

The Biblical Manumission Laws: Has the Literary Dependence of H on D been Demonstrated?

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Because three of the major corpora of biblical law—the Covenant Code (CC), the Holiness Code (H), and the Deuteronomic Code (D)—each have laws concerning the manumission of slaves, comparisons of these manumission laws have functioned prominently in discussions of the development of biblical law and the order of dependence among the various codes. Many of the most renowned scholars of the Pentateuch and biblical law have contributed to this debate at some point in their career.¹

¹ A partial overview of the literature would include the following: Rainer Albertz, “Die Tora Gottes gegen die wirtschaftlichen Sachzwänge,” *Ökumenische Rundschau* 44 (1993): 290–310; Yairah Amit, “The Jubilee Law—An Attempt at Instituting Social Justice,” in *Justice and Righteousness* (ed. H. G. Reventlow and Yair Hoffman; Sheffield: JSOT Press, 1992): 47–59; G. C. Chirichigno, *Debt-Slavery in Israel and the Ancient Near East* (JSOTSup 141; Sheffield: JSOT Press, 1993): 342–43; Heinz-Josef Fabry, “Deuteronomium 15,” *ZABR* 3 (1997): 92–111; Robert Gnuse, “Jubilee Legislation in Leviticus: Israel’s Vision of Social Reform,” *BTB* 15 (1985): 43–48; Sara Japhet, “The Relationship between the Legal Corpora in the Pentateuch in Light of Manumission Laws,” in *Studies in the Bible* (ed. Sara Japhet; ScrHier 31; Jerusalem: Magnes, 1986): 63–89; Stephen A. Kaufman, “A Reconstruction of the Social Welfare Systems of Ancient Israel,” in *In the Shelter of Elyon* (ed. W. B. Barrick and J. R. Spencer; JSOTSup 31; Sheffield: JSOT Press, 1984): 277–86; Hans G. Kippenberg, “Die Entlassung aus Schuld knechtschaft im antiken Judäa: Eine Legitimitätsvorstellung von Verwandtschaftsgruppen,” in *Vor Gott Sind Alle Gleich* (Dusseldorf: Patmos, 1983): 74–104; N. P. Lemche, “The Manumission of Slaves—The Fallow Year—The Sabbatical Year—The Jubel Year,” *VT* 26.1 (1976): 38–59; Bernard M. Levinson, “The Birth of the Lemma: The Restrictive Reinterpretation of the Covenant Code’s Manumission Law by the Holiness Code (Leviticus 24:44–46),” *JBL* 124 (2005): 617–39; idem, “The Manumission of Hermeneutics: The Slave Laws of the Pentateuch as a Challenge to Contemporary Pentateuchal Theory,” in *Congress Volume Leiden 2004* (ed. André Lemaire; VTSup 109; Leiden: Brill, 2006), 281–324; Norbert Lohfink, “Gottes Reich und die Wirtschaft in der Bibel,” *IKaZ* 15.2 (1986): 110–23; Arndt Meinhold, “Zur Beziehung Gott, Volk, Land im Jubel-Zusammenhang,” *BZ* n.f. 29.2 (1985): 245–61; Eckart Otto, “Programme der sozialen Gerechtigkeit,” *ZABR* 3 (1997): 26–63; Adrian Schenker, “The Biblical Legislation on the Release of Slaves: The Road from Exodus to Leviticus,” *JSOT* 78 (1998): 23–41. A fuller listing would take into account

Nonetheless, the precise nature of the relationship of the biblical manumission laws, as well as the biblical legal corpora generally, remains a disputed question.

Recently, some have claimed to have resolved the issue of the priority of D vis-à-vis H by demonstrating the *direct literary dependence* of the manumission laws of H on those of D.² It is claimed that, apart from considerations of historical or cultural development, the priority of D to H can be conclusively proven through literary analysis alone. If this claim were shown to be true, it would represent a significant advance in the study of biblical law. It is the purpose of this paper to evaluate whether this strong claim will withstand scrutiny.

1. Criteria for Detecting Literary Dependence

At the outset is necessary clearly to distinguish *literary* from *conceptual* dependence. *Literary dependence* describes one text's use of the very *words* of a earlier text; *conceptual dependence* describes the use of the earlier text's *concepts*.

In this paper we are focusing solely on the question of *literary dependence*, which may be stated as follows: Do either H or D show evidence of borrowing the other's

contributions to the subject found in the monographs and commentaries of Yehezkel Kaufmann, Moshe Weinfeld, Jacob Milgrom, Jeffrey H. Tigay, Christopher J. H. Wright, Robert G. North, H. G. Reventlow, and many others.

² For example, Bernard Levinson, "The Manumission of Hermeneutics: The Slave Laws of the Pentateuch as a Challenge to Contemporary Pentateuchal Theory," in *Congress Volume Leiden 2004* (ed. André Lemaire; VTSup 109; Leiden: Brill, 2006), 281-324; and Jeffrey Stackert, *Rewriting the Torah: Literary Revision in Deuteronomy and the Holiness Legislation* (FAT 52; Tübingen: Mohr Siebeck, 2007), 113-64. I have responded in detail to Levinson's arguments in Bergsma, *The Jubilee from Leviticus to Qumran: A History of Interpretation* (VTSup 115; Leiden: Brill, 2007) 138-42. The arguments of Levinson and Stackert have been endorsed recently by Mark Leuchter, "The Manumission Laws in Leviticus and Deuteronomy: The Jeremiah Connection," *JBL* 127 (2008): 635-53.

words? We do not wish to address here the question of *conceptual dependence*. It is quite possible that one text is strongly influenced by another text's concepts even if it never borrows that text's diction.

Several scholars have proposed criteria for detecting the presence of literary dependence within the biblical text, including Richard Hays, Dennis MacDonald, and David Carr.³ I do not disagree with the criteria of any of these scholars. However, since the relationship of H and D is disputed, I would like to propose a few alternative common-sense criteria for detecting literary dependence, stated in a form more amenable to quantitative, statistical analysis than the criteria of Hays, McDonald, and Carr.⁴ My hope in doing so is to place the discussion of the relationship of H and D on a more objective foundation.

Therefore, I wish to propose two primary and one secondary criteria for identifying literary dependence between two texts. Texts show evidence of literary dependence if they exhibit:

- (1) shared low-frequency *vocabulary*;
- (2) shared low-frequency word *sequences* (strings of words); or
- (3) shared low-frequency *combinations* of high-frequency words.

