

## ESSAY

### PSYCHODYNAMICS OF THE JUDICIAL PROCESS

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*In this essay, Sahand Shaibani employs a Freudian psychoanalytic approach to discuss the influence of irrational and emotive forces in the American judicial process. He argues that the adversarial legal process serves the important psychological function of sublimating aggression, and that trial courts present a forum for the recreation of the Oedipal triangle, wherein the judge is unconsciously perceived as a symbolic father-figure onto whom emotional reactions are projected. Mr. Shaibani further argues that judges manipulate the language of precedent to rationalize their inherently irrational decision-making which is often based upon an emotional reaction to a given set of facts. Mr. Shaibani concludes that the psychoanalysis of the American judicial system is likely to stir a sense of chaos in society, but that the pursuit is, nonetheless, worthwhile.*

#### INTRODUCTION

And you, red judge, if you were to tell out loud all that you have already done in thought, everyone would cry, “Away with this filth and this poisonous worm!”<sup>1</sup>

Lawyers, judges, and legal scholars have traditionally presumed that humans are rational beings, at least insofar as the law is concerned, and that judicial decision-making is a determinate process characterized by the application of precedent to existing facts in a deductive and logical manner. The presupposition of law’s inherent rationality has led to the eclipse of another dimension of law – the mysterious emotive forces lying beneath conscious awareness that often influence the life of the law without manifesting themselves explicitly. Is it possible that humans are primarily governed by irrational instinctual<sup>2</sup> impulses, and that the law is a necessary external element that must regulate

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<sup>1</sup> FRIEDRICH NIETZSCHE, *THUS SPOKE ZARATHUSTRA* 38 (Walter Kaufmann trans., The Modern Library 1995).

<sup>2</sup> See SIGMUND FREUD, *BEYOND THE PLEASURE PRINCIPLE* 43 (James Strachey ed., 1961) [hereinafter *PLEASURE PRINCIPLE*], for Freud’s definition of instinct. Freud writes:

their behavior in order for civilization to persist? Could it be that the law is inherently illogical, although it exists under the pretense of rationality? What of the proposition that judicial decision-making is the fulfillment of personal prejudices of judges rather than the product of “legal reasoning based on precedent”? What is the consequence of validating such subversive queries?

This essay uses a Freudian psychoanalytic perspective to introduce a discussion of the influence of irrational and emotive forces in the judicial process. This inquiry is based on the premise that human personality is shaped by the psychodynamics of conscious and unconscious, rational and irrational, as well as the ambivalent emotional and instinctual impulses which interact to determine the outcome of human behavior. This discussion of the judicial process is limited to cases that are likely to stir emotional and idiosyncratic reactions in the participants; adjudication of criminal, tort, family, and constitutional law cases fall within this category.

In Part One, I will discuss the psychoanalytic significance of law’s function as a social mechanism designed to regulate and institutionalize the otherwise violent means of dispute resolution among members of society. In Part Two, the discussion will shift to the psychodynamics of trial court litigation. In Part Three, I will discuss the nature of appellate-level judicial decision-making from a Freudian psychoanalytic view.

#### I. PSYCHOANALYTIC FUNCTION OF THE ADVERSARIAL LEGAL PROCESS

The idea that law serves the social purpose of regulating the resolution of disputes among members of society in a peaceful and orderly manner is rather obvious. One can imagine the chaos that would ensue in a state where citizens did not have access to an institutional mechanism for resolving their disputes with one another. The parties would have to resort to private vengeance; the stronger party would likely humiliate, extort, and/or physically harm the other. Soon society would revert back to the Hobbesian “state of nature,” characterized by utter lawlessness, absence of justice or ethics, and “such a war as is of every man against every man” wherein “the life of man [is] solitary, poor, nasty, brutish, and short.”<sup>3</sup> Thus, law brings peace and order to society by mandating appropriate forms of action, prescribing punishment for disobedience, and institutionalizing the means for dispute resolution.

Perhaps less obvious is the psychological function served by choosing law as the social mechanism for adjudication. The adversarial legal process serves a very important

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But how is the predicate of being ‘instinctual’ related to the compulsion to repeat? . . . *It seems, then, that an instinct is an urge inherent in organic life to restore an earlier state of things* which the living entity has been obliged to abandon under the pressure of external forces . . . . [T]o put it another way, [an instinct is] the expression of the inertia inherent in organic life.

