In Celebration of Twenty-Five Years

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The Honorable Roger Traynor wryly noted, "It is more fun to dedicate law reviews than to edit them."[1] Now having done both, I wholeheartedly agree. Like Traynor, I am an undying fan of law reviews.[2] Law reviews are remarkable institutions; that the editing, writing and publication of so much legal scholarship has been entrusted to students is one of the most unique aspects of the law.[3] Indeed, many scholars roundly criticize student-edited law reviews,[4] with one critic commenting:

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[1] Roger J. Traynor, *To the Right Honorable Law Reviews*, 10 UCLA L. REV. 3 (1962-63) (writing on the occasion of UCLA Law Review's tenth anniversary).

[2] "There is in no other profession and in no other country anything equal to the student-edited American law review, nurtured without commercial objective in university law schools alive to the imperfections of the law, and alert to make space for worthy commentary of an unknown student as well as for the worthy solicited or unsolicited manuscript of renowned authority . . . . Time is with the law reviews. An age that churns up problems more rapidly than we can solve them needs such fiercely independent problem-solvers with long range solutions." Traynor, *supra* note 1, at 8-10 (quoted in Richard S. Harnsberger, *Reflections About Law Reviews and American Legal Scholarship*, 76 NEB. L. REV. 681 (1997)).

[3] According to critics, "Far and away, the most noted facet of student-run law reviews — and the one that allegedly causes all their other quirks – is the fact that students run them. Students select articles written by professors, judges, practitioners – their experiential and – hell! — moral superiors. Students then edit and criticize . . . often without reservation and often without the benefit of any experience." James W. Harper, *Why Student-Run Law Reviews?*, 82 MINN. L. REV. 1261, 1270 (1998). However, Harper refutes complaints that students are not qualified to select and edit by noting "[l]aw is not like other academic pursuits or the sciences, where reification and new levels of abstraction are . . . improvements . . . . "[L]aw should be understandable. Let lawyers talk to each other in their own language from time to time, but law is not served by relying to excess on legal jargon, veering into abstract theory, or rendering legal principles less clear." *Id.* at 1280. He approves that students "select articles they can grasp, then edit them to maximize their own understanding." *Id.* at 1279.

[4] For a sample of the vast body of literature criticizing student-edited law reviews as the main source of legal scholarship, *see e.g.*, Fred Rodell, *Goodbye to Law Reviews*, 23 VA. L. REV. 38 (1936-37) ("The average law review writer is peculiarly able to say nothing with an air of great importance."); Fred Rodell, *Goodbye to Law Reviews – Revisited*, 48 VA. L. REV. 279 (1962) (offering an irreverent, humorous rant against the student-run law reviews); Bernard J. Hibbitts, *Last Writes? Reassessing the Law Review in the Age of Cyberspace*, 71 N.Y.U. L. REV. 615, 628-54 (1996); Bernard J. Hibbitts, *Yesterday Once More: Skeptics, Scribes and the Demise of Law Reviews*, 30 AKRON L. REV. 267 (advocating self publishing online); Richard A. Posner, *The Future of the Student-Edited Law Review*, 47 STAN. L. REV. 1131, 1133 (1995); Roger Crampton, *The Most Remarkable Institution: The American Law Review*, 36 J. LEGAL EDUC. 1 (1986) (opining that students do not have the background to select or edit submissions and questioning the future of the traditional law review). John Kester concludes that as student-edited law reviews fade (replaced by professional journals), "we will no longer enjoy the myth

> In the classic description, students without law degrees set the standards for publication in the scholarly journals of American law – one of the few reported cases of the inmates truly running the asylum. The baffled outsider is expected to marvel at how the legal profession, unlike any other, can rely so exclusively for scholarly discourse on journals edited by students.[5]

Despite the naysayers, law reviews, and particularly the University of Hawai'i Law Review, have successfully assumed an important role in legal education and in promoting scholarly discourse in the legal community.[6] Writing student notes or comments and reading, selecting and editing the works of noted scholars obviously provides a substantial learning opportunity to students.[7] In addition, working with and motivating authors and critiquing the work of seasoned law professors are unparalleled learning experiences.[8] Law review is not just a teaching tool. We also know that law review membership is a mark of distinction that earns members more post-law school

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that students set the intellectual standards for the legal profession. But that is all right. They never should have. And they never really did." John G. Kester, *Faculty Participation in the Student-Edited Law Review*, 36 J. LEGAL EDUC. 14, 17 (1986).

