

*Istoria mentalităților, comunicarea
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Early Modern Body Politics: From Effacement to Celebration through Costume

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Résumé : *L'approche du corps, l'interprétation et la représentation du corps proviennent de la mentalité d'une époque mais aussi de divers discours circulés dans une société donnée. Dans le Moyen Age le discours religieux prévalait; celui-ci était concentré sur l'idéal spirituel et insistait sur l'idée que le corps devait être caché, camouflé, effacé parce qu'il était une source de tentation peccable et un indigne élément d'expérience humaine. L'époque pré-Renaissance a été témoin de l'essor de l'individualisme et de la sécularisation de l'art et de la pensée. L'homme de l'époque pré-Renaissance a été libéré des contraintes et de la rigidité médiévale; l'individualisme lui a donné la liberté de s'exprimer et d'évaluer, nourrir et instruire son corps comme son esprit. Cela a déclenché l'intérêt et l'accent sur le corps humain comme un atout précieux qui doit être étalé pour sa beauté, mais aussi utilisé comme une forme d'expression du statut social de l'individu. Par conséquent, le corps a été étalé avec ostentation et orné de tissus et bijoux chers.*

Mots-clés: *représentation du corps, costume, mentalité, statut social*

Social representations place the body in a certain position within the general symbolism of the society. The body is never a given fact, it is the effect of a social and cultural construct. Within the framework of the transformations that occurred in the early modern times, the approach to the body also shifts: the body is no longer repealed, condemned, and effaced; on the contrary, it is celebrated as a valuable part of human experience.

The body, as an element which can be isolated from the person who owns it, can only exist in individualist societies, where people are separated from each other, relatively autonomous in their initiatives and values, and where the body functions as a boundary separating one person from the rest of the community. In traditional societies like the medieval one, the body, on the contrary, establishes the connections with the community.

The rise of individualism in the early modern period gradually leads to the human being's separation from their body, not from a religious, but a profane perspective. In the Middle Ages, the human

being was separated from their body from a religious perspective: as opposed to the soul, which was the only important element in the human experience and the only one capable of reaching God, the body is discredited as leading only to temptation and sin. In the early modern times, the human being is separated from the body in the sense that he/she perceives his/her body as an asset, or as an instrument, which should be taken care of, used, or displayed.

Individualism emerged in the late Middle Ages, as a result of the development and increase in importance of the fields of commerce and banking. The merchant is the prototype of the modern individual – a cosmopolitan, whose ambitions go beyond the pre-established limits. He is therefore less influenced by the community and by traditions. He is aware of his social importance, and therefore he knows that he is the only one to create his destiny. On the other hand, secularization, liberation from all the restraints imposed by religion, leads to the awareness of personal responsibility.

The rise of individualism is also reflected in the approach to the body. In the early modern times, the portrait becomes one of the most important forms of painting, gradually removing and replacing religious painting and the subsequent tendency of representing the human being only with reference to a religious figure. The church considered that portraits were sources of temptation, and the sitters were likely to become victims of magic. Therefore, the only portraits in the early Middle Ages were portraits of high dignitaries of the church, who were protected against magic, because they were portrayed as participants in religious episodes and surrounded by divine characters. Individualism and secularization made it possible for the portraits to increase in number and to become devoid of any religious reference.

As a result of the human being's self-awareness as an individual, not as a member of a community, the body becomes the boundary between individuals. As a factor of individualization, the body becomes the target of specific interventions: the anatomic research, through the dissection of the human body, is the most remarkable in this sense.

In the Middle Ages, the human body was studied in relation to the universe. The body was defined in terms of the four humours: the blood, the phlegm (mucus), the yellow gall, and the black gall. Health and illness depended on the exchanges between the four humours. The vital fluids had to have a constant level, ensuring man's relation with

the world. Illness was thought to appear when one of the humours was either in excess, or insufficient [1]. Each of these humours was believed to cause specific illnesses, and the doctor's task was to reestablish the balance between the human being and universe. The movements of the stars were thought to decisively influence the balance of these humours, as well as the cycle of the seasons. Medical care, consisting in the taking of blood, diets or some surgical interventions, tried to reestablish the humoral balance and harmony. The medicine of correspondences contributed to this representation which unites the human being with the entire universe. The moon, for instance, was said to influence the taking of blood, women's menstruation, the moment of birth or death etc. By analogy, an element of nature – an object, a colour, a smell, a shape – could act upon an organ, a wound, a disorder etc. [2]. A multitude of beliefs which link the human body with the stars, with the universe and with the elements of nature was what medieval medicine consisted in.