*Id.*

<sup>3</sup> Thomas Hobbes, *Leviathan*, in THE OXFORD COMPANION TO PHILOSOPHY 851 (Ted Honderich ed., 1995).

psychological function insofar as it results in the sublimation of the aggressive instinct, thereby curbing the path for the expression of the litigants' hostility towards each other. Before commencing litigation, parties have often reached a point where no other means of resolution seem to exist. They are frustrated, enraged, and filled with "combat feelings" that seek some form of expression. The adversarial legal process allows litigants to express their aggression without resorting to physical violence: "That clients . . . try to use litigation as a 'channel for . . . hostile and aggressive impulses' . . . is, of course, hardly surprising, since lawsuits are historically, and even presently, substitutes for private brawls, blood-feuds and the like."<sup>4</sup> Furthermore, litigation allows the parties' lawyers to "fight" for their clients—assuming they empathize with their client's cause—and in this way, the lawyers themselves release aggressive impulses, albeit in sublimated form.<sup>5</sup>

In return for the apparent peaceful solution that the law brings to dispute resolution, there is a corresponding disadvantage bestowed upon citizens by the rule of law: namely, neurosis and unhappiness.<sup>6</sup> From a psychoanalytic view, the renunciation of instincts (in the sense of suppressing innate sexual and aggressive urges) is a necessary prerequisite for joining civilization and upholding lawful society. This repression of instinctual urges increases the unpleasant experience of guilt<sup>7</sup> when one fails to repress fully such unacceptable unconscious tendencies. The renunciation of instincts leads to some degree of neurosis, which in turn results in unhappiness for civilized humanity. Indeed, by becoming members of lawful society, citizens exchange a portion of their happiness—formerly fulfilled through direct instinctual gratification—for the degree of security brought about by the law.

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<sup>4</sup> C. G. SHOENFELD, *PSYCHOANALYSIS AND THE LAW* 99 (1973) (citations omitted).

<sup>5</sup> *See id.* (explaining the "combat feelings" that may motivate attorneys); *see also id.* at 17 (asserting that "trials not only provide opportunities to express hostility, conscious and unconscious, but may also be *instigated* at times by this hostility.").

<sup>6</sup> *See generally* SIGMUND FREUD, *CIVILIZATION AND ITS DISCONTENTS* (James Strachey ed., 1961) [hereinafter *FREUD, CIVILIZATION*].

<sup>7</sup> *See id.* at 84. (noting that, just as the law is the external mechanism employed by civilization for regulation of aggression, the sense of guilt is the internal mechanism employed by the Super-Ego to prevent the fulfillment of the Id's aggressive impulses, both in fantasy and reality). Freud explains:

His aggressiveness is introjected, internalized; it is, in point of fact, sent back to where it came from—that is, it is directed towards his own ego. There it is taken over by a portion of the ego, which sets itself over against the rest of the ego as super-ego, and which now, in the form of 'conscience', is ready to put into action against the ego the same harsh aggressiveness that the ego would have liked to satisfy upon other, extraneous individuals. The tension between the harsh super-ego and the ego that is subjected to it, is called by us the sense of guilt; it expresses itself as a need for punishment. Civilization therefore, obtains mastery over the individual's dangerous desire for aggression by weakening and disarming it and by setting up an agency within him to watch over it, like a garrison in a conquered city.

*Id.* (citation omitted).

Thus, the law forbids members of society to engage in private vengeance, and in its place allows people to release their sublimated aggression through the adversarial litigation process:

This replacement of the power of the individual by the power of a community constitutes the decisive step of civilization. The essence of it lies in the fact that the members of the community restrict themselves in their possibilities of satisfaction, whereas the individual knew no such restrictions. The first requisite of civilization, therefore, is that of justice—that is, the assurance that a law once made will not be broken in favor of an individual . . . The further course of cultural development seems to tend towards making the law no longer an expression of the will of a small community . . . . The final outcome should be a rule of law to which all . . . have contributed by a sacrifice of their instincts, and which leaves no one . . . at the mercy of brute force.<sup>8</sup>

However, this subordinated form of instinctual gratification is not adequate to the Id,<sup>9</sup> whose impulses must be continuously repressed by the Ego<sup>10</sup> in order to obey the internal and external rules of law.

