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ARTICLE: CLUSTER VI: Class, Economics, and Social Rights: Power, Politics, and Pleasure: Class Differences and the Law

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BIO:

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SUMMARY: ... Whenever we enter discussions about race, there is a presence that haunts us. ... As an aspect of culture, our class position affects the way in which we learn to think about the law and its agents. Through our relationships in various racial, ethnic, gender, and sexual identity groups - as well as through the hegemonic processes of the dominant culture - we come to understand how to respond to, view, and think about our legal system. ... " Though this understanding is often voiced as suspicion about one's loyalty to the group, poor and working-class people know that economic position as it intersects with race matters. ... It is only when the rich are victimized by individual working-class people that we see the poor represented publicly. ... Yet if we Latinas/os want to work toward social transformation, we must face the fact that race and gender conflicts are already class based. ... But even when "race and gender are legible as social identities" and legitimate as social issues, many of the jurors - regardless of their own social location - will identify with what George Lipsitz calls an "ideological 'middle-class'. ...

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Whenever we enter discussions about race, there is a presence that haunts us. It often remains at the edges of our consciousness, and when we try to look directly at this fantasma, it disappears. The truth of liberal and judicial education is that we are not taught to think about class, even though many of us talk endlessly about the intersections of race, class, and gender. In popular culture, George Lipsitz tells us, "our shared social language about wealth, reward, status, and stratification encourages everyone to think of themselves as middle-class." n1 It is extremely important that we pay attention to this mystification process in the development of LatCrit theory.

The abyss between the rich and the poor confronts us at every turn in this relatively new manifestation of an old concept - the global economy. At some level, as bell hooks says, "we are all aware of class." n2 "Yet there is no organized class struggle," n3 no systematic interrogation of power and "capitalist greed" on a daily basis by those involved in the law. n4 Indeed, the majority of the legal profession serves that greed. Yet LatCrit theorists emerged from the profession precisely because there were scholars unwilling to ignore social justice issues. In particular, they were concerned with the way in which race as a social construct impacted the enforcement and creation of laws.

While it is impossible to talk about race without rubbing up against many of the complexities of class, we often have more trouble identifying and articulating the social processes of class oppression. To some extent we can rely on Marxist theories for this information. As necessary as this is however, such a focus on economic systems [*854] rarely lets us understand the cultural and personal aspects of class positions.

J.K. Gibson-Graham suggests that "various concepts of class coexist within Marxian political economy, often within the writings of the same person ... [but] most Marxists understand the term 'class' as referring primarily to a social group." n5 Generally speaking, this status is conferred upon individuals due to commonalties they share with others. These can be either structurally created or "experientially defined." n6 Marxist theorists usually speak of "three shared attributes" when identifying "social groups as classes": power, property, and exploitation. n7 All of these qualifications are intimately related to the legal system.

As an aspect of culture, our class position affects the way in which we learn to think about the law and its agents. Through our relationships in various racial, ethnic, gender, and sexual identity groups - as well as through the hegemonic processes of the dominant culture - we come to understand how to respond to, view, and think about our legal system. Our social location, of which class is an important part, constitutes our fears, desires, and expectations as we encounter the justice department in its many forms. Class, in and of itself or in conjunction with race and gender, will greatly influence how we interpret our experiences. This is important to our individual quality of life, but also dictates what is likely to be replicated in the next generation.

As Devon Carbado points out, our identities are not just a product of how we experience and perceive the world, but also a product of how we are experienced and perceived by others.ⁿ⁸ Thus, it is important to think about the way in which working-class Chicana/o defendants, law students, and lawyers will be experienced by judges, juries, professors, and opposing counsel who may be of a different class, ethnic, or racial background. Unlike racial signification, we can more easily escape some of the symbols of our class position should we at some point have the means to do so. But a shifting positionality, based largely on appearance, does not mean we can escape the cultural significance of growing up working class or poor.

We carry these positions like scars. For some people, they are permanent and deep. For others, they may become faint lines easily hidden by assimilating into a new socioeconomic and cultural environment. Assimilation of this type can be a kind of cultural genocide **[*855]** that separates us from seeing the political landscape through the eyes of the most intimate connections we may have had in our lives - our parents and our childhood family and friends. This is especially true if cultural and class assimilation coincides with light skin - something many Latinas/os must consider.

