

12. 23 F.3d 496 (DC Cir. 1994).
13. 504 US 555, 558 (1992).
14. 765 F.2d 937 (9th Cir. 1985).
15. 478 US 221 (1986).
16. 561 F.2d 1002 (DC Cir. 1977).
17. *Id.* at 1007. See also *Alaska Fish & Wildlife Fed'n v. Dunkle*, 829 F.2d 933 (9th Cir. 1987), granting standing to those "who wish to hunt, photograph, observe, or carry out scientific studies on migratory birds," in the context of a challenge to agreements that would permit the hunting of such birds in Alaska); *Humane Society of the United States v. Hodel*, 840 F.2d 45 (DC Cir. 1988) (allowing society members who visited wildlife refuges standing to challenge rulings expanding hunting, on the ground that members would be subjected to environmental degradation, fewer numbers of animals, and corpses).
18. 154 F.3d 426 (D.C. Cir. 1998).
19. See, e.g., *Northern Spotted Owl v. Hodel*, 716 F. Supp. 479 (WD Wash. 1988); *Northern Spotted Owl v. Lujan*, 758 F. Supp. 621 (WD Wash. 1991); *Mt. Graham Red Squirrel v. Yeutter*, 930 F.2d 703 (9th Cir. 1991).
20. 852 F.2d 1106, 1107 (9th Cir. 1988).
21. See *Citizens to End Animal Suffering and Exploitation v. New England Aquarium*, 836 F. Supp. 45 (D Mass. 1993).

12

CATHARINE A. MacKINNON

OF MICE AND MEN

A Feminist Fragment on Animal Rights

Nonhuman animals in man's society are more than things, less than people. If the father of all social hierarchies, or the mother of all social distinctions, is the animate-inanimate division, it is quickly followed by the human-animal dichotomy,¹ and then (for present purposes) the male-female line. When the three hierarchies are analyzed together—even tentatively and incompletely, as here—the ordering of humans over animals appears largely retraced within the human group at the male-female line, which retraces the person-thing dichotomy, to the detriment of animals and women. To unpack and pursue this analysis in the context of theorizing animal rights in law, the ways nonhuman animals are seen and treated by human animals is considered in gendered terms. Comparing humans' treatment of animals with men's treatment of women illuminates the way the legal system's response to animals is gendered, highlighting its response to women's inequality to men as well. How animals are treated like women, and women like animals, and both like things, are interrogated in search of reciprocal light.

Beneath the inquiry lurk large issues. Is the fact that, from the human side, the animal-human relation is necessarily (epistemically and ontologically) a relation *within* human society more problematic than it has been seen to be? Is the inquiry into what can be done for animals in human society and law limited when women's social and legal subordination to men is

overlooked? Specifically, is missing the misogyny in animal use and abuse detrimental to gaining rights for animals? Under existing law, are animals in any respects treated better than women are? On these questions, the operative suspicion is yes. The resulting further suspicion is that the primary model of animal rights to date—one that makes animals objects of rights in standard liberal moral terms—misses animals on their own terms, just as the same tradition has missed women on theirs. If this is right, seeking animal rights on a "like-us" model of sameness may be misconceived, unpersuasive, and counterproductive.

1

People dominate animals, men dominate women.² Each is a relation of hierarchy, an inequality, with particularities and variations within and between them. Every inequality is grounded and played out and resisted in unique ways, but parallels and overlaps can be instructive. One prominent similarity between these two hierarchies is ideological: In spite of the evidence that men socially dominate women and people dominate other animals, the fact that relations of domination and subordination exist between the two is widely denied. More precisely, it is widely thought and practiced and said that people are "above" animals, while being commonly thought and practiced but denied that it is thought and practiced that men are "above" women. And while a hierarchy of people over animals is conceded, and a social hierarchy of men over women is often denied, the fact that the inequality is imposed by the dominant group tends to be denied in both cases. The hierarchy of people over animals is not seen as imposed by humans because it is seen as due to animals' innate inferiority by nature. In the case of men over women, it is either said that there is no inequality there, because the sexes are different, or the inequality is conceded but is said to be justified by the sex difference, that is, women's innate inferiority by nature. Religion often rationalizes both.