Popular beliefs were based on the same idea: the human being was part of a holistic network, in which everything intertwined, and in which a simple gesture could influence the universe and unleash forces, either on purpose (magic, witchcraft), or accidentally. The frontiers of the individual are beyond his/her body; the individual is defined not by his/her body, but by his/her family, his/her assets, by everything that surrounds him/her, in a network which is typical of the community structure where the human being is not an individual, but a man/woman in a relation or a network of relations.

In the Middle Ages, the human being couldn't be separated from his/her body, not even after death. It was believed, for instance, that the victim's dead body bleeds in the presence of the assassin. The murderer's body, on the other hand, could be subjected to any kind of torture, because the murderer is someone who imposed his individuality against the will and values of the community. This is the murderer's destiny: his separation from the society is a dismemberment of the social group, metaphorically punishable by the dismemberment of his body. As a consequence of this belief, the first corpses offered to anatomists for dissections belonged to criminals sentenced to death.

Saints' relics were also dismembered, so that the relics could spread in the whole Christian world. In the sanctified body fragment a metonymy of the glory of God is celebrated. It was believed that the state of a corpse, even if mutilated or destroyed by time, could not prevent revival, but this belief was professed by the members of the

clergy. The popular belief was that an alteration of the body could affect the deceased person's destiny in the afterlife, and, therefore, the dead body provoked fear. The body, therefore, was thought to continue to accompany the person even in death.

In a world which was governed by superstition, by popular beliefs, by magic, and in which the human being was seen as inseparable from his/her body, the idea of shedding blood, even in order to treat the body, meant breaking the sacred alliance, destroying a taboo. This is why the surgeon's profession was one of the most disregarded in the Middle Ages. Surgeons are suspect characters, who generate their contemporaries' unrest. In the 12th century, the medical profession was divided into three categories: the university doctors, the clerical doctors, who were experts in speculations rather than therapy, and surgeons. The first two categories treated the body against 'external' illnesses, without touching the patient's body. Surgeons acted at the level of the interior of the body, going beyond the sacredness of the blood and the frontier of the skin. They were generally laic, despised by the clerical doctors for their ignorance in the scholastic science. Ambroise Pare, a surgeon who discovered the ligature of arteries for avoiding hemorrhages and as a consequence saved numerous lives, was ridiculed by the clerical doctors for not speaking Latin [3]. It was therefore more important for a doctor to speak Latin than to cure. The doctor held the privileged position of a person who is assumed to have the knowledge, but who does not touch the impure blood, and thus his profession is not among the most despised.

A sign of the shift in mentalities which makes the individual autonomous and throws some light on the human body is the inauguration of the anatomic science in Italy in the 14th century. With the first official dissections, a huge anthropological and ontological mutation takes place: the distinction between the person and the body, the human being's separation from his/her body. Dissociated from the person, the body is studied as an autonomous reality. The treatises dating before the 16th century were based especially on the porcine anatomy, considered not to differ too much from the human. This is because until the 16th century the human body was untouchable, since the human being, a fragment of the community and of the universe, was untouchable.

One of the sources of our representation of the body dates back in the 16th century. Starting with Vesalius, a new anthropology develops,

announcing a break with the previous one, which saw man as a part of the cosmos.

At the end of the 16th century a new feeling appears: curiosity, in close connection with individualism and with the distinction between the public and the private. Private persons create in their homes their own anatomic cabinets, where they collect unusual things associated with the human body, or even mummified bodies. Corpses and body fragments are collected for their originality or for the direct knowledge they provide, thus enriching the medical practice. As the body is dissociated from the person it used to incarnate, becoming the anonymous relic of someone who no longer exists, collecting and studying body fragments, tumours, stones, fetuses, limbs with malformations or preserving mummified bodies become legal [4].

With the development of the anatomic and medical sciences, the approach to the body changes. The human being is separated from his/her body, and the body becomes an autonomous reality. Popular traditions and beliefs lose their significance. At the level of the higher social categories, the body is depreciated, objectified. Two attitudes polarize: one that depreciates the body, objectifying it, and identifying it as it actually is – different from the person it incarnates – the attitude of having a body; the other one identifying the person with the body – the attitude of being your own body.