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<sup>8</sup> *Id.* at 49.

<sup>9</sup> The Id is the great reservoir of instinctual energy, containing the passions emanating from the two instincts of sexuality and aggression. The Id is mostly unconscious, though its impulses often emerge to conscious awareness. The Id is governed by the “pleasure principle,” which may be characterized by the assertion “act in the manner which will bring you the most pleasure immediately regardless of the consequences.” See *id.* at 29–30, for Freud’s comments on sublimation. Freud explains:

The task here [in sublimation] is that of shifting the instinctual aims in such a way that they cannot come up against frustration from the external world. In this, sublimation of the instincts lends its assistance. One gains the most if one can sufficiently heighten the yield of pleasure from the sources of psychical and intellectual work. . . . A satisfaction of this kind, such as an artist’s joy in creating, in giving his fantasies body, or a scientist’s in solving problems or discovering truths, has a special quality . . . . But their intensity is mild as compared with that derived from the satiation of crude and primary instinctual impulses.

*Id.* Freud further notes: “Sublimation of instinct is an especially conspicuous feature of cultural development; it is what makes it possible for higher psychical activities, scientific, artistic or ideological, to play such an important part in civilized life.” *Id.* at 51.

<sup>10</sup> Freud describes the Ego in the following way:

It is easy to see that the ego is that part of the id which has been modified by the direct influence of the external world . . . . [The ego] endeavors to substitute the reality principle for the pleasure principle which reigns unrestrictedly in the id. . . . The ego represents what may be called reason and common sense, in contrast to the id, which contains the passions. . . . Thus in its relation to the id it is like a man on horseback, who has to hold in check the superior strength of the horse; with this difference, that the rider tries to do so with his own strength while the ego uses borrowed forces.

The Ego finds itself in a very difficult position, since it must mediate between the Id's demand for instinctual gratification, and the Super-Ego's<sup>11</sup> opposing demand for the renunciation of morally questionable and unacceptable unconscious desires emanating from the Id. In order to protect itself, the Ego employs various defense mechanisms,<sup>12</sup> and simultaneously uses the law as an external instrument for regulating irrational tendencies. The outcome of creating such a complex psycho-legal regulatory network is that judicial processes are inevitably influenced by irrational emotive factors. Indeed, one may speak of the "psychodynamic judicial process," where chaos is disguised as order, and irrationality disguised as reason. The next section will discuss some of the emotive forces at play during trial.

## II. PSYCHODYNAMICS OF TRIAL-COURT LITIGATION

Trial provides various opportunities for all participants to express unconscious parent-oriented emotions that have been repressed since childhood. These emotions are repressed in childhood primarily due to the fact that they are extremely ambivalent, eliciting punishment from the Super-Ego. From a psychoanalytic view, the trial judge can be viewed as a symbolic father figure, who may arouse in the litigants parent-oriented feelings. If the judge is perceived as an unconscious symbolic father-substitute, the litigants may unconsciously displace<sup>13</sup> their parent-oriented feelings onto him. This may take the form of an unconscious wish to physically harm the judge, manifesting itself in conscious hostility toward the judge, particularly if he is ruling against one's case. A trial judge who uses his discretion to limit a litigant's chances of winning the case may be perceived as a father who sought to limit the child's desire for having intimate relations with the mother, thereby evoking the child's Oedipal<sup>14</sup> feelings of hatred. As Shoenfeld asserts:

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SIGMUND FREUD, THE EGO AND THE ID 18–19 (James Strachey ed., 1960) [hereinafter EGO].

<sup>11</sup> The Super-Ego is the psyche's moral agency, comprised of the Ego-Ideal (the agency declaring how I ought to be) and conscience (the agency prescribing moral codes and punishments for violations thereof). *See id.* at 22–36. The Super-Ego is "heir to the Oedipus complex," created after repression of Oedipal wishes and identification with the same-sex parent. *See id.*

<sup>12</sup> Defense mechanisms are techniques employed by the Ego to reduce anxiety originating from the threat of Super-Ego punishment or the dread of being overwhelmed by the strength of the instincts. Examples include repression, denial, sublimation, projection, and rationalization. *See generally* ANNA FREUD, THE EGO AND THE MECHANISMS OF DEFENSE (rev. ed., 1966) (describing the ways by which the Ego fends off anxiety and assumes control over instinctive impulses).