While it is certainly based on shared oppression, "the assertion of Latina/o identity is, at least sometimes, an assertion of values, culture, and history."ⁿ⁹ If you have assimilated into the middle and/or upper classes, you will be less likely to exhibit or remain loyal to the beliefs, habits, and experience of your original social location,ⁿ¹⁰ i.e., less likely to claim a Latina/o identity, except perhaps, in a colloquial sense. Although some people make very carefully planned decisions to leave their working-class sensibilities behind, such denial often occurs outside our consciousness. Everything in mainstream culture encourages us to see the world from a middle-class perspective and to ignore class as a socioeconomic construct.

We do, of course, have lively conversation nearly everyday about the significance of race, ethnicity, and gender. But as bell hooks has said, "the closest most folks can come to talking about class in this nation is to talk about money."ⁿ¹¹ In fact, talk about race obscures or blurs class categories. While racial solidarity should cut across class lines, it does so haphazardly. White folks, however, have successfully forged this racial alliance across ethnic and class boundaries. It is not in our best interest to forget that white folks have used this blurring of the categories to ensure what George Lipsitz calls in his book of the same name, the "possessive investment in whiteness."

ⁿ¹² This is an investment in racial cohesion, which erases the reality of class divisions and, as bell hooks says, "makes the white poor see their interests as one with the world of white privilege."ⁿ¹³

Law students, like other scholars, are taught "never to speak about the ways the distribution of education, assets, and opportunities is severely skewed along class lines."ⁿ¹⁴ Yet this can have a profound affect on a client's approach to securing an attorney, or behaving **[*856]** in his/her own best interest. The law, we are led to believe, does not discriminate. While many know this to be myth, they have had to learn to argue cases as if it were true. And the fact is, that in U.S. courtrooms it is much easier to "play the race card" than to play a class card.

In papers filed with the courts and in constructing arguments, lawyers may "from time to time talk about 'disadvantaged' populations," but this generally raises the specter of race rather than class.ⁿ¹⁵ This can backfire because it may be interpreted through traditional social science thinking that connects "disadvantaged" with a propensity to commit crime. Such cultural assumptions in the courtroom - at trial and during sentencing - criminalize black and brown people whether rich or poor. But they also structurally support and recreate middle-class reasoning that not only associates aggressive behavior with race, but also conflates race and class.ⁿ¹⁶ Yet the ruling classes do not suffer from the other half of this assumption. Almost never in court cases do judges and juries associate people's economic privilege to their propensity to exploit, subordinate, or suppress low-wage or under-employed workers who secure advantages for the wealthy.ⁿ¹⁷ Even in cases where it has been successfully argued that one's disadvantaged status has influenced a poor client's actions, there is rarely an effort to place blame where it belongs - on those who control the means of production as well as the resources and wealth. In the hands of liberal theorists, as opposed to truly critical theorists, "race and gender can be used as screens to deflect attention away from the harsh realities class politics exposes."ⁿ¹⁸

Black and brown people "have always been told that" race matters most - that it is more important than class in determining one's fate.ⁿ¹⁹ But today, bell hooks contends, we "know better."ⁿ²⁰ We "are not **[*857]** so easily duped," she says, "by an appeal to unquestioned racial identification and solidarity."ⁿ²¹ Though this understanding is often voiced as suspicion about one's loyalty to the group, poor and working-class people know that economic position as it intersects with race matters. While they may be uncertain about the meaning of that intersection, and

find no arena in which to articulate how class functions in their interpersonal relationships, they intuitively act on its significance.

In fact, working-class people of color often bond with poor Whites in ways that are invisible or mysterious to middle and upper class people of color. Such people may be prejudiced on the basis of skin color and this may be expressed rhetorically. Yet in geographic locations where there is less de facto segregation, surviving similar socioeconomic deprivation and living side-by-side in inadequate housing often has a way of bridging the racial divide.

Sensitive people of color in the middle to upper classes at some time will certainly feel the rejection of those with less economic means. Yet, they may not be able to identify this as class conflict. They will puzzle about why they are being criticized, but the contours of class will once again be obscured by critiques focusing on skin color. For many of us, this denial is precipitated by fear. "At the end of the day," bell hooks says, "the threat of class warfare, of class struggle" across racial lines, "is just too dangerous to face How will [we] know who to fear or who to challenge" without those "neat binary categories of white" and non-white. n22