However, the depreciation of the body is not the medieval rejection of the body as unimportant or unworthy. On the contrary, seen as autonomous, separate from the person, the body lets itself be studied, cured, taken care of, adorned, and used. It is no longer a taboo. If it suffers, it should be treated. If it is healthy, it has to be taken care of, in order not to become ill. And, since according to the early modern mentality, the body is a personal asset contributing to the public image of the self, it should also be adorned, and its image should be used.

The body is therefore no longer effaced, on the contrary, it is displayed and emphasized. There are new criteria for evaluating the body, from the ideal of beauty, to fashion and manners. The ideal shape of the body is reconsidered: the flesh colour is emphasized; the female body, especially, acquires a density and a flesh tint which it didn't have until then, its aspect becomes fleshier, and its contours more consistent. A discreet sensuality hints to the sap pulsating under the skin, suggesting the milk and the blood [5]. 'Roundness' is the term most widely used to describe a beautiful body, indicating the

balance between plumpness and thinness. The medieval slim shape is no longer an ideal.

The early modern idea of beauty implies a hierarchy, distinguishing the upper and the lower parts of the body. Beauty is present in the upper part, and this is why the upper part is displayed. The lower part is concealed, as it is seen merely as the support of the upper part, where beauty actually resides. The neck, the shoulders, the chest, and the arms, not to mention the face, are the actual indicators of beauty, and hence the fashion of the décolletage.

But beauty does not only involve the natural beauty of the body, but also the dress, which is meant to emphasize the body, the posture, and the manners related to the body. The body is therefore not only displayed and celebrated for its beauty, it is also used as a symbol of status. Social distance is also expressed at the level of the manners. Dress is obviously a marker of the wearer's status, but it has to be accompanied by the appropriate posture and manners.

The history of fashion gives us valuable information in this respect. Beyond its variations, the costume has the primary function of entirely concealing the female body – including the hair. The bust has to be leveled, flat, because the ideal of virtuous beauty presupposes the absence of breasts.

The shape of the early medieval costume was characterized by extreme simplicity. Both men's and women's costumes were loose and generally not much adorned. A typical men's costume consisted of a tunic with a wide neck, three-quarter-length sleeves and embroidered borders, very loose and pouched over a belt at the waist, worn over a linen shirt and braies. The latter were loose, trouser-like items, which were held up by means of a cord running through the hem at the waist; crossed linen bands kept them secured to the lower legs. Other common elements were the semicircular cloak, sometimes fastened over a shoulder with a brooch. Shoes were very simple and high-fitting to the ankles. Armours were also very simple: a cone-shaped helmet and a hood of chain covering the head, and a coat of mail (hauberk) with short sleeves.

The only changes that emerged during this period were the appearance of the hose and the adornment of a few items. Towards the end of the twelfth century, a new style of tunic appeared, with unusual sleeves that were wide from the elbow but narrowed to the wrist. Other new elements were the ornate girdle, the full woolen cloak, the

Phrygian cap, very popular among the rich, and the boots with coloured lining.

A typical women's costume consisted of plain woolen and linen clothes, with some embroidery. The gown was similar in style to a man's tunic, very loose and with an opening at the neck. The neck, cuffs and hem of the gown were embroidered, and the gown was gathered at the waist with a girdle. A veil was used to cover the head, wound around the neck so that the hair was completely covered. The hair was not supposed to be visible, as it represented a temptation. Over the gown a voluminous woolen cloak was worn for warmth. The shoes were also very simple, with no embroidery or garments.

The style slightly changed at the beginning of the twelfth century. The gown was more or less the same, except for the fact that the sleeves became very wide from the elbow. The girdle was long and jeweled, and worn high around the waist, crossed at the back and brought forward low onto the hips. For covering their head women wore a veil and a coronet, and the hair was arranged into two long plaits bound with a silk ribbon. The rest of the twelfth century saw little change in women's clothes, except that the long plaits and the wide sleeves gradually went out of fashion. In 1170 the barbette was introduced. This was a linen band that passed under the chin and over the head. In 1190 a linen covering for the neck appeared. It was called a wimple and was tucked into the dress at the front and often veiled the chin. These items became very popular and, after a few years' respite, ladies concealed their hair once again.