³ See Richard B. Hays, *Echoes of Scripture in the Letters of Paul* (New Haven/London: Yale University Press, 1989), 29-32; Dennis R. MacDonald, *The Homeric Epics and the Gospel of Mark* (New Haven/London: Yale University Press, 2000), 8-9; and David Carr, "Method in Determination of Direction of Dependence: An Empirical Test of Criteria Applied to Exodus 34, 11-26 and its Parallels," in *Gottes Volk am Sinai: Untersuchungen zu Ex 32-34 and Dtn 9-10* (ed. M. Köckert and E. Blum; Gütersloh: Gütersloh Verlaghaus, 2001), 107-40, esp. 126.

⁴ Readers will recognize that my criteria here would fall under Hays' categories "volume" and "recurrence"; and MacDonald's categories "density," "order," and "distinctiveness."

By “frequency” I refer to how frequently the word occurs within the relevant literary tradition. For present purposes, the relevant literary tradition is the MT. “Low frequency” words are uncommon in the MT and “high frequency” are common.

The rationale for these criteria should become apparent upon reflection. Literary dependence is, after all, one text’s reuse of the *language* of another text. Therefore, for literary dependence to be demonstrated, the two texts must show *similarity of language*, and not just any similarity of language, but a *greater similarity* than can readily be explained by other factors—such as common subject matter, common literary tradition, a common source text on which both subject texts depend, or simple coincidence. The similarity of language between the two texts must be unusual, i.e. rare, i.e. statistically improbable. Thus, my stress on *low-frequency* (statistically improbable) phenomena.

My first criteria states that *shared low-frequency vocabulary* is an indicator of literary dependence. If a text employs terms that are relatively rare in the common discourse of its literary tradition, but are characteristic of a particular earlier text, a case can be made for literary dependence. If it is sufficiently rare, a single lexeme may be sufficient to identify literary dependence. Using an example from American popular culture, the term “Shazbot” is so uncommon in American English that any text employing the word is almost certainly making an allusion to—and is therefore in some sense literarily dependent upon—Robin Williams’ late-1970s TV comedy “Mork and Mindy.”

Moving to a biblical example, the Hebrew term **מַרְצֵעַ**, “awl,” occurs only in Exod 21:6 and Deut 15:17 and nowhere else in Biblical Hebrew. This shared low-frequency term is good evidence of literary dependence of Deut 15:17 on Exod 21:6.

To constitute evidence of literary dependence, vocabulary must necessarily be low-frequency, because high-frequency words—“blue,” “sun,” “water”—occur in so many texts that it would be impossible for the reader to identify dependence on any particular text.

The second criterion holds that *shared low-frequency sequences* are evidence of literary dependency. For example, none of the words in the sequence “By the dawn’s early light” are themselves low-frequency English lexemes, but the sequence itself is so uncommon that, were it to be found in a written text, it would almost surely indicate literary dependence on the Star Spangled Banner. Likewise, the sequence “blood of the covenant” (τὸ αἷμα τῆς διαθήκης), while composed of common biblical words, is sufficiently rare that one may confidently identify its occurrences in Matt 26:28 and Mark 14:4 as examples of literary dependence on Exod 24:8.

Sequences provide the best evidence of literary dependence when they appear verbatim (uninterrupted and identically-inflected) in both texts. However, sequences may be modified by, among other things, (1) insertion, (2) deletion, (3) inversion (reversing the order of sequence), (4) substitution of synonyms, (5) change of inflection (person, gender, number, case, etc.), and (6) selective rearrangement of elements. However, these modifications weaken the case for literary dependency. The more the sequences of a source text are modified, the more difficult it becomes to demonstrate dependence. If the sequence is modified beyond recognition, it becomes impossible to detect literary dependence. To state the issue more accurately, if there are only weak hints of a common sequence between two texts, it is impossible to determine whether the shared weak

sequence is an instance of literary dependence with extensive modification, or merely a coincidence.

The first two criteria of low-frequency vocabulary and sequences are primary; the third and final criterion is secondary, and is not likely to be sufficient to demonstrate literary dependence in the absence of corroborating evidence. Nonetheless, *shared low-frequency combinations of high-frequency terms* can provide some evidence of literary dependence. Two texts may not share low-frequency lexemes; however, they may exhibit two or more high-frequency lexemes which are only rarely found in conjunction with one another outside those two texts. Thus, the *combination* (“clustering”) of the terms is uncommon, even if none of the terms are when taken by themselves. For example, the lexemes דַּלַּת, “door”; אָזֶן, “ear”; and עוֹלָם, “forever” are all high-frequency taken by themselves, but the combination of the three is low-frequency, found only in Exod 21:6 and Deut 15:17, providing some evidence for literary dependence.

This criterion must be used with discretion, however, because—without other corroborating evidence—it can yield false positives. Two texts may share a number—even a large number—of high-frequency words due to other factors than literary dependence. For example, both texts may be describing the same person, recounting the same historical event, or treating the same legal issue. In the case of Exod 21:6 and Deut 15:17, there is corroborating evidence in the form of shared low-frequency vocabulary (מִרְזָע) and a shared sequence in close literary proximity (Exod 21:2//Deut 15:12, see below).

1.1. Some Examples of the Criteria Applied

In order to put the literary relationship of the manumission laws of H and D in its proper context, it is appropriate to precede the discussion of these laws with some examples of widely-recognized literary dependence elsewhere in the Hebrew Bible.

1.1.1. The Dependence of the Chronicler on the Deuteronomistic History:

In the following example, despite a lack of low-frequency vocabulary, more than one identically-inflected, low-frequency sequence can be observed between the two texts, providing indisputable evidence of literary dependence:

1 Kings 3:5-6	2 Chronicles 1:7-8
<p>בגבעון נראה יהוה אל שלמה בחלום הלילה ויאמר אל הים שאל מה אתן לך 6 ויאמר שלמה אתה עשית עם עבדך דוד אבי חסד גדול ... ותתן לו בן יושב על כסאו כיום הזה</p>	<p>בלילה ההוא נראה אל הים לשלמה ויאמר לו שאל מה אתן לך 8 ויאמר שלמה לאל הים אתה עשית עם דויד אבי חסד גדול והמלכתני תחתיו</p>
<p>5 At Gibeon the LORD appeared to Solomon in a dream by night; and God said, “Ask what I shall give you.” 6 And Solomon said, “Thou hast shown great and steadfast love to thy servant David my father, ... and hast given him a son to sit on his throne this day.</p>	<p>In that night God appeared to Solomon, and said to him, “Ask what I shall give you.” 8 And Solomon said to God, “Thou hast shown great and steadfast love to David my father, and hast made me king in his stead.</p>

There are two verbatim, identically-inflected sequences, one of six, the other of seven Hebrew words in length, both of which are only to be found in these two instances in all of the MT.