Yet we must consider how class divides people of the same or similarly oppressed racial categories, and who benefits from these divisions. It is no coincidence that just as more and more people are beginning to pay increased attention to class politics, the government and even some conservatives now want to talk more about race. n23 This does not mean that either the government or conservatives really want to discuss race and injustice in depth, only that they wish to deny class differences. Inevitably, Carl Gutierrez-Jones reminds us, these kinds of discussions and "misunderstandings of deeper group conflicts" as class intersects race and gender, will be interpreted as inevitable differences of opinion. n24 This kind of denial and mystification of class will tend to "legitimate the status quo." n25

Though we have in this country, what bell hooks calls, a "tabloid passion to know about the [*858] lives of the rich," discussions about the lives of the poor never garner media attention. n26 Many people have pointed out what surely would have been only local or non-news had O.J. Simpson not been a rich celebrity. n27 While race certainly played a significant role in this news frenzy, class was rarely discussed except to question why poor Blacks would support O.J. Because the lives of the poor have been relatively invisible to middle class America, such a question rises out of their failure to understand the depth with which poor people despise the criminal justice system. Though O.J. was not poor, the conflation of race and class in the popular

imagination allowed him to become a symbol of judicial mistreatment of and unfairness toward poor defendants. Because popular culture encourages everyone to think moving up the socioeconomic ladder is possible for all, some poor people saw O.J. as a fantasy representative of what was possible with money even for black folks. Others simply saw him as a rare occurrence - one small stone not cast against blackness.

Unfortunately, the lives of the disadvantaged remained hidden even in coverage of the trials that grew out of the Los Angeles Rebellion after the Rodney King decision. It is only when the rich are victimized by individual working-class people that we see the poor represented publicly. We will never see daily, parallel coverage of the many ways that the rich victimize the poor (both individually and as a group). As Alfredo Mirande points out in his book, *Gingo Justice*, brown folks are not criminalized because they break more laws or because they are more violent, but because there is a conflict between competing cultures in our economic system. n28

Unfortunately, the media's neglect of class conflict has other repercussions for Latinas/os. "Victor Valle and Rudy D. Torres have argued that a ... tendency in the media to produce a 'great melodrama of race relations' has" been manifested in black and white. n29 Thus the mainstream has not only been allowed to ignore the way in which Latinas/os have suffered in terms of race relations, they have also been kept from knowing "how Mexicanos and Chicanos have been made into a malleable working class through economic, educational, and political underdevelopment." n30

I am not arguing for a hierarchy of oppressions with class at the top. In fact, I believe, as bell hooks does, that most academics and scholars who still discuss class in that way are mostly white and [*859] mostly male. n31 (However, it is not hard to locate such intellectual discourse among latino and black Marxists.) "While a few women get to have their say, most of the time men do not really listen. Most leftist men will not fully recognize the left politics of revolutionary feminism" n32 Yet, within much of radical feminist theory, a rigorous class analysis exists. The difference is that it does not subsume "an analysis of race and gender." n33 Gayatri Chakravorty Spivak has called "for Marxism to reinvent itself 'in the pores of feminism.'" n34 But she also, as Amitava Kumar reminds us, "offers a stringent critique of 'remote-control bleeding-heart feminism.'" n35 Thus she makes clear that there is a difference between radical and mainstream feminist analyses.

Though I am not here to argue that class is all that matters, nor that feminism is the only theoretical

framework, I am saying that few scholars take class seriously enough. As I hinted earlier, race/class/gender has sometimes become a theoretical world in which everyone is oppressed in some way, and therefore, no one is. This is the language of postmodernism which posits the disappearance of centers and clear-cut boundaries. n36 Yet were postmodernism to actually exist we would have noticed a profound shift of global proportions - for if all centers had really dissolved, capitalism could not function. For many less critical scholars, studying race, class, and gender has become a peculiar kind of pleasure. One in which they get to identify with the oppressed rather than the oppressor. Unfortunately, this shift in perspective does not necessarily lead to a radical critique of capitalism and its agents.

Among these scholars is a strong contingent of anti-essentialists, who rightfully question certain definitions of what it means to be Chicana/o. But their most passionate arguments are saved for those who dare suggest that white folks ought not to be teaching Chicana/o, Native American, African American, or Asian American Studies - ought not to be writing papers on quinceañeras, hip hop culture, or powwows. When I first stated this position publicly, you would have thought I was suggesting they give up sex. But let's face it, even for [*860] academics of color, race is often more pleasing as a category, and an easy subject about which to be passionate. Class analysis is less "sexy" and can bring up feelings of guilt and shame in regard to our shifting positionality. Yet if we Latinas/os want to work toward social transformation, we must face the fact that race and gender conflicts are already class based. Thus we must not continue to simply conflate race, class, and gender, but also "seek opportunities to create" a new economic system. n37 While it may not be as pleasurable as anti-racist work, it seems obvious that we need to spend just as much energy creating theoretical frameworks around class as we do around race.