In place of recognizing the realities of dominance of humans over animals and men over women is a sentimentalization of that dominance, combined with endless loops of analysis of sameness and difference. We see denial that each hierarchy involves socially organized power, combined with justifications of why one group, because of its natural superiority, should have what is, in substance, power, dominion, and sovereignty over the other. The denial often takes the form of the assumption that the groups are equal just different, so their different treatment, rather than being a top-down ranking, is not unequal treatment but merely an appropriate reflection of their respective differences. It is as if we are confronting Aristotle's level line unequally divided, treating unlikes unlike—that is, equality.³

The denial of social hierarchy in both relations is further supported by verbiage about love and protection, including in what have been termed

"the humane movements." The idea is, love of men for women or people for animals, motivating their supposed protection, mitigates the domination. Or, by benign motivation, it eliminates the dominance altogether. One recalls Justice Bradley's concurring language denying Myra Bradwell's petition to be admitted to the bar that permitted persons: "The humane movements of modern society, which have for their object the multiplication of avenues for women's advancement, and of occupations adapted to her condition and sex, have my heartiest concurrence."⁴ Difference rationalized dominance despite support for movements for advancement. Organized attempts to prevent cruelty to animals or to treat them "humanely" echo a similar underlying top-down paternalism, most vividly in some social movements of the past to uplift prostituted women.⁵ Neither with women nor animals has redress of abuses of power changed that power's underlying distribution. Loving women is an improvement over hating them, kindness to animals is an improvement over cruelty, but neither has freed them nor recognizes their existence on their own terms.

Women are the animals of the human kingdom, the mice of men's world. Both women and animals are identified with nature rather than culture by virtue of biology. Both are imagined in male ideology to be thereby fundamentally inferior to men and humans. Women in male-dominant society are identified as nature, animalistic, and thereby denigrated,⁶ a maneuver that also defines animals' relatively lower rank in human society. Both are seen to lack properties that elevate men, those qualities by which men value themselves and define their status as human by distinction. In one vivid illustration that condescends to women and animals at once, James Boswell recounts Samuel Johnson saying, "Sir, a woman's preaching is like a dog's walking on his hind legs. It is not done well but you are surprised to find it done at all."⁷ Using dogs imitating people as a simile for women speaking in public, a woman engaging in democratic discourse becomes as inept, laughable, unnatural, and imitative as a dog trying to walk upright. Qualities considered human and higher are denied to animals as qualities considered masculine and higher are denied to women.

In a related parallel, both animals and women have been socially configured as property (as has been widely observed), specifically for possession and use. Less widely observed, both women and animals have been status objects to be acquired and paraded by men to raise men's status among men, as well as used for labor and breeding and pleasure and ease. Compare beauty pageants with dog and cat shows. Men have also appointed themselves women's and animals' representatives without asking and have often defined both as to be protected by them. In law, this has often meant that injuries to animals and women—if seen as injuries at all as opposed to breaches of moral rules—are seen as injuries to their owners, like the seduction of a young woman (which was often rape) was legally considered an injury to her father.⁸ In neither case has protection worked.

In a point of overlap and convergence between the two hierarchies,

women have been dominated by men in part through the identification of their sexuality with their bodies and their bodies with nature, meaning with animals. Women are attributed "naturalness," hence proximity to supposedly lower life forms. When your name is used to degrade others by attribution, it locates your relative standing as well, as "girl" is an insult for boys. Animality is attached to women's sexuality; the most common animal insults for women are sexual insults. Women are called animal names—bunny, beaver, bitch, chick, and cow—usually to mark their categorically lesser humanity, always drawing on the assumption that animals are lower than humans.⁹ In pornography, women are often presented as animals and mated with animals. The more denigrated the woman among women, prominently on racial grounds, the more and lower animal names she is called. This dynamic insults women, reinforces the notion that being like animals is a denigration, and denigrates animals.