1.1.2 Ezekiel’s Dependence on the Holiness Code⁵

⁵ The direction of dependence between Ezekiel and the Holiness Code is in dispute, but Jacob Milgrom, Risa Levitt-Kohn and Michael Lyons have provided strong reasons to

It has long been recognized that Ezekiel demonstrates a close literary relationship to the Holiness Code, as in this example:

Leviticus 26:5b-6	Ezekiel 34:25
<p>ואכלתם לחמכם לשבע וישבתם לבטח בארצכם ונתתי שלום בארץ ושכבתם ואין מחריד והשבתי חיה רעה מן הארץ וחרב לא תעבר בארצכם</p>	<p>וכרתי להם ברית שלום והשבתי חיה רעה מן הארץ וישבו במדבר לבטח וישנו ביערים</p>
<p>And you shall eat your bread to the full, and <i> dwell in your land securely</i>. And I will give peace in the land, and you shall lie down, and none shall make you afraid; and <i> I will remove evil beasts from the land</i>, and the sword shall not go through your land.</p>	<p>“I will make with them a covenant of peace and <i> banish wild beasts from the land</i>, so that they may <i> dwell securely in the wilderness</i> and sleep in the woods.</p>

The five-word, identically-inflected sequence *והשבתי חיה רעה מן הארץ*, “I will banish wild beasts from the land,” is extremely low-frequency: it occurs only in these two passages of the Hebrew Bible. A second sequence in Lev 26:6, *ישבתם לבטח בארצכם*, “You shall dwell in safety in your land,” seems to have been modified by Ezekiel into *וישבו במדבר לבטח*, “and they shall dwell in safety in the wilderness.”

resolve the issue in favor of H → Ezekiel. See Jacob Milgrom, “Leviticus 26 and Ezekiel,” in *The Quest for Context and Meaning: Studies in Biblical Intertextuality in Honor of James A. Sanders* (eds. Craig A. Evans and Shemaryahu Talmon; Leiden: Brill, 1997), 57–62; idem, *Leviticus 17–22: A New Translation with Introduction and Commentary* (AB 3a; New York: Doubleday, 2000), 1362; Risa Levitt Kohn, “A New Heart and a New Soul: Ezekiel, the Exile and the Torah,” (Ph.D. Dissertation; University of California, San Diego, 1997); eadem, “Ezekiel, the Exile, and the Torah,” *SBL 1999 Seminar Papers* (1999): 501–26; eadem, “A Prophet Like Moses? Rethinking Ezekiel’s Relationship to the Torah,” *ZAW* 114 (2002): 236–54; eadem, *A New Heart and a New Soul: Ezekiel, the Exile, and the Torah* (JSOTSup 358; Sheffield: Sheffield Academic Press, 2002); Michael A. Lyons, “Marking Innerbiblical Allusion in the Book of Ezekiel,” *Biblica* 88 (2007) 245-50.

C. *The Dependence of the Holiness Code on the Covenant Code:*

An example from the Holiness Code and the Covenant Code:

Exod 23:10	Lev 25:3
<u>וּשְׁשׁ שָׁנִים תִּזְרַע אֶת אֶרֶצְךָ וְאָסַפְתָּ אֹתָהּ</u>	<u>שֵׁשׁ שָׁנִים תִּזְרַע שְׂדֶךְ וּשְׁשׁ שָׁנִים תִּזְמַר</u> <u>כִּרְמֶךָ וְאָסַפְתָּ אֹתָהּ תְּבוֹאָתָהּ</u>
<i>For six years you shall sow your land and gather in its yield</i>	<i>Six years you shall sow your field, and six years you shall prune your vineyard, and gather in its yield</i>

In this example Leviticus 25 employs two verbatim sequences from Exod 23:10: וּשְׁשׁ שָׁנִים תִּזְרַע, “Six years you shall sow,” and וְאָסַפְתָּ אֹתָהּ תְּבוֹאָתָהּ, “You shall gather in its yield.” These are the only two passages of the Hebrew Bible where these sequences occur. Furthermore, the shared word תְּבוֹאָה is somewhat low-frequency, occurring less than fifty times in the MT.

D. *The Dependence of Deuteronomy on the Covenant Code*

Many have studied the relationship of Deuteronomy to the Covenant Code, perhaps most famously (in recent years) Bernard Levinson.⁶ The manumission laws of both legal corpora show evidence of literary dependence, probably from CC to D.

Exod 21:2	Deut 15:12-18
כִּי תִקְנֶה עֶבֶד שֵׁשׁ שָׁנִים יַעֲבֹד וּבִשְׁבַעַת יָצֵא לְחֹפְשֵׁי חָנָם ...	כִּי יִמְכַר לְךָ אֶחָיִךְ הָעִבְרִי אֹו הָעִבְרִיָּה וְעָבַדְךָ שֵׁשׁ שָׁנִים וּבִשְׁנָה הַשְּׁבִיעִית תִּשְׁלַחְנוּ חֹפְשֵׁי מַעֲמֶךָ

⁶ See Levinson, *Deuteronomy and the Hermeneutics of Legal Innovation* (Oxford: Oxford University Press, 1998).

The two texts share low-frequency vocabulary: עברי (35/MT) and חפשי (17/MT) are uncommon. Furthermore, the sequence of lexical units in Exod 21:2, although modified by the substitution of synonyms and an inversion, is still recognizable in Deut 15:12:

לחפשי free	יצא he will go out	ובשבעת and in the seventh	יעבד he shall serve	שש שנים six years	עבד עברי Hebrew slave	תקנה you buy	כי if
חפשי free	תשלחנו you shall send him away	ובשנה השביעת and in the seventh year	שש שנים six years	ועבדך and he serves you	אחיך העברי או העבריה your brother a Hebrew or Hebrewess	ימכר לך Is sold to you	כי if

Finally, although many of the lexemes are high-frequency taken by themselves, the cluster of lexemes observable in these two verses (חפשי, עברי, עבד, שנה, שבע, שש) is low-frequency, occurring only in these two passages and in Jeremiah 34, which is almost certainly dependent on Deuteronomy 15.

