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# Getting Our Stories Straight: Narrative Autonomy and Feminist Commitments

MILTON C. REGAN, JR.\*

In an original and stimulating paper, Susan Williams has suggested that feminists can find value in civil society to the extent that it features communities that nurture their members' capacity for autonomy. Her argument flows from recognition of the importance of social relationships in fostering individual self-governance. Such relationships enable an individual to act autonomously when they encourage her to ask whether her commitments are consistent with a sense of her life as an integrated narrative.

Professor Williams's account of autonomy has a richness and subtlety that present a sharp contrast to the model conventionally attributed to liberal individualism. Her model rejects the vision of the autonomous individual as "securely isolated from his threatening fellows."<sup>1</sup> It offers instead a socially embedded self capable of reflecting on which attachments are most consistent with her sense of identity. At the same time, I want to suggest that we can see Williams's paper as a contribution to the liberal project. She accepts its normative commitment to autonomy, but offers a better description of just how the process of self-determination unfolds.

Seeing the paper in this light reveals certain tensions in her model, tensions that characterize feminism more generally. The liberal project has emphasized the abstract individual who is due respect because of her capacity for autonomy, regardless of her particular individual characteristics. Liberalism has argued that we must look beyond ostensibly superficial differences to find the common features that unite human beings as such. Much of recent feminism, however, has expressed suspicion of the liberal emphasis on universality. It has directed attention to the ineradicability of difference and the importance of respecting the particularity of individuals.

Can feminism honor its commitment to the universal ideal of autonomy and still maintain its appreciation for difference? Will insistence on communities that foster autonomy enlist feminism in the homogenization of civil society? Or will solicitude for a diversity of social forms undercut the critical force of feminism?

One of the attractions of Professor Williams's model is that it has the potential to mediate between feminist commitments to universality and difference. My comments are intended to suggest just how this might be so.

Let me begin with liberal theory. Over the past fifteen years or so, communitarian and feminist thinkers have vigorously criticized that theory for

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1. Jennifer Nedelsky, *Reconceiving Autonomy: Sources, Thoughts, and Possibilities*, 1 YALE J.L. & FEMINISM 7, 12 (1989). We must be careful not to attribute this vision to all liberal theories of autonomy. See, e.g., STEPHEN MACEDO, LIBERAL VIRTUES: CITIZENSHIP, VIRTUE, AND COMMUNITY IN LIBERAL CONSTITUTIONALISM 220 (1990) (discussing "situated autonomy," which involves "critical reflection on inherited values, personal commitments, and basic goods, not a flight from and abandonment of them").

its unrealistic depiction of individuals as atomized and asocial.<sup>2</sup> These critics have argued that liberal theory is incoherent in conceptualizing individuals as distinct from their ends and purposes. They maintain that liberalism fails to capture important aspects of social experience by characterizing all relationships as voluntarily established. Finally, critics assert that liberals neglect the fact that the very sense of one's self as a distinct individual depends on involvement in social relationships.

These criticisms reveal serious inadequacies in liberalism understood as a descriptive theory of human experience. In recent years, however, several thinkers have emphasized that the individualism that characterizes liberal theory is meant *not* as a description of social life, but as a way of emphasizing the normative importance of individual self-determination and critical reflection—in short, of autonomy. That is, liberal individualism is meant to drive home the point that, regardless of her inevitable location in a history shared with others, an individual can “reflect upon his or her history and, as a result of that reflection, come to alter one's aims and attachments.”<sup>3</sup> Put differently, liberal individualism expresses the view that “all moral obligations and social arrangements stand in need of justification to . . . the individual normatively characterized.”<sup>4</sup> Liberalism's normative commitment to autonomy therefore need not be disturbed by arguments that individuals as a factual matter are primarily, or even exclusively, socially constituted. Even if that is so, this does not mean that the influences that shape the individual should automatically have any moral claims on her.

As a result, it becomes clear that the portrait of the abstract individual in liberal theory is meant to emphasize that *all* individuals, regardless of particular attributes, personal history, or station in life are entitled to self-determination. Liberalism asserts that what is of moral significance about individuals is defined apart from our particularity: it is our capacity to distance ourselves from any commitment or attachment and ask whether it is consistent with the life we want to lead.