Real changes in style did not appear until the first half of the fourteenth century, when revolutionary ideas were introduced and the whole silhouette was transformed. Instead of being loose and flowing, garments were made to fit the figure, emphasizing the male and female shapes, and so the tailoring began. These innovations were due in part to natural evolution, but also to the stirring of the Renaissance in Italy, where the human body was being studied and glorified in art and literature, and tailored fashions helped to display the figure better. Brilliant colours, costly fabrics, fur and fur linings, patterning, motifs and jeweled embroideries were all popular, culminating in ostentatious displays during the reign of Richard II.

The new styles developed further in the fifteenth century with an even greater variety of designs and fabrics. The most interesting change in fashion that has occurred since the late fourteenth century is the disappearance of the slim silhouette. Expensive, rich fabrics like

velvet, brocade, silk, and gold and silver cloth were imported for the upper classes and beautifully woven fabrics were produced in England due to the influx of Flemish weavers who came to England under the patronage of Edward III. Fashion became more exaggerated and flamboyant: there was great scope for display and extravagance, which sometimes caused much inconvenience to the wearer. Good examples of this were the exaggerated pointed toes of men's shoes and the large, unusual headdresses worn by ladies.

However, by law, high fashion was defined as being the prerogative of the upper classes with diminishing privileges given to those in the middle and lower classes. This meant that wealthy middle-class people would not be allowed to wear clothes as sumptuous as those of the nobility. Sometimes royalty would hand down or bequeath garments to their servants, but only after the costly trimmings had been removed. The servants would later sell them to second-hand clothes dealers and eventually the same garments would be seen, worn out, on the backs of the poorer. Clothes were a mark of status and it was possible to determine a person's rank by the length of his tunic or size of her headdress. As fashions became more extravagant, strict sumptuary laws were passed in an attempt to curb any excesses. For example, it was ordained that: 1) only royalty and nobility could wear pearl embroidery and ermine; 2) cloth of gold, jewels and miniver (plain white fur) linings could be worn only by knights and people of higher rank; 3) cloth of silver, silver girdles and fine quality wool were restricted to squires and people of higher rank; 4) commoners were permitted to wear only the coarser quality wools, and even if they could afford jewels and silk, they were not allowed to wear them [6].

At the end of the Middle Ages a radical change occurred, which (as we have shown above) was translated into a similarly revolutionary women's fashion. The décolletage became so deep, that breasts were half visible. A novelty was the dress 'à la grande gorge', which opened at front to the navel. But, as opposed to the medieval dress code, where the body was completely concealed and effaced, the early modern permissiveness went even further: sometimes the breasts remained completely uncovered, the nipples were ornamented with red, with precious stones, and sometimes they were even pierced to allow for gold chains to be hung up. This permissiveness will later be depicted in some of Herrick's poems: 'A sweet disorder in the dress/Kindles in clothes a wantonness:/A lawn about the shoulders

thrown/Into a fine distraction:/An erring lace, which here and there/Enthralls the crimson stomacher:/A cuff neglectful, and thereby/Ribbands to flow confusedly:/A winning wave (deserving note)/In the tempestuous petticoat:/A careless shoestring, in whose tie/I see a wide civility:/Do more bewitch me than when art/Is too precise in every part.' ('Delight in Disorder'). 'Whenas in silks my Julia goes,/Then, then (methinks) how sweetly flows/That liquefaction of her clothes.//Next, when I cast mine eyes and see/That brave vibration each way free,/O how that glittering taketh me!' ('Upon Julia's Clothes')

In the fifteenth century, if the topless style is only rarely adopted – Simonetta Vespucci painted by Piero de Cosimo – a new ideal of beauty emerges, which emphasizes the charms of nature at the expense of the charms of virtue. The preference for the round, ripe shapes increases with the progress of the early modern period. The lithe young men and fragile young ladies of the Trecento and Quattrocento became powerful and determined men with broad shoulders and vigorous women with ample lines in the Cinquecento, as we know them from the masterpieces of the time (Leonardo da Vinci, Raphael, Michelangelo, Giorgione, Titian, Corregio and others). The shape of the body was sometimes revealed, and other times emphasized by clothing. This tendency will still have echoes later, in the seventeenth century. Richard Lovelace, for example, made an apology of the vigorous body in his 'La Bella Bona Roba' (a common expression for a whore, but literally meaning a pleasantly plump girl): 'I cannot tell who loves the skeleton/Of a poor marmoset, naught but bone, bone./Give me a nakedness with her clothes on.//Such whose white-satin upper coat of skin,/Cut upon velvet rich incarnadine,/Has yet a body (and of flesh) within.'