While I certainly believe there are dangers in putting so much emphasis on class differences within ethnic or racial groups, I do not think this necessarily precludes solidarity. In his article, *Ties That Bind*, Devon Carbado argues that acknowledgement of the differences and tensions that exist among Latinas/os does not mean that we "do not or cannot exist as a political community." n38 In fact, it would be antithetical to LatCrit theory to believe otherwise. My understanding is that one of the basic premises of LatCrit theory is that there is an identifiable Latina/o community - from which to theorize around social justice issues in an attempt to change the subordinate status of that community. n39

As individuals, Chicanas/os "may participate in a variety of class [procedures] at one moment and over time. Their class identities are therefore potentially multiple" n40 According to Gibson-Graham, "none of these class positions confers a fixed or singular class identity. Within one individual multiple class identities will overdetermine and contradict one another, as well as other positions of the subject." n41 While this may be true in both theory and practice, it is also the case that Chicanas/os will often be assumed to be - and targeted as - members of the working class.

I have, for instance, in the past year been approached as a possible maid, kitchen worker, field hand, and a suspect by the police despite the middle-class status afforded me by my position in the University. In each of these instances, there was nothing ambiguous or transitional about my class position in the eyes of these white folks. They saw me as a fat, brown, woman which to them equaled subservient, working class, and suspect.

[*861] Even though I might be expected to respond to such approaches according to my current social location, I do not. When confronted by such assumptions, especially by the police, I tend to respond with guilt, shame, and nervousness. I exhibit all the oppression I internalized as I grew up as a Chicana in a working-class household. I know well, as bell hooks has said, that "we live in a society where the poor have no public voice." n42

Gutierrez-Jones points out that our

experience consistently tells [us] that [we] will be treated differentially - that is, as [working-class] Chicanos, not as race-neutral [or class-neutral] citizens. Even so, [our] concomitant awareness of the very real gains that have been won through protest and rights activism induce a certain hope and further offer a crucially important opportunity for the construction of resistant communities. It is with these stakes in mind that [we] most frequently struggle with legal culture [E]ven in the most radical, most utopian experiments, what is at issue is the potential for altering institutions which perpetuate specific social relations, relations rooted in class, gender, sexuality, race, and ethnic hierarchies. n43

We have long known the hazards for poor, Spanish-speaking clients in United States courtrooms with inadequate translators - either because there were insufficient numbers of them or because those available were not fluent. Furthermore, Susan Berk-Seligson in her study *The Bilingual Courtroom: Court Interpreters in the Judicial Process*, shows that even subtle changes in the way translators speak can

"dramatically alter responses [of jurors] to testimony."
n44

Gloria Anzaldua lists at least eight different forms of Spanish used by Chicanos from south Texas. n45 I would argue that class mediates all regional variations. Thus it makes sense to assume that no matter how fluent a translator may be, they will not be capable of faithful translations unless they are from the same region and of the same class as the client. Since the majority of people in courtrooms who need translators are poor, it seems reasonable to insist that translators be able to bridge not just the gap between two languages, but also the gap between the defendant's class position and the social locations of the prosecutors, juries, and judges.

In an article on class-consciousness, George Lipsitz tells the story of Chicano workers being falsely accused of a crime by a white woman.

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Hearing her words, the workers feel a mixture of resentment and shame. They know that they are not "bad men," that their behavior stems from how they have been humbled by poverty and humiliated by the indignities of low-wage labor. Yet they also feel ashamed and guilty. They know how they look to the woman ... inside each of them an inner voice says that she is correct. n46

Such guilt and shame can show on the faces of innocent members of the working class, and thus be seen by arresting officers, interrogators, juries, and judges - even their own lawyers. Jurors will not miss this response in the facial expressions, tone of voice, nervousness, or body language of defendants. This subconscious expression of shame will be interpreted as a confession.

But even when "race and gender are legible as social identities" and legitimate as social issues, many of the jurors - regardless of their own social location - will identify with what George Lipsitz calls an "ideological 'middle-class'." n47 This construction is "not so much a description of actual social roles or status as [it is] an affirmation of allegiance to competition, individual ambition, and the pursuit of material gain as the center of the social world." n48 Thus they may feel sympathetic to overt and even subtle forms of racism and sexism. Because they identify with middle class values, however, they may not be able to understand certain behaviors as anything but individual choice.

