use synthetic speech to crack important places related to personal safety, such as smart homes and hotel residents' voice locks, this will lead

to the destruction of sound rights and lead to a tragic outcome that threatens personal safety. Therefore, the use of voice, especially the use of voice published in Big data on the Internet, must be rationalized and legalized within the legal framework. It cannot break the bottom line of morality and law and undermine the good and stable order of society.

3.2.3. Ambiguous Identification and Assumption of Responsibility

For the rules and principles of voice rights disputes, the law does not clearly stipulate whether to bear fault liability or Strict liability, and the constituent elements of voice rights disputes are not explained by referring to the applicable general provisions, that is, the four elements are in a vague state. In addition, most disputes over voice rights occur on the internet, which makes it difficult to predict the harm and consequences caused by the rapid spread of certain specific information once it is published, making it difficult to obtain effective remedies for voice rights disputes. And for the problem of determining the amount of damages after the infringement of voice rights, although Article 1182 of the Civil code stipulates the calculation method of compensation for property losses caused by infringement of other people's personal rights, which can be applied to the case of voice rights infringement, there are still difficulties in determining the amount of damages. When the voice of the rights holder is attacked by the internet, the high-speed dissemination and widespread coverage of the internet will inevitably bring great challenges to the path of safeguarding rights, making it even more difficult to accurately calculate the gains and losses of property value in the interests of the voice. Although in this situation, when both parties cannot reach a consensus on the amount of compensation, the court can determine the amount based on the specific situation, this undoubtedly gives the judge too much discretion, making it difficult for the actor to predict the amount of damage compensation in advance and effectively protect the right to sound.

4. Experience and Enlightenment on the Application of Rules for the Protection of Foreign Voice Rights and Interests

4.1. The Dual Protection of Public and Privacy Rights Against Infringement of Sound Rights in the United States

As a basic right, American voice right is protected by the right of publicity. The right to publicity, as a commercial use right that is independent of traditional privacy rights, has formed a new type of right that pays more attention to protecting the value of natural person property. In existing laws in the United States, the right to publicity is defined as a right that only involves the property rights of natural persons, and other legal persons and literary fictional characters do not have the right to publicity. In addition, the United States focuses on protecting the commercial use of sound, but does not specify the scope of protection for sound rights. The object of privacy protection under US law is the undisturbed spiritual interests of living alone. The act of recording, editing, synthesizing, leaking or distorting or vilifying the voice of others without their permission clearly violates the relevant provisions of privacy. Therefore, in the United States, the right to sound can also be legally protected through privacy. There are similarities in many aspects between China's voice rights and the United States' right to disclosure, but there are some differences between the two due to differences in economic and social conditions. The voice rights and interests of our country are regulated by the Personality rights, which pays more attention to the value of human beings and focuses on protecting the spiritual interests of the voice rights and interests of natural persons; The public right in the United States focuses on protecting the property interests of sound rights, but overall, the public right in the United States provides many ideas for the protection of China's sound rights from both legislative and judicial perspectives.

4.2. The Protection of Napoleonic Code Against Infringement of Voice Right

The code first clearly defines the personality attributes of the right to sound, which is a personality element and clarifies that each person's voice is unique and can play a role in identifying the person. In addition, the code stipulates that when a voice is used to identify someone's identity, it can be protected by the code, that is, judges have the right to take any inhibitory measures to prevent infringement of their private lives. When imitating someone's voice causes confusion, misunderstanding, or any harm, anyone can prevent others from imitating their own voice. The Napoleonic Code has clearly defined the subject specificity of the voice right, that is, voice is a personality feature, has a significant identity, can play the role of identifying specific people, and can be protected as a personality interest. At the same time, it also clarifies the judgment rules for infringement of sound interests, that is, when imitating others' voices is sufficient to cause public confusion, legal protection can be obtained, and causing confusion or identification and other harm is a condition for assuming responsibility. Moreover, it also stipulates that in emergency situations, there is a sound rights relief model, which means that without affecting the compensation for the damage suffered, judges can provide relevant measures such as custody or seizure of disputed property or other appropriate measures to prevent or stop the obstruction of private life and privacy to provide relief for sound rights. Compared with other countries' relatively vague regulations, France directly recognized the personality attribute of sound and proposed an element to determine the establishment of tort liability. In addition, a more special point is that the provisions of the Napoleonic Code on the infringement of the right to sound are placed in the chapter of privacy protection, and the provisions on the protection of the right to sound are similar to those on the protection of the right to privacy.