The Italian fashion in the fifteenth century was with the waist high, emphasizing the breasts. This can be seen on the funerary monument of a matron from Lucca, carried out by Jacopo della Quercia (around 1438), a sculptor of the round shaped maternity. We find the same high waist fashion in Jan van Eyck's famous painting, 'The Marriage of Giovanni Arnolfini and Giovanna Cenami'. In the sixteenth century, the Italian fashion provides for the waist down, the bust being covered by a short singlet with a square décolletage. Francesco del Cossa's fresco 'The Weavers' is a real parade of the high waist fashion; on the contrary, Raphael's portraits are proofs of the lowering of the waist and the evolution of the décolletage. There is a certain

balance in this variation in women's fashion: the high waist emphasizes the breasts, which still remain covered; the low waist flattens the breasts, but the décolletage, sometimes large enough to stretch over the shoulders, reveals the upper part of the female body.

An English example of the topless fashion is to be found in Robert Peake's *Portrait of Lady Elizabeth Pope*. Pope's portrait shows a young lady seated under a laurel tree in a pastoral landscape. Her upper body is partially covered with a classical mantle of heavy black cloth, knotted at her shoulder. The fabric is embroidered with pearls in an elaborate feather design. Her hat displays the same feather pattern. Her hair falls loose across her shoulders and upper arms, hiding but also suggesting the line of her exposed left breast. She is represented wearing a necklace with a pendant reaching between her breasts. Her neck is encircled by a choker whose large hanging pearl points to the pendant. The painting is an illustration of the tensions between voluptuousness – conveyed by the loose hair, the curves of the feather pattern, the uncovered breast and the relaxed and graceful position of Lady Elizabeth Pope's hands – and the more rigid codes of Elizabethan fashion and portrait convention. 'Lady Elizabeth's head is held in a precise vertical position, and the slight angle of the line between the pearl and the pendant implies that her body is not equally upright. Yet even this intimation of a relaxed pose is effectively denied by the rigid axial coordination of the necklaces and the awkward position of her arms. Both are bent, the rigid arm resting lightly on a green stump, the left stiffly away from her body' [7].

In Peake's painting, with its formal and symbolic complexities, meaning is conveyed through a play of oppositions and contrasting elements: the public display of the full-scale portrait and the private experience of the miniature (the painting is designed and framed as a miniature); the heraldic flatness of Lady Pope's body and the sensuous physicality of her costume. And although her image belongs to the heraldic tradition, the depictions of movement, the display of the body, and the space and depth within the painting suggest an attempt to change the conventions of the English icon. 'Within this frontal plane, symbolic framing devices define a parameter or boundary for Lady Elizabeth's image. Laurel branches fill the top of the panel, focusing the viewer's glaze, while sheltering Lady Elizabeth within a private bower. This reframing of her image is repeated in a self-generating frame. Lady Elizabeth's arms are positioned so that a powerful circular movement through hands, arms, hair and head

creates a little world of her body within that protected bower. With this enframing device Peake seems to re-create for the viewer the Renaissance conception of the human body as a miniature or microcosm of the world' [8].

The position of Lady Elizabeth's hands suggesting modesty and passivity was typical of many Elizabethan and Jacobean portraits of women: hands are clasped together or rest at their side or on a table or a chair. However, the image of Lady Elizabeth Pope, as depicted by Peake, is a sensuous one. Despite the fact that it belongs to this tradition and to a certain extent participates in the above described convention, Peake's portrait is atypical through its sensuality. In her left hand, Lady Elizabeth feels a thick fold of cloth between her thumb and her ring finger. The material presence of the cloth is described in precise detail: each fold and drape are revealed by the distortions imposed on the pearls of the feather pattern. 'The fabric is the only real volumetrically conceived space in the painting. Its descriptive power, as Elizabeth Pope touches it, quite literally fashions her identity, and at the same moment she seems to invite the beholder to share the intimacy of that touch and to feel the palpable fabric that creates her presence' [9]. So both the materiality and the sensuality within the portrait are actually given by the fabric rather than by the body itself. The cloth complements the body, it both hides and reveals the body.

