

Citation

CHICAGO: D. Murauskas, *The Tension Between the Constitutional Court and the Parliament: the Resolution of the Civil Unions in Lithuania*, "Przegląd Prawa Konstytucyjnego" 2026, no. 2, pp. 13–25, <https://doi.org/10.15804/ppk.2026.02.01>

APA: Murauskas, D. (2026), *The Tension Between the Constitutional Court and the Parliament: the Resolution of the Civil Unions in Lithuania*, "Przegląd Prawa Konstytucyjnego" no. 2, pp. 13–25, <https://doi.org/10.15804/ppk.2026.02.01>

Donatas Murauskas

ORCID ID: 0000-0003-2092-2873

Vilnius University, Lithuania

E-mail: donatas.murauskas@tf.vu.lt

The Tension Between the Constitutional Court and the Parliament: the Resolution of the Civil Unions in Lithuania

Keywords: Constitutional Court of Lithuania, deliberative democracy, judicialisation of politics, civil unions, value pluralism

Słowa kluczowe: Trybunał Konstytucyjny Litwy, demokracja deliberatywna, sądowa jurdyzacja polityki, związki partnerskie, pluralizm wartości

Abstract

In this article I examine the 17 April 2025 ruling of the Lithuanian Constitutional Court, which recognised same-sex civil unions as constitutionally protected, marking a turning point after nearly twenty-four years of legislative inaction. Using this ruling as a case study, I explore the interplay between constitutional adjudication and deliberative democracy. I argue that the Constitutional Court's intervention illustrates how constitutional review can reinvigorate democratic deliberation when political institutions fail to act on fundamental rights. I depict the Constitutional Court ruling as both a corrective to democratic paralysis and a test of the boundaries of judicial engagement in deeply pluralistic societies.

Streszczenie**Napięcie między Sądem Konstytucyjnym a parlamentem:
rozwiązanie kwestii związków partnerskich na Litwie**

W niniejszym artykule analizuję wyrok litewskiego Sądu Konstytucyjnego z 17 kwietnia 2025 r., w którym uznano związki partnerskie osób tej samej płci za podlegające ochronie konstytucyjnej, co stanowi punkt zwrotny po niemal dwudziestu czterech latach legislacyjnej beczynności. Wykorzystując ten wyrok jako studium przypadku, badam relację między sądową kontrolą konstytucyjności a demokracją deliberatywną. Dowodzę, że interwencja Sądu Konstytucyjnego pokazuje, w jaki sposób kontrola konstytucyjna może ożywiać demokrację deliberatywną w sytuacjach, gdy instytucje polityczne zawiodą przy ochronie praw podstawowych. Przedstawiam orzeczenie SK jako zarówno środek naprawczy wobec paraliżu demokratycznego, jak i próbę wyznaczenia granic sądowej ingerencji w głęboko pluralistycznych społeczeństwach.

✱

I. Introduction

Should the Constitutional Court decide on divisive issues that political actors can hardly resolve? The growing tendency to hand over such “hot potatoes” from representative institutions to the courts reflects the global trend of judicializing politics. This serves as a rational strategy for politicians to avoid negative public reactions to difficult political decisions. Courts are appealing because they enjoy greater legitimacy and are perceived as more impartial, allowing politicians to accept judicial rulings while claiming that it was the law, rather than politics, that determined the outcome¹. However, this approach might escape the essence of deliberative democracy – to strive that political decisions are the product of fair and reasonable discussion and debate among citizens.

One of the most illustrative examples from recent years is the same-sex civil unions issue in Lithuania. The issue that has long been one of the most

¹ R. Hirschl, *The New Constitutionalism and the Judicialization of Pure Politics Worldwide*, “Fordham Law Review” 2006, vol. 75, iss. 2.

contentious and sensitive topics in Lithuanian politics. It could be illustrated by the 2013 judgment in *Vallianatos and Others v. Greece*, where the European Court of Human Rights observed that Lithuania and Greece were the only Council of Europe member states to offer a form of registered partnership exclusively to different-sex couples as an alternative to marriage, which itself was also limited to different-sex couples².

The Lithuanian law explicitly required the Parliament to adopt necessary legislation to regulate civil unions. However, after years of inaction of the Parliament to adopt necessary legislation it became clear that the deadlock might only be resolved by the courts. On 17 April 2025 the Lithuanian Constitutional Court (the Court) held that both types of unions³ fall within the scope of constitutional protection (the Ruling)⁴. The Court imposed a clear obligation on the legislature to enact the necessary civil unions legal framework and empowered ordinary courts to adjudicate individual requests concerning civil unions on a case-by-case basis.

