

Postmodernism, Hellenism, and Hebraism

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In a well-known passage in *Moby-Dick*, Ishmael tells the reader that “All that most maddens and torments; all that stirs up the lees of things; all truth with malice in it; all that cracks the sinews and cakes the brain; all the subtle demonism of life and thought; all evil, to crazy Ahab, were personified and made practically assailable in Moby Dick. He piled upon the whale’s white hump the sum of all the general rage and hate felt by his whole race from Adam down.” With a large measure of exaggeration, I must admit that I feel a bit like that whale’s white hump to Professor Gottfried’s Ahab.

He is attacking something with great passion, but I am not sure exactly what, though my review of *Heidegger and Criticism: Retrieving the Cultural Politics of Destruction* and my book *The Deconstruction of Literature* are prominently featured. He is also defending something with equally great passion, and I’m not quite sure what that is, either, although it seems to be the scholarly reputation of William V. Spanos and the honor of Martin Heidegger. Professor Gottfried pigeonholes me by saying that “Hirsch’s comments belong to a bitter brief which goes back to Allan Bloom’s *The Closing of the American Mind*.” I don’t object to being put in Allan Bloom’s company; in fact, I’m probably undeserving of such an honor. But my “bitter brief” does not go back to Bloom’s book. For the historical record, Bloom’s book was published in 1987. By that time, I had written several essays, published from 1979 through 1988, critical of the new theoreticism coming from France, and its origins in Heideggerian thinking.

My observations about the reception of Heidegger by American academics and my reservations about Heidegger’s behavior during and after the Holocaust were personal. My wife, whom I met soon after the war, is a Holocaust survivor. I’ve been teaching American literature since 1957 and Holocaust literature since 1965. As a consequence, the spectacle of American professors’ wallowing in adulation over a philosopher who, from 1933 until 1945, remained a member of the Nazi party, and till his death in 1976 could never bring himself to denounce the evil of Nazism and its ideology of the *Übermensch*, struck me as an appalling development. Had these professors forgotten American literature’s glorious tradition of celebrating the common man? I articulated my dismay before the appearance of Bloom’s book, or even before that of Viktor Farias’s.

In an essay published in January, 1982, I wrote that for Frank Lentricchia, an American critic chronicling the literary history of the eighties, “Heidegger’s infatuation with National Socialism may as well be nonexistent.¹ Heidegger’s

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post-war silence on Nazism (when he might have spoken openly without fear of retribution) is...of no import to Lentricchia." In the book I was discussing, Lentricchia makes the observation that

The bridge between early and late Heidegger is "The Origin of the Work of Art"..., and the bibliographical history of this piece is a clue to the value he placed upon it. Given initially as a single lecture at Freiburg in the fall of 1935,...and repeated at Zurich in January of 1936, "The Origin of the Work of Art" was expanded into three lectures which were delivered in Frankfurt late in 1936.²

At the time, I was shocked by Lentricchia's naiveté, and said so. To me it seemed bizarre that while young men Heidegger had urged on to "Labor Service, Military Service, and Knowledge Service" were preparing to incinerate children, Heidegger himself was spending his time and energy making sure he was getting "the origin of the work of art" exactly right.

The question that struck me, but not my colleague in American literature, was: How could a true philosopher remain concerned with such rarefied aesthetic questions while living in a culture of pure evil? Gottfried asks whether "...the vast majority of German academics [were] even aware of the Holocaust." We shall never have the answer to that question because of the massive denial that took place among Germans after the war. Hannah Arendt, hardly an enemy to Heidegger or German culture, observes, in *Eichmann in Jerusalem*, that

the practice of self-deception had become so common, almost a moral prerequisite for survival, that even now, eighteen years after the collapse of the Nazi regime, when most of the specific content of its lies has been forgotten, it is sometimes difficult not to believe that mendacity has become an integral part of the German national character.³

Given that problem, it is difficult to figure out what German academics knew or did not know. But anyone who has read Max Weinreich's *Hitler's Professors* will not doubt that the vast majority of academics backed the National Socialist cause. And we now know that many of the SS elite were former or future academics.