When we make normative claims about human beings, however, it is natural that we also draw mental pictures about the lives of the flesh-and-blood individuals who are the subjects of those claims. Thus, despite liberals' emphasis on their theory as normative in nature, many observers have inferred certain descriptive assumptions that seem implicit in that theory. The emphasis on abstract individuals with no constitutive ties has tended to promote a description of the experience of autonomy as freedom unfettered by involvement with others.

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2. See, e.g., VIRGINIA HELD, *FEMINIST MORALITY* (1993); MICHAEL J. SANDEL, *LIBERALISM AND THE LIMITS OF JUSTICE* (1982); Annette Baier, *Trust and Antitrust*, in *FEMINISM AND POLITICAL THEORY* 279 (Cass R. Sunstein ed., 1990); CHARLES TAYLOR, *Atomism*, in *PHILOSOPHY AND THE HUMAN SCIENCES* 187-210 (1985).

3. J. DONALD MOON, *CONSTRUCTING COMMUNITY: MORAL PLURALISM AND TRAGIC CONFLICTS* 50 (1993); see also DAVID GAUTHIER, *MORALS BY AGREEMENT* 349 (1986); WILL KYMLICKA, *LIBERALISM, COMMUNITY, AND CULTURE* 50-52 (1989).

4. Alisa L. Carse, *The Liberal Individual: A Metaphysical or Moral Embarrassment?*, 28 *NOÛS* 184, 185 (1994); see also Charles Taylor, *Cross-Purposes: The Liberal-Communitarian Debate*, in *LIBERALISM AND THE MORAL LIFE* 159 (Nancy L. Rosenblum ed., 1989).

The implication is that human agency is threatened by social relationships. On this view, achieving autonomy requires constant vigilance lest the claims or needs of others intrude on individual sovereignty. As Jennifer Nedelsky has observed, the emphasis has been on the preservation of boundaries among individuals.<sup>5</sup> One consequence is the idea that preserving autonomy in the midst of social relations requires as a psychological matter that we regard all attachments in civil society as voluntary associations. As such, they are both freely chosen and freely terminated without any effect on the independent self who makes such decisions.<sup>6</sup>

Where does feminism fit into this? On the one hand, the ideal of autonomy promoted by the normative project of liberalism is an important commitment of feminism. As Deborah Rhode observes, “[s]ome concept of autonomy has been central to the American women’s movement since its inception, autonomy from the constraints of male authority and traditional roles.”<sup>7</sup>

On the other hand, many women do not recognize themselves in the implicit psychology that has been associated with the liberal ideal of autonomy. That psychology has seemed inattentive to the ways in which concrete individuals actually experience their relations with others in the course of seeking to live autonomously. Many feminists therefore have sought a richer descriptive account of autonomy that does justice to its experiential complexity. In particular, they have pressed for a model whose protagonist is the situated, rather than isolated, individual.<sup>8</sup> For such an individual, social relationships do not simply constrain autonomy, but enable it as well. Such relationships can be constitutive of individual identity, entering into one’s sense of self. Furthermore, the situated individual uses not only reason, but also emotion, in developing and expressing her autonomy. This account of the autonomous individual as grounded in the social and natural world is consistent with feminism’s tendency to insist on attention to the particularities of concrete experience, rather than idealized models of human life.<sup>9</sup>

We might say, then, that Williams’s paper is a sterling example of the way in which feminism seeks a more adequate description of the autonomous individual who occupies center stage in normative liberal theory. While committed to the liberal project, she offers the outlines of a moral psychology more plausible than the one attributed to the abstract subject of that theory.

5. See Nedelsky, *supra* note 1; Jennifer Nedelsky, *Law, Boundaries, and the Bounded Self*, in *LAW AND THE ORDER OF CULTURE* 162 (Robert Post ed., 1991).

6. DIANA T. MEYERS, *SELF, SOCIETY, AND PERSONAL CHOICE* 44-45 (1989).

7. Deborah L. Rhode, *Feminist Critical Theories*, 42 *STAN. L. REV.* 617, 628 (1990); see also Nedelsky, *supra* note 1, at 8-9; Anne C. Dailey, *Feminism’s Return to Liberalism*, 102 *YALE L.J.* 1265, 1280 (1991) (book review). This reflects but one sense in which feminism draws inspiration from many of the tenets of liberalism, which challenge social hierarchy in the name of the individual. See SUSAN MOLLER OKIN, *JUSTICE, GENDER, AND THE FAMILY* 61 (1989); CAROLE PATEMAN, *THE DISORDER OF WOMEN* 118 (1989); Rhode, *supra*, at 1279.