In this article I explore the Ruling through the lens of deliberative democratic theory, using it as a case study to reflect on the potential and limitations of constitutional adjudication as a site of public reasoning. I examine the decision considering two enduring challenges that the implementation of deliberative democracy concept faces today. First, that is the problem of value pluralism and the potential of constitutional tribunals to engage with this issue. Second, it is the effect of judicial decisions on issues that are not effectively deliberated in democratic institutions due to strong vetoing participants.

II. Value pluralism in difficult political considerations

S. Elstub and P. McLaverty pose a fundamental question at the intersection of political theory and institutional design: what kinds of institutions are required to reconcile the ideals of deliberative democracy with the empirical

² Judgment of the ECtHR of 7 November 2013, *Vallianatos and Others v. Greece* [GC], applications no. 29381/09 and 32684/09.

³ The term “partnership” (“partnerystė”) is used in the national legal setting. The terms “civil unions” and “partnership” are used interchangeably in this text.

⁴ The Ruling of the Lithuanian Constitutional Court of 17 April 2025, no. KT21-N5/202.

realities of pluralistic, diverse, and often divided societies⁵? Although deliberative democracy strives to political decisions that are the product of fair and reasonable discussion and debate among citizens⁶, it nevertheless is faced by the number of fundamental problems. Facing the difficult political choices the proponents of deliberative democracy argue for the setting in which the free discussion ensures the win of the better argument. J. Habermas focused on such idea of deliberative democracy⁷. However, the free and unconstrained debate is the ideal world perception, which is sometimes unrealistic in real life.

The third generation of theorists of deliberative democracy, led by J. Bohman, made the way for more practical questions on implementation of deliberative democracy in practice⁸. And while understanding that the political theory gave insights for how to solve the differences between us, we still face the realities of total disagreement, disregarding all the opportunities to search for the better argument within the different types of deliberative democracy frameworks.

Why do people so often reject arguments they disagree with, even when those arguments are well-reasoned and supported by evidence? Is it merely a matter of lacking a suitable platform for open, respectful discussion? While the absence of structured dialogue certainly plays a role, the answer is likely far more complex, rooted in human psychology, educational background, personal lived experience and other internal and external factors. These factors can shape how individuals interpret information, evaluate competing values, and, ultimately, determine what they perceive as persuasive or legitimate. Sometimes, even the most compelling argument fails, not because it is weak, but because it clashes with deeply held beliefs or identity commitments.

One of the central challenges facing contemporary political decision-making is value pluralism, i. e. the coexistence of multiple, often conflicting, but internally coherent value systems within a democratic society. As M. Cinalli

⁵ S. Elstub, P. McLaverty, *Introduction: Issues and Cases in Deliberative Democracy* [in:] *Deliberative Democracy*, eds. S. Elstub, P. McLaverty, Edinburgh University Press, 2014, p. 11.

⁶ *Deliberative Democracy* [in:] *Encyclopaedia Britannica*, <https://www.britannica.com/topic/deliberative-democracy> (10.10.2025).

⁷ J. Habermas, *Moral Consciousness and Communicative Action*, Cambridge: Polity Press, 1990.

⁸ S. Elstub, P. McLaverty, *op.cit.*, p. 6.

and I. O’Flynn point out, the recognition of value pluralism presents a serious dilemma: if values, whether democratic, cultural, or moral, cannot be rationally compared or ranked, then the deliberative model struggles to function. In such cases, political outcomes may be shaped less by persuasion and more by bargaining, voting, or even the exercise of power. When foundational values diverge so radically, deliberation may no longer serve as a meaningful path to consensus, as there may be no common ground from which to begin convincing others that one’s values are preferable⁹.

This insight invites us to reconsider the assumptions behind deliberative processes, especially in polarised societies. It also raises important questions for constitutional courts and other institutions tasked with resolving morally charged disputes: can they still serve as platforms for reasoned dialogue, or are they increasingly arenas of negotiated power and symbolic politics? The question is related to S. Wheatley’s critique that majority-based institutions, which primarily aggregate individual preferences, often fail to genuinely include minority perspectives in their decision-making processes¹⁰.