The case for the dependence of Deut 15:12 on Exod 21:2 is weakened by the lack of verbatim repetition of the source text (Exod 21:6) by the Deuteronomist. Still, what David Carr would call the “density,” “order,” and “distinctiveness” of the parallels provide enough evidence to produce a reasonable argument.

The four examples of literary dependence among different sources within the Hebrew Bible have been cited above in order to serve as a contrast with the comparison of the manumission laws of H and D below. We will find that the kind of clear evidence for literary dependence present in the examples above is lacking between Lev 25:1-55 and Deut 15:1-18.

2. The Criteria Applied to Manumission Laws of H and D

We now transition to an application of the criteria described above to the manumission laws of H and D. To increase the likelihood of discovering literary dependence, we will include the closely-related seventh-year laws of H (Lev 25:1-7) and D (Deut 15:1-11) along with the manumission laws, and define the texts to be compared as Lev 25:1-55 and Deut 15:1-18.⁷

2.1. Low-Frequency Vocabulary

For our purposes we will define “rare” lexemes as those occurring less than ten times in the MT, and “uncommon” as less than 50 times.

Leviticus 25:1-55 and Deut 15:1-18 share fifty-two (52) lexemes.⁸ Of these fifty-two, thirty-five (35) are found in the analogous laws of the Covenant Code. Thus, Leviticus 25 and Deuteronomy 15 share only eighteen (18) lemmas whose origin could not possibly be explained by the dependence of each of them on the laws of the Covenant Code.

Of the fifty-two lexemes Leviticus 25 and Deuteronomy 15 share in common, none are rare and only two, שָׂכִיר (“hired man,” 18/MT) and כֹּפֵר (“enough, sufficient,” 39/MT) are uncommon.

⁷ I combine the seventh-year legislation in to my textual comparison because in both H and D, the seventh year laws are juxtaposed with the manumission laws. Secondly, in H, the manumission laws are thoroughly integrated into H’s larger “sabbatical year” system, such that *conceptually* all of Deut 15:1-18 is relevant to compare with Lev 25:1-55. The comparison of these larger units should not statistically be to the detriment of an argument for dependence; rather, it should increase the likelihood of discovering literary parallels. Stackert, for example, also combines these laws for the purpose of comparison (*Rewriting the Torah*, 113-64).

⁸ The complete list is provided in Appendix 2.

The lexeme שְׂכִיר occurs six times in the Holiness Code (Lev. 19:13, 22:10, 25:6, 40, 50, 53) but only twice in Deuteronomy (15:18, 24:14). Aside from the use of the word itself, there is no indication in the lexical context of any of the four occurrences of the word in Leviticus 25 (vv. 6, 40, 50, 53) of literary dependence on Deut 15:18 (see Appendix 1). Twice in Leviticus 25, שְׂכִיר is employed as part of the word pair שְׂכִיר וְתוֹשֵׁב, “hired man and resident alien” (vv. 6, 40), which appears to be a characteristic word pair in the Priestly/Holiness tradition: cf. Exod 12:45; Lev 22:10. This word pair does not occur in Deuteronomy.

There seems to be little reason to find even conceptual dependence of H on D in this instance. Deuteronomy 15:12 exhorts the Israelite slave owner to set his Hebrew slave free gladly, since he has given the labor of a שְׂכִיר for six years at half the cost. The Holiness Code, however, insists that an impoverished Israelite must not be treated as a slave, but shall have the status of a hired man (שְׂכִיר) or resident alien (Lev 25:40 etc.). Thus, the conceptual context in which each text introduces the term שְׂכִיר occurs is significantly different. Neither Deut 15:12 nor Lev 25:40 appears to be polemicizing against the other—they unfold independently of one another and indeed do not seem to be cognizant of each other.

The other uncommon lemma that Leviticus 25 and Deut 15:1-18 share is דַּי, “sufficient, enough,” but again, a comparison of its occurrences in context (Deut 15:8; Lev 25:26, 28) show no corroborating signs of literary dependence of one text on the other.

To summarize, then, the analysis of common vocabulary between Leviticus 25 and Deut 15:1-18, the two share no rare words and only two uncommon ones, and when examined in context, the two shared uncommon terms do not appear to be instances of literary dependence. This is not due to a dearth of low-frequency vocabulary. Deuteronomy 15 includes twenty-eight (28) lexemes of less than fifty (50) occurrences in the MT, of which nine (9) are rare.⁹ If the Holiness author were employing Deuteronomy 15 as a source, one would think he would have found the following low-frequency terms useful for his sabbatical-year and manumission laws:

Hebrew Lemma	Meaning	Frequency of Occurrence in MT
אָמַץ	to be strong	41
חָסַר	to lack, decrease	22
חָפַשׁ (חִפְּשִׁי)	free	17
חָסַר (חָסָר)	need	13
נָשָׂא (נָשָׂא)	loan	1
נָגַשׁ	to oppress	23
נָשָׂה	to forget, lend	18
עָבַט	to take or give a pledge	5
עָנַק	to provide liberally	3
שָׂכַר	wages	28
שָׁמַט	to let drop, release	10
שָׁמַט (שָׁמַט)	remission	5

⁹ For its part, Lev 25 boasts about forty-two (42) uncommon lexemes, of which fourteen (14) are rare.

2.2. Common Low-Frequency Sequences

The common sequences shared by Leviticus 25 and Deut 15:1-18 are never more than two Hebrew words in length. These sequences are as follows:

1. שש שנים. “six years.” The sequence שש שנים occurs in Deut 15:12, 18 and Lev 25:3. However, שש שנים also occurs in Exod 23:10, and Lev 25:3 is obviously dependent on this text and not on Deut 15:12 or 18.
2. ובשנה השביעית, “and in the seventh year.” The exact phrase ובשנה השביעית occurs in Deut 15:12 and Lev 25:4, and, without the initial conjunction, in Lev 25:20. However, aside from the use of this sequence, there are no other signs of literary dependence on Deut 15:12 in either of these verses. Moreover, the exact phrase (although with plene orthography) occurs also in 2 Kings 11:4, 2 Chron 23:1, and, without the initial conjunction, in Ezek 20:1. Thus the phrase is not unique to Deuteronomy. The occurrence of ובשנה השביעית appears to be a natural coincidence resulting from the fact that both Deuteronomy and the Holiness Code employ seven-year patterns in their legislation. The shared concern for the seventh year is better discussed as an example of possible conceptual dependence between the texts rather than literary dependence.
3. ארץ מצרים, “Land of Egypt.” Deut 15:12 employs the sequence ארץ מצרים in the phrase בארץ מצרים, and Leviticus 25 thrice employs the slightly different phrase מארץ מצרים (vv. 38,42,55). However, since this sequence occurs over 200 times in the MT, in a variety of literary sources and strata, so its