If lawyers play into that ideology, or simply allow it to exist unchallenged, they are reinforcing a view of "social existence as primarily private and personal."

n49 Instead, they should be reminding the jurors - and sentencing judges - that this way of thinking is "inadequate for understanding social relations and the connections" between individual actors and "broad social structures" that channel behaviors in a given set of circumstances. n50 If we want a rich and full representation for Chicanas/os or Latinas/os within the justice system, then we must stress the importance of studying, appreciating, and articulating the full contours of our lives. n51 This necessarily includes paying as much attention to class as we do to race. Even if we "experience only one or two of" n52 several kinds of oppression to which Latinas/os might be subject, given our relatively privileged positions, [*863] we may not be entirely protected from judicial abuse. Thus, "it is in our interest to face the issue of class, to become more conscious, to know better so that we can know how best to struggle for economic justice." n53 Self-interest cannot be the only motivator, however. "Creating a knowledge of class implies not only a concern about exploitation and economic difference but a commitment to a ... theoretical position." n54

Ultimately, we need more studies, and need to be aware of the ones that already exist, on the role of shaming processes and internalization on the human psyche, as well as their effect on behaviors and responses. We need to be able to make juries and judges understand that "survival ... requires the ability to live with [the] unrelenting challenges and chronic instability" n55 of being poor, and that individual punishment is not the answer. Similar to an argument made by bell hooks, a radical practice of law "must begin with a 'deconstruction of the traditional notion that only the [person arrested] is responsible' for" all participants being in the courtroom. n56

Just as we have done with race and gender, George Lipsitz tells us, we must begin to identify and use "the vocabularies and grammars [we] would need ... to articulate and analyze experiences and perspectives defined by social class" n57 "Strategies are needed that will allow [those involved in both the creation and the practice of law] to find the intellectual and emotional benefits of freeing themselves from [classist], racist, [and sexist] cultural and institutional practices." n58

Given the circles in which lawyers often interact, and the access they might have to affecting the creation of new law, those interested in social justice are in as great, if not a greater, position to do that work than are other professionals. Yet, this work should not be done in isolation. Alan Wald suggests that "rather than trying to [go it alone], the radical [lawyer] would be wiser to maintain his or her connection to the

egalitarian social movements." n59 Such coalitions led to the social reforms we now enjoy. Thus, it makes sense to join forces with contemporary political groups who seek to maintain and protect those reforms in addition to seeking even greater transformation of the society. n60

[*864] Such alliances can keep the mind fresh, push us into new directions, and remind us not to become too self-righteous. Of course we must all be careful not to be sidetracked by seductive new theories that may do nothing more than lead us away from revolutionary projects or a working-class orientation. In the world of ideas and arguments, it can be too easy to slip away from an internationalist perspective, an anti-imperialist identity, and a "commitment to organization building." n61

As Latinas/os, it is possible we may have learned about mutual dependence in extended families - about the way in which day-to-day survival depends on our willingness to support one another in whatever way is necessary. Help is given with the assumption that no one member can succeed unless all do well. Thus, even as we professionals rise in status, we must remain committed to our racial, ethnic, and class families. Since no simple answers to economic inequality exist, it makes sense that our best hope for finding solutions may be born out of complex alliances with other people.

FOOTNOTE-1:

n1. George Lipsitz, *Class and Consciousness: Teaching about Social Class in Public University*, in *Class Issues: Pedagogy, Cultural Studies, and the Public Sphere* 10 (Amitava Kumar ed., 1997).

n2. bell hooks, *Where We Stand: Class Matters* 1 (2000).

n3. *Id.*

n4. *See id.*

n5. J.K. Gibson-Graham, *The End of Capitalism (as we knew it): A Feminist Critique of Political Economy* 49 (1996).

n6. *Id.*

n7. *Id.*

n8. Devon W. Carbado, *The Ties That Bind*, 19 *Chicano L. Rev.* 283, 285 (1998).

n9. *Id.* at 287.

n10. I make a distinction between assimilation and acculturation. Acculturation is learning how to operate

within the dominant culture - to imitate behaviors and values in order to function successfully within middle and upper class socioeconomic environments. This does not mean total capitulation of your home culture. Assimilation, on the other hand, means completely adopting middle to upper class values and customs, with full abandonment of your original culture.

