

Competing Narratives, Competing Jurisprudences: *Are Law Schools Racist?* and the Case for an Integral Critical Approach to Thinking, Talking, Writing, and Teaching About Race

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Prologue (Or: Diary of *Another Mad Law Professor*)¹

SINCE YOU ARE READING THESE words—the second in a series of essays written by me and printed by this Law Review, the sixth in a series of articles including writings from the two other law professors in this colloquy—you deserve to know that as I write this by hand, and only minutes after getting out of bed, I have not properly composed myself. Indeed, the thoughts that began to work their way toward that certain need for expression that gives a writer a sense of purpose began their march through my brain before dawn—disturbing my sleep in the way that only an editor’s strict enforcement of a deadline will do. As I sit here gathering myself, fortified by a single quarter of an orange and a half cup of black coffee, Msnbc.com is describing President Barack Obama as the “Optimist-in-Chief.” Underneath his shining visage, the following headline crawls across the television screen:

* Professor of Law, University of San Francisco School of Law. I dedicate this essay to the many courageous and well-meaning students who have enrolled in my Race Law seminars over the years, including, especially, those enrolled in Racism and Justice in American Legal History this semester (Spring 2009). My sincere thanks to Aileen Pang, my editor on the *University of San Francisco Law Review*, for her patient and diligent support of this piece; to Cameron Cloar, the Editor-in-Chief of Volume 43 of the *University of San Francisco Law Review*, for his vision; and to all of the editors and staff of Volume 43 of the *University of San Francisco Law Review*, whose efforts supported this colloquy.

1. With apologies and a deep bow of gratitude and respect to Professor Patricia Williams, whose column, *Diary of a Mad Law Professor*, appears regularly in *The Nation*, and whose book *The Alchemy of Race and Rights* provided the inspiration for this meditational prologue. I submit this prologue, and view this colloquy in general, as homage to her work. See PATRICIA J. WILLIAMS, *THE ALCHEMY OF RACE AND RIGHTS* 4–5 (1991).

NAACP Filing Lawsuits Against Two Banks Accusing It of Steering African Americans Toward Bad Loans [sic].

Searching the Web for more detail, I find numerous reports of lawsuits against banks alleging racial steering toward bad loans, and at least one reported settlement in a New York class action lawsuit involving over \$600,000 in restitution.²

It's morning in color-blind America. The NAACP is alleging the contemporary application of tactics born in the era of Official White Supremacy, which then, as now, had the purpose and effect of undermining Black Americans' efforts to partake of the so-called American Dream. The links between race, real estate, wealth, policing policies, health and education policies, and their outcomes in this country are close, but have been too little examined by those who would truly understand the disparity of educational performance among Blacks and others in the United States in the years following the ending of slavery and Jim Crow segregation.³ Headlines like this one reveal some of the stingy rights and remedies our liberal legal system—the same system that supported Jim Crow and slavery for centuries—recognizes today. And what headlines do we not see? We do not see, for example, the following:

Multiracial Coalition of Citizens File Class Action Suit Against Federal and State Governments for Inadequately Educating Black and Brown Students in Dilapidated Public Schools, Decimating Communities by Overpolicing and Anti-black Sentencing Disparities, and Failing to Deliver a Healthcare System to Provide Adequate Coverage to the Working Poor.

We do not see headlines like this. The reason that we do not see headlines like this is not only because the press would reduce any such complicated claim of interconnected cause and effect to a much shorter “sound bite,” but also because under our liberal⁴ legal system, such a lawsuit would be dismissed coming though the door. Such a lawsuit would fail to meet the legal system's requirements for reasons too numerous to name. But the fact that the legal system today would not recognize such a claim does not mean that such a claim—one that reveals the interconnectedness of race policy and its many outcomes—should not be recognized. After all, slavery and Jim Crow legalized and

2. See *Mortgage Brokers Jerked Minority Borrowers*, BET, Jan. 7, 2009, <http://blogs.bet.com/news/newyoushouldknow/national-mortgage-brokers-jerked-minority-borrowers-car-jacking-suspects-arrested-in-atlanta/>.

3. C.f. Charles Lawrence III, *Unconscious Racism Revisited: Reflections on the Impact and Origins of “The Id, the Ego, and Equal Protection,”* 40 CONN. L. REV. 931, 948 (2008) [hereinafter Lawrence III, *Unconscious Racism Revisited*] (“[T]he injury of racism was found in symptomatic material conditions, including inequalities of wealth, employment, schooling, health, incarceration, etc., and in the ideology that produced and justified those symptomatic material conditions.”).

4. I use the term “liberal” in the classical, philosophical sense—as a system based on the rights of individuals to “liberty” and “equality.”

normalized racial injustice and white male privilege by the very same trick—refusing, for so many years, to recognize as valid the claims brought by the system's victims and their supporters against the system's victors and their supporters.

Welcome to 2009. Awake to the internal sounds of this new fury, I throw open a window and let the sun shine in.

I. Introduction

Though this nation has proudly thought of itself as an ethnic melting pot, in things racial we have always been and continue to be, in too many ways, essentially a nation of cowards. Though race related issues continue to occupy a significant portion of our political discussion, and though there remain many unresolved racial issues in this nation, we, average Americans, simply do not talk enough with each other about race. It is an issue we have never been at ease with and given our nation's history this is in some ways understandable. And yet, if we are to make progress in this area we must feel comfortable enough with one another, and tolerant enough of each other, to have frank conversations about the racial matters that continue to divide us. But we must do more—and we in this room bear a special responsibility.

—Eric Holder, United States Attorney General⁵

One of these things is not like the other, one of these things does *not* belong!

—Tenured white male law professor, commenting to me, an untenured (at the time) black woman law professor, on what “the students [will] say when they see *you!*”

[P]eople who don't understand don't *want* to understand.

—Bill Cosby⁶

In *Are Law Schools Racist?*—Part II, Professor Dan Subotnik argues that Professor Delgado and I have failed to show anti-black ra-

5. Eric Holder, Attorney General, Prepared Remarks at the Department of Justice African American History Month Program (Feb. 18, 2009), *available at* <http://www.usdoj.gov/ag/speeches/2009/ag-speech-090218.html> [hereinafter A.G. Holder Remarks]. I include this unedited version of the paragraph partially and sporadically quoted by Subotnik for an accurate representation of the Attorney General's stated views. Given his stated longstanding distaste for “phonies,” I assume that Subotnik will appreciate this move in the direction of truth and accuracy. See Dan Subotnik, *Are Law Schools Racist?—Part II*, 43 U.S.F. L. REV. 761, 763 (2009) [hereinafter Subotnik II].