One of the central challenges posed by value pluralism is the incommensurability of values. The idea that certain values cannot be meaningfully compared or measured against one another using a common standard. This becomes particularly problematic in political and legal decision-making, where rational choice often relies on the assumption that alternatives can be weighed and ranked¹¹. Intuitively, we seek to identify the “best” or most justified course of action. But when values are incommensurable, when, for example, liberty and equality come into conflict without a clear hierarchy, rational deliberation may stall.

To address this dilemma, J. Rawls offered a response grounded in the notion of public reason. He argues that when citizens of a democratic society seek to resolve deep disagreements about the basic structure of that society, they

⁹ M. Cinalli, I. O’Flynn, *Pluralism and Deliberative Democracy* [in:] *Deliberative Democracy: Issues ...*, p. 83.

¹⁰ S. Wheatley, *Deliberative Democracy and Minorities*, “European Journal of International Law” 2003, vol. 14, iss. 3, pp. 507–527.

¹¹ H. Andersson, N. Hsieh, *Incommensurable Values* [in:] *The Stanford Encyclopedia of Philosophy*, Fall 2025 Edition, eds. E.N. Zalta & U. Nodelman, <https://plato.stanford.edu/archives/fall2025/entries/value-incommensurable> (10.10.2025).

should not appeal to their own comprehensive doctrines, i.e., their personal moral, religious, or philosophical convictions. Instead, they should engage in shared political values that are embedded in “reasonable comprehensive doctrines” asserted by “reasonable persons”¹². These values serve as a common language of justification, making democratic deliberation possible even amid deep pluralism.

III. The premises of the Ruling: what was at stake?

Let's return to the Ruling of the Court and the questions of its interplay with the notions of deliberative democracy. Before we start, a short introduction on the context. Under Lithuanian law, the concept of civil partnership was formally recognised since 2000, but only in a limited and incomplete manner. The Civil Code allowed for the conclusion of a partnership exclusively between a man and a woman. The Civil Code set out a basic legal framework for regulating such partnerships, primarily addressing certain aspects of property relations between partners. However, this framework has remained legally dormant. The relevant provisions of the Civil Code shall only enter into force once a separate law regulating the procedure for partnership registration is adopted. No such law had been enacted, meaning that the Civil Code provisions on partnership remained inoperative.

This legal design created a paradoxical situation: the Civil Code implied the existence of a partnership institution – thus acknowledging the legal need for recognising non-marital unions – but limited it to heterosexual couples and renders it non-functional due to the absence of implementation legislation. As a result, while certain provisions concerning property relations between different-sex partners who might enter such a union exist on paper, the partnership framework lacked legal effect. This conditional norm effectively suspended the legal recognition of civil partnerships, leaving same-sex couples with no access to comparable legal protection.

¹² J. Rawls, *Political Liberalism*, 2nd ed. New York 1996, p. 59.

IV. The Ruling as a constitutional turning point

In its Ruling the Court provided a binding interpretation affirming that the absence of legal recognition for same-sex couples is incompatible with the Constitution's guarantees of human dignity, private and family life, and equality for the first time. The Court reaffirmed that the Parliament retains an obligation to adopt the necessary legislation to regulate partnerships in a manner that includes both same-sex and different-sex couples.

The Court also addressed the interim legal vacuum created by the legislature's prolonged inaction. It ruled that until the necessary legislation is enacted, individuals have the right to seek the recognition of their partnership through the courts. This means that courts now have a constitutional mandate to adjudicate such cases and to ensure protection of fundamental rights, even in the absence of specific statutory regulations and they successfully started to do in first decision in August 2025, with the first partnership confirmed in September 2025¹³.

The Constitutional Court's Ruling carries significant implications for advancing equality. However, it also reopened the debate on the institutional foundations of deliberative democracy in Lithuania. Drawing on the distinction between 'political' and 'legal' constitutions¹⁴, one might view parliament as the primary arena for resolving morally and politically divisive issues. However, this assumption becomes questionable in the context of real-world politics. Critics observe that modern parliaments often face structural constraints, ranging from entrenched party interests¹⁵ to a decline in legislative autonomy vis-à-vis the executive¹⁶, that can hinder genuine deliberation. Mansbridge raises the question of whether parliaments can truly represent the broader

¹³ See: D. Platūkytė, 'Finally': same-sex couple exchange rings in Vilnius Town Hall ceremony, LRT.lt: https://www.lrt.lt/en/news-in-english/19/2674437/finally-same-sex-couple-exchange-rings-in-vilnius-town-hall-ceremony?srsId=AfmBOozpXqBHG8nUOvAkUg-52D9aywbBSPfT2HBPecTnHr2ipLfg_1I4 (10.10.2025).