- coincidence in Deuteronomy 15 and Leviticus 25 does not arouse the suspicion of dependence between the texts.
4. יהוה אל הים, “the LORD God.” The sequence יהוה אל הים occurs in Deut 15:4,6,7,10,14,15, and 18, always in the form יהוה אל היך. The sequence also appears in Lev 25:17,38, and 55, always as part of the Holiness Code catch phrase אני יהוה אל היכם. Here again, יהוה אל הים is quite common in the biblical tradition (891/MT), and the way it is inflected in Deuteronomy 15 and Leviticus 25 differ, so there is no grounds for claiming direct literary dependence.
 5. שבע שנים, “seven years.” The exact sequence שבע שנים occurs in both Deut 15:1 and Lev 25:8, but aside from this parallel, the verses share no words in common. The sequence שבע שנים occurs (sometimes in the construct form שבע שני) about forty-nine (49) times in the MT (cf., e.g. Gen 41:26-54). At best, this is material for discussion of the conceptual dependence between the texts rather than a demonstrable instance of literary dependence.
 6. אחד אחים, “one of (your) brothers.” The sequence אחד אחים occurs Deut 15:7 as part of the phrase מאחד אחיך. The slightly different phrase אחד מאחיו occurs in Lev 25:48; however, the contexts of the phrase in Deut 15:7 and Lev 25:48 are quite different. The use of the term אח to refer to a fellow Israelite is a matter for discussion in terms of conceptual dependence between the H and D, but there are insufficient grounds to see literary dependence between Deut 15:7 and Lev 25:48. The closest parallel to Lev 25:48’s

construction **מֵאָחִי אֶחָד** is the phrase **אֶחָד מֵאָחִי**, “one of my brothers,” in Neh 1:2.

7. **לְךָ נִמְכַר**, “is sold to you.” Deut 15:12 employs the phrase **לְךָ נִמְכַר** and Lev 25:39 has the similar construction **וְנִמְכַר לְךָ**. This is probably the closest significant linguistic parallel between the two texts. These are the only two instances in the Hebrew Bible where the *niphal* of **מִכַּר** is followed immediately by **לְךָ** (although the inflection of the verb is different in each case). Also, the subject of **מִכַּר** in both instances is **אָחִיךָ**, “your brother.”

<p>כִּי־יִמָּכַר לְךָ אָחִיךָ הָעִבְרִי אוֹ הָעִבְרִיָּה וְעַבְדְּךָ שֵׁשׁ שָׁנִים וּבַשְּׁנָה הַשְּׁבִיעִת תִּשְׁלַחְנוּ חֲפָשִׁי מֵעִמְךָ</p>	<p>וְכִי־יִמּוֹד אָחִיךָ עִמָּךְ וְנִמְכַר־לְךָ לֹא־תַעֲבֹד בּוֹ עַבְדָּת עָבֵד</p>
<p>If your brother, a Hebrew or Hebrewess, is sold to you, he shall serve you six years and in the seventh year you shall send him away from you free.</p>	<p>If your brother who is with you grows poor, and sells himself to you, you shall not make him work like a slave.</p>

Unlike all of the other instances in which we have found sequences in common between Deuteronomy 15 and Lev 25, at least here there is some similarity in context. The two texts both address the issue of the “brother” being sold to “you.” While this could be an example of literary dependence, the following factors should be considered before reaching that conclusion:

- The verb מָכַר, including the *niphal* form, is widely attested throughout the MT in the context of the sale of human beings, both literal and metaphorical.¹⁰ In fact, about half its total occurrences are in such contexts. It occurs in the Covenant Code in both the *qal* and *niphal* referring to the sale of persons (Exod 21:7,8,16 *qal*; 22:2 *niphal*), and thirteen times in Leviticus 25, in both stems. Its use in Lev 25:39 is scarcely unusual.
- The *niphal* stem of מָכַר in Deut 15:12 and Lev 25:39 has a different force in each instance. In Deut 15:12, the force is almost probably passive (“If a Hebrew *is sold* to you”) whereas in Lev 25:39 it is probably reflexive (“If your brother *sells himself* to you”). The two texts are not describing the same kind of transaction.
- The term אֶחָיוֹ, “your brother,” has a different sense in Deuteronomy 15 than in Leviticus 25. In Leviticus 25, the term can be translated “your kinsman,” and, as I have shown elsewhere, refers to a male landed Israelite head of household.¹¹ The אֶחָיוֹ of Deuteronomy 15 is quite different: “He” is a

¹⁰ See Gen 31:15 (*qal*); 37:27 (*niphal*); 37:28 (*qal*); 37:36 (*qal*); 45:4 (*qal*); 45:5 (*qal*); Exod 21:7,16 (*qal*); 22:2 (*niphal*); Deut 21:14 (*qal*); 24:7 (*qal*); 28:68 (*hith*); 32:30 (*qal*); Judg 2:14 (*qal*); 3:8 (*qal*); 4:2 (*qal*); 4:9 (*qal*); 10:7 (*qal*); 1Sam 12:9 (*qal*); 1 Kings 21:20 (*hith*); 21:25 (*hith*); 2 Kings 17:17 (*hith*); Isa 50:1 (*niphal & qal*); 52:3 (*niphal*); Jer 34:14 (*niphal*); Joel 4:3 (*qal*); 4:6,7,8 bis (*qal*); Amos 2:6 (*qal*); Zech 11:5 (*qal*); Ps 44:13 (*qal*); 105:17 (*niphal*); Esth 7:4 bis (*niphal*); Neh 5:8 (*qal* once; *niphal* twice). Thus, about forty (40) of a total eighty-nine (89) occurrences in the MT are in the context of the literal or metaphorical sale of human beings.

