

Volume 60 | Issue 4 Article 1

12-1-2015

Martin Luther King, Jr. Lecture - "A Love Supreme"

Gregory S. Parks

Follow this and additional works at: https://digitalcommons.law.villanova.edu/vlr



Part of the Civil Rights and Discrimination Commons

Recommended Citation

Gregory S. Parks, Martin Luther King, Jr. Lecture - "A Love Supreme", 60 Vill. L. Rev. 693 (2015). Available at: https://digitalcommons.law.villanova.edu/vlr/vol60/iss4/1

This Lecture is brought to you for free and open access by Villanova University Charles Widger School of Law Digital Repository. It has been accepted for inclusion in Villanova Law Review by an authorized editor of Villanova University Charles Widger School of Law Digital Repository.

VILLANOVA LAW REVIEW

Volume 60 2015 Number 4

Martin Luther King, Jr. Lecture

"A LOVE SUPREME"

Gregory S. Parks*

FOR years, people have written and sung about it. Gary Chapman told us that it has five types of languages.¹ Charles Bukowski told us that it is "a dog from hell."² Elizabeth Gilbert wrote about how she found herself by doing this and eating and praying.³ Movies have described it as *crazy* and *stupid*,⁴ compared it to *other drugs*,⁵ and James Bond even sent it to us from Russia.⁶ The Harlem Renaissance poet Countee Cullen described it as a tree.⁷ English poet Robert Browning cast it among ruins.⁸

Singers like Perry Como found themselves a prisoner of it.⁹ The Beatles said you can't buy it for them.¹⁰ Captain and Tennille said it "will keep [them] together."¹¹ Robert Palmer said he was addicted to it.¹²

Editor's Note. This Article was published as part of Villanova University School of Law's Martin Luther King, Jr. Memorial Lecture Series.

- 1. See Gary D. Chapman, The 5 Love Languages: The Secret to Love that Lasts (Elizabeth Cody Newenhuyse ed., 2010).
- 2. See Charles Bukowski, Love Is a Dog from Hell: Poems 1974-1977 (1983).
 - 3. See Elizabeth Gilbert, Eat, Pray, Love (2006).
 - 4. See Crazy, Stupid, Love (Carousel Prods. (II) 2011).
 - 5. See Love & Other Drugs (Fox 2000 Pictures et al. 2010).
 - 6. See From Russia with Love (EON Prods. & Danjag 1963).
 - 7. See Countee Cullen, The Love Tree, in Copper Sun 36, 36 (1927).
- 8. See Robert Browning, Love Among the Ruins, in Men and Women (Israel Gollancz ed., London, JM Dent & Co. 1899).
 - 9. See Perry Como, Prisoner of Love (RCA Victor Records 1946).
 - 10. See The Beatles, Can't Buy Me Love (EMI Studios 1964).
- 11. See Captain & Tennille, Love Will Keep Us Together (A&M Records Inc. 1975).
 - 12. See Robert Palmer, Addicted to Love (Island Records 1985).

(693)

^{*} Assistant Professor of Law, Wake Forest University School of Law. The title of this Article is taken from the John Coltrane album, "A Love Supreme." *See* John Coltrane, A Love Supreme (Impulse! 1965).

LL Cool J said he needed it.¹³ Lil Wayne tried to teach us how to do it.¹⁴ And Beyoncé said that she was so deep in it, that she was drunk.¹⁵

But just over fifty years ago, a jazz musician gave us something to aspire to. Born John William Coltrane on September 23, 1926, in Hamlet, North Carolina, 16 he would become one of America's most highly influential jazz saxophonists and composers. Coltrane studied music in Philadelphia after high school and was drafted into World War II, when he had the opportunity to play in the United States Navy Band.¹⁷ Following the war, Coltrane began his monumental career working with artists such as Dizzy Gillespie and Miles Davis. 18 Coltrane passed away at the age of forty from liver disease.¹⁹ Despite his short life, Coltrane generated an impressive body of work. Among it, the defining album "A Love Supreme" was released by the John Coltrane Quartet two years before his death in 1964.²⁰ In this album, Coltrane channeled his emotions about God's love, a love not necessarily confined to one being.²¹ Coltrane was in fact known for his belief that God could not be contained by a single doctrine.²² Most cite the inspiration for "A Love Supreme" as Coltrane's near heroin overdose, after which he became more in touch with his spirituality.²³

And that, "A Love Supreme," is why I'm here, in my short time, to talk with you about a broader love than that raised by Coltrane—one focused on a love for "the least of these" but built on something solid.²⁴ Indeed, the broader context is the life of Dr. King, who was raised in the Christian tradition from an early age.²⁵ His parents were loving people who spoke

^{13.} See LL COOL J, I Need Love, on BAD (Def Jam Recordings 1987).