Both women and animals are seen as needing to be subdued and controlled. Both are imagined as dangerously powerful so must be kept powerless; if not locked up and kept down and in place, and killed when they step out, they will take over, overrun civilization, make chaos, end the known world. They can be subjected to similar treatment, often by the same people in the same course of conduct, including torture, battering, terrorizing, taunting, humiliation, and killing.¹⁰ Nowhere are the powerless as powerful as in the imaginations of those with real, not imaginary, power.

A related ideological parallel is the endless moralism of people with power in contending how good "we" are to be good to "them," surrounded by the resounding silence of the powerless. Consider the repeated retracing of the "as we treat them, so go we" trope.¹¹ We can tell how civilized we are by how well we treat our _____. Fill in the blank with the unfortunates, the lessers. Take Senator Jennings Randolph in congressional debate in 1963 over the Equal Pay Act: "Emerson wrote that one of the measures of a civilization is the status which it accords women."¹² Or Mahatma Gandhi: "The greatness of a nation and its moral progress can be judged by the way its animals are treated."¹³ Treating the low well, raising up women and animals within their limits, shows how civilized and great humans and men are. The ranking of noblesse oblige, who and what matters, in whose eyes, who is great, civilized, and progressing could not be clearer or more self-referential.

Men's debates among themselves over what makes them distinctively human have long revolved around distinctions from women and animals. Can they think? Are they individuals? Are they capable of autonomous action? Are they inviolable? Do they have dignity? Are they made in the image of God? Men know they are men, meaning human, it would seem, to the degree that their answer to these questions is yes for them and no for animals and women. In response to this definition-by-distinction, many who seek rights for women and for animals have insisted that they do, too, have these qualities that men value in themselves. If men have dignity, women and animals have dignity. If men can think, women and animals can think.

If men are individuals, so are women and animals. That women are like men and animals are like people is thought to establish their existential equality, hence their right to rights.

So the question becomes: Are they like us? Animal experimentation, using mice *as* men (so men don't have to be), is based on degrees of an affirmative answer.¹⁴ The issue is not the answer;¹⁵ the issue is, is this the right question? If it is the wrong question for women—if equality means that women define the human as much as men do—it is at least as wrong for nonhuman animals.¹⁶ It is not that women and animals do not have these qualities. It is why animals should have to be like people to be let alone by them, to be free of the predations and exploitations and atrocities people inflict on them, or to be protected from them. Animals don't exist for humans any more than women exist for men.¹⁷ Why should animals have to measure up to humans' standards for humanity before their existence counts?

II

Bearing in mind the limitations of dominant standards, following Mari Matsuda's injunction to "ask the other question,"¹⁸ the woman question can be asked of animals in the animal law area. Relatively little attention has been paid by animal law scholars to the sexual use and abuse of animals.¹⁹ Most states have provisions against bestiality, which in substance are laws against doing sexually to animals what is done to women by men on a daily basis. These laws define it as immoral for men to treat animals as they treat women free of legal restraints.²⁰ To the degree an injured party is envisioned in bestiality laws, though, it is structurally imagined to be the human or the community. Only Utah categorizes the laws against sexual contact by humans with animals under cruelty to animals.²¹