8. See, e.g., MEYERS, *supra* note 6, at 42-58; Nedelsky, *supra* note 1.

9. “[F]eminist theory strives to remain anchored in the lived experience of women.” Dailey, *supra* note 7, at 1274; see also Margaret J. Radin, *The Pragmatist and the Feminist*, 63 *S. CAL. L. REV.* 1699, 1707 (1990).

It's important to emphasize that, just as we can infer certain descriptive assumptions from liberalism's normative vision, certain normative implications flow from feminism's descriptive model of autonomy.

In particular, if autonomy is a capacity that must be developed in connection with others, then we may have certain obligations to ensure that conditions exist that serve to nurture it. Put differently, autonomy is a positive liberty that may create affirmative duties, not simply a negative liberty that enjoins us from interfering with others.<sup>10</sup> In this way, commitment to the moral priority of individual self-determination requires attention to the shape of the larger community and society.<sup>11</sup>

In its commitment to the fundamental importance of autonomy, feminism can be seen as subscribing to what John Rawls might call "comprehensive liberalism."<sup>12</sup> That is, feminism regards autonomy as a basic feature of the good life for individuals in all dimensions of experience. It is this commitment to autonomy that leads Williams to maintain that feminists should support only those communities in civil society that encourage their members' exercise of narrative autonomy. This assertion can be seen as an articulation of the universal imperative of the liberal project. *All* persons, regardless of particular attributes or commitments, are entitled to develop and exercise their capacity for autonomy. It follows that *all* communities, regardless of particular features or traditions, should promote this practice in their members.

Thus, abstracting from differences among communities, only those that satisfy this universal standard are worthy of support and preservation. In this sense, feminist commitment to autonomy is a commitment to universality.<sup>13</sup>

On the other hand, contemporary feminism has proclaimed the importance of attention to particularity and difference.<sup>14</sup> Insistence on the ineradicability of difference has been prompted in part by suspicion of the liberal narrative and its

10. This distinction is drawn from ISAIAH BERLIN, *Two Concepts of Liberty*, in *FOUR ESSAYS ON LIBERTY* 118 (1970).

11. See, e.g., JOSEPH RAZ, *THE MORALITY OF FREEDOM* 425 (1986).

12. JOHN RAWLS, *POLITICAL LIBERALISM* 78 (1993).

13. At a minimum, the commitment is universal in the sense that it is applicable to members of modern liberal democracies that place importance on autonomy. See, e.g., RAZ, *supra* note 11, at 390-95. As such, it is an example of an approach to political theory that seeks more generally to articulate implicit normative commitments of liberal society. See RAWLS, *supra* note 12, at 8. Those who engage in this project, however, often tend to find it difficult to avoid assuming the universal validity of certain minimum values. See, e.g., STEPHEN MULHALL & ADAM SWIFT, *LIBERALS AND COMMUNITARIANS* 286 (1992).

In any event, as the remainder of my essay suggests, the attention to context demanded by Professor Williams's model should prompt appreciation of the need for empathetic assessment of women's complex experience in different cultures even if we regard feminism as committed to the trans-cultural value of autonomy. For one effort to engage in such assessment, see Claire Robertson, *Grassroots in Kenya: Women, Genital Mutilation, and Collective Action, 1920-1990*, 21 *SIGNS* 615 (1996).

14. See, e.g., Seyla Benhabib, *The Generalized and the Concrete Other: The Kohlberg-Gilligan Controversy and Moral Theory*, in *WOMEN AND MORAL THEORY* 154 (Eva F. Kittay & Diana T. Meyers eds., 1987); Iris M. Young, *Polity and Group Difference: A Critique of the Ideal of Universal Citizenship*, 99 *ETHICS* 250 (1989).

