

The second great hero of the False Decretals is Pope Symmachus I. On 22 November 498, a clerical faction inclined to Chalcedonian orthodoxy elected the deacon Symmachus to the see of St. Peter, while another with Eastern sympathies chose the archpriest Laurentius of Santa Prassede. Symmachus's opponents eventually accused him of financial and moral impropriety, and he or his supporters responded with the so-called Symmachian forgeries. These are a series of false councils and trial narratives that enshrined in canon law the maxim that „prima sedes a nemine iudicabitur“⁴. Pseudo-Isidore knew one of these forgeries, though its associations with Symmachus were obscure to him and the matter of papal immunity lay beyond his concerns⁵. Instead, Pope Symmachus I interested Pseudo-Isidore as another bishop who, like Athanasius, had been driven from office, unjustly tried and finally vindicated. To the single authentic decretal of Symmachus that Pseudo-Isidore found in his most important formal source, the interpolated *Hispana*, he appended six further conciliar documents and two letters in Symmachus's name⁶.

Dekretalen (Rheinisch-Westfälische Akademie der Wissenschaften. Geisteswissenschaften: Vorträge 428, 2011).

4) On the Symmachian forgeries and the political drama that prompted them, see Eckhard WIRBELAUER, *Zwei Päpste in Rom: Der Konflikt zwischen Laurentius und Symmachus (498–514)* (Quellen und Forschungen zur Antiken Welt 16, 1993). A convenient account of the events of the schism itself is Thomas F.X. NOBLE, *Theoderic and the Papacy*, in: *Teoderico il Grande e i Goti d'Italia: Atti del XIII Congresso internazionale di studi sull'Alto Medioevo 1* (1993) p. 395–423. For “prima sedes a nemine iudicabitur” in later canonical theory and practice, see Harald ZIMMERMANN, *Papstabsetzungen des Mittelalters* (1968).

5) The *Excerpta quaedam ex synodalibus gestis sancti Sylvestri Papae*, ed. HINSCHIUS, *Decretales* (as n. 1) p. 449–50, are based in part on the *Constitutum Sylvestri*, one of the Symmachian forgeries. See Eckhard WIRBELAUER, *Zum Umgang mit kanonistischer Tradition im frühen Mittelalter: Drei Wirkungen der Symmachianischen Documenta*, in: *Schriftlichkeit im frühen Mittelalter*, ed. Ursula SCHAEFER (*ScriptOralia* 53, 1993) p. 207–225, here 221–4.

6) From the interpolated *Hispana* (Vatican, Biblioteca Apostolica, Vat. lat. 1341) comes JK 764, transcribed by Annette GRABOWSKY, at http://www.benedictus.mgh.de/quellen/chga/chga_159t.htm. HINSCHIUS, *Decretales* (as n. 1) p. 657 has the decretal from *Collectio Canonum Ecclesiae Hispanae 2*, ed. Francisco Antonio GONZÁLEZ (1821), repr. PL 84 col. 811–12. There follow three Roman councils under Symmachus that Pseudo-Isidore has from the *Dionysio-Hadriana*, the last of them the *Synodus Palmaris* from 502. HINSCHIUS, *Decretales* (as n. 1) p. 657–64, reprints from the *Collectio Dionysio-Hadriana* (specifically, the *Codex canonum vetus Ecclesiae Romanae restitutus*, ed. Pierre PITHOU [Paris 1609]) rather than from the Pseudo-Isidorian tradition. (For a critical text of these councils, including the Dionysian tradition but excluding Pseudo-Isidore, see *Acta Synodorum Hab-*