

"Les hommes ont toute l'autorité": Madeleine des Roches and the *Querelle* between women and the law

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“LES HOMMES ONT TOUTE L’AUTORITE”:

MADELEINE DES ROCHES AND THE *QUERELLE* BETWEEN WOMEN AND THE LAW

ABSTRACT

A Renaissance *querelle* was primarily litigious. As such, it was heavily gendered: women, who were culturally expected to be conciliatory, not argumentative, were excluded from the law courts. This article uses the example of Madeleine des Roches—a widow, and so legally “capable”, like her unmarried daughter, Catherine—to consider how women negotiated the challenges of legal quarrelling. It analyzes the strategies des Roches employed, in her poetry and in her published correspondence, to avoid being perceived as quarrelsome, to bind her judicially influential addressees in obligation to her, and to object to women’s exclusion from the law. It thus shows how des Roches’s references to the court cases that plagued her widowhood actively engaged both with the individual quarrels of these specific cases and with a more general quarrel with the injustices of an exclusive and often obstructive process of law. Des Roches’s rejection of overtly agonistic writing in favor of discreetly powerful methods of persuasion reflects her objection to quarreling—as an unwelcome distraction from the literary self-expression that she maintains is a woman’s intellectual right—even as she engaged with both the law courts and the *querelle des femmes*.

KEYWORDS: Madeleine des Roches, agonistic writing, forms of obligation, the *querelle des femmes*, women and the law

INTRODUCTION

The respectability of Renaissance quarrelling was governed by gender. Women were culturally placed at a double disadvantage: on the one hand, propriety expected them to be conciliatory

rather than antagonistic; on the other, misogyny dismissed them all too readily as quarrelsome, following the pejorative stereotype of the angry fishwife.¹ Furthermore, a Renaissance *querelle*, following the Latin *querela*, refers primarily to a legal accusation—and women were formally excluded, at a pragmatic and institutional level, from quarreling’s respectable, professional context: the law.² For the law courts, as Justinian’s *Digest* specifies, were an exclusively male preserve:

Feminae ab omnibus officiis ciuilibus uel publicis remotae sunt et ideo nec iudices esse possunt nec magistratum gerere nec postulare nec pro alio interuenire nec procuratores existere.

[Women are debarred from all civil and public functions and therefore cannot be judges or hold a magistracy or bring a lawsuit or intervene on behalf of anyone else or act as procurators.] (50.17.2)

The force of custom, with its belief in women’s modesty and in their physical and rational frailty, thus excluded women from quarrelling with the law.³

Yet women, and particularly widows, were nonetheless subject to the trials of legal *querelles*.⁴ A prime example is Madeleine des Roches, a financially independent widow in the legal center of Poitiers, whose writing reflects her involvement in a series of legal disputes, and most notably a thirteen-year trial, that were (ostensibly) quarreling’s respectable side. Precise details of these legal disputes are few and hard to come by, unlike the frequent but oblique references to them in des Roches’s published works.⁵ The “Dames des Roches de Poitiers”—

¹ On the origins of the figuratively quarrelsome “harangère”, see Ronzeaud (especially 740-41). These long pre-date Erasmus’s lament over the inability of women, in particular, to regulate their tongues (*Lingua* 28, 106, 121, 143-45; *Tongue* 264, 339, 353, 376-77). On the early modern perception of women’s idle talk as a sign of social and intellectual inferiority, see Butterworth 4-7 and 32.

² The Latin term *querela* primarily denotes a complaining, or a complaint; in the post-Augustan period, it came to mean particularly an accusation (Lewis and Short s.v. “querela”).

³ See Maclean, especially chapter 5, “Law” (68-81).

⁴ See Warner 237-40; Kenny 23, 114.

⁵ For archival details, see Rambaud; Diller 170-74. Apart from four passing references to the thirteen-year trial (*Œuvres* 83, 125-26, 143-44, 176-77), des Roches specifically mentions only

Madeleine Neveu and her daughter Catherine Fradonnet—jointly published their *Œuvres* in 1578; an augmented edition was published in 1579, followed by their *Secondes Œuvres* in 1583; then in 1586, they published their private correspondence in *Les Missives*.⁶ The name “des Roches” comes from property owned by Madeleine’s family: its aristocratic indication of land ownership partly disguises the supposed venality of writing for a living by portraying the family as financially secure; moreover, it provided mother and daughter with a shared name inherited through the female line.⁷ Both poets variously exploited the symbolism of this chosen name, which provided Madeleine with a powerful image with which to represent the experience of going to law.

Both women were legally “capable” by the time of their first appearance in print: Madeleine was twice widowed, following the deaths of, first, André Fradonnet, Catherine’s father, a *procureur* or solicitor, in 1547, and then François Eboissard, an *avocat* at the regional court, in 1578; Catherine, born in 1542, was unmarried and over the age of twenty-five.⁸ The recent death of Eboissard left the Dames des Roches with financial difficulties, exposing Madeleine in particular to court cases, and prompting them to earn an additional income from their writing.⁹ The publication of their works constituted an exercise in self-representation and in literary and social self-promotion, as well as an advertisement for their intellectually distinguished literary salon, made up chiefly of lawyers from Poitiers but extending to visiting

one affair: her poem “Au Roy” (*Œuvres* 172-73) asks Henri III for an indemnity following the destruction of two houses, worth 2,000 *livres*, during the siege of Poitiers in 1569; the request was granted in February 1587.

⁶ On the Dames des Roches, see in particular Larsen, “Introduction”; Diller.