6. Hardball with Chris Mathews (MSNBC television broadcast Mar. 12, 2009) (emphasis in original) (speaking about the persistence of anti-black racism in the United States despite the election of President Barack Obama and despite his desire to see Blacks to adopt a “victors” mentality by focusing on the successes of Blacks and Africans in United States and world history).

cism in law schools.⁷ He further charges that the real race problem within legal academia is “racism against whites.”⁸ Without attempting to speak for Professor Delgado, who speaks beautifully well for himself,⁹ the task I set forth for myself in my response to Professor Subotnik’s narrative was decidedly not to prove the existence of anti-black racism in law schools.¹⁰ The singsong message I personally received from a white male professor very early in my own tenure at the University of San Francisco—“*one of these things is not like the other*”—provides anecdotal evidence of what may be unconscious racism and sexism on the part of at least one member of a faculty at a United States law school, and, if he is to be believed, some indication of students’ views there as well. It provides endless grist for one’s critical analytical mill. I venture that a close examination of the experiences of any woman of color on the full-time faculty of any law school in this country would similarly avail. Nor was my purpose to disprove the claim that whites may suffer some forms of racism in law school or elsewhere. Racism is always a dual structure, with privileges at one end, and disadvantages at the other that lead to grievances that may give rise to what might sound and feel like racism when they are expressed.¹¹ Fortunately for whites, and in particular white men, their combined numerical majority and ideological and material control over legal institutions, historically and through today, guarantee that even without the major shift in the collective consciousness for which I call for in this Article, such expressions do not lead to their race- or gender-based subordination within law schools, and will not for the foreseeable future.

That law schools can and do perpetuate the privileges of “Whiteness” and disadvantages of “Blackness” and “Coloredness” embedded in our society and legal culture since the founding—i.e., that law

7. Subotnik II, *supra* note 5, at 764. Subotnik’s discussion of the critical theory of gender theorists, sprinkled throughout his original essay, is mysteriously dropped in his reply. In this latest essay, Subotnik speaks only of the question of racism. I continue to refer more broadly to these categories of bodily marked difference as, for me and for all women of color, they are inevitably intertwined.

8. *Id.* at 768.

9. See Richard Delgado, *The Sincerest Form of Flattery?*, 43 U.S.F. L. REV. 253 (2008); Richard Delgado, *Getting Real: A Reply to Dan Subotnik*, 43 U.S.F. L. REV. 770 (2009).

10. Rhonda V. Magee, *Toward an Integral Critical Approach to Thinking, Talking, Writing, and Teaching About Race*, 43 U.S.F. L. REV. 259, 264–65 (2008) [hereinafter Magee, *Integral Critical Approach*].

11. *But see* SIOBHAN B. SOMERVILLE, *QUEERING THE COLOR LINE* 11 (2000) (“[I]deologies of racism remain contradictory structures, which can function both as the vehicles for the imposition of dominant ideologies, and as the elementary forms for the cultures of resistance.” (internal quotation marks omitted)).

schools inevitably manifest institutionalized racism against people of color—should by now be beyond cavil. My purpose has been to make the case for a new phase in the pedagogy of race and law, both in and out of formal educational settings, and to use Subotnik's argument as an example of why this must be done. Quite simply, it should by now be obvious that argument alone is not enough. I argue for "upping the ante": we must address these issues with a new level of commitment to genuine connection by embracing the teachings of social and emotional intelligence. We must marry honesty, self-revelation, and personal accountability with a commitment to mutual respect, self awareness, and interpersonal consideration of our interconnectedness that is not commonly brought to bear within the academy, let alone without.¹²

Unfortunately, Subotnik does not genuinely embrace my call for a new approach. In response to my essay, Subotnik instead continues to demonstrate two common dialogical problems that sit at the root of my call for a different approach to the race pedagogy. These two problems are: (1) the problem of competing literacies and narratives; and (2) the problem of competing jurisprudential and methodological approaches. Each of these problems, incidentally, are identified and taken seriously by critical legal theorists generally, and critical race theorists in particular. But not even critical legal theorists have stepped outside of the discourse of that tradition and explicitly called for the specific inclusion into these discussions of the insights of psychology that gather under the label of emotional and social intelligence.¹³

A. The Problem of Competing Narratives

I applaud Subotnik's concern about the welfare of Black law students.¹⁴ What troubles me are two stark indications that Subotnik's professed concern is actually, well, something else. These indications are: (1) the remedy that he chooses—that we should further abandon the already under-supported affirmative action programs among law schools today; and (2) his absolute unwillingness to own up to and deal with anti-black racism as a reality in our culture, in our communities, and yes, even in our law schools.

12. Magee, *Integral Critical Approach*, *supra* note 10, at 266.

13. *Id.* at 264–65.

14. Dan Subotnik, *Are Law Schools Racist?: A "Talk" with Richard Delgado*, 43 U.S.F. L. REV. 227, 234, 246–52 (2008) [hereinafter Subotnik I].

Subotnik's embrace of a remedy for this purported concern for Black students—dismantling affirmative action—is a woefully inadequate fit for the problem he posits. If his true concern is for the outcomes and feelings of so-called underprepared Black students, why should his remedy not directly address *that* concern? For example, he could argue for greater support, such as that provided remarkably well through programs at many law schools under the straightforward designation “academic support.” He does not. He could argue for the inclusion of staff counselors in law schools that would address the misplaced feelings of inadequacy that so-called underprepared Black students' circumstances sometimes impart. He does not.

Accordingly, Subotnik's reference to the difficulties of *some* Black students as a rationale for an argument against affirmative action strikes me as a cover for his real concern—that these programs displace white males from their “rightful” position at the top of the opportunity hierarchy, based on their presumptively superior “merit.” If this is Professor Subotnik's real concern, a reasonable amount of scholarly integrity demands that he not cloak his arguments in purported concern for those whose situation he does not adequately address.

Further, after receiving more opportunity to do so than most, Subotnik remains absolutely unwilling *even to consider* the role of racism as a cause of the outcomes he decries. Given his stated concerns for the welfare of Black students attending United States law schools just a generation after the official dismantling of the Jim Crow segregation in which legal education (and, indeed, many tenured legal educators) grew up, this seems odd.