¹¹ See Bergsma, *The Jubilee from Leviticus to Qumran: A History of Interpretation* (VTSup 115; Leiden: Brill, 2007), 100-101. I quote here the relevant passage: “Chirichigno, Schenker, and Wright argue that this impoverished kinsman of Leviticus 25 is an Israelite *paterfamilias*, and that judgment is almost certainly correct. Collateral evidence for this position is to be found in the rest of the Holiness Code, much of which seems to be addressed to the free male landed Israelite *paterfamilias*. It has already been

Hebrew (not necessarily an Israelite) of either gender (possibly a “Hebrewess”!), landless, and without an ancestral inheritance.¹² In general, the Deuteronomist uses the term אִשְׁרָאֵלִי rather freely, even to refer to an Edomite (Deut 23:7), while the Holiness author(s) employs it much less often and with a significantly more restricted range of meaning. In my opinion, the similarity of the use of the term in both texts, and the significance of that similarity, has sometimes been overemphasized.

- The term אִשְׁרָאֵלִי in Lev 25:39 is not a *direct* borrowing from Deut 15:12, since it is part of a catch phrase, כִּי יָמוּךְ אִשְׁרָאֵלִי, that H employs four times in Leviticus 25 as part of its systematic response to four progressively worse stages of impoverishment of an Israelite *paterfamilias*, (1) sale of ancestral

noted above that Lev 18 addresses “the Israelite male in the prime of his life, head of his family” (van der Toorn, *Family Religion*, 195 [see below]). He owns land and works it (19:9–10), hires laborers (19:13), acts as judge for other kinsmen (19:15–18), has a daughter (19:29) and a beard (19:27). The “you” of 25:35–46 by implication has an ancestral possession and the means sufficient to support or hire his impoverished “kinsman.” “Your kinsman” of 25:25–55 seems quite clearly to be the sociological equal of the “you”—i.e. a landed Israelite *paterfamilias* (as the term *yja* implies)—who through impoverishment has lost all the resources that the “you” enjoys. Furthermore, the concern throughout Leviticus 25 is with the *land*, to ensure that it is not separated from its ancestral family. It follows that the impoverished Israelite with which Leviticus 25 is concerned is not a landless one whose enslavement does not threaten familial possession of the ancestral inheritance, but the head of the family who has title to the land of his fathers.” My references are to Adrian Schenker, “The Biblical Legislation on the Release of Slaves: The Road from Exodus to Leviticus,” *JSOT* 78 (1998): 23–41, here 27; G. C. Chirichigno, *Debt-Slavery in Israel and the Ancient Near East* (JSOTSup 141; Sheffield: JSOT Press, 1993): 342–43, here 352; Christopher J. H. Wright, “What Happened Every Seven Years in Israel? Part II” *EvQ* 56 (1984): 193–201, here 196; Karel van der Toorn, *Family Religion in Babylon, Syria, and Israel* (Studies in the History and Culture of the Ancient Near East 7; Leiden: Brill, 1996), here 196.

¹² Hebrew does not always mean “Israelite” in the Hebrew Bible (see Gen 14:13, 1 Sam 14:21. See Bergsma, *Jubilee*, 43-45

property, (2) complete insolvency, (3) self-sale to a kinsman, (4) self-sale to a foreigner:

כִּי־יִמּוֹךְ אֶחָיִךְ וּמָכַר מֵאֲחֻזָּתוֹ	If your brother becomes poor and sells some of his property ... (v. 25)
וְכִי־יִמּוֹךְ אֶחָיִךְ וּמָטָה יָדוֹ עִמָּךְ	If your brother becomes poor and cannot maintain himself with you ... (v. 35)
וְכִי־יִמּוֹךְ אֶחָיִךְ עִמָּךְ וַיִּמָּכֶר־לְךָ	If your brother becomes poor and sells himself to you ... (v. 39)
וְכִי תִשָּׂיג יָד גֵּר וְתוֹשֵׁב עִמָּךְ וּמָךְ אֶחָיִךְ עִמּוֹ וַיִּמָּכֶר לְגֵר	If a stranger or sojourner becomes rich, and your brother near him sells himself to the stranger ... (v. 47)

Rather than claiming direct literary dependence of Lev 25:39 on Deut 15:12, one would have to claim that the entire passage Lev 25:25-55 was literarily dependent on Deut 15:12 for the term אֶחָיִךְ. That is possible, but debatable.

Examining both passages in their larger context, the evidence of literary dependence between Deut 15:12 and Lev 25:39 is interesting but not compelling. In Lev 25:25-55, the Holiness author is, in my opinion, developing his legislation according to his own logic, working systematically through the various stages of impoverishment of the landed Israelite head of household. When he reaches the stage of self-sale to an Israelite, he linguistically “crosses paths” with the Deuteronomist, who in Deut 15:12 address the situation of sale of a Hebrew to an Israelite, resulting in a similar but not identical turn of phrase in Deut 15:12 and Lev 25:39.

2.3 Combinations (Clusters) of Common Terms

As mentioned above, Leviticus 25 and Deut 15:1-18 share about fifty-two (52) lexemes,¹³ only two of which are uncommon in terms of frequency in the MT. The number of shared terms between these texts is probably higher than the average number of shared terms of two randomly-selected texts of similar size, although not dramatically so—for example, randomly-selected texts Prov 22:1-23:8 and Exod 30:2-31:18 have about fifty lexemes in common. Moreover, of the fifty-two (52) lexemes in common between Leviticus 25 and Deut 15:1-18, thirty-four (34) are found in the analogous (slave- and seventh-year laws) of the Covenant Code (Exod 21:2-11 and 23:10-11). Since the Covenant Code is widely acknowledged as a source for both Leviticus 25 and Deut 15:1-18, the presence of these thirty-four (34) lexemes in Leviticus 25 could be explained as dependence on CC rather than D. That leaves only eighteen (18) lexemes in common between Deut 15:1-18 and Leviticus 25 that are *not* found in the CC (see Appendix 2). However, these terms are not clustered, but scattered throughout both texts. We lack the clustering of common terms that might constitute evidence of literary dependence.