⁷ On the significance of their adoption of this name, see Kenny 114-15.

⁸ On women as legally “capable”, see Biet, “Quand la veuve contre-attaque” 17-20; Warner 237-41. On Catherine’s determination not to marry, see Larsen, “Catherine des Roches” 97-100; Larsen, “Legitimizing”, especially 559-63. On the relatively low social standing, within the legal world, of Madeleine’s husbands, see Kenny 49, 55, 115.

⁹ See Larsen, “introduction” 17-19, 38.

writers, lawyers and dignitaries from Paris during the Grands Jours of 1579.¹⁰ It also provided Madeleine with an opportunity to promote the justice of her (legal) cause and to reflect on the gendered injustices of the law.

This article focuses on Madeleine des Roches—less overtly antagonistic and more intricately involved in troublesome court cases than Catherine—and on her references to these legal quarrels in her works.¹¹ It considers how she negotiated the significant challenges faced by Renaissance women of quarreling without being perceived as quarrelsome and of quarreling successfully with the law. It argues that her decision to represent her experience of legal quarreling, in her poetry and her correspondence, constitutes both a pragmatic means of influencing the outcome of her court cases, as she exploited the social and legal obligations to which she was subject to her own advantage, and also a significant contribution to a virtually invisible area of the *querelle des femmes*: a decidedly one-sided *querelle* that was consequently never really formalized as such between women and the law.

The article first situates des Roches's work against the culturally gendered backdrop of Renaissance quarreling. It then focuses on des Roches's mode of quarrelling, as she rejects overtly agonistic writing in favor of the plaintive genres also associated with *querela*, and on her objection to the constrictive processes of litigation. Next it analyzes des Roches's method of quarreling, as she bound her judicially influential addressees to the promotion of her cause. Finally, it considers the place of des Roches's references to her own court cases within her engagement with the wider *querelle des femmes*, as she asserted women's intellectual

¹⁰ On the many lawyers attendant at the Dames des Roches's salon, see Tarte 751, 761.

¹¹ On the (anxious) cultural focus on widowed rather than unmarried women as legal actors, see Biet, "Quand la veuve contre-attaque" 19-20, 23-26; see also Warner 238-39.

competence and highlighted the injustice of their exclusion from the law courts.¹² Yet des Roches was not simply asking for women to be given access to this masculine world: rather, she imagined changing it. In place of obstructive litigation, des Roches advocated the mutual bonds of moral and social obligation that her writing cultivates and on which she, necessarily, relied.¹³

LEGAL *QUERELLES*: GENDERED QUARRELLING

Early modern dictionaries confirm that Renaissance quarrelling was primarily litigious. The first adjective in Maurice De La Porte's list of epithets for the term *querelle* is "litigieuse" (s.v. "querelle"); Jean Nicot's French-Latin dictionary translates "querelleux" as "litigiosus", adding the explanatory collocation "homme querelleux & qui aime les proces" (s.v. "querelleux"); Randle Cotgrave's French-English dictionary translates *querelle* as "a quarell, pike, brawle, difference, debate; Suit, Action, Processe against" (s.v. "querelle"). This litigious meaning confers a specific, agonistic style upon a *querelle*: in contrast to the open-minded spirit of a balanced philosophical debate, a legal *querelle* is violently contentious; it asserts its position without being swayed by opposing arguments, as it seeks only to prevail (Viala 5, 8-11, 15; Lecercle 6, 16).

¹² Biet, "Introduction" 20-21, portrays literature that engages with the law as a genre determined to assert its legitimacy and power, yet seeking consensus rather than rupture in its questioning of the law: it thus shares the status and role conventionally ascribed to women. On texts that call for justice being a *querelle* themselves, and on the consequent importance of their appeal to the public, see Viala 21.

¹³ On literature's ability to satirize legal systems and so question the legitimacy of the law, see Biet, "Judicial" 403-4. Des Roches questions the processes behind legal judgments rather than any individual judgments themselves.

A litigious *querelle* was thus heavily gendered, both pragmatically and culturally. It was located within an institution that excluded women both physically and intellectually;¹⁴ it operated through the scholastic forms of debate taught in educational establishments that were inaccessible to women (Campbell 366; Viala 11); its aggressive sparring closely associated verbal and physical violence;¹⁵ it resembled the fierce competition of the noble sports of jousting, hunting, and fencing (Larsen, “On Reading” 64-65).¹⁶ These pragmatic obstacles to women’s engagement in legal *querelles* were rendered doubly difficult, first by the cultural expectation that women should not be agonistic, and second by the dismissive perception of women as nonetheless quarrelsome: De La Porte’s list of epithets for *querelle* includes the simple adjective “feminine” (s.v. “querelle”).¹⁷

Yet Renaissance satirists were quick to question how respectable professional quarrelling really is. When Erasmus wished to mock scholars, sophists, and lawyers for their endless arguments, he did so through a humiliating analogy with women. Folly’s paradoxical

¹⁴ On women’s legal inferiority and incapacity, see Maclean 68-81. On the propriety that increasingly governs women’s exclusion from the courts, see Biet, “Quand la veuve contre-attaque” 18. Legally “capable” women are necessarily excepted; the second annotator of the Dames des Roches’s *Secondes Œuvres* notes, “Les ... sorties frequentes de la maison ... sont excusables aux femmes qui ont plusieurs procez, ou aultres affaires d’importance et qui n’ont point de marys, ou enfantz, ou aultres personnes capables et entenduz pour la conduite de leurs affaires, et sur qui elles s’y puissent bien reposer” (234-35, n. 30).