I am concerned about Black students as well. I am concerned about the experiences and performance of Blacks in law school. I am also concerned about the ways that the legacies of the racism and white male supremacy that have been the cornerstones of our society since the founding are also negatively impacting Black students in integrated settings. Thus I have long been concerned about the relative under preparation *of law schools* for the job of teaching a diverse student body, with different pedagogical, emotional, and social needs.¹⁵ I

15. *C.f.* Rhonda V. Magee, *The Master's Tools, From the Bottom up: Responses to African American Reparations in Mainstream and Outsider Remedies Discourse*, 79 VA. L. REV. 863, 871–75 (1993). Arguing for a “cultural equity” approach to racial remedies, I wrote that under such an approach:

Schools would begin to appreciate the awesomeness of the task of nurturing young Black minds within a majority white environment, given our shared history of white-over-Black op[p]ression and the resulting climate of distrust. . . . Coun-

want to assume that Subotnik is concerned about the legacies and continued operation of racism and white male supremacy in our society, and thus, inevitably, in the law. But if he is concerned about these distortions of the processes of democratic inclusion in legal academia, he has yet to express it in this colloquy.

The legacies of our historical over-commitment to white male supremacy in law, and the continued systemic operation of practices that advantage the historically privileged in law, as throughout our society, are often difficult to see. It is much easier to point to particular outcomes—the “test scores” gap,¹⁶ for example—as evidence of Blacks being underprepared for law school, and to argue that, therefore, Blacks should not be admitted to such schools. It is harder, for some, to see how such an argument reflects a continued embrace of a subtle, structural form of white supremacy.

From the standpoint of history, and in light of the dominant color-blind thesis embraced by the United States Supreme Court in anti-discrimination and integration cases over the past generation,¹⁷ Subotnik’s is an easy argument to make. It is easy to make if we do not see the philosophy and structural underpinnings of white male supremacy as an ongoing problem (if, indeed, we can see that it ever was).¹⁸ It is easy to make if we see the goal of integration—of a society

tering the continuing assault on Black self-esteem would require more specialized educational efforts, such as those that encourage cultural sensitivity training for teachers, more attention to the contributions of African-Americans to the American economic and cultural foundations, and other behavioral and attit[u]dinal adjustments.

Id. at 875. In a more recent article, I broaden this objective, linking the alienating experiences of students from outside of the mainstream in legal education to a spiritual crisis among lawyers generally, and calling upon critical legal scholars to participate in legal education reform to address these matters for the benefit of all. See Rhonda V. Magee, *Legal Education and the Formation of Professional Identity: A Critical Spirituo-Humanistic—“Humanity Consciousness”—Perspective*, 31 N.Y.U. REV. L. & SOC. CHANGE 467, 467–68 (2007) (“Because of their tendency toward counter-cultural political views, students whose experiences, social identities, or political leanings place them outside of the mainstream—women, students of color, students from poor or lower socioeconomic status backgrounds, sexual orientation minorities, for example—likely experience more intense feelings of alienation than law students from more ‘mainstream’ backgrounds. Scholars engaged in critical analyses have a special obligation to participate in the reconstruction of legal education to address these recurring concerns.”).

16. Subotnik I, *supra* note 14, at 231.

17. See generally Neil Gotanda, *A Critique of “Our Constitution in Color-Blind,”* 44 STAN. L. REV. 1, 44–46 (1990) (discussing the Supreme Court’s embrace of color-blind constitutionalism, and arguing that it supports the supremacy of white interests and must therefore be regarded as racist).

18. *But see* City of Richmond v. Croson, 488 U.S. 469, 552–53 (1989) (Marshall, J., dissenting, joined by Brennan, J., and Blackmun, J.) (“[A] majority of this Court signals

committed to universal democratic inclusion—as unworthy of actual *efforts* to achieve. And it is easy to make if one does not actually believe that systemic or institutionalized racism exists.

Subotnik asks, “Are law *schools* racist?”¹⁹ The answer one gives to this question depends, of course, on what one means by “racist.” Subotnik himself admits to using a “cramped, dictionary” definition of racism.²⁰ He takes the view that the “institutional” and “unconscious” racism noted by Delgado and me are “all ways of identifying the same sense of superiority”²¹—i.e., the same “racism” that one would recognize under the “cramped” definition that he has chosen as the foundation of his argument. Under whatever definition, he seems to be saying that there is no anti-black racism may be viewed as standing in law schools, and that there is, instead, and only, so far as he is willing to acknowledge, racism against whites.²² Later, he changes the question altogether, asserting that Delgado and I are avoiding answering the question whether “law-*professors-are-racists.*”²³

Subotnik’s conflation of personal bigotry and systemic racism time and again in his writings and speeches on race is not surprising. Racism is a complicated and varied term. Personal racism—or old-fashioned bigotry and prejudice—is the sort of racism and bias referenced in Subotnik’s essays, and is the frame through which, by his own admission, he views these more systemic versions (when he deigns to acknowledge them at all).²⁴ However, unconscious and institutionalized racism stand in contrast to, and are distinct from, these

that it regards racial discrimination as largely a phenomenon of the past, and that government bodies need no longer preoccupy themselves with rectifying racial justice.”).

19. Subotnik I, *supra* note 14, at 227.

20. *Id.* at 235 (defining racism as “[a] belief in the superiority of a particular race”); Subotnik II, *supra* note 5, at 769.

21. Subotnik I, *supra* note 14, at 237; Subotnik II, *supra* note 5, at 768.

22. *See* Subotnik II, *supra* note 5, at 769.

23. *Id.* (emphasis added). Incidentally, Subotnik also variously levels his arguments against “minority” and “women” or “race and gender” theorists, but in his Reply, discusses only the problem of race scholars and their failure to prove that racism exists in law schools. *Id.* Leaving aside the difficulty one has following and responding to an argument that dips in and out of focus in this way, the intersectionality of race and gender in the experiences of each of us is yet another important insight elaborated by critical scholars the basic familiarity with which Subotnik appears all too comfortable remaining unburdened. *See, e.g.,* Kimberlé Williams Crenshaw, *Mapping the Margins: Intersectionality, Identity Politics, and Violence Against Women of Color*, 43 STAN. L. REV. 1241 (1991).