[5] Kester, *supra* note 4, at 14.

[6] *See e.g.*, Harper *supra* note 3. Additionally, Harper approves that students "select articles they can grasp, then edit them to maximize their own understanding." *Id.* at 1279.

[7] *See id.* (commenting that "the teaching function is an important purpose of the student-run law review" and writing a note or comment benefits the writer and the student editor); *see also* Traynor, *supra* note 1, at 4-5 ("law reviews that enable some students, and ideally should enable all students, to refine and also broaden their education, render consequential service to the legal profession").

[8] The value of the "people skills" and "thick skin" developed to manage outside authors should not be underestimated. The Chicago Kent Law Review wrote candidly about the arrogance of some authors:

> An editor sent a manuscript back to an author with a relatively long list of suggestions she thought would improve the article. The author responded with a scathing letter that rejected virtually all the changes and claimed that "it is virtually impossible for you to suggest an alternative construction of a sentence that I have not already considered and rejected. I've been doing this for a long time and I know what I'm doing." The Law Review responded with a letter explaining our policy of deferring to the author, but encouraging the author to at least consider our changes. His response included the following passage, which addressed the Law Review's argument that no article is beyond improvement and that given the disparity in quality of manuscripts submitted to us we have an obligation to try and improve each of them: "Now it is certainly the case that some law professors cannot write their way out of a paper bag: as the year goes along you will see a huge quantity of miserable writing, all by people older and more experienced than you are . . . . You will also see some things (one anyway) that are very well written, so well written that they are very hard to improve (so far as the writing is concerned). My article is like that."

Executive Board of the Chicago Kent Law Review, *The Symposium Format as a Solution to the Problems Inherent in Student-Edited Law Journals: A View From the Inside*, 70 CHI.-KENT L. REV. 141, 149-50 n.29 (1994).

opportunities than the rest of a law school's student body.[9] However, membership does not grant a student a free ride, it is the experience, not the status, of law review membership that makes law review members desirable to employers.[10] Villanova's Professor John Gotanda (Editor-in-Chief 1987) confirms that law review is an excellent training ground:

> I found working on the Law Review both challenging and exciting. It vastly improved my ability to perform in-depth legal research and to think critically about legal issues, and refined my writing and editing skills. It also taught me how to work as part of a highly qualified team. These skills have served me well in my professional life.

Each school benefits from the student's efforts as well; a well-run law review brings prestige to the law school, and the school continues to benefit from the achievements of law review graduates.[11] These students often begin their legal career with prized judicial clerkships. Besides distinguished careers in private practice, government, and industry, some remain in or return to academia[12] or become jurists.[13]

Law reviews promote legal discourse that benefits the entire legal community. Earl Warren once commented, "If it were not for [law reviews'] critical examination, we would have a great void in the legal world. Courts would have few guidelines for appraising the thinking of scholars and students

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[9] "Another purpose of student-run law reviews, complimentary and subsidiary to the teaching function, is distinguishing among students for legal employers . . . . Knowing who is on law review helps law firms and judges decide who to interview and hire as associates and clerks." Harper, *supra* note 3, at 1274. More cynically put, "The point of law review from the beginning has been to separate the best from the merely good for the benefit of fancy employers—first corporate, then corporate and judicial. Employers liked this separation because it lowered their costs first by limiting the number of students who might plausibly have merited an interview and second by teaching each student something useful for his new job - how to endure intense boredom for the corporate types, how to write a judicial opinion for the aspiring clerks." John Henry Schlegel, *An Endangered Species?*, 36 J. LEGAL EDUC. 18 (1986).

[10] Law review members are attractive employees not merely because they sit at the top of their class. They bring skills to the workplace that distinguishes them from other students. "[T]he best help of all to employers is the certification 'law review student.' This guarantees that the 'school within the school' has trained the student to perform many of the tasks judges and lawyers want employees to do. It is this ultimate law review credential that truly saves employers tremendous amounts of time, money, and energy." Harnsberger, *supra* note 2, at 686.

[11] *See* Harper, *supra* note 3, at 1276-78.