^{14.} See Lil Wayne, How to Love, on Tha Carter IV (Cash Money Records, Inc. 2011).

^{15.} See Beyoncé, Drunk in Love, on Beyoncé (Parkwood Entm't with Columbia Records 2013).

^{16.} See generally Ashley Kahn, A Love Supreme: The Story of John Coltrane's Signature Album (2002); Ben Ratliff, Coltrane: The Story of a Sound (2007).

^{17.} See Ratliff, supra note 16, at 3.

^{18.} See Kahn, supra note 16, at 15.

^{19.} Id. at 195.

^{20.} Id.; see also generally id. chs. 3 & 4.

^{21.} Id. at 144-46.

^{22.} See Arun Rath, 50 Years of John Coltrane's 'A Love Supreme', NAT'L Pub. Radio (Dec. 7, 2014), http://www.npr.org/2014/12/07/369191157/50-years-of-coltranes -a-love-supreme [http://perma.cc/R449-2JVG].

^{23.} See John Coltrane, Famous Afr. Ams., http://www.famousafricanamericans.org/john-coltrane [http://perma.cc/R8WH-7B9R] (last visited Oct. 8, 2015).

^{24.} Singer Sade conceptualized this in her album Lovers Rock (Sony Music Entm't Inc. 2000).

^{25.} See generally Tavis Smiley with David Ritz, Death of a King: The Real Story of Dr. Martin Luther King Jr.'s Final Year (2014); The Autobiography of Martin Luther King, Jr. (Clayborne Carson ed., 1998).

against racism as "an affront to God's will." Their teachings would influence Dr. King's conception of love in his later life, one that stood as a testament to the words in the Bible's book of Corinthians:

695

Love is patient, love is kind. It does not envy, it does not boast, it is not proud. It does not dishonor others, it is not self-seeking, it is not easily angered, it keeps no record of wrongs. Love does not delight in evil but rejoices with the truth. It always protects, always trusts, always hopes, always perseveres. Love never fails.²⁷

I. LOVE OF THE PEOPLE

As lawyers, we are called upon not just to make a living, but to also make a difference. History is replete with examples of lawyers—high profile, low profile, and no profile—using their time and talents to uplift downtrodden humanity.²⁸ Without question, many of our country's greatest and most progressive changes have come at the hands of lawyers.²⁹ I submit that such work has been motivated by a spirit of love.

The world's major religions instruct us to look and love beyond ourselves, to serve those less fortunate than us. Our Jewish brothers and sisters in the Talmud articulate a set of codes that include "rules about justice, equality before the law, loving-kindness, social welfare, and the ideals of peace and political freedom." In the religion of Islam, the Holy Qur'an promotes social welfare based on a love of God. The seventy-six Surah instructs: "And they feed, for the love of Allah, the indigent, the orphan, and the captive (Saying), 'We feed you for the sake of Allah alone: no reward do we desire from you, nor thanks." "31

Dr. King promoted the Christian doctrine of loving not only God, but one another as well. Indeed, Christianity emphasizes love. In the book of Leviticus, it tells us: "[Y]ou shall love your neighbor as yourself";³² in the book of Deuteronomy, it instructs: "For the poor will never cease out of

^{26.} See Martin Luther King Jr.: Civil Rights Activist, Minister (1929–1968), вю., http://www.biography.com/people/martin-luther-king-jr-9365086#montgomery-bus-boycott [http://perma.cc/PC5F-KA3D] (last visited Oct. 8, 2015).

^{27. 1} Corinthians 13:4-8 (New Int'l Version).

^{28.} See, e.g., Robert L. Carter, A Matter of Law: A Memoir of Struggle in the Cause of Equal Rights (2005); Rawn James, Jr., Root and Branch: Charles Hamilton Houston, Thurgood Marshall, and the Struggle to End Segregation (2010); David J. Langum, William M. Kunstler: The Most Hated Lawyer in America (1999); Kenneth W. Mack, Representing the Race: The Creation of the Civil Rights Lawyer (2012); Constance Baker Motley, Equal Justice Under Law: An Autobiography (1998).