24. Subotnik I, *supra* note 14, at 236; *see also* JUAN F. PEREA ET AL., RACE AND RACES: CASES AND RESOURCES FOR A DIVERSE AMERICA 43 (2d ed. 2007) (defining “personal” racism).

personal, psychologically based forms of racism and bias.²⁵ By definition, unconscious and institutionalized racism may exist even in the absence of personal racism or bigotry. Systemic definitions of racism are the primary concern of critical race theorists, who often focus on explaining the “racism of law [a]s structural, not conspiratorial.”²⁶

Under a structural definition of racism,²⁷ law *schools* may be called racist against Blacks. One does not have to look very hard to see, or think very hard to understand why; but, one may have to be willing to acknowledge one’s unearned racial privilege—something that most folks find very hard to do. Legal institutions in America have upheld and supported the legacies of deep historical commitments to white supremacy and eugenics shot through American law and public policy. For example, the measures of merit—standardized tests, grades, even writing samples—are all infected by these histories and their contemporary manifestations.²⁸ This is not to say, of course, that Blacks cannot perform at high levels by each of these measures. It is simply to say that Blacks or any others who do not should not *necessarily* be deemed unworthy of legal education, even at so-called “elite” institutions.²⁹

25. PEREA ET AL., *supra* note 24, at 37. The seminal article on unconscious racism and law is Charles R. Lawrence III, *The Id, the Ego, and Equal Protection: Reckoning with Unconscious Racism*, 39 STAN. L. REV. 317 (1987). See also Lawrence III, *Unconscious Racism Revisited*, *supra* note 3; Mari Matsuda, *Are We Dead Yet? The Lies We Tell to Keep Moving Forward Without Feeling*, 40 CONN. L. REV. 1035, 1040 (“What Charles Lawrence did, was to make visible that which we routinely choose not to see. By positing the effects of racism as the proof of racism, and by explaining the role of collective, unconscious practices in producing these effects, he stole our innocence.”).

26. Richard Schur, *Critical Race Theory and the Limits of Auto/Biography: Reading Patricia Williams’s The Alchemy of Race and Rights Through/Against Postcolonial Theory*, 25.3 BIOGRAPHY 455 (2002) (citing Gerardieu Spann); see also PEREA ET AL., *supra* note 24, at 37–40 (defining “institutional racism” and various ways of defining racism and its variant strains).

27. “Structural” or “institutional” racism may be defined as “a highly organized system of race-based group privilege that operates at every level of society and is held together by a sophisticated ideology of color/race supremacy. Racist systems include, but cannot be meaningfully reduced to, racial bigotry.” Noel A. Cazenave & Darlene Alvarez Maddern, *Defending the White Race: White Male Faculty Opposition to a White Racism Course*, 2 RACE & SOCIETY 25, 42 (1999); see also Joe Feagin, SYSTEMIC RACISM: A THEORY OF OPPRESSION 1–4 (2006) (explaining the historic and ongoing systemic racism in the United States); PEREA ET AL., *supra* note 24, at 37 (defining “institutional racism”).

28. See William C. Kidder, *Does the LSAT Mirror or Magnify Racial and Ethnic Differences in Educational Attainment?: A Study of Equally Achieving “Elite” College Students*, 89 CAL. L. REV. 1055 (2001) (discussing scientific evidence that standardized tests unfairly penalize students of color).

29. For example, the University of Michigan has shown that it agrees. See *Grutter v. Bollinger*, 539 U.S. 306, 315 (2003) (offering evidence and argument in support of diversity program favoring admission of students with less competitive scores).

Subotnik does not see this. He does not understand or accept this definition of racism.³⁰ He therefore cannot see racism, systemic or otherwise, in law schools today. And so he simply repeats his demand that someone come along and “prove” to him that it exists.³¹

Professor Subotnik is entitled to his view, of course. Thankfully, and as a direct result of hundreds of years of struggle against racism and sexism waged by generations of whites, Blacks, men, and women all racialized differently before me, I am entitled to mine. My view is that if we agree on the importance of ending the legacies of white supremacy, and if we embrace the goal of democratic inclusion in law, we must be willing to “do more,” as Attorney General Holder said.³² We must be willing to take measures aimed at achieving it. For me, those measures would include improving educational opportunities for every child in America, at every level of our educational system—from kindergarten through J.D. and Ph.D. Improvements include work aimed at dismantling the structural supports of white male supremacy (and heteronormativity and classism) in American life, including in law schools. Structural racism, sexism, classism, and heteronormativity exist in law schools today—and yet many white men seem not to see it.

As a student and teacher of Critical Race Theory (“CRT”), this does not surprise me. I have seen this kind of difference in point of view over and over again in discussions about race and reality in integrated institutions. Indeed, the many differences between Subotnik’s argument and mine demonstrate a central problem identified and discussed by critical legal theorists—the problem of competing literacies and narratives; i.e., that whites and people of color repeatedly exhibit very different ways of “reading” the data or facts and circumstances that describe a particular issue, and develop very different (and hence competing) stories about them, as a result.³³ As critical race theorists have shown, “[t]o an important extent, minorities and whites are reading race as well as racism differently.”³⁴ It is this problem that both justifies and renders valuable the work of critical theorists who

30. Subotnik I, *supra* note 14, at 235–37; Subotnik II, *supra* note 5, at 769.

31. See Subotnik II, *supra* note 5, at 769 (criticizing Delgado and me for “fail[ing] to show antiblack racism in law schools”). This is true even though in his first essay, Subotnik writes that the question whether racism exists in law schools exists is “not the issue.” Subotnik I, *supra* note 14, at 235.

32. See A.G. Holder Remarks, *supra* note 5.

33. See CARL SCOTT GUTIERREZ-JONES, CRITICAL RACE NARRATIVES: A STUDY OF RACE, RHETORIC, AND INJURY 1–2 (2001).

34. *Id.*

seek a more democratic and inclusive academy, and more universally just law by recognizing the need to problematize the “natural narratives” that are the legacies of our inevitably limited experiences.