¹⁴ G. Gee, G.C.N. Webber, *What Is a Political Constitution?* "Oxford Journal of Legal Studies" 2010, vol. 30, iss. 2, <https://doi.org/10.1093/ojls/gqq013>.

¹⁵ R.S. Katz, P. Mair, *Changing Models of Party Organization and Party Democracy: The Emergence of the Cartel Party*, "Party Politics" 1995, vol. 1, iss. 1, <https://doi.org/10.1177/1354068895001001001>.

¹⁶ *Parliaments and Governments in Western Europe*, ed. P. Norton, London 1998.

community when minority rights are at stake¹⁷. The Constitutional Court's intervention compensates for parliamentary deadlock but, doing it in the spirit of deliberative democracy. The Ruling encourages the legislature to move beyond its long-standing stalemate and to fulfil its constitutional duty while respecting the principles of value pluralism.

V. How has the Constitutional Court's reconciled value pluralism in the society?

In its ruling, the Court resolved a long-standing legal deadlock arising from the absence of a functional legal framework for civil unions by acknowledging that the Parliament had failed to adopt the necessary implementing legislation in due time. The Court accomplished this without directly engaging in the deeper value conflict between equality in family relations and the preference for a heterosexual family model, a divide that had paralysed parliamentary decision-making for more than two decades.

Attempts to pass such a law, however, encountered deep value-based disagreements. Supporters of inclusive partnership legislation consistently based their arguments on constitutional principles of equality, human dignity, and non-discrimination. Opponents, by contrast, appealed to tradition, understood as upholding the heterosexual family model, and expressed concerns about its erosion, the potential "slippery slope" toward legalizing same-sex marriage or children adoption, and a broader discomfort with non-heteronormative relationships.

These claims, often emotional or ideologically charged, proved resistant to rational deliberation. As a result, public debate around civil unions became a contest between the allegedly majority-driven argument for the traditional family concept values and the need to ensure equal protection of same-sex families – a type of discourse that is especially difficult to reconcile within the framework of reasoned democratic deliberation.

In its ruling, the Constitutional Court did not engage directly with this antagonism of values. It did not attempt to identify or deconstruct the normative

¹⁷ J. Mansbridge, *Rethinking Representation*, "American Political Science Review" 2003, vol. 97, iss. 4, <https://doi.org/10.1017/S0003055403000856>.

foundation of the traditionalist position. By invoking established constitutional principles, the Court effectively undermined the legitimacy of arguments rooted solely in majority sentiment or cultural tradition and ‘restored’ value pluralism in the democratic deliberative process. The Court identified positive measures to tackle discrimination, which is considered risky redistributing measure substituting for the legislature¹⁸. Citing its prior rulings, the Court emphasised that: “Only a state that is guided by respect for the dignity of every person can be considered genuinely democratic. It should be emphasised that, as the Constitutional Court has noted, the Constitution is an anti-majoritarian act – it protects the individual” (Rulings of 19 August 2006 and 11 January 2019)”.

It further indicated that: “In a democratic state governed by the rule of law, the prevailing views or stereotypes held by a majority of society at a given time cannot constitute a constitutionally justifiable basis – even when pursuing constitutionally important objectives, *inter alia* public order – for discriminating against individuals solely on the grounds of their sexual identity and/or sexual orientation, including by restricting the protection of private and family life, as guaranteed under Art. 22(1) and (4) of the Constitution” (Ruling of 11 January 2019)”.

Through its reasoning, the Court implicitly rejected arguments based on “traditional values”, reaffirming that the preservation of cultural norms alone cannot justify restrictions on fundamental rights. In doing so, the Court avoided making a moral judgment between competing value systems and instead drew a constitutional boundary against majoritarian discrimination. It elevated the discourse to the level of deliberative democracy in Rawlsian terms, engaging with shared political values embedded in “reasonable comprehensive doctrines” upheld by “reasonable persons”¹⁹.