^{29.} See Sameer M. Ashar, Public Interest Lawyers and Resistance Movements, 95 Calif. L. Rev. 1879 (2007).

^{30.} Judaism and Social Justice, SACRED, http://www.sacred.org.za/judaism-and-social-justice/ [http://perma.cc/G4HL-KGLQ] (last visited Oct. 8, 2015).

^{31.} Three Translations of the Koran (Al-Qur'an) Side by Side 76:8 (Hafiz Abdullah Yusuf Ali et al. trans., 2009).

^{32.} Leviticus 19:18 (Rev. Standard Version).

the land; therefore I command you, You shall open wide your hand to your brother, to the needy and to the poor, in the land."³³ Even more, as we look to the New Testament, it demonstrates how Jesus simplified the Ten Commandments in the book of John: "I am giving you a new command. You must love each other, just as I have loved you. If you love each other, everyone will know that you are my disciples."³⁴

It is no surprise that Dr. Cornel West—a Christian, a scholar, and an activist—tells us "[y]ou can't lead the people if you don't love the people. You can't save the people if you don't serve the people."³⁵ A love in which one is willing to sacrifice their life for another appears to be the ultimate love. In Christianity, Jesus Christ is viewed as the "ultimate gift" because of his sacrifice for the sins of all mankind. The appearance of Christ-figures is prominent in works of literature and film, although, they are not confined to fictional characters. Individuals in the real world who become martyrs for their cause are often called Christ-figures and are admired for their bravery and remembered for their love.

Dr. King became a martyr for African Americans' efforts for civil rights and social equality. And although he did not elect to die for this cause, it was apparent from his teachings and actions that he loved his people enough to sacrifice himself. He was persecuted for his beliefs and placed in jail on a number of occasions for his actions as a part of the civil rights movement. And while the same demands are not necessarily placed on you, I urge you to embrace the call—in ways large and small—to uplift our brothers and sisters in humanity who are less fortunate than, or suffer from lack of equal rights as, you.

But love for the people cannot be a hollow and vacuous concept devoid of substance. As the legal realists conceptualized the law as something to be understood as being "in action," so too must we embrace love as a verb: a transformative force that emerges from a solid foundation, a love for both the minority and the majority, and a love for this country drawing from the wellspring of love.

II. LOVE OF THE MINORITY

As the Bible tells us in the book of Proverbs, "as he thinketh in his heart, so *is* he "37 The challenge is that, in our beloved country, marginalized groups have been taught to not love who and what they are. Majority groups have been taught to have a false sense of greatness, a false love.

^{33.} Deuteronomy 15:11 (Rev. Standard Version).

^{34.} John 13:34–35 (Contemporary English Version).

^{35.} Cornel West, Hope on a Tightrope: Words & Wisdom 151 (2008).

^{36.} See American Legal Realism 5 (William W. Fisher III, Morton J. Horwitz & Thomas A. Reed eds., 1993) (referencing Roscoe Pound, Law in Books and Law in Action, 44 Am. L. Rev. 12 (1910)).

^{37.} Proverbs 23:7 (King James Version).

Take, for example, the social psychological studies of Drs. Kenneth and Mamie Clark during the 1940s, known as the doll tests, designed "to study the psychological effects of segregation on African-American children." The experiments involved asking children which doll they preferred, a choice between two identical dolls with one difference: one was white while the other was black. In most cases the children preferred the white dolls. Based on this finding, "[t]he Clarks concluded that 'prejudice, discrimination, and segregation' created a feeling of inferiority among African-American children and damaged their self-esteem. The studies were quite significant and contributed to the monumental 1954 United States Supreme Court decision in *Brown v. Board of Education*, which ended legal segregation in public schools. It was clear from Kenneth and Mamie Clark's research that segregation and an implicit promotion of one race over another negatively affect racial minorities, but I submit to you that it does psychological damage to majority groups as well.

As noted by the Clarks' experiment, self-love is influenced by outside factors. The African-American children in the study preferred white dolls to black dolls because their entire lives, they had been exposed to white supremacy. With white supremacy inculcated in their minds, they had difficulty loving themselves.