Why do laws against sex with animals exist? Their colonial roots indicate a preoccupation with debasement of the self, a lowering of the human to the animal realm.²² In contemporary times, these laws are barely enforced if they ever were. Commercial pornography alone shows far more sex with animals than is ever prosecuted for the acts required to make it. Much like laws on sodomy (not a random parallel; in some sodomy laws, gay men are *sub silentio* lumped in with beasts), so little is done with it, one wonders what the law is doing there. Moralism aside, maybe the answer is that people cannot be sure if animals want to have sex with us. Put another way, we cannot know if their consent is meaningful. Other than in some feminist work, the question of whether the conditions of meaningful consent to sex exist for women has not been seriously asked. Whether it is possible, under conditions of sex inequality, to know whether women fully and freely consent to sex, or comply with much sex without wanting to (not to mention whether they consent to other things, like the form of government they live

under), is a neglected question of inequality among people. So, too, it is neglected between people and animals, although the substance of the inequalities are not identical. Surely animals could be, and are, trained to make it appear that they enjoy doing what people want them to do, including have sex with people. Pornographers train dogs to sexually penetrate women on signal; other pimps train donkeys to have sex with women in stage shows. Pornographers joke that women would have more sex with animals in their films but that would be cruelty to animals; putting a mouse in a woman's vagina would be cruel to the mouse, ha ha. Now whose status is higher?²³

Laws against "crush videos" illustrate the comparative public ethos on this point. In this genre of pornography, mice or other small rodents are "taunted, maimed, tortured and ultimately crushed to death under the heel of a shoe or bare feet of a provocatively dressed woman"²⁴ to make a fetish film. The sex in the movie centers on the slow killing of the animals, called "pinkies" when they are babies. Congress made crush videos a federal crime recently in a bill providing "punishment for depiction of animal cruelty."²⁵ It covers any visual or auditory depiction in which a living animal is "intentionally maimed, mutilated, tortured, wounded, or killed" if the conduct is illegal under federal law or the law of the state in which the "creation, sale, or possession" of such materials occurred.²⁶ There is no such law against depicting cruelty to women, a multibillion-dollar industry with considerable constitutional protection.

There was some dissent to the federal bill, largely by the American Civil Liberties Union on First Amendment speech grounds, and some opposition to it in committee. The essence of the objection: "Films of animals being crushed are communications about the act depicted, not doing the acts."²⁷ That it often takes the doing of the act to create the communication about the acts depicted is as obvious as the fact that the film itself is not the killing of the animal, although it would not usually exist without it. To the question "whether protecting animal rights counterbalances citizens' fundamental constitutional rights" to speech, the dissenters concluded that they did not.²⁸ But the bill passed. No prosecutions under it have yet been reported, so no occasion has arisen to consider any issues of freedom of expression further. There still is no equivalent statute prohibiting a depiction in which a living human is intentionally maimed, mutilated, tortured, wounded, or killed in order to make a film. The First Amendment-protected status of such films, including snuff films, in which a human being is murdered to make a sex film, remains contested even in theory, making it unclear whether such a statute would be found constitutional.

In California, a bill was introduced in February 2000 that would have prohibited both crush videos of animals and torture and snuff films of human beings. For animals, it sought to prohibit an "image that depicts . . . the intentional and malicious maiming, mutilating, torturing, or wounding of a live animal" or the similar "killing of an animal" when the

"killing of an animal actually occurred during the course of producing the depiction and for the purpose of producing that depiction."²⁹ For humans, the bill defined as a felony "the intentional or malicious killing of, or intentional maiming, torturing, or wounding of a human being, and intentional killing or cruelty to a human being actually occurring in the course of producing the depiction and for the purpose of producing the depiction."³⁰ A massive public First Amendment hue and cry, principally by the ACLU, was raised about the human part of the bill only.³¹ No part of the bill passed. However, the makers of a crush video were successfully prosecuted for the underlying acts under the California law this measure had sought to amend, a provision that prohibits malicious mutilation, torture, or killing of a living animal.³² In the prosecution, the videotape—for which rats, mice, and baby mice were slowly killed "for sexual gratification of others and for commercial gain"³³—was evidence.