[12] Those pursuing careers in academia include: Lawrence Foster (University of Hawaii), John Y. Gotanda (Villanova), Danielle Hart (Southwestern), Hazel Beh (University of Hawaii), Mari Matsuda (Georgetown), S.Y. Tan (University of Hawaii John A. Burns School of Medicine), Laurie Tochiki (University of Hawaii), Judith Weightman (University of Hawaii), and Susan Marie Connor (John Marshall).

[13] Distinguished jurists include Sabrina McKenna, Elizabeth Hifo (Bambi Weil), and Karen Ahn.

or of the bar itself. It is largely through them that we are able to see ourselves as others see us."[14] As evidence of their impact, student works in Hawai'i's law review have been widely read and cited in legal scholarship[15]

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[14] Earl Warren, *Upon the Tenth Anniversary of the UCLA Law Review*, 10 UCLA L. REV. 1 (1962-63).

[15] *See e.g.*, Suzianne D. Painter-Thorne, Comment, *Contested Objects, Contested Meanings: Native American Grave Protection Laws and the Interpretation of Culture*, 35 U.C. DAVIS L. REV. 1261 (citing Isaac Moriwake, Comment, *Critical Excavations: Law, Narrative, and the Debate on Native American and Hawaiian "Cultural Property" Repatriation*, 20 U. HAW. L. REV. 261, 242 (1998)); Tracy Schacter Zwick, *Over Privileged? A Guide To Illinois Attorney Privilege to Defame*, 86 ILL. B.J. 378 (1998) (citing M. Linda Dragas, *Curing a Bad Reputation: Reforming Defamation Law*, 17 U. HAW. L. REV. 113, 115 (Summer 1995)); David Tomlin, *Sui Generis Database Protection: Cold Comfort for Hot News*, 19 SPRING COMMUNICATIONS L. 15 (2001) (citing Rex Y. Fujichaku, *The Misappropriation Doctrine in Cyberspace: Protecting the Commercial Value of "Hot News" Information*, 20 U. HAW. L. REV. 421, 446 (1998)); R.A. Conrad, *Searching for Privacy in All the Wrong Places: Using Government Computers to Surf the Internet*, 48 NAVAL L. REV. 1 (2001) (citing Jared D. Beeson, *Cyberprivacy on the Corporate Intranet: Does the Law Allow Private-Sector Employers to Read Their Employees' E-mail?*, 20 U. HAW. L. REV. 165 (1998)); Patrick Boyd, Note, *Tipping the Balance of Power: Employer Intrusion on Employee Privacy through Technological Innovation*, 14 ST. JOHN'S J. L. COMM. 181 (1999) (citing Jared D. Beeson, *Cyberprivacy on the Corporate Intranet: Does the Law Allow Private-Sector Employers to Read Their Employees' E-mail?*, 20 U. HAW. L. REV. 165 (1998)); Sherry Talton, *Mapping the Information Super Highway: Electronic Mail and the Inadvertent Disclosure of Confidential Information*, 20 REV. LITIG. 271 (2000) (citing R. Scott Simon, Recent Development, *Searching for Confidentiality in Cyberspace: Responsible Use of E-Mail for Attorney-Client Communications*, 20 U. HAW. L. REV. 527 (1998); Shelly Ross Saxer, *Planning Gain, Exactions, and Impact Fees: A Comparative Study of Planning Law in England, Wales and the United States*, 32 URBAN LAWYER 21 (2000) (citing Michael B. Dowling & A. Joseph Fadrowsky III, Casenote, Dolan v. City of Tigard: *Individual Property Rights v. Land Management Systems*, 17 U. HAW. L. REV. 193, 209 (1995)); Yuval Merin, *The Case Against Official Monlingualism: The Idiosyncracies of Minority Language Rights in Israel and the United States*, 6 ILSA J. INT'L & COMP. L. 1 (1999) (citing Susan Kiyomi Serrano, *Rethinking Race for Strict Scrutiny Purposes: Yniguez and the Racialization of English Only*, 19 U. HAW. L. REV. 221 (1997); Carol J. King, *Burdening Access to Justice: The Cost of Divorce Mediation on the Cheap*, 73 ST. JOHN'S L. REV. 375 (1999) (citing Renee M. Yoshimura, Recent Development, *Empowering Battered Women: Changes in Domestic Violence Laws in Hawai'i*, 17 U. HAW. L. REV. 575, 576 (1995)); Stephan Wilske, Teresa Schiller, *Jurisdiction Over Persons Abducted in Violation of International Law in the Aftermath of* United States v. Alvarez-Machain, 5 U. CHI. L. SCH. ROUNDTABLE 205, 241 (citing Elizabeth Chien, Note, 15 U. HAW. L. REV. 179 (1993)); Barbara Glesner Fines, *Joinder of Tort Claims in Divorce Actions*, 12 J. AM. ACAD. MATRIMONIAL LAW 285, 302 (1994) (citing Lori L. Yamauchi, Note, Gussin v. Gussin: *Appellate Courts Powerless to Mandate Uniform Starting Points in Divorce Proceedings*, 15 U. HAW. L. REV. 423, 450 (1993)); Kirsten K. Davis, *Ohio's New Administrative License Suspension for Drunk Driving: Essential Statutes Has Unconstitutional Effect*, 55 OHIO ST. L.J. 697, 697 (1994) (citing Michael A. Medeiros, Comment, *Hawai'i's New Administrative Driver's License Revocation Law: A Preliminary Due Process Inquiry*, 14 U. HAW. L. REV. 853 (1992)); Greg Guidry & Gerald Huffman, *Legal and Practical Aspects of Alternative Dispute Resolution in Non-Union Companies*, 6 LAB. LAW. 1, 39 (1990) (citing Lynette T. Oka, *Disarray in the Circuits after* Alexander v. Gardner-Denver Company,