4.3. Protection of Infringement of Voice Rights in German Criminal Code

The German Criminal Code stipulates the elements of a crime against the voice: "(1)if the perpetrator secretly records what others have not said publicly without permission, eavesdropping on the undisclosed words that others clearly express that they are not allowed to know; (2)using the above means to produce or be obtained by a third person;(3) If the words obtained from the above regulations are made public, but the announcement is made in the public interest and cannot be punished, and if the above conditions are met, it constitutes a crime and is sentenced to a free sentence of not more than three years or money It can be seen that Germany protects acts that infringe on the interests of sound in criminal legal norms, adopts stricter punishment measures, pays attention to protecting illegal recording and eavesdropping of others' unpublished voices, and also sets limits on public interest protection.

4.4. The Protection of the Civil Code of Quebec, Canada Against Infringement of Voice Rights

The Civil code of Quebec, Canada, was once influenced by French law, inherited the civil law tradition of civil law countries such as France, and then was influenced by British law. It draws on the legislative experience of Common law countries, absorbs the principles and spirit of Common law countries, and is a mixed law, which reflects the extensive exchanges between multi-ethnic jurisdictions. Its protection of voice is of reference significance for China's research. Article 36 of the Civil code of Quebec stipulates that "the theft or unauthorized use of others' names, portraits or voices is an infringement of others' privacy". The code does not explicitly stipulate the right of voice, but protects the right of voice as a right of privacy. The scope of protection of the right of voice is also too general. As for why the right of voice should be protected as a right of privacy, it has also been mentioned above, The civil law of Quebec province is influenced by the Common law. Although the civil law of Quebec inherits the tradition of the civil law system, the essence of the right of privacy in Quebec is different from

that in China, and its meaning is more extensive than that of the right of privacy in China. Its right of privacy is more similar to the general Personality rights in China. The Code affirms the protection of sound rights and stipulates that the manifestation of infringement of sound rights is the theft or use of others' voices. At the same time, it also imposes restrictions on the protection of sound rights and stipulates that the situation of reasonable use is excluded from those that are reasonably disclosed to the public.

5. Judicial Suggestions on the Protection of Voice Rights and Portrait Rights

5.1. Clarify the Legal Relationship Elements of Sound Rights

Firstly, the subject of sound rights should be natural persons. A complete personality is composed of sound and numerous other personality elements, and natural persons should naturally be the subject of sound rights. Moreover, legal persons cannot become the subject of sound rights. Because a legal person is a person created by law, there are differences in nature compared to natural persons. Legal persons are born under the development of commodity economy and society. According to the law, property interests are the core value of their personality rights, while natural persons take spiritual interests as the core. In addition, the subject of voice rights is not only celebrities, and the concept of celebrities is very vague. There is no strict standard to distinguish between celebrities and ordinary people. With the progress of the times, ordinary people and celebrities can use their voices for commercial activities through various means, but the economic benefits are not as great as those of celebrities. Secondly, as the object of sound rights, it should be the personality elements of sound rights, and together with other personality interests, form a complete personality element to maintain personal dignity. It has two benefits attributes: spiritual and property. Because we can distinguish others through sound, making sound interests have personality identity. When sound rights are violated, it will cause mental damage to the rights subject. If it is a public figure, it may also cause adverse social impact; When sound rights are used in commercial activities, infringement of sound rights may also cause property losses to the rights holder. The object of sound rights is not the external carrying form of sound, which is vastly different from sound works in copyright. Finally, the content on sound rights should include exclusive rights to sound recording, exclusive rights to use sound, and exclusive rights to dispose of sound.