Instructively, the joint crush/snuff bill had a consent provision only for people.³⁴ Welcome to humanity: While animals presumably either cannot or are presumed not to consent to their videotaped murder, human beings could have consented to their own intentional and malicious killing if done to make a movie, and the movie would be legal. Even that was not enough to satisfy the avatars of freedom of speech. One wonders anew if human rights are always better than animal rights. Many laws prohibit cruelty to animals, but no laws prohibit cruelty to women as such. There are prohibitions on behavior that might be said to be cruel that at times are applied to women, such as laws against battering and torture. And laws against cruelty to animals are not well enforced. But then again the laws against battering and torture of people are not well enforced either where women are concerned. Consider the outcry if California's criminal law against negligent and intentional "torture" of animals—defined as any act or omission "whereby unnecessary or unjustified physical pain or suffering is caused or permitted"—was sought to be extended to women.³⁵ One has to go to the Canadian criminal law on pornography to find a law against "cruelty" to women, sexual or otherwise.³⁶

Having asked a woman question—sexuality—about animals, it is time to ask the animal question of animals. What is the bottom line for the animal-human hierarchy? I think it is at the animate-inanimate line, and Carol Adams and others are close to it: We eat them.³⁷ This is what humans want from animals and largely why and how they are most harmed. We make them dead so we can live. We make our bodies out of their bodies. Their inanimate becomes our animate. We justify it as necessary, but it is not. We do it because we want to, we enjoy it, and we can. We say they eat each other, too, which they do. But this does not exonerate us; it only makes us animal rather than human, the distinguishing methodology abandoned when its conclusions are inconvenient or unpleasant. The place to look for this bottom line is the farm, the stockyard, the slaughterhouse. I have yet to see one run by a nonhuman animal.

The main lesson I draw for theorizing animal rights from work on women's issues is that, just as it has not done women many favors to have those who benefit from the inequality defining approaches to its solution, the same might be said of animals. Not that women's solution is animals' solution. Just as our solution is ours, their solution has to be theirs. This recognition places at the core of the problem of animal rights a specific "speaking for the other" problem. What is called "animal law" has been human law: the laws of humans on or for or about animals. These are laws about humans' relations to animals. Who asked the animals? References to what animals might have to say are few and far between. Do animals dissent from human hegemony? I think they often do. They vote with their feet by running away. They bite back, scream in alarm, withhold affection, approach warily, fly and swim off. But this is interpretation. How to avoid reducing animal rights to the rights of some people to speak for animals against the rights of other people to speak for the same animals needs further thought.³⁸

A related absence is the lack of serious inquiry into animal government, including political organization in the sense of patterns of deference and command, and who gets what, when, how, and why. Ethologists and animal behaviorists have provided observations that might be put into that category,³⁹ but lawyers have devoted little attention to the emerging rules and forms of governance in animal societies that might illuminate entitlement, ethics, justice. The point of this inquiry would not be to see how "they" are like "us" or different. One point is to see whether, not having made such a great job of it, people might have something to learn. Maybe hierarchy and aggression and survival of the fittest are systematically focused upon by people in animal studies because those dynamics are so central to the organization of human affairs by male humans. How animals cooperate and resolve conflicts within and across species might be at least as instructive. How do they define and distribute what we call rights, or is there some other concept? Do they recognize and redress injuries? While animals aggress, so far as I know, there has yet to be an animal genocide. This inquiry would be into animals' laws, not just what the two-leggeds say about the four-leggeds. Inventing what is not known across power lines has not worked well between men and women. I do not know why it would work any better between people and animals.

The question is (with apologies for echoing Freud's infamous question of women), what they want from us, if anything other than to be let alone, and what it will take to learn the answer. Instead of asking this question, people tend to remain fixated on what we want from them, to project human projects onto animals, to look for and find or not find ourselves in them. Some see economics. Some see Kant-in-the-making. Some see women. People who study animals often say more about themselves than about animals, leaving one wondering when the road kill will rise up off the page and say: Stop making me an object of your analysis. What it would do to the discussion if they spoke for themselves is the question. The animal

communicators are working on it.⁴⁰ People joke about dolphins having discursive democracy but miss whether people will ever be able to communicate collectively as well as whales and blackbirds—who do not seem to have our collective action problems—do.