and in judicial opinions in Hawai'i[16] and elsewhere.[17]

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9 U. HAW. L. REV. 506 (1987)); John J. Ross, The Employment Law Year in Review (1991-1992), PLI September-October, 1992 (citing Michael Nauyokas, *Two Growing Procedural Defenses in Common Law Wrongful Discharge Cases—Preemption and Res Judicata*, 11 U. HAW. L. REV. 143 (1989); Richard L. Barnes, *Delusions by Analysis: The Surrogate Mother Problem*, 34 S.D. L. REV. 1, 1989 (citing Comment, *Who's Minding the Nursery: An Analysis of Surrogate Parenting Contracts in Hawaii*, 9 U. HAW. L. REV. 567 (1987)); Fred Bosselman, *Land Use Planning Requirements of Selected Federal Statutes*, ALI-ABA Course Study, (August 19, 1992) (citing Note, "Stop H-3 Association v. Dole: *Congressional Exemption From National Laws Does Not Violate Equal Protection*" 12 U. HAW. L. REV. 405 (1990)); Jerome B. Kauff & David Block, *Recent Developments in the Law of Unjust Dismissal* – 1986, PLI, January 1, 1987 (citing Note, *Promissory Estoppel and the Employment At-Will Doctrine:* Ravelo v. County of Hawaii, 658 P.2d 883 (Haw. 1983), 8 U. HAW. L. REV. 163-190 (Spring 1986); Robert N. Leavell, *Corporate Social Reform, The Business Judgment Rule and Other Considerations*, 20 GA. L. REV. 565 (1986) (citing Comment, *Disclosure of Socially Oriented Information Under The Securities Acts*, 2 U. HAW. L. REV. 557 (1980-81)); Herbert Hovenkam & John A. MacKerron, *Municipal Regulation and Federal Antitrust Policy*, 32 UCLA L. REV. 719 (1985) (citing Marjorie Au & Gregory Turnbull, Note, Community Communications Co. v. City of Boulder: *Antitrust Liability of Home Rule Municipalities and the Parameters of Home Rule Authority*, 5 U. HAW. L. REV. 327 (1983)).