Nor was Lentricchia, *pace* Gottfried, alone among American academics in his uncritical admiration of Heidegger and his blindness to Heidegger's involvement in Nazism. "Neither the misogynist Nietzsche nor the social organicist Heidegger," Gottfried declares, "enjoys any special favor among American deconstructionists." I don't know where Professor Gottfried has been the last fifteen years, but he is completely mistaken in this assertion. The Lentricchia book mentioned above, which is highly laudatory of both Heidegger and Nietzsche (as well as of the French Nietzschean, Michel Foucault), appeared in 1980. A year later it was followed by a turgid study from another American literature scholar, David Halliburton, who introduced his work with the words,

"Among modern thinkers no one has made higher claims for art or for poetry than Martin Heidegger."⁴ He also volunteered the information that "the later writings of Kenneth Burke reveal the imprint of Heidegger's thinking; Heidegger has been linked to American blues music by Christian Norberg-Schulz. I might also mention the influence of Heidegger on my *Edgar Allan Poe: A Phenomenological View*."

For the record, which seems to be a blank sheet to Professor Gottfried, in 1976, William V. Spanos published a special Heidegger issue in his journal, *Boundary 2*, which was reproduced in hard cover by the Indiana University Press three years later as *Martin Heidegger and the Question of Literature: Toward a Postmodern Literary Hermeneutics*. This collection consists of seventeen worshipful essays on the work of the master, including at least half a dozen pieces by American literary critics and scholars who were practically beside themselves in their admiration for Heidegger, The Thinker. And Heidegger's role as a founding father was proclaimed prominently during the eighties in many primers on deconstruction. I will mention only one as symptomatic, Vincent Leitch's *Deconstructive Criticism: An Advanced Introduction* (1983). Only two of the writers discussed in this *Advanced Introduction* receive more citations than Heidegger: Derrida and Foucault. I don't want to waste space with a list of American deconstructionists and Heideggerians, but Professor Gottfried can find one on page xxiv, in the "Acknowledgments" of Spanos's book. And Leitch ends his book with a fairly extensive "Note on Bibliography," including the statement that "The materials related to deconstruction will grow in numbers in the 1980s. As I write this note, I am aware of books in progress by . . .," and goes on to mention seven future writers, plus "recent translations of essays by Julia Kristeva, . . . to be followed by another volume of her work."⁵

When Gottfried writes that "Having been around educational egalitarians, feminist zealots, and multicultural reformers for three decades now, it is hard for me to recall a single conversation with any of them on Heidegger or Nietzsche," I can only say that for the last two decades he has not been talking to the people who were writing the books I read and reviewed. The "authors favorably mentioned by [Professor Gottfried's] colleagues have been Karl Marx, John Dewey, Gloria Steinem, and others identified with their own efforts at eradicating social and gender distinctions." The academic feminists I know look down with contempt at Steinem as a popularizer and never speak of Dewey, but they do often worship at the Marxian altar. The feminist authors favorably mentioned by such colleagues tend to be more the likes of Gayatri Spivak, Julia Kristeva, and Helene Cixous, all, to some extent, disciples of French theorists and of Heidegger and Marx, as well.

And what about Professor Gottfried's interesting image of Donna Shalala poring over "*Sein und Zeit* before imposing minority quotas at the University of Wisconsin"? Why would she have pored over that tome of Heidegger's when she might have gone straight to Heidegger's most direct declaration of educa-

tional philosophy, his Rectorate Address, "The Self-Assertion of the German University." There, Ms. Shalala might have learned something about educational quotas, though they would not have been quotas favoring oppressed minorities, but rather quotas intended to enshrine the most militant male representatives of the majority white culture. She would not only have learned something about how to institute quotas favoring the politically correct, but also how to shape students at the University of Wisconsin into goose-stepping battalions.

Let us contemplate the words of Heidegger himself. "All abilities of will and thought," he announced to the students and faculty of the University of Freiburg, "all strengths of the heart, and all capabilities of the body must be unfolded *through* battle, heightened *in* battle, and preserved *as* battle."⁶ The original German provides an even clearer picture of his mindset: "*Beide Willen müssen sich gegenseitig zum Kampf stellen. Alle willentlichen und denkerlichen Vermögen, alle Kräfte des Herzens und alle Fähigkeiten des Leibes müssen durch Kampf entfaltet, im Kampf gesteigert und als Kampf bewahrt bleiben.*" One can debate whether Heidegger was merely an opportunist or a philosopher who really believed in National Socialism, but these are not mutually exclusive possibilities, and the probability is that both are true: Heidegger believed in National Socialism and was not above currying favor with Adolph Hitler. How else to explain the drumbeat of "Kampf" in an address given to university students and faculty soon after the accession to power by the author of *Mein Kampf*?