<sup>13</sup> "[Displacement a]s a defense mechanism involves a purposeful unconscious shifting from one object to another in the interest of solving a conflict. Although the object is changed, the instinctual nature of the impulse and its aim remain the same." JAY KATZ ET AL., PSYCHOANALYSIS PSYCHIATRY AND LAW 157 (1967).

<sup>14</sup> For a description of the Oedipus Complex, see FREUD, EGO *supra* note 10, at 26–27. Freud writes:

In its simplified form the case of a male child may be described as follows. At a very early age the little boy develops an object-cathexis for his mother, which originally

Persons who may serve as unconscious parent symbols (kings, judges, employers and so on) often have displaced onto them repressed parent-oriented feelings that have remained in the unconscious since early childhood; and because . . . a child's early feelings towards his parents usually range from primitive love to savage hatred, the repressed emotions of early childhood displaced onto parent substitutes are frequently not only affectionate and loving but also angry and hostile . . . . [I]t is conceivable that judges and the courts on which they sit may well constitute the law's most important unconscious parent symbols.<sup>15</sup>

In a sense, a child's parents are his first judges, constructing the family "tribunal" wherein the father's "law" adjudicates whether the child's actions are right or wrong, and mandates appropriate rewards and punishments.<sup>16</sup> If someone had experienced frequent "injustice" in the parental tribunal, then it is not inconceivable that he or she would later view all courts and laws as instruments of oppression designed to perpetuate injustice. Such a litigant would tend to displace feelings of hostility—originating from childhood—onto the judge and the court.

Likewise, someone who has experienced violent abuse during childhood may later perceive all instruments of the law—the police, the judge, and the criminal law—as extensions of the unjust father figure who will forever pursue him to inflict further harm. From this point of view, it is not surprising to observe an uncooperative attitude in criminal defendants toward the criminal justice system. These ideas may shed light on the proposition that an abusive family environment in childhood may be a significant cause of adult criminality.

Furthermore, trial provides an atmosphere where not only litigants but also their lawyers can displace family-oriented feelings onto the judge and opposing counsel. A lawyer who identifies with his client, or at least empathizes with his client's cause, will often perceive the other side's counsel as a threat. This rivalry is not simply limited to

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related to the mother's breast and is the prototype of an object-choice on the anaclitic model; the boy deals with his father by identifying himself with him. For a time these two relationships proceed side by side, until the boy's sexual wishes in regard to his mother become more intense and his father is perceived as an obstacle to them; from this the Oedipus complex originates. His identification with his father then takes on a hostile colouring and changes into a wish to get rid of his father in order to take his place with his mother. Henceforward his relation to his father is ambivalent; it seems as if the ambivalence inherent in the identification from the beginning had become manifest. An ambivalent attitude to his father and an object-relation of a solely affectionate kind to his mother make up the content of the simple positive Oedipus complex in a boy.

*Id.* (citations omitted).

<sup>15</sup> SHOENFELD, *supra* note 4, at 35, 40 (citation omitted).

<sup>16</sup> *See id.* at 42.

the purpose of winning the case, for it may have its origins beyond the immediate court action. The lawyer's rivalry may be motivated by subconscious tendencies that have been repressed in childhood, turning his case into a personal matter. Specifically, the opposition between each side's counsel may have its underlying origin in a childhood experience of sibling rivalry that significantly influenced the development of the lawyer's personality. In such a situation, the trial judge may be a symbolic parental figure for lawyers who subconsciously perceive each other as rival siblings reliving a childhood experience. The lawyers could project parental feelings onto the judge, and depending on which side he favored in the litigation, the projections could range from severe hostility to intense liking. Accordingly, sibling rivalry may be a valid explanation for why opposing counsel at times scream at each other and express hostility toward one another in the courtroom:

A lawyer . . . may on an unconscious level equate the counsel who opposes him with the brother or sister who once competed with him for parental love during childhood. If so, then the likelihood is that angry and hostile feelings of sibling rivalry concerning this brother or sister that he may have repressed during childhood will be displaced onto the opposing counsel; and as a result, he may provoke and actively engage in undignified and unnecessary squabbles with this counsel.<sup>17</sup>

In addition to litigants and their lawyers, the judge may also subconsciously displace family-oriented emotions onto the trial participants. A trial judge who subconsciously perceives a litigant or lawyer as a symbolic daughter or son would likely displace parental emotions onto the symbolic child-figure. Depending on how the judge views his or her own child and what sort of emotions he or she feels toward the child, the litigant or lawyer who symbolically represents the judge's child would be subject to familial emotional reactions—ranging from intense like to dislike—from the judge. These ideas could explain a situation where a judge seems to favor one of the litigants over the other, even though the disfavored party has a better argument. Thus, none of the trial participants is immune to the everlasting recreation of the Oedipal triangle,<sup>18</sup> and the resulting emotional reactions generated therefrom.