Women are doubtless better off with rights than without them. But having rights in their present form has so far done precious little to change the abuse that is inflicted on women daily, and less to alter the inferior status that makes that abuse possible. Like women's rights, animal rights are poised to develop first for a tiny elite, the direction in which the "like us" analysis tends. Recognizing rights for chimpanzees and bonobos,⁴¹ for instance, would be like recognizing them for the elite of women who can preach in public—perhaps at the expense of, and surely in derogation of, the rights of that rest of women who are most women. Establishing animal individuality, agency, and rationality as a basis for their rights goes down that road.

Predicating animal rights on the ability to suffer is less likely to fall into this trap, as it leads more directly to a strategy for all.⁴² Indeed, capacity to suffer may be closer to women's bottom line than liberal legal approaches to women's rights have yet reached. But women's suffering, particularly in sexual forms, has not delivered us full human status by law. It has gotten us more suffering. That women feel, including pain, has been part of stigmatizing them, emotions in particular traditionally having been relegated to the lower, animal, bodily side of the mind-body split. What will it do for animals to show that they feel?⁴³ Calculations of comparative suffering weighted by status rankings, combined with the inability to register suffering on the sufferer's terms, have vitiated the contribution Bentham's recognition might make. The ways women suffer as women have been denigrated and denied, and when recognized more often used to see us as damaged goods than as humans harmed. Fundamentally, why is just existing, being alive, not enough? Why do you have to hurt? Men as such never had to hurt or to suffer to have their existence validated and their harms be seen as real. It is because they are seen as valid and real to begin with that their suffering registers and they have rights against its harm.

Women have been animalized, animals feminized, often at the same time. If qualified entrance into the human race on male terms has done little for women—granted, we are not eaten, but then that is not our inequality problem—how much will being seen as humanlike, but not fully so, do for other animals? What law resists doing is taking anything they want away from those at the top of hierarchies. It resists effectively addressing the inequality's material bottom line.

III

Rereading Steinbeck's play *Of Mice and Men*⁴⁴ in this context—seeing mice as animals in the animal rights and crush video sense, and men as

men in the sense of exercising gender dominance—offers insights in hierarchy, power, and love among people and between people and animals. Three interlocking hierarchies structure the play. Lenny, the slow, caring guy who doesn't know his own strength, is above animals. Curly, the boss's son, who only wants to have a level conversation with the boys in the bunkhouse, is above his recently wed young wife, initially a sexualized tart. George, Lenny's buddy, the guy's guy, is the smart one: Shutting Lenny up, he will speak for him, make everything come out right. You know Lenny cares about animals. You question if Curly cares about his wife. You never doubt that George, with condescension and comprehension, loves Lenny, who returns that love with unquestioning trust, adulation, and adoration.

With his love, Lenny kills the mice he dotes on, then the puppy his heart and hands adore; eventually, by accident and in panic, he kills Curly's wife. Curly's masculinity is desperate. The boss's son, he has to make himself a place among men. He is ultimately responsible for his wife's death, because he set her up for it: He stifled her, made her have to leave, run away, by depriving her of the ability to have her own life. He made Lenny rightly fearful of her making noise, of exposing her plans to flee, of them being together. Curly put her in the position where Lenny, always stronger than he knows, stifles her life out of her because he so loves her silky hair and to keep her leaving from being found out once she starts screaming. She is an animal to him. Once George realizes what Lenny has done, knowing Lenny will be hunted down like an animal and will not survive men's legal system, because he loves him, George kills Lenny himself. As we say of animals, including those who attack humans, he put him down.