At any rate, Professor Gottfried misses the main point of my essay, which is rather surprising, given the fact that it is stated in the title, "Leaning Left from the Far Right." The point I thought I had made quite explicitly was, not that we can go directly from Heidegger's thinking to radical revisionist attacks on "the canon" of American literature, but precisely the opposite—namely, that one cannot make this passage directly and that what Spanos does (as do others, including Donald Pease, an American literature critic, who gushes over Spanos—and Heidegger—in a foreword to *Heidegger and Criticism*) is to superimpose social goals generated by progressive Enlightenment ideas on the reactionary radicalism of Heidegger.

Professor Gottfried continues to miss the point when he writes that:

The review of Spanos's book, moreover, does not prove Hirsch's case. From Spanos's failure to deal critically with the antisemitism of Pound and Eliot in his book on modernist aesthetics, Hirsch infers that Spanos must be of the far Right: "[H]e was quite comfortable with the reactionary and, in many instances, fascist politics of the modernist poets and essayists." None of this can be justifiably inferred from Spanos's scholarship of the mid-seventies, at least as presented by Hirsch. There is no reason to think that Spanos acted as a closet fascist by failing to denounce the politics of Eliot or Pound.

It may be that here the fault is mine in not having made my point as clearly as I should have. I did not mention a Spanos book on modernist aesthetics, as

Professor Gottfried claims, for the simple reason that as far as I know there is none. I was referring to an early essay included in the Heidegger book, and what I was talking about, generally, on the first page of my essay was an inherent dishonesty resulting from Spanos's juggling of materials in his essays as collected in the book, and his presentation of later interpolations into early essays as though the ideas in the interpolations were what Spanos had always believed. Hence, what I had in mind in my allusion to Spanos's writings on T.S. Eliot was to point out that although Spanos tells us he discovered Heidegger's philosophizing as an undergraduate, and tells us that Heidegger had fired him with opposition to war and racism among other evils, this fierce rage for social justice did not show up in his early encounters with Eliot's antisemitism or in his encounters with the fascist politics of other modernist writers.

Professor Gottfried, who wants "proofs," does not endeavor to prove his own arguments. For example, he asserts that "The European postmodernists who reign in our universities, Hirsch admits, are Frenchmen of the radical Left. Far from being Nazi antisemites, some, like Jacques Derrida, are undeniably Jewish." What is the logic of the argument? Being "undeniably Jewish" has not prevented Derrida from mounting an extravagant defense of Heidegger's Rectorate Address, interpreting it as an abstract disquisition on Spirit.⁷ Worse, he has defended the collaborator Paul de Man in an outrageous way. As I pointed out in 1988, it wasn't just that Derrida was defending de Man, but that he had turned him into a Christ-like victim. "Is it not de Man," Derrida asks, "who speaks to us 'beyond the grave' and from the flames of cremation?" Was de Man really gassed in a Nazi death camp, and is it in desecrating the memory of the Jewish victims of the Holocaust that Derrida proves himself "undeniably Jewish"? If we grant, however, what Professor Gottfried says, that Derrida is "undeniably Jewish," then he should hang his head in eternal shame.

Professor Gottfried says "Hirsch is wrong to maintain that 'the honor of conducting a totally obsessive, unrelenting campaign of genocide against a peaceful and defenseless 'enemy' belongs only to the Nazis,'" and adds that "The ancient Assyrians and Hittites boasted of the same deed; and Robert Conquest amply documents the genocidal policies carried out in Soviet Russia." I'm surprised that Professor Gottfried omitted some of the more obvious candidates for genocide frequently set parallel to the Nazi genocide of the Jews: Bosnia, Biafra, Rwanda, Cambodia, the Armenians. In a recent book, *The Holocaust in Historical Context*, Steven Katz considers all these and other candidates, including the Assyrian example, in arguing at great length and in meticulous detail the uniqueness of the Holocaust and Nazi genocide.⁸

I should add that Professor Gottfried's invocation of genocides inflicted by ancient peoples misses an important point. In *The Tower and the Abyss*, Erich Kahler compares Nazi violence and terror with its primitive antecedents, making the point that the German National Socialist violence constitutes a unique step

backward in human development, one in which a high culture plummeted to an almost inconceivable level of baseness, and Heidegger was a part of that fall.⁹