n11. hooks, *supra* note 2, at 5.

n12. George Lipsitz, *The Possessive Investment in Whiteness: How White People Profit from Identity Politics* vii (1998).

n13. hooks, *supra* note 2, at 5.

n14. Lipsitz, *supra* note 1, at 10 (discussing how all people are taught not to discuss class-based inequality).

n15. *Cf. id.* (noting that people who speak of "disadvantaged" populations often fail to connect disadvantage with other people's advantage).

n16. *Cf.* Carl Gutierrez-Jones, *Rethinking the Borderlands: Between Chicano Culture and Legal Discourse* 112-13 (1995) (discussing the link between aggression and passivity to gender).

n17. Lipsitz, *supra* note 1, at 10-11. For instance, a recent case in Minnesota saw a middle-aged white company owner on trial for assaulting a young Mexican worker. The older man hit the Mexican man over the head with a two-by-four for speaking Spanish to other employees on their lunch break. Though he stated this as the reason for his actions, the case was not prosecuted as a hate-crime. No one suggested that this man's position of economic privilege contributed to his criminality - his assumption that he could not only dictate what language these people spoke on their own time, but that he could enforce that rule with physical force. Yet it is commonplace to link disadvantage to criminal behavior.

n18. hooks, *supra* note 2, at 7.

n19. *Id.* at 5.

n20. *Id.*

n21. *Id.* at 5-6.

n22. *Id.* at 6.

- n23. *Id.* at 7.
- n24. Gutierrez-Jones, *supra* note 16, at 112-13.
- n25. *Id.* at 113.
- n26. hooks, *supra* note 2, at 7.
- n27. *Id.*
- n28. Gutierrez-Jones, *supra* note 16, at 1.
- n29. *Id.* at 2 (stating that the media ignores Latinos, a group unique in its cultural mixing).
- n30. *Id.*
- n31. hooks, *supra* note 2, at 7.
- n32. *Id.*
- n33. *Id.*
- n34. Amitava Kumar, Introduction, in *Class Issues: Pedagogy, Cultural Studies, and the Public Sphere* 1, 5 (Amitava Kumar ed., 1997)
- n35. *Id.*
- n36. See, e.g., Carol A. Stabile, Feminism and the Ends of Postmodernism, in *Materialist Feminism: A Reader in Class, Difference, and Women's Lives* (Rosemary Hennessy & Chrys Ingraham eds., 1997); Ben Agger, Cultural Studies as Critical Theory (1992); Masao Miyoshi, Sites of Resistance in the Global Economy, in *Cultural Readings of Imperialism: Edward Said and the Gravity of History* (1997).
- n37. Alan Wald, A Pedagogy of Unlearning: Teaching the Specificity of U.S. Marxism, in *Class Issues: Pedagogy, Cultural Studies, and the Public Sphere* 125, 143 (Amitava Kumar ed., 1997).
- n38. Carbado, *supra* note 8, at 285.
- n39. See *id.* at 283-84.
- n40. Gibson-Graham, *supra* note 5, at 19.
- n41. *Id.* at 19 n.39.
- n42. hooks, *supra* note 2, at 5.
- n43. Gutierrez-Jones, *supra* note 16, at 11.
- n44. *Id.* at 165 (citing to Susan Berk-Seligson, *The Bilingual Courtroom: Court Interpreters in the Judicial Process* 146 (1990)).
- n45. Gloria Anzaldua, *Borderlands/La Frontera: The New Mestiza* 55 (1987).
- n46. Lipsitz, *supra* note 1, at 13.
- n47. *Id.* at 11.
- n48. *Id.*
- n49. *Id.*
- n50. *Id.*
- n51. See Gerald P. Lopez, Learning About Latinos, [19 Chicano-Latino L. Rev. 363, 363 \(1998\)](#) (suggesting that Latinos must be pervasively recognized in order to exercise substantial influence).
- n52. Gibson-Graham, *supra* note 5, at 54-55.
- n53. hooks, *supra* note 2, at 8.
- n54. Gibson-Graham, *supra* note 5, at 51.
- n55. Wald, *supra* note 37, at 132.
- n56. *Id.* at 133 (discussing radical pedagogy and a professor's control of the classroom).
- n57. Lipsitz, *supra* note 1, at 11.
- n58. Wald, *supra* note 37, at 136.
- n59. *Id.* at 143.
- n60. *Id.*
- n61. *Id.* at 144.