On this reading, the play is about men's love: unknowing, gentle, soft, sensual love; sexual and explosive and possessive love; protectionist and "humane" love. Every relationship here is unequal: between humans and animals, between women and men, between some men and other men. It is about unequal love. In Steinbeck's context, one I am calling socially male, loving means death. Specifically, it makes murder.

Read this way, *Of Mice and Men* is a morality play about loving to death: the relation between affection and aggression. It shows the stifling lethality of protective love in society ordered hierarchically, where no one but George gets to be who he is without dying for it. In the interlocking connections among hierarchies among men, women and men, and people and animals, between love in its male-dominant form and death dealing, each man with the best of intentions kills what he loves most. Men's love did not save Curly's wife, the mice, or Lenny—quite the contrary. The good intentions of the powerful, far from saving the powerless, doom them. Unless you change the structure of the power you exercise, that you mean well may not save those you love. Animal rights advocates take note.

Central dilemmas in the use of law by humans to free women—men's pets, their beasts of burden, their living acquisitions—from male dominance have

included analyzing structural power in intimate settings, meeting and changing standards simultaneously, redefining power while getting some, gaining protection without strengthening its arbitrary exercise,⁴⁵ and supporting caring and empathy while enforcing accountability. And we supposedly speak the same language. In the effort to use law to free animals from the species domination of human beings, the most socially empowered of whom are men, these and further challenges remain unmet.

NOTES

- Special thanks go to Ryan Goodman, Cass Sunstein, Lisa Cardyn, Kent Harvey, and most of all Carol Adams for their helpful comments, and to the University of Michigan law library staff as always for their resourceful and responsive research assistance.
1. Recognizing that human beings are also animals, and the linguistic invidiousness that elides this fact of commonality, I sometimes here, for simplicity of communication, term nonhuman animals "animals," while feeling that this usage gives ground I do not want to concede.
 2. One analysis and documentation of male dominance is Catharine A. MacKinnon, *Sex Equality* (New York: Foundation Press, 2001).
 3. For discussion of this standard approach to equality, and a book full of examples of the problem discussed in this paragraph in the case of women, see MacKinnon, *Sex Equality*.
 4. *Bradwell v. Illinois*, 83 U.S. 130, 142 (1872).
 5. See, e.g., Mark Thomas Connelly, *The Response to Prostitution in the Progressive Era* (Chapel Hill: University of North Carolina Press, 1980); David J. Pivar, *Purity Crusade: Sexual Morality and Social Control, 1868–1900* (Westport, Conn.: Greenwood, 1973).
 6. Carolyn Merchant, *The Death of Nature: Women, Ecology, and the Scientific Revolution* (1980); Josephine Donovan, "Animal Rights and Feminist Theory," 15 *Signs: Journal of Women in Culture and Society* 350 (1990), reprinted in Josephine Donovan and Carol J. Adams, eds., *Beyond Animal Rights: A Feminist Caring Ethic for the Treatment of Animals* (New York: Continuum, 1996); and Carol Adams, *Neither Man nor Beast: Feminism and the Defense of Animals* (New York: Continuum, 1994), have theorized this question.
 7. James Boswell, 1 *Boswell's Life of Johnson* 266 (Mowbray Morris, ed., Crowell, 1922).
 8. See Lea Vandervelde, "The Legal Ways of Seduction," 48 *Stanford Law Review* 817 (1996).
 9. See Joan Dunayer, "Sexist Words, Speciesist Roots," in Carol J. Adams and Josephine Donovan, eds., *Animals & Women: Feminist Theoretical Explorations* 11 (1995) (hereafter Adams and Donovan).
 10. The parallels are documented and analyzed in Carol Adams, *The Pornography of Meat* (New York: Continuum, 2003).
 11. This may have begun with Fourier, to whom the insight is often credited, who said something somewhat different: "As a general proposition: Social progress and changes of historical period are brought about as a result of the progress of