Gottfried contends, "Contrary to one idea looming over Hirsch's book as well as his review essay, Heidegger has few defenders left in the American academy." Of course, Gottfried's rushing to Heidegger's defense refutes his point. But in addition, he misunderstands the context of my article. Spanos's book was an intervention, though he denied it, into the European debate on Heidegger generated by Viktor Farias's book. In their all-out efforts at damage control, French Heideggerians were forced to find some way to turn historical reality inside out. One attempt is Derrida's ludicrous analysis of Heidegger's Rectorate Address as a tribute to Spirit. Another is Philippe Lacoue-Labarthe's equally ludicrous assertion that

Nazism is a humanism in so far as it rests upon a determination of humanitas which is, in its view, more powerful—i.e., more effective—than any other.... The fact that [the subject of absolute self-creation] lacks the universality which apparently defines the humanitas of humanism in the received sense, still does not make Nazism an anti-humanism.¹⁰

No reasonable person would willingly accept such absurdities. Nazism was not a humanism but rather the mortal enemy of humanism, and it is clear that Lacoue-Labarthe's ridiculous claim is a desperate attempt to protect something in which he has a considerable stake. French Heideggerians and deconstructionists have long ago lost all credibility. It is obvious that their rear-guard action is intended to shore up a foolish investment by throwing good money after bad.

An op-ed piece by the historian Tony Judt in the 19 July 1995 *New York Times* confirms the French intellectuals' growing crisis of credibility. Professor Judt writes

Intellectuals, so prominent in post-war France, might have been expected to force the issue [of French guilt in the Holocaust]. Yet people like Jean-Paul Sartre and Michel Foucault were curiously silent.... When Simone de Beauvoir, Roland Barthes and Jacques Derrida entered the public arena, it usually involved a crisis far away—in Madagascar, Vietnam or Cambodia.

Professor Gottfried takes umbrage at my comparison of Heidegger with Matthew Arnold. Arnold, however, was no less a classical scholar than Heidegger. Arnold loved the ancient Greeks but never forgot that the essence of Western culture lay in its fusion of the Classical and Biblical pasts. The statement I made about Arnold in my book was infelicitous. I should never have used the unwarranted phrase, "Yet for all its shallowness." Arnold was a learned and brooding thinker, who was very far from being shallow. But I believe that he did find it difficult to dwell in the depths, and, when he caught a glimpse of the abyss, he did his best to avert his eyes.

It is generally agreed that Arnold preferred Hellenism to Hebraism, and that he did so in part, not only because of his training in classicism, but also because he underestimated the dark side of Hellenism. In the light of later research it is clear that the radiant surface of sweetness and light covered an abyss of unmitigated terror, the irrational, and unrestrained cruelty. On its dark side, Hellenism was a culture of excess, one that condoned slavery, unbridled acts of cruel vengeance, and even child sacrifice.

We can also perceive, looking back, that Arnold underrated Hebraism. He confused Hebraic religiosity with narrow Puritanism.¹¹ For Arnold, Hebraic moralism had to be acknowledged, one might say, as a necessary evil, or at least a necessary antidote to Hellenic excess. As Arnold saw it, only through Christianity, the purified distillation of Hebraism (in Arnold's own words, "the later, the more spiritual, the more attractive development of Hebraism"), could the ultimate goal of Hellenism be achieved. As Arnold put it, Hellenism was unable to achieve its goal of "seeing things in their essence and beauty, as a grand and precious feat for man to achieve," because the "Hellenic conception of human nature was unsound...at that particular moment of man's development." What was lacking among the Greeks, according to Arnold, was a sense of "discipline."¹²

"To a world stricken with moral enervation," Arnold continued, "Christianity offered its spectacle of an inspired self-sacrifice; to men who refused themselves nothing, it showed one, who refused himself everything." As a nineteenth-century Christian, Arnold would not deny the power of Hebraism, but, as has often been the case with Christians, he was not able to give Hebraism its full due either. Hebraism is not exclusively the stern Puritanism imagined by Arnold. It did not bring to Hellenism only a single instance of one individual who was a "spectacle of an inspired self-sacrifice" but offered, rather, a weighty and general counterbalance to the culture of cruelty underlying Hellenic sweetness and light.