¹⁵ See Viala 10. This aggression does not exclude women: on satirical representations of women’s conversation degenerating into physical violence, see Butterworth 192-93.

¹⁶ Shakespearean quarrels, although not litigious, are similarly gendered: they are to be settled at sword-point, making a readiness to quarrel a testimony to bravery and valor. It is a “quarrel” with France that leads the warlike Harry to Agincourt (*Henry V* 4.1.127); it is his “quarrel” with Caesar’s ambition that determines Brutus to slay Caesar (*Julius Caesar* 2.1.28); it is a “quarrel” between Richard Plantagenet and Somerset that triggers the Wars of the Roses (*Henry VI, Part I* 2.4.133); it is an “ancient quarrel” that divides the houses of Montague and Capulet (*Romeo and Juliet* 1.1.101).

¹⁷ No equivalent adjective specifies that a *querelle* may be “masculine”. On the impact of the *querelle des femmes* on the perception of women as quarrelsome, see Campbell 364.

encomium, in *Praise of Folly*, of those who are indebted to her includes such professional squabblers:

quorum unusquiuus cum vicenis delectis mulieribus garrulitate decertare possit, feliciores tamen futuri, si tantum linguaces essent, non etiam rixosi, adeo vt de lana caprina pertinacissime digladientur et nimium altercando plerunque veritatem amittant. (*Moriae Encomium* 142-44)

[any one of them could be a match for twenty picked women in garrulity, but they'd be happier if they were only talkative and not quarrelsome as well—they're so stubborn in their fights to the death about things like goat's wool,¹⁸ and they generally lose sight of the truth in the heat of the argument.] (*Praise of Folly* 125)

Women are simply the tools here of Erasmus's satire: as the epitome of talkativeness, they represent an ostensibly superlative example that the lawyers, who are the subjects of the satire, nevertheless surpass.¹⁹ Erasmus's women may be garrulous, but they are not quarrelsome: this remains a dubious male privilege, akin to physical fighting, as the image of the sword, or "gladius", in "digladientur" suggests.²⁰

Quarrelling became a female privilege in Louise Labé's *Débat de Folie et d'Amour*. At the start of the altercation over status that prompts their *débat*, Folie issues a high-handed warning to Amour: "Laisse moy aller, ne m'arreste point: car ce te sera honte de quereler avec une femme" (49). The "honte" of quarreling with a woman is open to several interpretations. It could suppose that quarreling is a male prerogative, and so criticize Amour for ungentlemanliness, in quarreling with a woman rather than protecting her, or for unfairness, in taking advantage of her as an easy victim. Alternatively, it could suppose that quarreling is a

¹⁸ "Rixari de lana caprina" is a proverbial expression for quibbling about trifles (Lewis and Short s.v. "lana"); Erasmus uses it again in *Lingua* (106; *Tongue* 338).

¹⁹ Erasmus employs the same device to shame garrulous men in *Lingua* (28; *Tongue* 264); see Butterworth 21, 178-79.

²⁰ The violence of the metaphor is echoed in Shakespeare, whose most antagonistic women notably bear sharp tongues in place of swords. Katherine, before Petruchio tames her, is "renowned in Padua for her scolding tongue" (*The Taming of the Shrew* 1.2.99), while in her merry war with Benedick, Beatrice "speaks poniards, and every word stabs" (*Much Ado About Nothing* 2.1.231-32).

woman's domain and so warn Amour that he risks exposing himself either to indignity, by descending to a woman's level, or, more humiliatingly, to serious embarrassment: the danger of quarreling with a woman is that she might win. Folie is, of course, mocking Amour: the "honte" with which she threatens him depends entirely upon his assumption of a male superiority that he would find it ignominious to lose but that she implies may not exist—at least not where quarreling is concerned.

The veneer of respectability given to legal *querelles* is further eroded as Erasmus's and Labé's female personifications of folly are both litigious quarrelers. Erasmus's Folly essentially takes the stand as chief witness in her own trial of her character, while Labé's Folie, having demonstrated quarreling's ready descent from verbal to physical violence by bodily assaulting Amour, becomes the defendant in a trial brought before Jupiter by Amour's mother, Venus; although both goddesses engage gods to speak on their behalf, Folie's voice breaks irrepressibly through that of her advocate, Mercure.²¹ If women may be successful litigants, then nothing distinguishes the lawyers satirized for their pointless and obstructive quarrels. This obstructiveness informs Folie's first objection to quarreling with Amour, which is that it would be an unwelcome restriction on her freedom: "laisse moy aller, ne m'arreste point". It is also the basis of Madeleine des Roches's objection to quarreling with the law.

MADELEINE DES ROCHES'S MODE OF QUARRELING: THE *PLAINTE*

Madeleine des Roches objected to quarreling even as she engaged with the *querelle des femmes*: it was an unwelcome distraction from the intellectual pursuits she advocated. In Ode 3, she takes satirical aim at three images of women and contrasts them with her own preferred

²¹ On Folie's participation in the patriarchal court system and appropriation of her advocate's voice, see Jones Wright and Rigolot.

image of the woman as writer.²² The first and third of these images—the woman who derives her moral and financial profit from domestic productivity and the woman who derives her sense of status from rich adornment—will be familiar to fellow readers of Louise Labé, who similarly enjoins women to choose literary glory over dull domesticity and superficial grandeur (41-43).²³ The second image—the quarrelsome woman, whose self-expression is confined to pointless (but pointed) arguments—replaces the materialism of the other two to focus on women’s tongues.