Today, we like to believe that we live in a supposedly post-racial America. However, in reality, we, *all of us*, automatically embrace traditional social hierarchies. System justification theory, a social psychological perspective, posits that people have a general motivation to rationalize, justify, or defend the existing social system in which they live. He effect

^{38.} See Brown at 60: The Doll Test, NAACP Legal Def. & Educ. Fund, http://www.naacpldf.org/brown-at-60-the-doll-test [http://perma.cc/X6JN-NFFZ] (last visited Oct. 8, 2015); see also Gerald Markowitz & David Rosner, Children, Race, and Power: Kenneth and Mamie Clark's Northside Center (2000); Toward Humanity and Justice: The Writings of Kenneth B. Clark, Scholar of the 1954 Brown v. Board of Education Decision (Woody Klein ed., 2004) [hereinafter Toward Humanity and Justice].

^{39.} See Markowitz & Rosner, supra note 38; Toward Humanity and Justice, supra note 38.

^{40.} See Markowitz & Rosner, supra note 38; Toward Humanity and Justice, supra note 38.

^{41.} See Brown at 60: The Doll Test, supra note 38.

^{42. 347} U.S. 483 (1954).

^{43.} See id.

^{44.} See Markowitz & Rosner, supra note 38; Toward Humanity and Justice, supra note 38.

^{45.} See Michael Tesler & David O. Sears, Obama's Race: The 2008 Election and the Dream of a Post-Racial America (2010); The Obamas and a (Post) Racial America? (Gregory S. Parks & Matthew W. Hughey eds., 2011).

^{46.} See John T. Jost, Mahzarin R. Banaji & Brian A. Nosek, A Decade of System Justification Theory: Accumulated Evidence of Conscious and Unconscious Bolstering of the Status Quo, 25 Pol. Psychol. 881, 887 (2004).

is such that "what is" is viewed as "what ought to be."⁴⁷ Justification is more than mere explanation; it attaches a sense of appropriateness and legitimization.⁴⁸ While justification of the status quo is largely intuitive for those who benefit from an existing system, those who are members of disadvantaged groups also buy into the narrative—Christian over non-Christian, man over woman, wealthy over poor, white over racial minority.⁴⁹

These attitudes, beliefs, and thoughts are powerful. There is an assumption that they are entirely accessible to conscious awareness and that human behavior is largely governed by conscious volition; all of this has been debunked in the past several decades. In fact, people's express reports of their cognitive processes are often inconsistent with their "actual" judgments.⁵⁰ Not surprisingly, many psychological influences on judgment seem to operate wholly outside of people's conscious awareness, so much so that psychologists now contend that people rely on two distinct cognitive systems of judgment.⁵¹

One system is rapid, intuitive, subconscious, and error prone; the other is slow, deductive, and deliberative, but much more accurate.⁵² The two systems may operate simultaneously and yet compute contradictory responses.⁵³ Even more, the subconscious system can often dictate choice, while the conscious system lags behind, searching for reasons for a choice that comport with the accessible parts of memory.⁵⁴ We live in a world, now, where social scientists have found that the ease with which people associate good things with whiteness and bad things with blackness is automatic,⁵⁵ with up to sixty percent of racial minorities—including African-Americans—and ninety percent of whites harboring such beliefs.⁵⁶

It's no wonder that Dr. King once noted:

Be proud [of] our heritage as somebody said earlier tonight; we don't have anything to be ashamed of. Somebody told a lie one day. They couched it in language. They made everything black ugly and evil; look in your dictionary and see the synonyms of the word black. It's always something degrading and low and sinister. Look at the word white; it's always something pure, high and clean.

^{47.} See id. at 884 (citing James R. Kluegel & Eliot R. Smith, Beliefs Without [sic] Inequality: Americans' Views of What Is and What Ought to Be (1986)).

^{48.} See id. at 889.

^{49.} See generally Daniel Kahneman, Thinking, Fast and Slow (2011).

^{50.} See id.

^{51.} See id.

^{52.} See id.

^{53.} See id.

^{54.} See id.

^{55.} See Anthony G. Greenwald & Linda Hamilton Krieger, Implicit Bias: Scientific Foundations, 94 CALIF. L. REV. 945, 961 (2006).

^{56.} See generally id.

Well I want to get the language right tonight. I want to get the language so right that everybody here will cry out: "Yes, I am black and I'm proud of it. I'm black and beautiful!" ⁵⁷

And whatever your race, religion, gender, sexual orientation, as a minority, you must find ways to constantly reaffirm the beauty of who you are, to acknowledge it and embrace it—to know self-love. And majority members must see through the fog and haze of your own racial, religious, gender, and sexual orientation sense of supremacy to appreciate the true majesty of those different from you.