Critical race theorists have not only identified this problem; they have suggested concrete measures aimed at responding to it. One of these is to make reckoning with these different stories—beginning with a close exploration of our own—a key feature of learning, *and teaching*, the law.³⁵

Social cognition theorists are providing empirical evidence that, try as we might, each of us is limited in our capacity to “read” the world through unbiased lenses.³⁶ If Subotnik wants to truly understand the operation of racially subordinating processes in legal education, he must, like all of us, actively work to reduce the limitations of vision inherently produced by the limitations of his own experience. *One* way to do this is to be open to alternative ways of “knowing” what the law is and does, how it is made and why, and what effect it has in our world. He might do so by listening to the stories of others with an open heart, and by finding the courage to more fully explore his own. Failure to do so again and again reveals Subotnik’s calls for “honest dialogue” appear more clearly as what they are: a mask for avoiding true and self-reflective dialogue, and a way of justifying and remaining comfortable with the continuation of the subordination of Blacks and others in, through, and by law.³⁷

Concrete measures for developing the capacity to see and to own white privilege and other biases are elaborated through jurisprudence and methods of CRT. One might posit that Subotnik’s failure to take these narrative differences seriously, to respect the narratives of others, and to see his own racialized and gendered positionality as relevant to his own “arguments” on these issues,³⁸ both follows from and explains his rejection of CRT. In fact, his approach reveals all of the reasons why law schools need more, not less, teaching of the jurisprudence and methods of CRT. This brings me to the second prob-

35. See, e.g., KIMBERLÉ WILLIAMS CRENSHAW ET AL., *CRITICAL RACE THEORY: THE KEY WRITINGS THAT FORMED THE MOVEMENT*, at xiii (1995).

36. See, e.g., Jerry Kang, *Trojan Horses of Race*, 118 HARV. L. REV. 1489, 1493 (2005) (describing accumulating, reliable research illuminating unconscious and non-obvious ways that “race alters intrapersonal, interpersonal, and intergroup interactions”).

37. *But see* HARLON DALTON, *RACIAL HEALING* 109–10, 115–16, 118 (1995) (pointing out the harm done by whites’ inability to recognize their own whiteness and white privilege, and calling for whites to “own” their own whiteness, white privilege, and to unlearn their habits of disowning race); *id.* at 148, 155–56 (calling for narratives that explain the link between slavery, segregation, and contemporary bias against Blacks in America).

38. Subotnik II, *supra* note 5, at 763.

lem illuminated by Subotnik's essay: the problem of competing jurisprudential and methodological frames.

B. The Problem of Competing Jurisprudential and Methodological Frameworks

CRT problematizes the competing world views that are the natural result of different lived experiences in a world marked by sexism, racism, and similar socially constructed realities. As a matter of fact, the CRT approach specifically embraces the narrative methodology as a means of grounding jurisprudential insights in the real world. Indeed, "Critical [R]ace [T]heory has differentiated itself from traditional legal criticism in part by insisting on the importance of auto/biography in shaping legal doctrine and practice."³⁹ CRT follows in the footsteps of the Realist and Critical Legal Studies traditions, taking as a given that law is a social construction. As such, the processes by which law is made must be seen in their full complexities. To fully understand these processes, an interdisciplinary, multiple-methodological approach is necessary.

For example, CRT co-founder Patricia Williams begins her seminal text by asserting that "[s]ince subject position is everything in my analysis of the law, you deserve to know that it's a bad morning. I am very depressed."⁴⁰ This is a classic example of a narrative embracing "standpoint theory," the view that knowledge derives from the particular sociological location of the author,⁴¹ and applying this epistemological approach to analyses of law. Williams has reportedly described race as one of the "governing narratives" or "presiding fictions" by which we constantly reconfigure ourselves in the world.⁴² Williams "shows how dominant racial fictions determine what claims of racial discrimination are possible or impossible to articulate,"⁴³ and hence, impossible to remedy.

Having long ago established the importance of narrative as *one* methodology useful to developing deep insight, understanding and meaning making in law,⁴⁴ critical race theorists in a variety of disci-

39. Schur, *supra* note 26, at 455.

40. WILLIAMS, *supra* note 1, at 1.

41. See Patricia Hill Collins, *Learning from the Outsider Within: The Sociological Significance of Black Feminist Thought*, 33 SOC. PROBS. S14-S16 (1986).

42. WILLIAMS, *supra* note 1, at 256.

43. Schur, *supra* note 26, at 456.

44. *But see* Kang, *supra* note 36, at 1496 (describing the methodological "war" over the value of narrative that "we endured in the 1980s and 1990s" as "unhelpful," and positing that "multiple methodologies produce the deepest insight").

plines have since taken up the work of the next phase: that of elaborating more vividly, and, I hope, persuasively, the link between narrative, meaning, and law and public policy.⁴⁵

My call in the preceding essay for more of Subotnik's own narrative⁴⁶ was aimed at enlisting him in this project: in personal reflection on his own life experience—through the lens of his own race—to bring these insights to bear on the discussion at hand. His brief discussion of ways he has felt limited in his capacity to speak to race issues as a white man⁴⁷ is, well, quite a limited start. Subotnik's *experience* of his own *raced* existence did not *begin* at the point at which he sought to teach a course in the area and was denied—even if one may surmise from his response to my query in this colloquy that his *consciousness* of it just may have.⁴⁸

So the question remains—what else can you tell us, Professor Subotnik, about what it has been like to live deep into adulthood as a white man? What more can you tell *yourself*? And what of the *privileges* of your raced and gendered life: have you known *none*? What might you say of all of the many ways your race and gender *did not* hinder you on your way? Perhaps the following prompts might help: when did you first learn the meaning of race in the United States—and, of your own in the community in which you lived? If your story is anything like many of my students, your own family immigration history might be revealing of how race has impacted your own understanding of these matters, and would be worth pondering as you prepare to discuss this matters. Assuming you were raised in the United States, what was it like growing up in your corner of America? And so on.

Asking myself these sorts of questions has helped me see, for example, some of the ways in which my own path in life has so far been

45. See Robert M. Cover, *Supreme Court Foreword—1982: Nomos and Narrative*, 97 HARV. L. REV. 4, 7, 10, 44–60 (1983) (describing how law is shaped by “interpretive commitments” that reflect and depend on personal narratives, and arguing that “[n]o set of legal institutions or prescriptions exist apart from the narratives that locate it and give it meaning;” and “[t]he codes that relate our normative system to our social constructions of reality and to our visions of what the world might be are narrative”); GUTIERREZ-JONES, *supra* note 33.

46. Magee, *Integral Critical Approach*, *supra* note 10, at 283–84.

47. Subotnik II, *supra* note 5, at 763.

48. Critical race and gender theorists have sought to raise the consciousness of whites and males of their often disavowed racial, gender and racially and gendered privileged experience. See, e.g., STEPHANIE WILDMAN & ADRIENNE DAVIS, *PRIVILEGE REVEALED: HOW INVISIBLE PREFERENCE UNDERMINES AMERICA*, at xi (1996); Peggy McIntosh, *White Privilege: Unpacking the Invisible Knapsack*, in RE-VISIONING FAMILY THERAPY 10 (1989); c.f. DALTON, *supra* note 37, at 105 (stating “Most White people, in my experience, tend not to think of themselves in racial terms,” and discussing his own male privilege as a lens through which he understands whites difficulty seeing their racial privilege); *id.* at 110.

at least partly smoothed by unearned privileges as a result of my status as a heterosexual woman from an ethnic background not typically associated with a recent immigrant experience. It is my belief that all of us have an obligation to engage in this kind of self-reflection, and must do so especially if we want to effectively and respectfully engage others about their views on these difficult issues. And to demand the right to teach race and law in American law schools without committing to such self-reflection as a necessary part of one's preparation for the task is an exercise in conceit.