5.2. Improve the Norms for the Rational Use of Sound

Rights should be subject to legal constraints to avoid abuse of rights. The protection of voice rights should comply with legislation and avoid abuse of rights when referring to the use of portrait rights clauses. Under the current legal system of our country, the application of the fair use system should refer to the fair use rules of the portrait right, that is, the fair use should refer to the provisions of Article 999, Article 1020, Article 1021 and Article 1022 of the Civil code. Moreover, the license for the use of sound should be based on the contract between both parties, and the other party must strictly exercise their rights in accordance with the provisions of the contract. The contract part of the Civil code provides a strong guarantee for natural persons to use voice to properly create income. The voice rights holder and other persons have agreed on the specific use of voice in the form of a contract. The other party to the contract needs to follow the written provisions, use the voice right of natural persons, and if it violates the relevant agreements and causes undue harm to the subject exercising the voice right, it needs to bear the corresponding compensation obligations. In the field of copyright law, sound rights are endowed with a special right attribute. In terms of the contract for authorizing the use of portraits, some celebrity artists will use their own portraits in the contract, and have made various restrictive agreements in advance. However, there is no specific legislation in China

that explicitly stipulates the protection of sound rights. After the Civil code has made clear provisions on "voice rights and interests", its "voice rights and interests" should also be included in the contract, which should be carried out within the limits of the contract to avoid commercial use of voice outside the contract. At the same time, it is also necessary to consider the value and interests of the sound itself: Secondly, when conducting for-profit activities, ensure that the sound is used completely and truthfully, and strictly prohibit editing that misleads the audience. To prevent infringement of their voice rights. In addition, in order to protect the interests of the public, certain legislative restrictions should be imposed on the reasonable use of sound, such as for scientific research needs, news and public opinion supervision, the use of public voice, and the performance of public duties within the scope allowed by law. The reasonable use of others' voice rights should be considered as the reasonable use of others' voice rights. This way, when determining the infringement of sound, natural persons can also make a reasonable use defense.

5.3. Clarify the Identification and Assumption of Liability for Sound Infringement

The principle of attribution is related to the determination and assumption of responsibility. Usually including fault liability and no fault liability. No fault liability applies only in specific situations where there are clear legal provisions. Sound infringement, as a common infringement, does not have special legal provisions, and this type of behavior is relatively common in daily social interactions. Generally, these behaviors do not have a high degree of danger, so the principle of fault liability is adopted. Secondly, determining whether the perpetrator bears the responsibility for sound infringement depends on whether it meets the four elements of infringement liability, including illegal behavior, subjective fault, causal relationship, and damage result. The traditional four elements apply to the determination of infringement liability for sound infringement. First, the Criminal defenses of conduct. Compared with other Personality rights, voice rights have their own characteristics and content, so the infringement of voice rights has its own particularity. Mr. Wang Zejian summarizes the types of behaviors that infringe on the rights and interests of the voice into three categories: "The first category is the use or recording of someone 's language and voice without the permission of the rights holder; the second category is eavesdropping on someone 's phone call or conversation. The last category is imitating someone 's voice in commercial activities." I believe there are several types of behaviors: first, recording someone 's voice without the consent of the rights holder or distorting someone 's voice Cutting, synthesis, etc. Secondly, it is an act of infringing on the voice rights of others by using imitation behavior to vilify, belittle others, or engaging in commercial activities that imitate others' voices without consent to obtain economic returns. Thirdly, without the permission of the voice owner, the voice of others is announced. If the sound rights have been technically processed for the purpose of news reporting, etc., making it impossible to identify the source of the sound, it can be considered that there has been no infringement on the sound rights. These are just a few typical manifestations of infringing on the right to sound, and the law cannot list all forms of expression. Therefore, it is necessary to set up a cover clause to ensure the practicality of legal application. Finally, the perpetrator must infringe on the voice rights of others based on subjective intent or negligence. And it needs to produce certain damage results. Whether the fact of causing damage can be used to define the application of the protection of Cause of action of voice infringement and Cause of action of Personality rights. Causing certain consequences of damage to voice rights holders, including personal injury, property damage, and mental damage. Finally, there must be a causal relationship. Causal relationship is a necessary condition for the legitimacy of attribution, and the existence of causal relationship indicates that attribution is

legitimate. The damage to the voice of others must be caused by the perpetrator's previous illegal behavior.

6. Conclusion

The Civil code only provides reference to the protection provisions of the right of portrait for the protection of voice rights in China, which has a large legal loophole. But like the names and portraits of natural individuals, their voices also have a strong personality identity that can be distinguished by the public. With the development of technology and the increasing commercialization, it is necessary to strengthen the protection of sound rights. This paper explores the judicial cases of disputes over voice rights and interests, explains the deficiencies in the protection of voice rights and interests in the current legislation, and puts forward some suggestions for improvement, so as to promote the development of the Personality rights law and even the entire civil law system.

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