III. LOVE OF THE MAJORITY

In addition to loving the minority, one must also love the majority—those in power and maybe too often those at odds with social equality and justice. In his own words, Dr. King reminded us that "hate is too great a burden to bear"⁵⁸ and that "love is the only force capable of transforming an enemy into a friend."⁵⁹ In a sermon delivered by Dr. King, he cited the Bible as the source of his belief in loving his enemies. In the book of Matthew, it states: "Ye have heard that it hath been said, Thou shalt love thy neighbour, and hate thine enemy. But I say unto you, Love your enemies, bless them that curse you, do good to them that hate you, and pray for them which despitefully use you"⁶⁰

This whole concept of loving one's enemies may seem counterintuitive, but consider the teachings of Buddhism, which tell us that understanding is the essence of love. We must have time and practice, looking deeply into those who oppose us. We must be there, present, and attentive. And the result of this is called understanding. But the greatest understanding is aiding the majority member to understand him or herself—to see themselves as they truly are, so that they can become their best selves.

^{57.} Martin Luther King, Jr., Speech at Glenville High School, Cleveland, Ohio (Apr. 26, 1967), transcript and video *available at* http://wisdomftf.com/2013/01/15/happy-birthday-to-dr-martin-luther-king-jr-video/ [http://perma.cc/XK9V-RK 46].

^{58.} Martin Luther King, Jr., Speech at the Eleventh Convention of the Southern Christian Leadership Conference in Atlanta, GA: Where Do We Go from Here? (Aug. 16, 1967), transcript *available at* http://kingencyclopedia.stanford.edu/encyclopedia/documentsentry/where_do_we_go_from_here_delivered_at_the_11th_annual_sclc_convention/ [http://perma.cc/XZK6-7V9]].

^{59.} Martin Luther King, Jr., Speech at Dexter Ave. Baptist Church, Montgomery, Ala.: Love Your Enemies (Dec. 25, 1957), transcript *available at* http://www.salsa.net/peace/conv/8weekconv4-2.html [http://perma.cc/73RL-J24E] (last visited Oct. 1, 2015).

^{60.} Matthew 5:43-44 (King James Version).

^{61.} See Thich Nhat Hanh, True Love: A Practice for Awakening the Heart 1–2 (Sherab Chödzin Kohn trans., Shambhala Publ'ns, Inc. 2004) (1997). 62. See id. at 3.

It is an effort that compels us to educate people to help them understand that they may subconsciously fear blacks, ⁶³ or dehumanize women, ⁶⁴ or associate women with lower status jobs than men. ⁶⁵ It is an effort that compels us to educate police officers to help them understand that they may reflexively be inclined to shoot blacks and not whites. ⁶⁶ Racism, sexism, homophobia, Islamophobia, anti-Semitism, and ageism are all sicknesses. And if a person is to become well—to reduce instances of racial profiling, sexual aggression, sex discrimination, and senseless deaths of people like Trayvon Martin, Jordan Davis, Michael Brown, Eric Garner, Tamir Rice—someone, in the spirit of love, must first bring their illness to their attention.

IV. LOVE OF ONE'S COUNTRY

Beyond the love we feel for self or others is a love for this space we find ourselves, in America. The tension created by loving one's country, while at the same time wishing to critique it, demonstrates the complexity of man. On one hand, an individual should love and take pride in their country, but on the other hand, they may not agree with everything that country stands for and, thus, may feel obliged to speak against it. In a way, however, feeling comfortable enough to speak against one's country is in its own way a sign of love for that country, as it reveals a devotion to improving that country. American writer and social critic James Baldwin phrased it this way: I love American writer and social critic James Baldwin phrased it this way: I love American writer and social critic James Baldwin phrased it this way: I love American writer and social critic James Baldwin phrased it this way: I love American writer and social critic James Baldwin phrased it this way: I love American writer and social critic James Baldwin phrased it this way: I love American writer and social critic James Baldwin phrased it this way: I love American writer and social critic James Baldwin phrased it this way: I love American writer and social critic James Baldwin phrased it this way: I love American writer and social critic James Baldwin phrased it this way: I love American writer and social critic James Baldwin phrased it this way: I love American writer and social critic James Baldwin phrased it this way: I love American writer and social critic James Baldwin phrased it this way: I love American writer and social critic James Baldwin phrased it this way: I love American writer and social critic James Baldwin phrased it this way: I love American writer and social critic James Baldwin phrased it this way are also be also be love to the critic by the love American writer and social critic James Baldwin phrased it this way are also be love to the love that the l