In fact, what arises from careful study of the diction of both passages is not an impression of commonality but of divergence. Particularly striking are the numerous occasions where Deut 15:1-18 exhibits a word or phrase that would have been useful to

¹³ See Appendix 2. Ambiguity about the exact number arises because of the difficulty in deciding whether some phonemes should be considered lexemes or bound morphemes, for example, the conjunction ׀ and the enclitic prepositions ך and ם. I have counted them as lexemes but would defer to others on the issue.

the author of Leviticus 25, but instead the Holiness author(s) uses a lexically distinct but semantically similar word or phrase. The following is a partial list:

To express the concept:	Deut 15:1-18 employs:	But Leviticus 25 exhibits:
assurance of YHWH's blessing of His people	ברך יברכך "He will surely bless you" (v. 4)	וצויתי את ברכתי לכם "I will command my blessing for you" (v. 21)
the year of (debt) forgiveness	שמטה <i>shemittah</i> , release (v.1,2, 9)	יובל, דרור <i>yobel</i> , Jubilee, (v. 10 <i>et passim</i>) or <i>deror</i> , liberty (v. 10)
inherited property	נחלה "inheritance" (v. 4)	אחזה "possession" (v. 13)
prohibition of social injustice among Israelites"	לא יגש את רעהו ואת אחיו "Let not a man oppress his neighbor or his brother" (v. 2)	אל תונו איש את אחיו "Do not wrong one another" (v. 14)
the necessity of obedience to YHWH's law	רק אם שמוע השמע בקול יהוה אל היך לשמר לעשות את כל המצוה הזאת "If only you will obey the voice of the LORD your God, being careful to do all this commandment ... (v. 14)	ועשיתם את חקתי ואת משפטי השמרו ועשיתם אתם "Therefore you shall do my statutes, and keep my ordinances and perform them ..." (v. 18)
harsh rule appropriate for Gentiles	ומשלת בגוים רבים "You shall rule (<i>mashal</i>) over many nations" (v. 6)	לא תרדה בו בפרך "You shall not rule (<i>radah</i>) over him with harshness (v. 43, 46, 53)
the poor brother	אחיד אביון "your needy brother" (v. 7, 9)	כי ימוך אחיד "If your brother grows poor" (vv. 25, 25, 29, 47)
exhortation to support the needy brother	פתח תפתח את ידך לאחיד לעניך ולאביון בארצך You shall open wide your hand to your brother, to the needy and to the poor, in the land. (v. 11)	וכי ימוך אחיד ומטה ידו עמך והחזקת בו גר והושב וחי עמך And if your brother becomes poor, and cannot maintain himself with you, you shall maintain him; as a stranger and a sojourner he shall live with you. (v. 35)
freedom	חפשי "free" (v. 12)	דרור "liberty" (v. 10)
redemption	פדה redeem (v. 15)	גאל redeem (v. 25 <i>et passim</i>)
remembrance of slavery in Egypt	וזכרת כי עבד היית בארץ מצרים ויפדך יהוה אל היך "Remember that you were a slave	כי לי בני ישראל עבדי הם אשר הוצאתי אותם מארץ מצרים "For to me the sons of Israel are

	in the Land of Egypt and the LORD your God redeemed you” (v. 15)	servants; they are my servants whom I brought forth from the Land of Egypt” (v. 55)
Land of Israel	<p>בְּאֶרֶץ אֲשֶׁר יְהוָה אֱלֹהֶיךָ נֹתֵן לְךָ נַחֲלָה לְרִשְׁתָּהּ</p> <p>“In the land which the LORD your God is giving you (sg) as an inheritance to possess.” (v. 4, cf. v. 7)</p>	<p>הָאֶרֶץ אֲשֶׁר אֲנִי נֹתֵן לְכֶם</p> <p>The land which I am giving you (pl). (Lev 25:2)</p>

These examples demonstrate that, even when expressing nearly identical concepts, the Holiness Code and Deuteronomy employ diction that is significantly—and often completely—distinct from one another. Such data does not support the hypothesis of literary dependence in either direction.

3. Conclusion

We have carefully scrutinized the seventh-year and manumission laws of the H and D, looking for the linguistic phenomena that provide the strongest evidence of literary dependence: common low-frequency vocabulary or low-frequency sequences. We have discovered that these two textual units share no rare lexemes and only two uncommon ones, and the context of the two uncommon terms in each text did not provide any corroborating evidence of literary dependence. This is despite the fact that both texts have a wealth of low-frequency vocabulary.

The longest identically-inflected sequence between Deut 15:1-18 and Leviticus 25 was found to be **וּבַשָּׁנָה הַשְּׁבִיעִית**. This phrase is found in other texts of the MT that discuss events “in the seventh year,” so it is not a unique parallel between Deut 15:1-18 and Lev 25. Strikingly, there are no identically-inflected sequences, of any length,

between Leviticus 25 and Deut 15:1-18 unique to these two passages (i.e. not found elsewhere in the MT).

The most significant sequence between these manumission laws was found to be נמכר לך in Lev 25:39 and Deut 15:12, despite differing inflections of the verb in each case. The significance of the sequence is bolstered by the fact that the word אִשָּׁחִיךָ is the subject of the verb in both cases. However, the meaning of אִשָּׁחִיךָ in each text is different in important ways, and the *niphal* of מִכַּר is relatively common in contexts discussing slave sale throughout the MT. While the sequence נמכר לך it could be an indication of literary dependence, it could also be a coincidence because of similarities between the situations being addressed in the two texts.

Has the *literary* dependence of H on D been demonstrated in the case of the seventh-year and manumission laws? While literary dependence can be maintained as a possibility in a few instances, to claim there is conclusive proof for it goes beyond the textual evidence. In fact, the literary relationship of H and D in the texts examined here stands in stark contrast to what was observed between the Chronicler and DtrH; Ezekiel and the Holiness Code; the Holiness Code and the Covenant Code; and Deuteronomy and the Covenant Code. In each of these latter cases it was possible to identify extremely low-frequency, identically-inflected vocabulary and/or sequences, often lengthy, between the two texts, pointing clearly to literary dependence in one or the other direction. These phenomena cannot be found between the seventh-year and manumission laws of H and D; nor can they be found, for the most part, in the other parallel laws of H and D. In contrast, these phenomena *are* observable between H and CC, and D and CC. If either H

or D is dependent on the other, why do we not see between them the kind of literary parallels that both these documents show toward the Covenant Code?

In the texts examined here, H (Lev 25:1-55) simply does not use enough of the words or the order of words peculiar to D (Deut 15:1-18) to demonstrate a *literary* relationship, since literary dependence, as we have defined it, is the reuse of the very words of one text by another.

The evidence examined here supports the hypothesis of *literary* independence of the two works. The possibility of *conceptual* dependence in one of the other direction is not necessarily effected by this evidence.¹⁴

¹⁴ For my part, I think both H and D represent independent developments of language and concepts present in CC, as discussed in Bergsma, *Jubilee*, 37-49 and 126-47.