[16] *See e.g.*, Ka Pa'akai O Ka'aina v. Land Use Commission, 7 P.3d 1068 (Hawai'i 2000) (citing D. Kapua Sproat, *The Backlash Against PASH: Legislative Attempts to Restrict Native Hawaiian Rights*, 20 U. HAW. L. REV. 321 (1998)); State v. Castro, 5 P.3d 444 (Haw. App. 2000) (citing Edmund Haitsuka, *Hawai'i Appellate Standards of Review Revisited*, 18 U. HAW. L. REV. 645 (1996)); State v. Pantoja, 974 P.2d 1082, 1093 (Hawai'i 1999) (Acoba, J., concurring) (citing Shirley Cheung, Note, State v. Sinagoga: *The Collateral Use of Uncounseled Misdemeanor Convictions in Hawai'i*, 19 U. HAW. L. REV. 813 (1997)); State v. Mallan, 950 P.2d 178 (Hawai'i 1998) (citing Nancy Neuffer & Gaye Y. Tatsuno, Note, State v. Kam: *The Constitutional Status of Obscenity in Hawaii*, 11 U. HAW. L. REV. 253 (1989)); State v. Tuipuapua, 925 P.2d 311 (Hawai'i 1996) (citing R. Nakatsuji, State v. Lessary: *The Hawaii Supreme Court's Contribution to Double Jeopardy Law*, 17 U. HAW. L. REV. 269 (1995)); Enos v. Pacific Transfer & Warehouse, Inc., 903 P.2d 1273, 1280 (Hawai'i 1995) (citing Professor Eric Yamamoto and Student Danielle Hart, *Rule 11 and State Courts: Panacea or Pandora's Box?*, 13 U. HAW. L. REV. 57 (1991)); Ditto v. McCurdy, 947 P.2d 952 (Hawai'i 1997) (citing Linda S. Martell, Leyson v. Steuermann: *Is There Plain Error in Hawaii's Doctrine of Informed Consent?*, 8 U. HAW. L. REV. 569 (1986)); Bernard v. Char, 903 P.2d 676 (Hawai'i 1995) (citing Linda S. Martell, Leyson v. Steuermann: *Is There Plain Error in Hawaii's Doctrine of Informed Consent?*, 8 U. HAW. L. REV. 569 (1986)); Keomaka v. Zakaib, 811 P.2d 478 (Haw. App. 1991) (citing Linda S. Martell, Leyson v. Steuermann: *Is There Plain Error in Hawaii's Doctrine of Informed Consent?*, 8 U. HAW. L. REV. 569 (1986)); Mroczkowski v. Straub Clinic & Hospital, Inc., 732 P.2d 1255, 1259 (1987) (citing Linda S. Martell, Leyson v. Steuermann: *Is There Plain Error in Hawaii's Doctrine of Informed Consent?*, 8 U. HAW. L. REV. 569 (1986)); Housing Finance and Development Corp. v. Castle, 898 P.2d 576 (Hawai'i 1995) (citing Eric Young & Kerry Kamita, *Extending Land Reform to Leasehold Condominiums in Hawaii*, 14 U. HAW. L. REV. 681 (1992); Doe v. Grosvenor Properties, 829 P.2d 512 (Hawai'i 1992) (citing Virginia Chock & Les Kondo, Knodle v. Waikiki Gateway Hotel, Inc.: *Imposing a Duty to Protect Against Third Party Criminal Conduct on the Premises*, 11 U. HAW. L. REV. 231 (1989)); State v. Kam, 748 P.2d 372 (Haw. 1988) (citing Trudy L. Tongg, Criminal Law—State v. Kam: *Do Community Standards on Pornography Exist?*, 9 U. HAW. L. REV. 727 (1987)); Crawford v. Crawford, 745 P.2d 285, 288

Foremost among the many rewards of law review is sharing work and goals that forge lasting friendships. Joyce McCarty (Editor-in-Chief 1986) sums up it up: "working with folks who are still some of my best friends in Hawaii and getting to know them much better than we would have otherwise." She observes, "In the end most things come down to people and relationships-law review was certainly no different."

Each year, we demand that a self-governed student group publish a high quality scholarly journal without paid staff or significant budget.[18]