^{63.} See Matthew D. Lieberman et al., An fMRI Investigation of Race-Related Amygdala Activity in African-American and Caucasian-American Individuals, 8 NATURE NEUROSCIENCE 720 (2005); Elizabeth A. Phelps et al., Performance on Indirect Measures of Race Evaluation Predicts Amygdala Activation, 12 J. Cognitive Neuroscience 729 (2000).

^{64.} See Laurie A. Rudman & Kris Mescher, Of Animals and Objects: Men's Implicit Dehumanization of Women and Likelihood of Sexual Aggression, 38 Personality & Soc. Psychol. Bull. 734 (2012).

^{65.} See Laurie A. Rudman & Stephen E. Kilianski, Implicit and Explicit Attitudes Toward Female Authority, 26 Personality & Soc. Psychol. Bull. 1315 (2000).

^{66.} See Joshua Correll, Geoffrey R. Urland & Tiffany A. Ito, Event-Related Potentials and the Decision to Shoot: The Role of Threat Perception and Cognitive Control, 42 J. Experimental Soc. Psychol. 120, 127 (2006).

^{67.} In the words of former Senator J. William Fulbright:

To criticize one's country is to do it a service and pay it a compliment. It is a service because it may spur the country to do better than it is doing; it is a compliment because it evidences a belief that the country can do better than it is doing.

In a democracy dissent is an act of faith.

J. William Fulbright, The Arrogance of Power 23 (1966).

^{68.} James Baldwin, *Notes of a Native Son, in Collected Essays* 5, 9 (Toni Morrison ed., 2d prtg. 1998).

tween its ideals and its realities and fighting on every front to close that gap.

V. Drawing from the Source of Love

And then there is this: a need for a source, something to sustain that love we feel and set in motion. Dr. King often spoke about a love of God. Specifically, God alone had the power to redeem all mankind. As Dr. King put it: "Bound by the chains of his own sin and finiteness, man needs a Saviour." "Man cannot save himself, for man is not the measure of all things and humanity is not God." Whether you believe that such great power resides within or outside of you, as the book of John tells us: "The one who does not love does not know God, because God is love."

Even more, "[t]here is no fear in love, but perfect love casts out fear and whoever fears has not been perfected in love." Bringing us full circle, as Dr. King put it: "We must constantly build dykes of courage to hold back the flood of fear." In essence, we must all be vigilant in our efforts to seek our own highest selves, to know that deep and abiding truth of love that resides within us. And as we struggle to make ourselves, humanity, and our society what it can and must be, we should look to something greater than ourselves as the ultimate bedrock for our love.

VI. CONCLUSION

It is apparent that Dr. King heavily relied on his ideas of love to pursue justice for African Americans and disenfranchised people. He "believe[d] that unarmed truth and unconditional love will have the final word in reality. This is why right, temporarily defeated, is stronger than evil triumphant." He preached non-violence and encouraged his congregations to have an abounding conception of love. As I close, may he leave you with this: "Darkness cannot drive out darkness; only light can do that. Hate cannot drive out hate; only love can do that." As you go out into the world, may those words, which encapsulate and underscore Dr. King's love-ethic, undergird and amplify your work as citizens and lawyers.

^{69.} Martin Luther King, Jr., How Should a Christian View Communism?, in Strength to Love 93, 94 (1963).

^{70.} John 4:8 (Holman Christian Standard).

^{71.} John 4:18 (English Standard Version).

^{72.} Martin Luther King, Jr., Antidotes for Fear, in Strength to Love, supra note 69, at 108, 112.

^{73.} Martin Luther King, Jr., Acceptance Address for the Nobel Peace Prize, in A Call to Conscience: The Landmark Speeches of Dr. Martin Luther King, Jr. 101, 107 (Clayborne Carson & Kris Shepard eds., 2001).

^{74.} Martin Luther King, Jr., Loving Your Enemies, in Strength to Love, supra note 69, at 34, 37.

702 VILLANOVA LAW REVIEW

[Vol. 60: p. 693