This approach reaffirmed the Constitution as a normative safeguard for individuals, especially in situations where legislative inertia or cultural resistance threatens the protection of minority rights. In doing so, the Court not only resolved a specific legal issue but also reinforced the broader princi-

¹⁸ See, for example, N. Petersen, *Mapping Equality Case Law Around the World – Conceptual Preliminaries* [in:] *Equality’s Guardians: How Courts Conceptualize Equal Protection and Non-Discrimination Guarantees*, ed. N. Petersen, Oxford University Press 2025, p. 15.

¹⁹ *Ibidem*, p. 12.

ple that constitutional democracy is not merely an expression of the majority's will, but a system dedicated to upholding the dignity and equality of all members of society.

VI. The effect on parliamentary deliberation

This case also raises important questions about the effectiveness of democratic deliberation, particularly within parliamentary settings. As Peter McLaverty has noted, genuine deliberation becomes nearly impossible when certain participants hold an effective veto over the process²⁰.

In Lithuania, the Parliament failed to adopt legislation on civil unions for 24 years, despite a clear provision in the Civil Code requiring such a law to give effect to the legal framework for partnerships. This prolonged inaction reflects more than legislative delay. It reveals an institutional unwillingness to engage in meaningful deliberation, particularly on issues that challenge majoritarian norms or cultural taboos. Without any enforceable timeline or external oversight, the legislature effectively suspended its constitutional duty to deliberate and decide on a politically sensitive but legally mandated issue. This, in turn, implied blame deflection strategy by transferring the burden of challenging political issues from the political deliberation to courts²¹.

The Court's Ruling served as a corrective intervention, one that highlights the lack of substantive, rights-based arguments from those opposing civil unions. Many of the arguments against recognising same-sex partnerships relied either on abstract appeals to traditional morality, biological reproduction, or bias against same-sex couples. These positions often collapse into a utilitarian conception of family, wherein social value is narrowly defined by reproductive potential.

The legal framework that allowed Parliament to delay action indefinitely, without setting a clear deadline, created a deliberative void. By stepping in, the Court did more than resolve a legal inconsistency. It reinvigorated delib-

²⁰ P. McLaverty, *Inequality and Deliberative Democracy* [in:] *Deliberative Democracy*, eds. S. Elstub, P. McLaverty, Edinburgh University Press 2014, p. 40.

²¹ M.C. Stephenson, *Legislative Allocation of Delegated Power: Uncertainty, Risk, and the Choice Between Agencies and Courts*, "Harvard Law Review" 2006, vol. 119.

erative democracy by emphasising that constitutional duties must be fulfilled within a reasonable time, especially when fundamental rights are at stake.

Through this ruling, the Court constitutionalised the duty to legislate in light of evolving societal needs, grounding its intervention in the doctrine of legitimate expectations and establishing the constitutional principle that inaction cannot persist indefinitely when rights are at stake. In doing so, the Court sent a broader message: prolonged legislative inaction is not a neutral or procedural issue – it undermines democracy itself by disabling inclusive and rights-oriented deliberation.

However, the Court's strong message also provoked heightened criticism, an expected outcome given the blame-deflection strategy employed by political actors who had struggled for a decade to resolve key issues concerning minority rights. One consequence was a series of public events criticising the Constitutional Court's judicial activism, including statements by some politicians claiming that “we are in a constitutional crisis”²² and calls by the leader of one of governing parties to abolish the Constitutional Court for its purportedly political judgments²³. Such rhetoric threatens the independence and impartiality of the judiciary, ironically, the very qualities that lead politicians to delegate difficult decisions to the courts in the first place.

By declaring that a 24-year delay in resolving such an issue is excessive, the Court effectively established a new constitutional standard requiring democratic institutions to engage in timely, citizen-oriented deliberation, especially, when legislation concerns vulnerable or marginalised groups. This development signifies a shift away from a purely procedural model of governance toward a more substantive, responsive, and constitutionally grounded form of democratic practice.

²² See the comments of Member of Parliament L. Girskienė on the Ruling: https://www.lrs.lt/sip/portal.show?p_r=35403&p_k=1&p_t=292038 (10.10.2025).

²³ See also statements by Member of Parliament R. Žemaitaitis in D. Biržietis et al., *Žemaitaitis sako palaikysiantis Sabatausko kandidatūrą, bet ragina naikinti KT*, LRT.lt: <https://www.lrt.lt/naujienos/lietuvoje/2/2697259/zemaitaitis-sako-palaikysiantis-sabatausko-kandidatura-bet-ragina-naikinti-kt> (10.10.2025).