Each image is promoted by “*Quelque langue de Satyre, / Qui tient banque de mesdire,*” and who authoritatively prescribes her own preferred occupation for all women (*Œuvres* 96-97). Malicious speech is accompanied by the potential for argument, given the three conflicting views. That each “*langue*” should belong to a “*Satyre*” suggests a rudeness and ill intention, while the “*banque de mesdire*”, connoting profit and immediacy (the “*banque*” or “*commerce d’argent*” is where news is brought²⁴), evokes a vulgar eagerness to peddle ideas filled, “*mesdire*” suggests, with ill will. Unpleasant speech is extended to women generally in the second image:

L’autre tient que c’est office
De plus loüable exercice
Se lever un peu matin,
Dire mal de sa cousine
Quereler à sa voisine,
Ou festier Saint Martin. (*Œuvres* 97)

²² On “*Ode 3*”, see *Tarte* 753-54.

²³ On the resemblance between des Roches’s ode and Labé’s “*Epître dédicatoire*”, see *Tarte* 754-55; on the Dames des Roches’s familiarity with Labé’s writing, see *Diller* 76; *Larsen*, “*introduction*” 27, 49-50.

²⁴ See des Roches, *Œuvres* 97, n. 35.

Women who are neither occupied by domestic labor nor engaged with silent display risk employing their tongues in abuse or the notoriously bibulous St. Martin's day festivities:²⁵ their petty disputes (“dire mal”; “quereler”) with those to whom they should be closest suggest the trifling futility of the limited activities available to women. Des Roches's rejection of domesticity, quarrelsomeness, and adornment in favor of writing is thus a preference for a creative form of intelligent self-expression over speaking abusively or remaining silent. The ode presents des Roches as a writer, then, and not a quarreler—even as it situates her squarely within the *querelle des femmes*.

For des Roches's writing, on both serious and light-hearted matters, is readily quarrelsome, but subtly so. In the *Missives*, the Dames des Roches willingly engage with the playfully oppositional genre of the *responce*: a short, witty piece, swiftly improvised to correct and outdo a given model, whose detail it heeds purely to counter and surpass it.²⁶ This same agonistic approach is apparent in Madeleine's Missive 17, in which she defends herself against a “souseçon contre moy qui est presque en forme de plainte” (106). The *plainte* in question is a flattering and gallant, rather than legal, accusation that her letters are welcome but too short; des Roches employs a strict monetary analogy to point out, rather tartly, that she repays her correspondent fully and fairly, writing in exactly reciprocal measure to his own brevity (106-7). Any antagonism here is disarmed by the playfulness of the conceit; it reflects des Roches's full awareness of the range of genres and subtle modes made available by a *querelle*.

²⁵ “Fêter la Saint-Martin” is a synonym for “faire bonne chère”, while “le mal de saint Martin” refers to the drunkenness to which the feast day (November 11) commonly led. Cotgrave includes the proverb “A la S. Martin lon boit le bon vin” in his *Dictionarie*, s.v. “Martin”.

²⁶ See Larsen, “On Reading” 64-66. At the end of “Ode 3”, Madeleine represents the triumph of the “Dames de France” over “ce monstre d'ignorance” as a jousting victory (*Œuvres* 100-101); see Tarte 766-67.

For if a legal *querelle* primarily suggests a decidedly aggressive model for antagonistic writing, the Latin *querela* has a second sense, which significantly modifies the agonistic genre: it also refers to a plaint, or plaintive song, sound or note that might be made to lull children to sleep, or by an animal or an instrument (Lewis and Short, s.v. “querela”; see Viala 11). It thus suggests a tone of voice rather than clearly articulated argument or speech;²⁷ it also offers a more subdued model for agonistic writing in the mode of a plaintive lament. Des Roches employs the *plainte* to lament the legal disputes that both distract her from her poetry and oblige her to adopt this plaintive mode.

Sonnet 8 constitutes an apologia, again in the face of an imaginary accusation, for des Roches’s consequently plaintive tone:

Quelqu’un mieux fortuné dira de ma complainte,
 Mes douloureux soupirs, et mon gémissement:
 “Cette-cy n’eut jamais que mal-contentement;
 On ne voit que rigueur dessus sa charte peinte.

Est-ce une histoire vraie, ou une fable feinte,
 Se veut-elle exercer sur un triste argument?” (*Œuvres* 128)

The hypothetical criticism triggers the poet’s robust defense of her plaintiveness as neither voluntary nor equal to its unspecified cause; the sonnet is an example of des Roches’s oblique references to the legal *querelles* that are as incompatible as domesticity with the writing they interrupt:

La perte du repos me faict plus de tourment
 Cent et cent mille fois que je ne fay de plainte.

Par le repos perdu j’ay la raison blessée,
 J’ay le discours rompu, la memoire offensée;
 L’aprehension faict mon cerveau distiller.

Le feu de mon esprit perd sa douce lumiere,
 Et ne me reste plus de ma forme premiere

²⁷ On the attribution to women of the onomatopoeic, animalistic noises associated with “caquet” rather than reasonable speech, see Butterworth 172-75.