That individual spectacle of inspired self-sacrifice was, after all, the culmination of centuries, if not millennia, of religious development. In an inspired comparison, Arnold writes that "The governing idea of Hellenism is *spontaneity of consciousness*; that of Hebraism, *strictness of conscience*" (Arnold's italics).¹³ The phrasing is magnificent, but the reality is necessarily oversimplified in both cases. As far as the latter goes, "strictness of conscience" is far from an adequate characterization of Hebraism, for the ground in which the seeds of Christianity were planted was much more fertile than that.

At the core of Hebraism is not simply "strictness of conscience" (and a narrow-minded obsession with sin, as Arnold seemed to suggest) but a stern yet tender code of transgression, repentance, atonement, *and forgiveness*. The biblical God may be a stern God, but He is also described as "slow to anger and great in mercy," as perhaps best exemplified in the famous verse 20, chapter 31 of the Book of Jeremiah: "Is Ephraim still my dear son, a child in whom

I delight? As often as I turn my back on him I still remember him; and so my heart yearns for him, I am filled with tenderness towards him." Nor is strictness of conscience merely self-righteousness, as is sometimes believed, but socially responsible behavior, as expressed in Isaiah 1:17: "Cease to do evil and learn to do right, pursue justice and champion the oppressed; give the orphan his rights, plead the widow's cause."

The tender quality of mercy so central to Hebraism is absent from Heidegger's philosophy of Being, as it is also absent from the ideology of National Socialism. In an address to the Second Consultation on Hermeneutics delivered in 1964, Hans Jonas asked his listeners: "My theological friends, my Christian friends—don't you see what you are dealing with? Don't you sense, if not see, the profoundly pagan character of Heidegger's thought?"¹⁴ In fact, we must go a bit further than Jonas.

It was Nietzsche who saw the dichotomy between Hellenism and Hebraism in a perspective that has become definitive for the twentieth century, one that was clearly outlined from a humanist point of view by Thomas Mann in a talk delivered at the Library of Congress in Washington, D.C., in 1947. Mann pointed out that, for Nietzsche, "civilization, that is, the nobleness of life," grows out of "art and instinct." And although Mann does not elaborate at this point, we must infer that he is thinking of Nietzsche's celebration of self-indulgent dionysian drunkenness and unrestrained licentiousness in *The Birth of Tragedy*. Nietzsche, Mann continues, considers "consciousness and cognizance, science and finally morals—that same morality which as preserver of truth assassinates life," as the enemies of "civilization."¹⁵

Later in his talk, Mann pointed out that "Nietzsche, far from any racial anti-semitism, does indeed see in Jewry the cradle of Christianity and in the latter, justly but with revulsion, the germ of democracy.... The primary reproach he throws at Christianity is the fact that it raised the individual to such importance that one could no longer *sacrifice* it."¹⁶ The paradox is that Hebraism restrains the behavior of the human individual at the same time that it raises the integrity of the individual to new heights. Hebraism does not call for sacrifice of the individual to satisfy a cause or the appetites of the gods, but rather calls on the individual to sacrifice his own selfish needs for the good of others.

In rejecting Hebraism, National Socialism also rejected all democratic and humane values, and sought to return to a glorious barbaric past that would replace humane values with a cult of cruelty. Heidegger, too, rejected Hebraism and yearned to return to a primeval past. William Barrett concludes that Heidegger's "thought never finally arrives at the ethical after all." But that may be an evasion. It may be more accurate to say that Heidegger's yearning to return to rediscover pre-Socratic philosophy inevitably brings with it an ethic of pagan cruelty, so that, as Nietzsche perceived, "in every exuberant joy there is heard an undertone of terror."¹⁷ Martin Buber had no trouble recognizing the pagan and dehumanizing elements in Heidegger's philosophy. In *Between*

Man and Man he points out that, "The man of 'real' existence in Heidegger's sense, the man of 'self-being,' who in Heidegger's view is the goal of life, is not the man who really lives with man, but the man who can no longer really live with man, the man who now knows a real life only in communication with himself."¹⁸ Heidegger himself believed his philosophy was compatible with the Nazi cult of cruelty. Why should we believe otherwise?

Richard Rorty has written that "There is no way to correlate moral virtue with philosophical importance or philosophical doctrine. Being an original philosopher . . . is like being an original mathematician or an original microbiologist or a consummate chess master: it is the result of some neural kink that occurs independently of other kinks."¹⁹ That's fine, but I wonder if Professor Rorty's department offers a concentration in "Readings in the Interesting Independent Neural Kinks of Assorted Weirdos," rather than a concentration in philosophy. Until it does, he would seem to be in bad faith, or at least guilty of permitting his department to engage in false advertising.