use of a protagonist depicted in abstract terms. Feminists have argued that the identification of ostensibly universal features of human beings is a political process that inevitably reflects the perspective of those with power. The result is that those who do not conform to these criteria are stigmatized as “different” and are marginalized within society. In particular, women have suffered from being judged according to ostensibly universal standards that are rooted in male experience.<sup>15</sup> Feminists have criticized communitarians on similar grounds, arguing that their assumptions of a unitary conception of the good life ignore important differences of perspective and values within society.<sup>16</sup> Finally, feminists have become more sensitive to the danger that positing a universal women’s experience ignores the diversity of experience among women correlated with phenomena such as class, race, sexual orientation, and other characteristics.<sup>17</sup> Such attention to particularity and difference flows naturally from feminism’s focus on concrete experience. It has led to the argument that respect for individuals requires attention to their otherness—to the ways in which they are irreducibly distinctive.<sup>18</sup>

Feminism’s commitments to both universality and difference create tensions in a feminist assessment of the social forms that make up civil society. On the one hand, feminist enlistment in comprehensive liberalism suggests that all social forms should be “modernized” in accordance with the liberal vision. Only this will ensure autonomy for all individuals, regardless of their particular affiliations. In particular, feminism insists as a core commitment that subordination of women must be ended in all social forms.<sup>19</sup> Regardless of the differences among those forms, none warrant respect unless they meet this minimum universal principle.

On the other hand, respect for difference might prompt acceptance of social forms that don’t regard the cultivation of members’ autonomy as an important value. This would seem to lead to support for social forms that constitute themselves in direct opposition to modern liberal values. One might argue, for instance, that attention to the diverse perspectives of women arguably requires respect for the claims of Amish or fundamentalist Christian women that their communities enable them to live meaningful and satisfying lives, even though others may regard them as within the grip of social forms with oppressive gender roles.

15. See Martha Minow, *Feminist Reason: Getting It and Losing It*, in *FEMINIST LEGAL THEORY: READINGS IN LAW AND GENDER* 357, 357-58 (Katharine T. Bartlett & Rosanne Kennedy eds., 1991).

16. See, e.g., Kathleen M. Sullivan, *Rainbow Republicanism*, 97 *YALE L.J.* 1713, 1721 (1988).

17. See, e.g., ELIZABETH V. SPELMAN, *INESSENTIAL WOMAN: PROBLEMS OF EXCLUSION IN FEMINIST THOUGHT* (1988).

18. The concept of positionality, for instance, emphasizes that a person’s knowledge of the world is influenced by her particular position within it. Any perspective therefore will inevitably be a partial one, whose adequacy can be improved only by supplementing it with other perspectives. See Katharine T. Bartlett, *Feminist Legal Methods*, 103 *HARV. L. REV.* 829, 880-87 (1990).

19. See Susan H. Williams, *Feminist Legal Epistemology*, 8 *BERKELEY WOMEN’S L.J.* 63, 87-88 (1993).

At first blush, feminism might seem faced with the choice between working toward remaking civil society according to the liberal blueprint or valorizing virtually all social forms within it. The narrative account of autonomy that Professor Williams offers, however, can serve to mediate between these two poles. It presents a universal normative ideal that nonetheless can be realized in a variety of particular ways. Attention to the complex ways in which socially embedded selves seek self-governance makes clear that we cannot fulfill our commitment to autonomy by imposing on all of civil society the liberal model of the voluntary association. Rather, we must attend to the diverse settings in which individuals are able to construct and reconstruct narratives in which they take responsibility for the course of their lives.

Just how the narrative model of autonomy is elaborated therefore will help shape how feminism reconciles its commitments to universality and particularity when it engages in an assessment of civil society.

Let me offer just one example of how complex that process might be. Consider women who accept traditional gender roles because of their understanding of the demands of biology or religion. Are these women acting autonomously? What position should feminists take toward social forms that encourage and reinforce such choices?

We have a sense of the texture of some of these women's lives from studies of women who are active in what is called the pro-life movement.<sup>20</sup> Research indicates that many such women believe that biology represents "a natural order that should really be allowed to prevail."<sup>21</sup> This means at least two things to them. First, men and women are "intrinsically different," which dictates that each sex has specific roles to play in life.<sup>22</sup> Second, reproduction is a natural process that individuals should not attempt to render completely subject to human control.<sup>23</sup> For these reasons, motherhood is both a primary and inevitable role for women, which they should not seek to evade.<sup>24</sup>

For many who characterize themselves as pro-life activists, reluctance to tamper with apparent biological imperatives is reinforced by religious belief. Such women are "skeptical about the ability of individual humans to understand, much less control, events that unfold according to a divine, rather than human, blueprint."<sup>25</sup> Events such as an unplanned pregnancy that seem problematic on the surface may ultimately be sources of great joy because of a larger plan. For this reason, pro-life women regard it as arrogant for individuals to disrupt pregnancy simply because it occurs at a time that does not conform to human convenience.