Sinon que j'ayme mieux escrire que filer. (*Œuvres* 128)

The poet's complaint is that the disruption of her "repos" is detrimental to her "raison", "discours", "memoire", "cerveau", and "esprit"—or to the chief tools of her poetic trade. Yet the formal regularity of the sonnet resists this claim. Instead, it celebrates the poet's successful separation of immeasurable emotion ("tourment") from measured expression ("plainte"), and thus her successful adherence to the one, unchanged aspect of her "forme premiere": her determination to write. The sonnet thus exemplifies des Roches's literary response to quarrelsome opposition: its plaintive appeal to the undefined reader's pity ends on a vital note of literary self-assurance as des Roches successfully reconciles these conflicting occupations through her (regretful) use of the *plainte*.

MADELEINE DES ROCHES'S PLAINTIVE THEME: LEGAL CONSTRAINTS

Notable in des Roches's poetic representation of her court cases is her conception of the law as something that is—or ought to be—binding.²⁸ This theme is explored in Sonnet 24, a strikingly powerful *plainte*, in which des Roches demands from an unspecified addressee the flouted justice that is her due:

Monsieur, j'avoy pour moy cette excellence Astrée,
Fille du tout-puissant, Deesse de raison,
Belle comme le Dieu de la claire maison,
Quand il faict de nouveau aux jumeaux son entrée.

Mais litige malin soudain l'a rencontrée,
Qui des armes du dol l'a blessée en trahison.
Et humble je vous fay ma devote oraison
Pour punir ce mutin qui a la vierge outrée. (*Œuvres* 143)

²⁸ On the application of the Latin proverb "verba ligant homines, taurorum cornua funes" [words bind men, ropes the horns of bulls] to legally binding contracts, see Guerrier. Erasmus erroneously attributes to Varro a supposed etymological derivation of *lingua*, "the tongue", from *ligare*, "to bind" (*Lingua* 32; *Tongue* 268 and 482 n. 29).

The quatrains stage the encounter between two personified abstractions: Astraea, or Justice, and shrewdly malign Litigation. The abstraction reflects des Roches's deliberate avoidance of overtly aggressive or antagonistic writing: she focuses on the process of law, rather than on a specific case or legal adversary. Yet for all its discretion, the sonnet is filled with violence. The analogy between Astraea's welcome appearance and the returning summer sunshine suggests she follows as free and natural a course as the sun, until she is waylaid ("rencontrée") and treacherously violated. Litigation is thus portrayed as maliciously disruptive ("ce mutin"): its methods are deceitful ("dol"; "trahison") and their consequences are painful ("blessée"; "outrée") and unjust.

The first tercet offers two powerful analogies for unregulated Litigation:

Comme un nouveau Prothé, il se va transformant
 En feu, en air, en eau, en un autre element,
 Ainsi que fait Thetis aux mains du Peleide. (*Œuvres* 143)

The mythological shape-shifters Proteus and Thetis represent figures of evasion who are nonetheless captured and constrained. Proteus is the seer who must be bound before he will speak; his speech then offers release to those who successfully bind him. In Homer's *Odyssey*, Eidothea tells Menelaus, becalmed and far from home, how to ambush and bind her father, Proteus, who explains how Menelaus may regain the favorable winds he needs and informs him of the captivity of his former companion Odysseus on Calypso's island (4.363-570). Odysseus's survival is the piece of information that is vital to the *Odyssey*'s narrative: it is available only because Proteus's shape-shifting has failed. The Homeric reference behind des Roches's analogy thus suggests the urgency of ending Litigation's evasions and reaching a judicial conclusion.

Virgil's adaptation of the Homeric account, in the *Georgics*, emphasizes the violent effort it requires. When Cyrene advises her son, Aristaeus, to consult Proteus about his diseased bees, she warns him that the information he seeks may be obtained only by force:

nam sine ui non ulla dabit praecepta, neque illum
orando flectes; uim duram et uincula capto
tende; doli circum haec demum frangentur inanes. (4.398-400: Mynors 85-86)

[For only by constraint will he give answer:
He bends to no entreaty; capture him
With ruthless force and fetters; only these
Will circumvent and shatter his designs.] (Wilkinson 137-38)

This need for force emphasizes the difficulty of binding and extracting information from the seer, as befits a preliminary act of spiritual redemption. Just as the adverse winds punished Menelaus for his neglect of the gods, so, Proteus reveals, Aristaeus's diseased bees punish him for the death of Eurydice, who was fleeing his rapacious advances when she was fatally bitten by a snake. This revelation allows Cyrene to teach Aristaeus the regenerative process of *bougonia* that will restore his bees, and so ends a form of narrative stasis. Once again, in order for narrative suspense to be resolved, Proteus's evasiveness is required to fail. The Virgilian echo in des Roches's analogy thus suggests her violent desire for Litigation to be defeated at all costs.

Ovid closely follows Homer's and Virgil's descriptions of Proteus but attributes no motive to his transformations and evokes no narrative desire for him to be pinned down (*Metamorphoses* 8.732-37). Instead, Ovid transforms Proteus into the informer, who tells Peleus how to bind, hold fast to, and so impregnate the equally Protean Thetis, predicted to bear a son greater than his father (*Metamorphoses* 11.229-265).²⁹ Once again, the narrative requires the binding to succeed, so that the hero Achilles may be born. Yet the reader's

²⁹ For a comparative analysis of Virgil's Proteus and Ovid's Thetis, see Smith 131-34. On the literary tradition of Proteus in Homer, Virgil and Ovid, see Fantham 12-14.

complicity with this narrative desire acquires rather different moral connotations since, as R. A. Smith notes, “What in Virgil had been a quest for the spiritual knowledge of regeneration has become in Ovid essentially a rape attempt” (134). Homer, Virgil and Ovid unite in presenting Proteus’s and Thetis’s transformations as defensive mechanisms against being pinned down and violated, as Proteus’s knowledge and Thetis’s sexual integrity are taken from them. Yet while the poetic description lingers admiringly on their shape-shifting abilities, the narrative drive of each poem requires Proteus and Thetis to fail. The classical references behind des Roches’s two analogies thus disguise an increasingly violent desire for Litigation to be forcibly constrained.