Appendix 1: שכיר in the Covenant Code, Deuteronomy, and the Holiness Code

<p>Ex 22:14 אִם־בָּעֲלָיו עָמוּ לֹא יִשְׁלַם אִם־שָׂכִיר הוּא אִם בָּא בְשָׂכְרוֹ</p>	<p>Ex. 22:15 If the owner was with it, he shall not make restitution; if it was hired, it came for its hire.</p>
<p>Deut. 15:18 לֹא־יִקְשָׁה בְּעֵינֶיךָ בְּשַׁלְּחֶךָ אֹתוֹ חֲפָזִי מֵעַמְּךָ כִּי מִשְׁנֵה שָׂכָר שָׂכִיר עָבְדְּךָ שֵׁשׁ שָׁנִים וּבִרְכָּךָ יִהְיֶה אֵלֶיךָ בְּכֹל אֲשֶׁר תַּעֲשֶׂה</p>	<p>Deut. 15:18 It shall not seem hard to you, when you let him go free from you; for at half the cost of a hired servant he has served you six years. So the LORD your God will bless you in all that you do.</p>
<p>Lev. 25:6 וְהִיְתָה שַׁבַּת הָאָרֶץ לָכֶם לְאֹכְלֶיהָ לָךְ וּלְעַבְדְּךָ וּלְאִמְתֶּךָ וּלְשָׂכִירְךָ וּלְתוֹשָׁבְךָ הַגֵּרִים עִמָּךְ</p>	<p>Lev. 25:6 The sabbath of the land shall provide food for you, for yourself and for your male and female slaves and for your hired servant and the sojourner who lives with you;</p>
<p>Lev. 25:40 כְּשָׂכִיר בְּתוֹשָׁב יִהְיֶה עִמָּךְ עַד־שָׁנַת הַיָּבֵל יַעֲבֹד עִמָּךְ</p>	<p>Lev. 25:40 he shall be with you as a hired servant and as a sojourner. He shall serve with you until the year of the jubilee;</p>
<p>Lev. 25:50 וְחָשַׁב עִם־קִנְיָהּ מִשְׁנַת הַמְּכֹרָו לֹו עַד־שָׁנַת הַיָּבֵל וְהָיָה כְּסָף מִמְּכֹרָו בְּמִסְפַּר שָׁנִים בְּיָמֵי שָׂכִיר יִהְיֶה עָמוּ</p>	<p>Lev. 25:50 He shall reckon with him who bought him from the year when he sold himself to him until the year of jubilee, and the price of his release shall be according to the number of years; the time he was with his owner shall be rated as the time of a hired servant.</p>
<p>Lev. 25:53 כְּשָׂכִיר שָׁנָה בְּשָׁנָה יִהְיֶה עָמוּ לֹא־יִרְדְּנוּ בְּכַרְךָ לְעֵינֶיךָ</p>	<p>Lev. 25:53 As a servant hired year by year shall he be with him; he shall not rule with harshness over him in your sight.</p>
<p>Lev 19:13 לֹא־תַעֲשֶׂק אֶת־רֵעֶךָ וְלֹא תִגְזֹל לֹא־תִלְוֶן פְּעֻלַּת שָׂכִיר אֹתְךָ עַד־בֹּקֶר</p>	<p>Lev. 19:13 “You shall not oppress your neighbor or rob him. The wages of a hired servant shall not remain with you all night until the morning.</p>
<p>Lev 22:10 וְכֹל־זֶר לֹא־יֹאכַל קֹדֶשׁ תוֹשָׁב בְּהֵן וְשָׂכִיר לֹא־יֹאכַל קֹדֶשׁ</p>	<p>Lev. 22:10 “An outsider shall not eat of a holy thing. A sojourner of the priest’s or a hired servant shall not eat of a holy thing;</p>

Appendix 2: The Common Lexemes of Lev 25:1-55 and Deut 15:1-12, with
frequency in Lev 25 and the MT

The first number is the frequency in Lev 25, the number in parentheses (for selected terms) is the frequency in the MT. The 18 lexemes not found in the analogous CC laws (Exod 21:2-11 and 23:10-11) are so marked.

או or = 6

אח brother = 10 (638) [Not in analogous CC laws]

אחד one (m) = 1 (977) [Not in analogous CC laws]

אל to, toward = 10

אלהים God = 7

אם if, whether = 5

אמנה female servant = 3 (322)

אמר to say = 3

ארץ land, earth = 20

אשר which = 14

את (direct object marker) = 28

את with = 3 [Not in analogous CC laws]

ב in, at, with = 40

בית house, receptacle = 6 [Not in analogous CC laws]

גוי nation = 1 [Not in analogous CC laws]

דבר to speak = 2 [Not in analogous CC laws]

די enough = 2 (18) [Not in analogous CC laws]

ה the = 46

היה to be = 22

ו and = 105

זאת this (f.) = 1 [Not in analogous CC laws]

יד hand, part, penis = 7 [Not in analogous CC laws]

יהוה LORD, Yahweh = 6 [Not in analogous CC laws]

יום day = 4

יצא to go out = 9 (1076)

ירש to possess, inherit, dispossess = 1 (232) [Not in analogous CC laws]

כ as, like = 6

כי that, because, when = 18

כל all, whole, everyone, everything = 4

ל to = 72

לא no, not = 25

לקח to take = 1 (976)

מכר to sell = 13 (85)

מן from = 24 [Not in analogous CC laws]

מִצְרַיִם Egypt, Mizraim = 3 (682) [Not in analogous CC laws]

נתן to give, put, set = 6 (2000+)

עבד to work, serve = 3 (11770)

עֶבֶד servant, slave = 8 (803)

עולם forever, everlasting, age = 3 (439)

עין eye, spring = 1 (933)

על upon, over, above = 3

עם with = 18

עשה to do, make = 3 (2000+)

צוה to command = 1 (496) [Not in analogous CC laws]

קרא to call = 1 (891) [Not in analogous CC laws]

רב great, many = 1 (645) [Not in analogous CC laws]

שָׂכִיר hired = 4 (18) [Not in analogous CC laws]

שְׁבִיעִי seventh = 3 (98)

שבע seven = 4 (642) [Not in analogous CC laws]

שמר to keep, watch, preserve = 1 (479)

שנה year = 37 (933)

שש six = 2 (215)