VII. Conclusions

Confronted with value pluralism, the Constitutional Court did not seek to reconcile competing worldviews directly. Instead, it elevated the discussion by grounding its reasoning in overarching constitutional principles such as dignity, equality, and the rule of law. By framing the issue at this higher level of abstraction, the Court established a rational and constitutionally coherent foundation for preferring one position over another. This reasoning reflects Rawls's concept of public reason, whereby resolution arises not from appeals to subjective (individual) moral or religious doctrines, but from shared political values accessible to all citizens. Although this approach may be criticised by those who favour more substantive or truth-oriented adjudication, it provides a pragmatic and legitimate response in circumstances where the institutions of deliberative democracy have failed to engage effectively.

The Constitutional Court's ruling imposed a constitutional imperative of effective deliberation upon the Parliament. By explicitly declaring that a 24-year delay in adopting the necessary legislation is constitutionally unacceptable, the Court set an important precedent. This determination challenges performative or merely declarative forms of deliberation, in which decision-makers simulate engagement without genuine intent to act. The Court's intervention sends a broader message: deliberation must be both timely and outcome-oriented when fundamental rights are at stake. Although the Constitutional Court reaffirmed its role as a catalyst for democratic responsibility, it simultaneously exposed itself to criticism of judicial activism from the very political actors who had long obstructed deliberation on sensitive political issues.

Literature

- Andersson H., Hsieh N., *Incommensurable Values* [in:] *The Stanford Encyclopedia of Philosophy*, Fall 2025 Edition, eds. E.N. Zalta & U. Nodelman, <https://plato.stanford.edu/archives/fall2025/entries/value-incommensurable>
- Cinalli M., O'Flynn I., *Pluralism and Deliberative Democracy* [in:] *Deliberative Democracy*, eds. S. Elstub, P. McLaverty, Edinburgh University Press 2014.
- Deliberative Democracy* [in:] *Encyclopaedia Britannica*, <https://www.britannica.com/topic/deliberative-democracy>

- Elstub S., McLaverty P., *Introduction: Issues and Cases in Deliberative Democracy* [in:] *Deliberative Democracy*, eds. S. Elstub, P. McLaverty, Edinburgh University Press 2014.
- Gee G., Webber G.C.N., *What Is a Political Constitution?*, “Oxford Journal of Legal Studies” 2010, vol. 30, iss. 2, <https://doi.org/10.1093/ojls/gqq013>.
- Habermas J., *Moral Consciousness and Communicative Action*, Cambridge: Polity Press, 1990.
- Hirschl R., *The New Constitutionalism and the Judicialization of Pure Politics Worldwide*, “Fordham Law Review” 2006, vol. 75, iss. 2.
- Katz R.S., Mair P., *Changing Models of Party Organization and Party Democracy: The Emergence of the Cartel Party*, “Party Politics” 1995, vol. 1, iss. 1, <https://doi.org/10.1177/1354068895001001001>.
- Mansbridge J., *Rethinking Representation*, “American Political Science Review” 2003, vol. 97, iss. 4, <https://doi.org/10.1017/S0003055403000856>.
- McLaverty P., *Inequality and Deliberative Democracy* [in:] *Deliberative Democracy*, eds. S. Elstub, P. McLaverty, Edinburgh University Press 2014.
- Parliaments and Governments in Western Europe*, ed. P. Norton, London 1998.
- Petersen N., *Mapping Equality Case Law Around the World – Conceptual Preliminaries* [in:] *In Equality’s Guardians: How Courts Conceptualize Equal Protection and Non-Discrimination Guarantees*, ed. N. Petersen, Oxford University Press 2025.
- Platūkytė D., ‘Finally’: same-sex couple exchange rings in Vilnius Town Hall ceremony, LRT.lt: https://www.lrt.lt/en/news-in-english/19/2674437/finally-same-sex-couple-exchange-rings-in-vilnius-town-hall-ceremony?srsltid=AfmBOoozpXqBHg8n-UOvAkUg52D9aywbBSPfT2HBPeCtnHr2ipLfg_114
- Rawls J., *Political Liberalism*, 2nd ed. New York 1996.
- Stephenson M.C., *Legislative Allocation of Delegated Power: Uncertainty, Risk, and the Choice Between Agencies and Courts*, “Harvard Law Review” 2006, vol. 119.
- Wheatley S., *Deliberative Democracy and Minorities*, “European Journal of International Law” 2003, vol. 14, iss. 3.