In the final tercet, des Roches describes the contrasting effect upon herself of the law’s delay:

Treze ans sont jà passez qu’il me sçeut attacher,
Et m’estrainst de nouveau au sommet d’un rocher,
Si la vertu de vous ne m’est un autre Alcide. (*Œuvres* 144)

The appeal to her judicially influential addressee’s Herculean virtue, which might rescue her from the rock to which litigation has attached her for thirteen years, persuasively combines pathos with flattery. The reference is to the episode in the *Metamorphoses* immediately preceding Peleus’s capture of Thetis. When faithless Laomedon denies Apollo and Neptune the gold he promised them for helping him found Troy, Neptune first floods the Trojan plains and then demands that the king’s daughter, Hesione, be chained to the rocks as an offering for a sea-monster. She is rescued by Hercules, but once again, Laomedon denies him the promised reward, prompting Hercules to capture doubly false Troy (*Metamorphoses* 11.199-215).³⁰ Des

³⁰ Ovid tells the related story of Andromeda, similarly chained to a rock and exposed to a sea-monster as divine punishment for parental wrong-doing before being rescued by Perseus: *Metamorphoses* 4.670-739. On the many resonances of this tale in the Renaissance, see Williams.

Roches—whose name should evoke the security of land ownership, but acquires connotations of vulnerable captivity—thus resembles Hesione, powerlessly exposed to danger on the rock to which she is bound.³¹ The image both appeals to the addressee’s (and reader’s) pity, and equates Litigation with false and rapacious Laomedon, while the contrast between Litigation’s Protean elusiveness and the constraints it imposes upon des Roches highlights its injustice. Through these increasingly aggressive intertextual references, the sonnet’s plaintive lament thus gives discreet expression to a violent quarrel with the iniquities of the law.

MADELEINE DES ROCHES’S METHOD OF QUARRELING: *NOBLESSE OBLIGE*

For all that des Roches objects to being unfairly bound by litigation, she nevertheless desires the security of a binding law. Sonnet 4 of the 1579 additions is a plea, addressed to a divinely equitable judge: “Qui aux mers de proces estes l’encre et la carte / Pour guider seurement la navigation” (*Œuvres* 176).³² In the dangerous, shifting waters of court cases, he offers both navigational reassurance and physical stability: the ink (“encre”) on a nautical chart or judicial decree is equated with its homophone “ancre”, the anchor that holds the ship fast. However, as the tercets reveal, such security has long remained elusive:

Treze ans sont jà passez que cherchans la justice,
 Nous avons voyagé plus que ne fait Ulysse
 Pour trouver un arrest qui nous pust arrester.

Nos arrets nous ont mis au destroit de Sicile,
 Tirez de Caribdis nous retombons en Scylle;
 Soyez-nous s’il vous plaist Palas et Jupiter. (*Œuvres* 177)

Like the wandering Odysseus, the poet is forced to make stops (“nos arrets”) dangerously close to Scylla and Charybdis;³³ she therefore desires a different “arrest”: the judicial decree that

³¹ For another example of des Roches playing upon the connotations of her name, see Tarte 767.

³² Des Roches’s “Missive 9”, addressed to an *avocat*, similarly evokes his true “navigation en ceste mer de procès” (*Missives* 99-100).

³³ See *Odyssey* 12.73-259.

might put a stop to (“arrester”) these uncertain wanderings. Des Roches again persuasively combines pathos with flattery of her addressee, compared to the gods who protected Odysseus and guided him home to Ithaca. Where Labé’s Folie requires absolute freedom and warns Amour “ne m’arreste point” (49), des Roches’s prayer is to be bound by the law: not chained and exposed to danger, but safely secured by a just anchor.

The sonnet demonstrates des Roches’s willingness to flatter and so bind those with judicial influence to her cause. This is particularly evident in the *Missives*, in which the Dames des Roches exploit their legal contacts to advance their interests. Madeleine’s letters to one particular *avocat* (*Missives* 12-14) flatter his “honestetez”, “prudence”, and “graces” while insisting on the urgency (“importance”) and justice (“equité”) of her cause (102-4).³⁴ In *Missive* 12, she justifies her confidence that her addressee will help her, “pensant qu’estes obligé à ma bonne volonté, à vostre promesse, et vostre bonté sincere” (102). She thus binds him to his promise of help by suggesting that his gentlemanly obligation (*noblesse oblige*) is as much to his own honor as it is to herself and her cause. Similarly, Catherine’s *Missive* 29 asks for an influential word in favor of her cousin in a “procés d’importance” (169); noting her addressee’s habit of helping her “lignage”, she comments, “j’ay pensé ceste coustume estre devenue une loy que vous ne voudriez aucunement enfreindre” (169). The term “loy” confers upon this voluntary undertaking a sense of obligation that seems more reliable than any law.