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20. See FAYE D. GINSBURG, *CONTESTED LIVES: THE ABORTION DEBATE IN AN AMERICAN COMMUNITY* (1989); KRISTIN LUKER, *ABORTION AND THE POLITICS OF MOTHERHOOD* (1984).

21. LUKER, *supra* note 20, at 159.

22. *Id.*

23. *Id.* at 169-70; see also GINSBURG, *supra* note 20, at 215 (discussing pro-life activists concerned that easy access to abortion undermines "the imperative of motherhood as a condition beyond human control").

24. LUKER, *supra* note 20, at 202.

25. *Id.* at 186.

For the women I have described, a good life therefore is one lived in conformity with the dictates of biology and/or religion—not one devoted to human mastery and control. Are these women leading autonomous lives? Or are they oppressed, having simply internalized rationalizations that justify their subordination?

On the one hand, it is not hard to make a case that they are not genuinely autonomous as that term is conventionally understood. These women seem willing to accept the constraints of ascribed roles, rather than to rely on their own initiative to fashion lives that express their unique individuality. By tying themselves so closely to the domestic sphere, they reinforce a state of affairs in which women are largely dependent upon men for their material welfare. A comprehensive liberal therefore could easily argue that the restricted opportunities and apparent fatalism of these women are inconsistent with the conditions of true autonomy.

If we listen more closely to these women's narratives, however, we can discern more complexity. Faye Ginsburg has suggested that pro-life women do not regard acceptance of their ostensibly natural role as passive acquiescence to biological difference. Rather, acceptance of that role involves an active affirmation of the biological features that are regarded as the basis for female identity.<sup>26</sup> Ginsburg describes the crucial role of narrative in this process. Pro-life women often describe the trajectory of their lives as a process of overcoming initial ambivalence about or even resistance to pregnancy, which culminates in the willing embrace of one's female nature.<sup>27</sup> For some women, early identification with liberal feminism contributed to reluctance to accept their role. Coming to accept that role thus required them to take a critical perspective toward an initial commitment.<sup>28</sup> In short, the pro-life women Ginsburg describes regard a female identity as something to be gained through effort, "rather than a biologically based ascription."<sup>29</sup>

These women do not see themselves as working to reinforce a system of male privilege. From their perspective, they are seeking to preserve an intricate set of social relationships that valorize women by promoting feminine values of nurture and responsibility.<sup>30</sup> Crucial to this matrix is the way in which the possibility of pregnancy serves to constrain male sexual activity. For these women, linking sex to pregnancy and marriage limits the tendency to regard women as sex objects and, serves as "the linchpin for the material security of women with dependents."<sup>31</sup>

Easy access to abortion is seen as threatening these social arrangements. Giving women the option of abortion weakens social pressure on men to take emotional and financial responsibility for the reproductive consequences of sex.<sup>32</sup> A system of complementarity between men and women is undermined by a rival

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26. GINSBURG, *supra* note 20, at 127.

27. *Id.* at 217-18.

28. *Id.* at 194.

29. *Id.* at 218.

30. LUKER, *supra* note 20, at 162.

31. GINSBURG, *supra* note 20, at 214.

32. *Id.* at 214.



vision of individualism, in which men and women are free to act as unfettered self-interested actors. According to pro-life women, such atomistic equality is rendered plausible only by positing that women as well as men separate sexual pleasure and individual ambition from procreation and caregiving.<sup>33</sup> This depiction of women's sexuality represents "an active denial by women of two essential conditions of female gender identity: pregnancy and the obligations of nurturance that should follow."<sup>34</sup> The availability of abortion thus makes it easier for men to exploit women,<sup>35</sup> as a sense of collective responsibility for those who are pregnant gives way to "heartless individualism."<sup>36</sup>

For pro-life activists, this transformation reflects the broader disturbing trend to valorize the values of the market over the norms of the family. Abortion makes a fetus's life depend on another person's assessment of the costs and benefits that it will produce.<sup>37</sup> It devalues motherhood and nurturance by authorizing a woman to end that life if it would interfere with her professional or financial ambitions. From this perspective, abortion is part of several developments in modern society that threaten respect for the basic dignity of each individual, no matter how powerless.