### III. PSYCHODYNAMICS OF APPELLATE-LEVEL JUDICIAL DECISION-MAKING

The legal profession has traditionally held dear the notion that judicial decision-making is a rational and objective process in which the judge applies precedent to existing facts. Indeed, the immense focus on “precedent” and “legal reasoning” within the legal profession has rendered these concepts irrefutable and unquestionable. One may even speak of the propaganda of the American legal culture, which holds all legal processes to be driven by logic, order, and reason. Why has this culture so seldom

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<sup>17</sup> *Id.* at 44 (citation omitted).

<sup>18</sup> The everlasting recreation of the Oedipal triangle is due to “repetition compulsion,” an instinctual characteristic which seeks to recreate an original instance of great emotional intensity. *See* FREUD, CIVILIZATION *supra* note 6, at 77–78. *See also* FREUD, PLEASURE PRINCIPLE *supra* note 2, at 43.

questioned the presupposition of rational decision-making which all of law seems to be based upon? Could there be another explanation for the process of judicial decision-making?

Judge Jerome Frank offered one in early 20<sup>th</sup> century:

Lawyers and judges purport to make large use of precedents . . . . But since what was actually decided in the earlier cases is seldom revealed, it is impossible, in a real sense, to rely on these precedents. What the courts in fact do is to manipulate the language of former decisions. They could approximate a system of real precedents only if the judges, in rendering those former decisions, had reported with fidelity the precise steps by which they arrived at their decisions . . . . “Of the many things which have been said of the mystery of the judicial process . . . the most salient is that *decision is reached after an emotive experience in which principles and logic play a secondary part.*”<sup>19</sup>

Jerome Frank’s insight is that judges make their decisions primarily based upon emotional reactions to the facts presented to them in a case, and then use precedent to rationalize their decision. Law’s indeterminacy and contingency lie in the fact that precedent can be interpreted in numerous ways, and that it is often used as justification for a position held by the judge long before he even considers precedent.

Accordingly, from a psychoanalytic point of view, judicial decisions are often made based on the personal prejudices and emotional reactions of judges with respect to a set of facts, and the process of “legal reasoning” is merely a mechanism employed by the Ego to rationalize<sup>20</sup> the Id’s irrational prejudices. But why is there such a need for rationalization? Two possibilities present themselves. First, the legal profession and society as a whole idealize the law as the perfect father-figure, and in their search for stability, demand that the law be a coherent and logical set of rules derived from reason. In other words, the Ego seeks to use the law as a further means of bringing order to the chaotic and passionate world of the Id. Second, the legal profession engages in endless rationalization as a means for alleviating the threat of punishment imposed on the Ego for its failure to incorporate the commands of the Super-Ego’s “inward court of law”<sup>21</sup> in laws governing members of society. In other words, if the Ego were to acknowledge explicitly that judicial decision-making is primarily an Id-driven process, then it would be subject to severe punishment from the Super-Ego for allowing instinctual impulses to reach conscious awareness, and worst of all, be the basis for law.

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<sup>19</sup> KATZ ET AL., *supra* note 13, at 30.

<sup>20</sup> Rationalization is a commonly used Ego defense mechanism—the purpose of which is to alleviate the anxiety placed upon the Ego from the threat of Super-Ego punishment—through the justification of morally unacceptable attitudes, beliefs, and desires by the “incorrect application of a truth, or the invention of a convincing fallacy.” *Id.* at 157.

<sup>21</sup> PETER GOODRICH, OEDIPUS LEX 237 (1995).