(Haw. 1987) (citing Michael P. Healy & Chuck T. Narikiyo, Rana v. Bishop Insurance of Hawai'i, Inc.: *The Death of Basic No-Fault Stacking in Hawaii* (1987) and Daniel T. Kim & Ward F.N. Fujimoto, In re Maldonado: *The Stacking of No-Fault Benefits on Workers' Compensation Benefits for the Same Loss*, 8 U. HAW. L. REV. 619 (1986)); Bertelmann v. Taas Associates, 735 P.2d 930, 933 (Haw. 1987) (citing Bradford F.K. Bliss & Susan D. Sugimoto, Ono v. Applegate: *Common Law Dram Shop Liability*, 3 U. HAW. L. REV. 149 (1981); Hawaii Housing Authority v. Lyman, 704 P.2d 888, 895 (citing Tom Grande & Craig S. Harrison, Midkiff v. Tom: *The Constitutionality of Hawaii's Land Reform Act*, 6 U. HAW. L. REV. (1984)); Chow v. Alston, 634 P.2d 430 (Haw. App. 1981) (citing Comment, *Defamation: A Study in Hawaiian Law*, 1 U. HAW. L. REV. 84 (1979); Pai Ohana v. United States, 875 F. Supp. 680, 688 (D. Hawaii 1995) (citing Gina M. Watumull, Pele Defense Fund v. Paty: *Exacerbating the Inherent Conflicts between Hawaiian Native Tenant Access and Gathering Rights and Western Property Rights*, 16 U. HAW. L. REV. 208 (1994)); Nelsen v. Research Corporation of the University of Hawaii, 805 F. Supp. 837, 849 (D. Hawaii 1992) (citing Linda M. Paul, Masaki v. General Motors Corp.: *Negligent Infliction of Emotional Distress and Loss of Filial Consortium*, 12 U. HAW. L. REV. 215 (1990)).

[17] *See e.g.*, State v. Hendricks, 787 A.2d 1270, 1278 (Vt. 2001) (Dooley, J., concurring) (citing Sarah Lee, Comment, *The Search for the Truth: Admitting Evidence of Prior Abuse in Cases of Domestic Violence*, 20 U. HAW. L. REV. 221 (1998)); VLT Corporation v. Unitrode Corporation, 194 F.R.D. 8 (2000) (citing Glenn Theodore Melchinger, *Collective Benefit: Why Japan's New Strict Product Liability Law is 'Strictly Business,'* 19 U. HAW. L. REV. 879 (1997); Doe v. Doe, 712 A.2d 132 (Md. App. 1998), rev'd 747 A.2d 617 (Md. 2000) (citing Recent Development, *Interspousal Torts: A Procedural Framework for Hawai'i*, 19 U. HAW. L. REV. 377 (1997)); Cammack v. GTE California Incorporated, 55 Cal. Rptr. 2d 837 (Cal. App. 1996) (citing Michael Nauyokas, *Two Growing Procedural Defenses in Common Law Wrongful Discharge Cases – Preemption and Res Judicata*, 11 U. HAW. L. REV. 143 (1989)); Saldana v. Wyoming, 846 P.2d 604, 639 (Wyo. 1993) (citing Karen L. Stanitz, State v. Rothman: *Expanding the Individual's Right to Privacy Under the Hawaii Constitution*, 13 U. HAW. L. REV. 619 (1991); Guiney v. Police Commission of Boston, 582 N.E.2d 523, 528 (Mass. 1991) (citing Susan Haberberger, *Reasonable Searches Absent Individualized Suspicion: Is There a Drug-Testing Exception to the Fourth Amendment Warrant Requirement After* Skinner v. Railway Labor Executive Association?, 12 U. HAW. L. REV. 345 (1990)); Engberg v. Meyer, 820 P.2d 70, 112 (Wyo. 1991) (citing Steven Kim, State v. Smith: *The Standard of Effectiveness of Counsel in Hawaii Following* Strickland v. Washington, 9 U. HAW. L. REV. 371 (1987)); Amin v. Wyoming, 774 P.2d 597, 619 (Wyo. 1989) (citing Steven Kim, State v. Smith: *The Standard of Effectiveness of Counsel in Hawaii Following* Strickland v. Washington, 9 U. HAW. L. REV. 371 (1987)).

[18] As an advisor to Law Review, each year I fear that this year may be the one in which members live out William Golding's novel, *Lord of the Flies*. Shortly after selection, new members are civilized, keenly intelligent men and women. In those dark days of tech-editing

Remarkably, year after year, the law review staff comes through. On the occasion of the University of Hawai'i Law Review's twenty-fifth anniversary, we celebrate this remarkable institution and twenty-five years of student leadership, accomplishment and grit.

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thousands of footnotes, as deadlines are abandoned, the workload grows insurmountably, mishaps of production stalk the review, I marvel that members are not transformed from civilized students into a lawless savage band haunting the library. Instead, they pull together, and each year, a wonderful, thoughtful, fresh journal appears.