The narratives I call for each of us to include in analyses of law-in-context are those which reflect relevant aspects of all of our lived experiences, and thus shed fuller, more ambient light on all of our lived experiences in the matter of race and gender in our lives. This is what an anthropologist of law would call "autoethnographic" reflection.⁴⁹ It helps us see the ways that lived experiences shape the life and meanings of law, and thus, help us to better understand law itself.

Subotnik's failure to understand the importance of this sort of narrative to legal analysis and argument should surprise no serious student or teacher of CRT. His jurisprudential inclinations reflect traditional forms of argument and methodology.⁵⁰ His inability to appreciate the insights of CRT demonstrate the problem of competing jurisprudences—a problem that flows in part from, and is exacerbated by, the problem of competing narratives and habits of reading "facts" and circumstances discussed above.

C. The Integral Critical Approach as a Solution to the Problems of Competing Literacies and Jurisprudences

To resolve these problems, we must first recognize them outside of the limited space of courses and articles devoted to CRT. For me, this colloquy has been a step in that direction. But we must do more. As this essay shows, the discussion among Subotnik, Delgado, and me in these *Law Review* pages highlights two profound and persistent areas of conflict among mainstream and outsider approaches to race. Addressing and navigating these conflicts is difficult.⁵¹ Doing so effec-

49. Magee, *Integral Critical Approach*, *supra* note 10, at 276 n.59.

50. See ROBERT L. HAYMAN, JR. ET AL., *JURISPRUDENCE CLASSICAL AND CONTEMPORARY: FROM NATURAL LAW TO POSTMODERNISM* 156–58 (2d ed. 2002) (describing formalism and its origins in the Langdellian moment at Harvard Law School, circa 1870).

51. Some scholars seem tempted to give up trying. *C.f.* Kang, *supra* note 36, at 1495 ("Race talk in legal literature feels like it is at a dead end. No new philosophical argument or constitutional theory seems to persuade those sitting on one side of the fence to jump to the other.").

tively in the twenty-first century may well require commitments to addressing these conflicts in ways informed by the assumption of mutual respect and interdependence set forth in the approach I call Humanity Consciousness, and the methods and skills of the approach I call the Integral Critical approach.

Subotnik does not accept my challenge to commit to these ways of more effectively and authentically addressing these conflicts. He suggests, without any analysis at all, that my request is somehow less “realistic” than that of Harlon Dalton, the author of *Racial Healing: Confronting the Fear Between Blacks and Whites*.⁵² It is not clear which work, Dalton’s or mine, Subotnik misreads. Fairly understood, my approach complements that of Dalton, who acknowledges that we fail to deal well with race for fear of “tapping into pent up anger, frustration, resentment and pain.”⁵³ But my approach extends Dalton’s by calling for an explicit commitment to mutual respect, compassion, and empathy as “ground rules” for discussions about these matters with emotional intelligence.⁵⁴ It is difficult for me to see how an approach to race dialogue which incorporates the insights of emotional intelligence can fairly be deemed anything but more realistic than one that is not.

Moreover, I know from my experience facilitating hundreds of these kinds of open conversations that this is not too much to ask. Preliminary evidence indicates that the Integral Critical approach can work. For example, just this semester, in a class entitled “Racism and Justice in American Law,” my students compiled a set of their own “Commitments” to support more respectful, genuine communication in our class.⁵⁵ By my students’ own reports, these commitments helped make it easier for them to speak more honestly about their

52. HARLON DALTON, *RACIAL HEALING: CONFRONTING THE FEAR BETWEEN BLACKS AND WHITES* 4–5 (1995).

53. *Id.* at 3.

54. See DANIS BOIS, *THE WILD REGION OF LIVED EXPERIENCE* 79 (2009) (discussing the skill of “body-mind tuning” as a medium for “saying things that can be heard by other people” with a focus on one expressing oneself and listening to others: “anything can be said, but there is an appropriate way to say it”); Magee, *Integral Critical Approach*, *supra* note 10, at 286.

55. Following is a list of “Genuine Conversation” Commitments generated by students in my Spring 2009 Racism and Justice and American Legal History class, through a guided but anonymous process:

- (1) Full participation, by everyone. (“I will join the conversation.”)
- (2) Genuine effort to listen fully. Without interruption and, to the degree possible, without judgment.
- (3) Be mindful of use of phrases such as “us” and “them” (or “we/they”).

thoughts and concerns in our class.⁵⁶ This is just a beginning, but it is a beginning that deserves support, further research and development, and wider dissemination.

Each of us must confront the legacies and continued operation of white male supremacy in the law. As the Attorney General suggests, as members of the legal profession, we have an ethical obligation to do so. And yet, doing so makes most people uncomfortable, and specifi-

(4) Presumption that all are well-intentioned, and giving one another the benefit of the doubt.

(5) Avoid attacking. (Here's a hint from Professor Magee: Practice staying on "your side of the net." E.g., "When you said ____, I felt or sensed in myself ____, " or ". . . I thought back to. . ."—that is, discussing *your* feelings and experience, rather than analysis, judgment or attack of the other.)

(6) Mutual respect.

(7) Honesty to the degree possible.

(8) Empathy to the degree possible.

(9) Practice awareness of your reactivity. Pause and notice your reactions before raising a hand to respond to another.

(10) Be mindful of the limitations of our perspectives that necessarily flow from the limitations of our lived experiences.

(11) [*Confidentiality via anonymity*]: okay to share content of class conversations, as long as not sharing speaker or identifying aspects of speaker (because our conversations, and the conversations with others that they spawn, can "be part of an evolution forward").

(12) A final commitment, added by one student after the original exercise, was that students take their learning from this class into others—a suggestion that reflects the desire for praxis.

"Genuine Conversation" Commitments (Spring 2009) (on file with author).

56. All of the responding students (12 of 15) recommended this exercise for future seminars on this topic, even the one respondent who believed that he/she had not "made all that much of a difference." Among the comments of my students are the following:

"[The Class Commitments have] allowed more openness. Also, I have been less judgmental to the comments of others."