Elizabethan and Jacobean paintings have been described as 'miniatures blown up under glass'. The image appears as if it were held in hand, and the full-scale portrait resembles the miniature through the way in which it couples the real and aesthetic space. The portrait of Lady Elizabeth Pope is full-sized, but Peake has 'deliberately evoked many of the formal and associative qualities of the miniature: not only the very different physical relation between viewer and image, but also the miniature's courtly origins, its representational function and its expression of 'private' emotion' [10].

The detailed depiction of the fabric and jewels that Elizabeth Pope wears invites the viewer to compare the real and the represented, to measure and acknowledge the value of the image. In addition, this precise, detailed description of the fabric and jewels is meant to reflect the status and wealth of the sitter. In this and other paintings, as well as in the mentality of the time, dress defined the social status of the sitter, as evidenced by the English sumptuary laws which defined the

dress code for every social rank and which were designed to preserve the established order and hierarchy.

Although Peake alludes to an Italianate figure, his portrait fits in the long-established convention of English portraits: Lady Elizabeth's figure is not an object of desire, nor is it an ideal of beauty or a means of expressing or inspiring emotion. What this figure emphasizes is the voluptuous display of rank and status rather than mere eroticism. Therefore the portrait of Lady Elizabeth Pope reveals a play of contradictions and a juxtaposition of dualities: exposure and concealment (suggested by the fabric and jewels), public display and private possession (full-scale portrait, inviting public admiration of Lady Elizabeth's beauty, painted in the style of miniatures, suggesting a private exchange between lovers), voluptuousness and chastity (loose hair, exposed body). And this play of contrasts and dualities is typical to the early modern mentality, as reflected in portraits and in the art of costume and jewelry: public and private, erotic voluptuousness and the voluptuousness of status, concealment and display, permissiveness and restrictions.

If in the medieval times the body was seen as worthless, sinful, a source of both pain and defiling sinful temptation and pleasure, in the early modern times it was regarded as a valuable asset, a beautiful creation, and a source of pleasure, which is no longer associated with sin. Therefore, while the medieval body was almost invisible, veiled and concealed under specially designed clothes, the early modern body started to become visible, sometimes to an exaggerated extent – the increasingly deep décolletage led to the topless fashion.

The visibility of the body does not only involve the body itself, but also the dress and jewels adorning it, which are symbols of the wearer's status. The early modern costumes and luxury objects become increasingly sophisticated. Moreover, the medieval sumptuary laws which prescribed the costume models and fabrics for each social category, preventing the lower categories from wearing the intricate models and expensive fabrics and jewels which were the mark of the aristocracy, became more lax in the early modern period, as a result of the rise of the bourgeoisie.

All the early modern representations of the body converge towards the same idea: Not only is the body effaced any longer, it becomes a constant preoccupation of the early modern individual. It is a means of expression, a beautiful creation, an object of desire, a valuable asset, a means of deception, an instrument of manipulation, a means of

figuratively challenging the established order, a model of perfection to be used even in architecture. The body is no longer hidden; it is taken from the margins where it was banned by the medieval society and brought to the centre of the human being's preoccupations.

Notes

- [1] in Le Breton, David, *Antropologia corpului și modernitatea*, Editura Cartier, Chișinău, 2009, p. 67.
- [2] in Le Breton, *op. cit.*, p. 68.
- [3] in Le Breton, *op. cit.*, p. 77.
- [4] in Le Breton, *op. cit.*, p. 97.
- [5] in Vigarello, Georges, *O istorie a frumuseții. Corpul și arta înfrumusețării din Renaștere până în zilele noastre*, Editura Cartier, Chișinău, 2006, p. 19.
- [6] in Ruby, Jenifer, *Costume in Context. Medieval Times*, B.T. Bradsford Ltd., London, 1995, p. 38.
- [7] Chirelstein, Ellen, *Lady Elizabeth Pope: The Heraldic Body*, in Gent, L. and Llwellyn, N. (eds.), 'Renaissance Bodies – The Human Figure in English Culture c. 1540-1660', Reaktion Books Ltd., London, 1994, p. 36.
- [8] Chirelstein, *op. cit.*, pp. 37-38.
- [9] Chirelstein, *op. cit.*, p. 38.
- [10] *Ibid.*

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