In *Missive* 14, Madeleine asks her addressee for both help and influence: “J’ose vous requerir encore qu’il vous plaise avoir soin de mon procès, lequel estant aux mains de Monsieur de la Vau, je desire aussi qu’il luy soit à la teste, et que bientost sortant par la bouche d’un Rapporteur tant equitable il face heureuse monstre de soy pour ma fille” (104). The reference

³⁴ *Missive* 26 also insists on the “equité de ma cause” (118).

to Jean de La Vau, an *avocat* in the Paris Parlement and a judge during the Grands Jours at Poitiers in 1579, emphasizes the legal privilege of being judged by the Parlement that the Dames des Roches, by virtue of their reputation and status, enjoyed.³⁵ The bodily imagery recognizes that while the case may be in La Vau's hands, it is not necessarily at the forefront of his mind; the letter's appeal is thus for La Vau to be reminded of it, so that it may be gestated and then born, like Athena from the head of Jupiter, when it emerges from the mouth of a *rapporteur* to give Catherine the benefit of financial security and a court case happily resolved.³⁶

The retrospective publication of the *Missives* displays the range and skill of the Dames des Roches's writing and the extent of the influence they wield and seek. It also forms part of their exchanges of obligation with their addressees, resembling payments of a debt: the letters advertise their addressees' generosity and influence, as well as the persuasive power of the writer. In Missive 14, Madeleine humbly acknowledges her "debtes" of gratitude; her testimony to her addressee's generosity binds him in further reciprocal obligation to her. She presents the currency underlying these honorable transactions as pleasure: she notes that "il ne vous a pas esté déplaisant de me faire plaisir", and so dares "vous requerir encore qu'il vous plaise avoir soin de mon proces" (104). Reticence about money, out of reluctance to appear venal, underlies the Dames des Roches's approach to all financial transactions: it is apparent in their thanks for the "presents" that they receive in exchange—rather than in payment—for their commissioned, circumstantial verse.³⁷ The value of poetry that is freely given lies in its celebration of the recipient's noble generosity, rather than in its monetary price or the poet's

³⁵ *Secondes Œuvres* 333, n. 1. Catherine's Responce 9 is addressed to La Vau's daughter, Marie (*Secondes Œuvres* 285-86).

³⁶ A *rapporteur* summarizes the principal details of a case before the court delivers its verdict (Cotgrave s.v. "rapporteur").

³⁷ See Larsen, "introduction" 38-39.

worth. The *Missives* show Madeleine employing exactly the same strategy towards the influential lawyers whose help she secures: she uses the opportunity provided by her court cases to enhance—and to advertise—the bonds that unite her to those best able to support her cause. Her adoption of the mode of *plainte*, rather than anything more overtly agonistic, to represent her helpless suffering during her legal *querelles* is not only the more respectable mode of quarrelling for a woman; it is also highly effective in actively enlisting concrete, pragmatic help.

THE DAMES DES ROCHES AND THE *QUERELLE DES FEMMES*: WOMEN AND THE LAW

Madeleine des Roches's decision to publish her experience of judicial procedures is a significant contribution to the *querelle des femmes*.³⁸ She consciously represents herself as legally “capable” and perfectly able to engage—in her writing, if not in practice—with the law, thereby highlighting the injustices of a legal system that excludes women, even as she laments the trouble occasioned by court cases that is her primary quarrel with the law. For the stasis of an interminable trial affects the poet, as Sonnet 5 of the 1579 additions reveals:

Triste penser qui me rends taciturne,
Que dans mon sein tu glissas promptement
Quand un procez cousu à clous d'aimant
Me fait changer Apolon pour Saturne! (*Œuvres* 177)

First the trial is sewn tight (“cousu”), suggesting sealed inaccessibility, then the malleable and severable thread is replaced by “clous d'aimant”, the proverbially hard mineral that connotes both physical indestructibility and emotional obduracy. This rigidity in turn immobilizes the taciturn poet, whose poetry reflects the sluggish melancholia associated with Saturn rather than the free-flowing poetic inspiration formerly granted by Apollo.

³⁸ This is discussed by Tarte 759-63. Most discussions of the Dames des Roches and the *querelle des femmes* focus on their commitment to women's education and literary self-expression; see, for example, Lazard.

The sonnet is addressed to Catherine, whom Madeleine gratefully portrays, in the “Epistre à ma fille”, as a metaphorical rock during the troubles of a thirteen-year trial:

Tu as, enfant, apporté un cœur fort
 Pour résister au violent effort
 Qui m'accabloit, et m'offris dès enfance
 Amour, conseil, support, obéissance. (*Œuvres* 83)

Yet as the tercets of Sonnet 5 reveal, Madeleine's reliance on Catherine is double-edged:

Mon dieu! faut-il que ta belle jeunesse
 Et ta douceur, du malheur qui me presse,
 Indignement sentent le dur effect? (*Œuvres* 178)

This is more than maternal concern to spare her daughter the physical (“ta belle jeunesse”) and psychological (“ta douceur”) consequences of anxiety and suffering. It reflects the injustice of a lengthy trial whose troublesome procedure and uncertain outcome affect her daughter as well as herself.

This injustice is apparent in the concluding tercet:

Ainsi Cadmus fait au serpent l'outrage,
 Et une voix menace le lignage
 Pour le péché que l'ayeul avoit faict.³⁹ (*Œuvres* 178)

The key word, in this analogy with Cadmus's divinely punished but innocent descendants, is “lignage”. It harks back to the three ancient duties—“à Dieu”, “au pays”, and “au lignage”—that des Roches outlines in the opening lines of the “Epistre à ma fille” (*Œuvres* 81). The poet asserts her faithful devotion to God and to her daughter, but notes:

Pour mon pays, je n'ay point de puissance.
 Les hommes ont toute l'autorité,
 Contre raison et contre l'équité. (*Œuvres* 81)

³⁹ On Cadmus, see Ovid, *Metamorphoses* 3.1-4.603. On Madeleine's concern for Catherine in this sonnet, see Kenny 119-20.