"These commitments have mainly kept me attentive to my words/actions not only in class, but also in everyday life, which is what I hoped they would do."

"I definitely felt more free to participate and express my opinions more openly and with less censorship than I might normally. I also felt a greater obligation to participate since I had helped draft the commitments."

"They impacted both my participation in the class and my relationships with the other students."

"They [] helped me to reflect on my reactions to other people's comments."

"The commitments help us to uphold mutual trust, so the conversation is more comfortable for everyone."

Original Results of 2009 Survey of Alternative Pedagogical Methods (Spring 2009) (on file with author).

cally may leave some of us more vulnerable than others. Too often, those left vulnerable by these discussions are those who have traditionally borne a disproportionate burden of race and sex in America, and not those who are privileged by the overarching white male supremacy. On behalf of those who are left vulnerable, I say, simply, enough. Those of us seeking real change need to ask of ourselves something more and we can look to the findings of disciplines focused on human behavior, psychology, and communication for help.

The Integral Critical approach I suggest can provide much needed support for those interested in working together in multiracial coalitions to address and perhaps reconcile the competing narratives and jurisprudential philosophies that make understanding across the lines of color and gender so seemingly hard to come by. It can provide the support we need to find faith in one another, and in ourselves; to do the work of self-reflection; and, to have the one hard conversation after another that is the inevitable way toward an inclusive academic community in the wake of centuries of white male privilege in America. For it is not being called a racist, borderline or otherwise, in the midst of such a discussion that determines whether or not the discussion has succeeded;⁵⁷ it is what we think, say, or do in response.

The Integral Critical approach asks that we listen with an open heart to the competing narratives of those with whom we engage, and set about to approach the next conversation from a place not *merely* of *argument* but of self-reflection and awareness, of humility and empathy. This is the way forward: toward genuine healing through a process that embodies not merely mudslinging, nor “unadulterated struggle,”⁵⁸ but the reliance on the insights of healing-therapies and contemporary psychological research and so does not recklessly wound in the process. Doing so requires work. It requires that we each look more closely within. The good news is that, fortified by a growing body of research that confirms the value of more humanizing methods, an inclusive community is emerging within law, and is committed to doing nothing less.

D. Conclusion

To presume interdependence of all humankind, to demand a commitment to mutual respect, and to aspire toward what Martin Lu-

57. Subotnik II, *supra* note 5, at 769 (complaining that he was called a “borderline racist” by a member of his faculty).

58. Subotnik I, *supra* note 14, at 230 (citing Harlon Dalton).

ther King, Jr. called the Beloved Community—in which a fierce mutual respect and unsentimental love is the dominant touchstone for justice—is what race law discourse needs to carry forward with effectiveness now.⁵⁹ The Integral Critical approach that I propose is a step in that direction. This approach finds support in both psychological and educational theory, and gives us concrete tools to assist us in addressing the underlying fear, mistrust, and desire for mutual recognition with increasing faith in one another that we all carry.

This approach recognizes that we can do so in a way that is as “full-throated” as it is mutually respectful and mutually compassionate. Ignoring the voices of white men—or anyone else—around issues of race or gender (or other markers of difference) is not a show of interdisciplinary, social or emotional intelligence, or of ethically grounded, compassionate integrity. Ignoring the ways in which law schools remain structurally or in other ways racist is not a show of interdisciplinary, social or emotional intelligence, or of ethically grounded, compassionate integrity. Frank discussion and common struggle together over difficult issues need not, and indeed must not, require us to leave human kindness at the door. Indeed, the way forward is and must be one which sheds as much warmth as light—one which, at long last, aims consciously at illumination without alienation.

Epilogue

It's another Monday morning. Since you are reading these words, you deserve to know that as I write this, I am suffering through the early stages of a head cold. My “under the weather” feelings began with the typical symptoms—scratchy throat, stuffy nose, a weary headache. The day before, I had attended a meeting of the homeowners association (“HOA”) of my six-unit building. I am privileged, economically, to live in a building that many in the City could not afford. Not unrelatedly, there are few other residents of color in my neighbor-

59. Many are unfamiliar with this aspect of Martin Luther King, Jr., that is, King as radical human rights universalist. Indeed, King ultimately called for a “genuine revolution in values”:

This call for a world-wide fellowship that lifts neighborly concern beyond one's tribe, race, class, and nation is in reality a call for an all-embracing and unconditional love for all men. . . . When I speak of love I am not speaking of some sentimental and weak response. I am speaking of that force which all of the great religions have seen as the supreme unifying principle of life.

MARTIN LUTHER KING, JR., *I HAVE A DREAM: WRITINGS AND SPEECHES THAT CHANGED THE WORLD* 150 (1992).

hood. *I wonder: could there be some connection between the present failure of my immune system and something I experienced during the HOA meeting?*

It's true that I had been feeling quite a bit of sadness since the meeting, because of an incident worth reporting here. At the meeting I learned that the tenant in the "penthouse" unit wants out of his lease. His landlord, and my co-owner for the past eight years—a man I will call "Bob" (not his real name, of course)—was just describing our building as being "San Francisco"—comprised of a diverse group that included whites, an Asian, a Black, and gays. He waxed exuberant about how well we had gotten along together over the years. He reported that "you don't get this where I live now"—he and his family had moved, he acknowledged, with apparent regret, to a South Bay suburb that was decidedly not diverse.

His tone then shifted; he was preparing to reveal something generally not stated, and we needed a bit of a clue. "I'm sorry for not being P.C.," he said. Then he shared with us his own interpretation of his tenant's "real" concerns. "He doesn't want to hear about a Black lawyer in the building," Bob stated bluntly. "He doesn't want to hear about a gay couple in the building." This, according to Bob, was the real reason the tenant wanted his family out of our building. Explicit, intentional racism—the old-fashioned, personally motivated kind—was being alleged by a white man against me here (along with, of course, straight-up homophobia). The tenant, who happens to be from the Middle East, soon came in for his own cultural-racist and indeed hyper-masculinist outburst: "He's a prick," Bob shouted. "They're Al Qaeda!" He continued, nearly shouting across the table now.

What didn't happen next is equally informative. Nothing happened next. Nobody gasped. Nobody feigned shock. The owners around the round table—myself, a single white woman, a single white man, a single Chinese American man, the aforementioned gay couple (who are two white men), and the white couple of which Bob is the husband—range in age from mid-twenties to early sixties.