Certainly, my colleague in American literature William V. Spanos does not seem to consider the study of Heideggerian destruction as the investigation of neural kinks. He claims that Heidegger's thinking provides the basis for converting us into oppositional intellectuals who will take it as our mission to reclaim literature departments, and academia in general, from what he takes to be the corrupting influence of Humanism.

Notes

1. David Hirsch, "Penelope's Web," *The Sewanee Review* (Winter 1982): 119-31.
2. Frank Lentricchia, *After the New Criticism* (Chicago and London: The University of Chicago Press, 1980), 88-89.
3. Hannah Arendt, *Eichmann in Jerusalem* (New York: The Viking Press, 1963), 52.
4. David Halliburton, *Poetic Thinking: An Approach to Heidegger* (Chicago, Ill.: University of Chicago Press, 1981).
5. Vincent B. Leitch, *Deconstructive Criticism: An Advanced Introduction* (New York: Columbia University Press, 1983), 286.
6. *Martin Heidegger and National Socialism: Questions and Answers*, ed. Gunther Neske and Emil Kettering, trans. Lisa Harries (New York: Paragon House, 1990), 12, emphasis in original.
7. The fairest and most sensible analysis of the address I know is in, Tom Rockmore, *On Heidegger's Nazism and Philosophy* (Berkeley, Los Angeles, Oxford: University of California Press, 1992), 54-72.
8. Steven Katz, *The Holocaust in Historical Context* (New York and Oxford: Oxford University Press, 1994).
9. Erich Kahler, *The Tower and the Abyss* (New York: George Braziller, Inc., 1957).
10. Philippe Lacoue-Labarthe, *Heidegger, Art and Politics: The Fiction of the Political*, trans. Chris Turner (Oxford: Basil Blackwell, 1990), 95.
11. See Harold Fisch, *Jerusalem and Albion: The Hebraic Factor in Seventeenth-Century Literature* (New York: Schocken Books, 1964), 285. Fisch observes that Arnold failed "to see that Puritanism is not quite co-extensive with Hebraism."
12. Matthew Arnold, *Culture and Anarchy* (Indianapolis and New York: The Bobbs-Merrill Company, Inc., 1971), 113-14.

13. *Ibid.*, 109.
14. Hans Jonas, "Heidegger and Theology," *The Phenomenon of Life* (New York: Harper & Row, 1966), 248.
15. Thomas Mann, "Nietzsche's Philosophy in the Light of Contemporary Events," *Nietzsche: A Collection of Critical Essays*, ed. Robert C. Solomon (Garden City, N.Y.: Anchor Books, 1973), 359. Nietzsche made a distinction between "the Dionysiac Greeks" and "the Dionysiac barbarians." The latter, he wrote, engaged in "complete sexual promiscuity...; all the savage urges of the mind were unleashed on those occasions until they reached that paroxysm of lust and cruelty which has always struck me as the 'witches' cauldron' par excellence." But having made the distinction, Nietzsche goes on to comment that "similar urges began to break forth from the deep substratum of Hellenism itself." Friedrich Wilhelm Nietzsche, *The Birth of Tragedy*, trans. Francis Golffing (Garden City, N.Y.: Doubleday Anchor Books, 1956), 25-26.
16. Mann, "Nietzsche's Philosophy," 369, emphasis in original.
17. Nietzsche, *The Birth of Tragedy*, 26, 27.
18. Martin Buber, *Between Man and Man*, trans. Ronald Gregor Smith (Boston: Beacon Press, 1961), 168.
19. Richard Rorty, "Taking Philosophy Seriously," *New Republic*, 11 April 1988, 32-33.

California State University, Sacramento (CSUS) ruled last year that psychology professor Joanne Marrow did not sexually harass a male student. The Fall 1995 *AQ* carried on page 17 an account of how the student, one Craig Roberts, had felt "raped and trapped" by Marrow's lesbian-inspired teaching. In *Feminist Teacher* (Spring/Summer 1995), page 4, Marrow commented on her exoneration as follows:

"I feel relieved and happy and pleased to have the support of the university to continue to teach about female sexuality and the simple joys and pleasures of masturbation."

Roberts filed suit against Marrow and CSUS in a California court in late 1995.