The debarring of the poet from this second duty by her sex places greater emphasis on her fulfilment of the other two, and so explains her anxiety to protect Catherine from a legal institution that either excludes women or disrupts their writing, their equanimity, and their familial duty. It also explains why the list of excellent women that concludes the “*Epistre à ma fille*” begins with two maternal law-givers, Carmentis and Ceres, justly able to combine their protective duties to both their “*pays*” and their “*lignage*” (*Œuvres* 99).⁴⁰

By promoting these female law-givers, des Roches bequeaths to Catherine a set of educative principles as a form of literary inheritance.⁴¹ The transmission is secure, for Catherine develops her mother’s ideals in her own works. In Catherine’s “*Dialogue de Placide, et Severe*”, whose protagonists discuss their daughters’ education, Severe relies on the authority of Roman law to assert: “*Elles n’estudiront pas aux loix*” (*Secondes Œuvres* 202). Placide replies, “*Elles n’en doivent pas estre du tout ignorantes*”, citing the Old Testament example of the prophetess Deborah, who judged over Israel (Judges 4:4), and pointing out the moral and practical flaws of denying women understanding of matters that fundamentally concern them, such as marital and inheritance laws (*Secondes Œuvres* 202-4).⁴² Madeleine des Roches’s “*lignage*” is thus secure, as Catherine takes up her mother’s quarrel, by continuing to defend women’s right to be educated in and to write about unjustly masculine preserves such as the law.

AND THE REST IS SILENCE?

⁴⁰ See Tarte 759-63. On des Roches’s similarity here with Christine de Pizan, also plagued in widowhood by law-suits, see Tarte 760-62.

⁴¹ On the importance to the Dames des Roches of a poetic lineage of moral precepts whose transmission is not threatened by the unmarried Catherine’s childlessness, see Kenny 115-20.

⁴² Placide also advocates women’s education in medicine, echoing the lesson of Catherine’s “*L’Agnodice*” (*Œuvres* 333-40).

Erasmus, in *Lingua*, decries the quarrelsome and the litigious, and advocates silence to end a quarrel (106, 163; *Tongue* 338-39, 396). Montaigne similarly notes the power of silence in “De la colere”:

[B] Ceux qui ont à négotier avec des femmes testues, peuvent avoir essayé à quelle rage on les jette, quand on oppose à leur agitation le silence et la froideur. (717-18)

While Montaigne rather delights in this strategic, silent disdain, he also recognizes its aggressive antagonism (“on oppose”). His illustrative example of the Athenian statesman Phocion, impassively waiting for an angry opponent’s stream of insults to end, concludes with the observation, “[B] Il n’est replique si piquante comme est un tel mespris” (718). To deny anger an opponent is no passive refusal to quarrel: it is a paradoxically “piquante” action, understandably provoking frustrated “rage” in those from whom a necessary opposition is withdrawn.

For Montaigne himself is a writer particularly given to pugnacious imagery, and he finds opposition essential, as he explains in “Comme l’ame descharge ses passions sur des objects faux, quand les vrais luy defaillent”:

[A] Comme le bras estant haussé pour frapper, il nous deult, si le coup ne rencontre, et qu’il aille au vent; [...] de mesme il semble que l’ame esbranlée et esmeuë se perde en soy-mesme, si on ne luy donne prinse; il faut tousjours luy fournir d’object où elle s’abutte et agisse. (22)

The powerfully physical analogy for the frustration of being denied a point of opposition is supported first by a visual analogy with the distant gaze that needs to be checked by a point of focus, and then by an illustrative quotation from Lucan’s *Civil War*, suggesting the dangerous self-destruction that may ensue if all external opposition is withdrawn.⁴³

⁴³ See Lucan, *Pharsalia* 3.362-63.

The Dames des Roches similarly reject silence. Madeleine, addressing her female readers in the “Epistre aux Dames”, presents it as an unproductive virtue compared to eloquence: “Si ... vous m’advisez que le silence, ornement de la femme, peut couvrir les fautes de la langue et de l’entendement, je respondray qu’il peut bien empescher la honte, mais non pas accroistre l’honneur” (*Œuvres* 79-80). Catherine, in the “Dialogue de Placide, et Severe”, follows her mother:

Je pense bien que le Silence
Est l’ombre du vrai ornement,
Comme la discrete Eloquence,
Lumiere de l’entendement. (*Secondes Œuvres* 209)

Both women prefer and advocate women’s literary self-expression. Even as Madeleine objects to her legal *querelles* for threatening to consign her to melancholic poetic silence, her writing responds to these adverse circumstances, demonstrating the creativity that a *querelle* may produce.⁴⁴ The Dames des Roches may be careful to avoid appearing quarrelsome, but their works feed off opposition as they readily engage with the *querelle des femmes* and, more specifically, with its never fully formalized *querelle* between women and the law. If the alternative is silence, then both Madeleine and Catherine des Roches show that they would prefer to quarrel.

⁴⁴ On the creativity of *querelles*, see Viala 19; on the idea of writing that responds to opposition, see Larsen, “On Reading” 64-66.

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