Apart from a smattering of faintly disapproving nervous laughter, we all sat silently in the face of this "report." We continued to sip wine and champagne, to nibble on purple-red grapes, blue cheese, almonds, and thinly shaved prosciutto. No one felt compelled even to feign surprise. No one felt compelled, either, to extend any apologies—other than, as observed above, for "not being P.C." Meanwhile, I had begun to feel smaller in my seat. Since the first mention of "a Black lawyer" about which the tenant "did not want to hear," I'd suddenly felt defined by, reduced to, the color of my skin. My heart rate increased. I could not help noting that no one looked me in the eye for some time after that. I said nothing. Eyes fixed placidly on our speaker, and with no visible emotional response, we changed the subject quickly and smoothly. Even-

tually the meeting wound down to its natural close. The racial (and hetero-dominant) moment that we had experienced together, like many that show up in integrated settings, arose and passed without any discussion at all.

Thus at least a few honest words about race came out of the mouth of at least one white man this weekend in San Francisco, California. My guess is that, were Subotnik to listen, he would have heard some of the same—virtually uncensored words of racism and bias—in his own circle at some point over the past week as well. Race and bias infects every aspect of our lives, and so, naturally, and perhaps especially, infects real estate marketing and related wealth-making, asset distribution and redistribution—issues implicitly raised by my neighbor's disturbing outburst. Asset distribution and redistribution infect many other things, including one's access to high-quality education.

Indeed, one of the signal features of racism and racialization in America is the long-standing practice of constructing the meaning of race through the construction of racialized spaces. And this association of race and real estate and lending goes on, even under the optimistic eye and warm smile of our first Black president. This is why no one should be surprised about the NAACP's recent lawsuits alleging racial steering in mortgage lending. It is also why no one should be surprised to find racism in law schools—another traditionally racially identified, heterosexist space—a space previously explicitly preserved for straight white men. Explaining all of this is tiresome work, and it is work I now happily leave to any others willing to do it—and to do it with the courage of naming their reality in the process.

It's now Monday afternoon. The HOA meeting is well behind me. Only the aches—and these new chills and sniffles—remain. And at this hour, on this day in 2009, Msnbc.com is reporting that a German company has been marketing a fried chicken product called "Obama Fingers"—a reference to America's first "African American president." How would you read such a product, Professor Subotnik, or the claims of racial insensitivity with which it has been met? And does racial debate within the domestic (and international) cultures that produce American law and legal education have no impact on those institutions? In other words, how do you read these connections, and what is the story about them that you will tell yourself that will shape the interpretive commitments reflected in your analysis of race law and policy? What does this product, and the culture's reading of it, tell us about the continuing presence of within our culture of racial stereotypes than link certain racialized bodies with certain foods and other practices—stereotypes that that undergird the racial stories that perpetuate, often unconsciously, racial disparity in legal education and the broader culture of the United States, and the world?

The work of navigating the terrain of race and other forms of Othering and subordinating in the world today, and of assisting our students as they

seek to do this with ethical grounding, cultural competency, and interpersonal skill, turns up almost anywhere we look. Dealing with this reality honestly and adroitly is not for the faint of heart. It is not for one not given to ongoing self-examination. I wish you support and self-awareness, Dan, on your journey through the reckoning with race and racism that you seek.

A week has passed since I completed what were to be my “final” edits to this essay. Reflecting on it for the last time (really!) this morning, I am struck by what, by my own hand, has NOT made it into the light.

For example: last December, I received an e-mail from Professor Subotnik. Apparently, he had received a copy of a draft of my response to his first article in this colloquy. In his e-mail, Professor Subotnik made an unexpected move toward genuine verbal communication with me: “I want to take you up on your kind offer to talk (your draft response to my article). I never expected such a long, thoughtful, and welcoming response.”⁶⁰ Although I responded with enthusiasm (“Let’s find a way”),⁶¹ to date, our conversation has essentially been limited to the pages within the University of San Francisco Law Review.⁶²

I am not much troubled by the fact that we have not yet spoken together as Professor Subotnik invited us to do. I trust that we may, someday. But more to the point, my effort here has been to explore ways of encouraging such genuinely reflective dialogue in the pages of the law reviews in which we “work.” Still, I find it noteworthy that, until this moment, none of this “soft” exchange had surfaced in our “official” written colloquy. I wonder why not. Although it may be that these brief, encouraging messages in some way impacted what we each have written in our responses to one another (and I believe they necessarily did), what explains our mutual silence about them?

The answer may once again be found in our mutual liberal legal educations, the formal and informal trainings we each endured regarding the appropriate scope of our discussions in academic print, and about the

60. E-mail from Dan Subotnik, Professor of Law, Touro Law Center (Dec. 30, 2008, 21:13 PST) (on file with author).

61. E-mail from Rhonda Magee, Professor of Law, University of San Francisco School of Law (Dec. 30, 2008, 12:35 PST) (on file with author).

62. Professor Subotnik and I had a second brief exchange of emails related to the topic of “gratefulness.” E-mail from Rhonda Magee, Professor of Law, University of San Francisco School of Law (Mar. 11, 2009, 17:02 PST) (on file with author); E-mail from Dan Subotnik, Professor of Law, Touro Law Center (Mar. 11, 2009, 17:17 PST) (on file with author). I sent the same “gratefulness” email to Professor Delgado, which sparked a short exchange with him as well. E-mail from Rhonda Magee, Professor of Law, University of San Francisco School of Law (Mar. 11, 2009, 17:02 PST) (on file with author); *see also* E-mail from Richard Delgado, Professor of Law, Seattle University School of Law (Mar. 11, 2009, 17:24 PST) (on file with author).

appropriateness of “walls” between formal and informal communication—trainings that, whatever else they do, effectively discourage engagement at an undefended, interpersonal level. These trainings are so deep that even one aiming specifically at challenging them (like me!) will be lulled into reenacting many of their embedded norms.

And so, in unmasking, reconsidering and supplementing these trainings, I want support and greater self-awareness. I have as much need of these as may Dan Subotnik. After all, there will always be “your view” and “my view.” Present quietly among these competing views, however, is the luminous view of the Whole. I want to think, talk, write, and teach about our differences in a way that begins by acknowledging “my view” and listening to “yours,” yet continuously invites our mutual and sustained reflection on, and eventual communication through, that third view—an Integral view. And I realize here again, humbly and with gratitude, that I cannot do this alone.

May we walk together in the light of this unyielding quest.