If judicial opinion-writing is merely a linguistic practice of rationalizing pre-existing attitudes, then a judge engaged in such activity may plausibly be called a sophist.<sup>22</sup> Just as the sophist can make the worse cause appear the better through the use of oratorical skills, a judge engaged in sophistry can make the worse argument appear the better by arguing that it “more accurately conforms to precedent,” and by presenting it as “the law.” As Stanley Fish says, “[opinion writing] is not a mechanism by which decisions are generated, but the complex of rhetorical gestures to which one has recourse when a decision, already made, must be put into presentable form.”<sup>23</sup> This would lead one to say that judicial opinions codify the perpetuation of a tradition that disguises prejudice as “precedent,” forever passing down arbitrary rules from one judicial generation to the next. In this light, the history of law may be viewed as the history of evolving subjective and socio-cultural prejudices that find verbal expression in legal opinions, “rules of law,” and social reactions thereto formulated in new legislation.

#### IV. CHAOS & TRUTH V. ORDER & SELF-DECEIT

If law is merely an arbitrary set of rules based on judicial prejudices and emotional reactions, presented under the guise of “legal reasoning based on precedent,” where does that leave us? Should we acknowledge such a subversive psychoanalytic discovery, at the expense of disturbing the normal functioning of the Ego and diminishing our sense of stability in the world? Should we simply disobey whatever law is contrary

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<sup>22</sup> For a description of Sophists, see THE OXFORD COMPANION TO PHILOSOPHY, *supra* note 3, at 839–40. Sophism is defined in the following way:

A sophism is a type of fallacy that is not just an error of reasoning, or an invalid argument, but a kind of tactic of argumentation used unfairly to try to get the best of a speech partner. . . . [Sophists were] able to ‘make the weaker argument the stronger’, a claim apparently based on the view that to every thesis there was opposed an equipollent contrary thesis. If all these have equal evidentiary support . . . then it is an appropriate task for the technique of persuasion to devise arguments on either side sufficient for their political or forensic function. . . . Plato is therefore at pains to depict the Sophists as bogus practitioners of philosophy . . . [who] pretended to knowledge that they did not possess, and . . . sought popularity and success by dressing up popular prejudices with a specious appearance of novelty.

*Id.* See also Michael S. Moore, *The Interpretive Turn in Modern Theory: A Turn for the Worse?*, 41 STAN. L. REV. 871, 888–89 (1989). (describing the skeptic’s view on judicial interpretation of precedent). As professor Moore explains:

[T]he skeptic finds both legal texts (statutes, constitutions) and prior case decisions woefully indeterminate. His judge ‘interprets’ legal texts by finding what he wants in them—for neither nature nor convention binds his interpretive efforts, the words of legal texts becoming mere chameleons in his hands. Because past cases exemplify an infinite number of rules, any choice of rules can be consistent with precedent—so long as one denies, as does the skeptic, that there are any natural kinds or conventional categories that would limit the rules he might choose.

*Id.* (citations omitted).

<sup>23</sup> Stanley Fish, *Dennis Martinez and the Uses of Theory*, 96 YALE L.J. 1773, 1790 (1987).

to our liking? Should we set sail in search for truth upon the tumultuous ocean of uncertainty? Or should we rather immure ourselves forever in self-deceit, so that we may live under the shadow of illusory images depicting “law,” “order,” and “justice”? Auden’s poem brilliantly expresses this paradox:

Law, says the judge as he looks down his nose,  
Speaking clearly and most severely,  
Law is as I’ve told you before,  
Law is as you know I suppose,  
Law is but let me explain it once more,  
Law is The Law.

Yet law abiding scholars write;  
Law is neither wrong nor right,  
Law is only crimes  
Punished by places and by times,  
Law is the clothes men wear  
Anytime, anywhere,  
Law is Goodmorning and Goodnight . . . .

If therefore thinking it absurd  
To identify Law with some other word,  
Unlike so many men  
I cannot say Law is again,  
No more than they can we suppress  
The universal wish to guess  
Or slip out of our own position  
Into an unconcerned condition.  
Although I can at least confine  
Your vanity and mine  
To stating timidly  
A timid similarity,  
We shall boast anyway:  
Like love I say.

Like love we don’t know where or why,  
Like love we can’t compel or fly,  
Like love we often weep,  
Like love we seldom keep.<sup>24</sup>

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<sup>24</sup> W. H. Auden, *Law Like Love*, in *THE NORTON ANTHOLOGY OF POETRY* 1101–02 (3d ed. 1983).