Not only do pro-life women see these changes as jeopardizing women by promoting an ethic of individualism. They also see them as reducing women's autonomy by making it more difficult to lead a traditionally feminine way of life. As Kristen Luker observes, "a social ethic that promotes more freely available sex undercuts pro-life women [in] two ways: it limits their abilities to get into a marriage in the first place, and it undermines the social value placed on their presence once within a marriage."<sup>38</sup> A homemaking career also is undermined by the increasing availability of other domestic services from sources outside the household,<sup>39</sup> and by the diminishing number of stay-at-home women who might provide a support network for women choosing a traditional role.<sup>40</sup>

From the perspective of these women, feminist support for liberal reforms contributes to the oppression of traditional women and diminishes their autonomy. By undermining the feasibility of a traditionally feminine way of life, such reforms leave women little attractive choice but to assimilate into the modern mainstream. It seems disingenuous to these women to say that modern reforms are simply neutral measures that enhance the range of women's choices. Traditional women contest the very model of human experience that underlies the liberal notion of choice—that individuals should seek to maximize control over their own destinies. To the extent this model is internalized, a traditional way of life is likely to be devalued and rejected. Kristin Luker, for instance, observes that in her interviews half the pro-life activists who are full-time homemakers

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33. *Id.* at 217.

34. *Id.* at 216.

35. LUKER, *supra* note 20, at 162.

36. GINSBURG, *supra* note 20, at 215 (quoting pro-life activists).

37. LUKER, *supra* note 20, at 170-71.

38. *Id.* at 209.

39. *Id.*

40. See KATHLEEN GERSON, *HARD CHOICES: HOW WOMEN DECIDE ABOUT WORK, CAREER, AND MOTHERHOOD* 211-12 (1985).

identified themselves in terms of the wage work they had given up, even when they had not been in the paid labor force for as long as thirty years. Luker suggests that such women may have “internalized their loss of status as housewives,”<sup>41</sup> ironically expressing the pervasiveness of a cultural value that they ideologically oppose.<sup>42</sup> As Kathleen Gerson observes, as women increasingly have left home for the workplace, “those left behind have found themselves having to defend an increasingly devalued way of life.”<sup>43</sup>

Feminists have expressed suspicion toward claims of formal neutrality, and have insisted on attention to the concrete effects of different social policies.<sup>44</sup> Paying such attention in this instance illustrates that exalting the abstract ideal of choice risks obscuring the ways in which pro-life women feel that legal reforms have undermined their welfare. To use Robert Cover’s term, these women experience as “jurispathic”<sup>45</sup> many of the measures that liberal feminists have championed. To them, such measures have weakened the viability of their “nomos” by employing law to increase the influence of a value system that they oppose.

Conventional liberalism is likely to dismiss out of hand these women’s claims to autonomy and their contention that liberal feminist reforms have contributed to their subordination. The universal model of the autonomous individual would regard the advance of modern values as nothing but liberating. It is a tribute to Professor Williams’s account of autonomy that, by taking difference seriously, her model makes it harder categorically to reject these voices. Their claim of autonomy is plausible because many pro-life women see acceptance of traditional gender identity as the product of struggle, reflection, and rejection of liberal feminism. Their claim of subordination as a result of modern reform is colorable, because these women see themselves conscripted into a regime that limits their choices and promotes traditionally male values.

I don’t purport to know how those of us who identify with feminism ultimately should adjudicate these claims. I do know that the richness of Williams’s model makes more complicated the task of deciding which social forms are in the interest of women, and which reforms are consistent with feminist ideals. The ways in which Professor Williams develops her account of autonomy therefore will give important shape to feminism’s attempt to reconcile its commitments to universality and difference in assessing civil society. That her model at this point leaves us with less certainty than before, and more questions than answers, is a mark not of its limitations, but of its insight, ambition, and importance.

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41. LUKER, *supra* note 20, at 202.

42. *Id.* at 203.

43. GERSON, *supra* note 40, at 211.

44. *See* Minow, *supra* note 15, at 357.

45. Robert M. Cover, *Foreword: Nomos and Narrative*, 97 HARV. L. REV. 4, 40 (1983).

