

ESSAY

How Amendment 1 (North Carolina’s Anti-Marriage Equality Constitutional Amendment) Helped Me Become a Better Law Professor

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I. INTRODUCTION	91
II. THE TEACHER.....	94
III. THE STUDENTS	97
IV. THE SUBJECT MATTER.....	99
V. CONCLUSION	101

I. INTRODUCTION

On May 8, 2012, voters in North Carolina, the state where I live and teach, voted to amend our state Constitution.¹ By a vote of 61% in favor and 39% opposed,² North Carolina, a state that already had a legislative ban against same-sex marriage,³ became the thirtieth state to limit constitutionally the right to marriage to heterosexual couples.⁴ In fact, North Carolina now does more than make marriage off-limits for same-sex couples. As a result of the May 8th vote, the North Carolina Constitution expressly prohibits the state from acknowledging any intimate, domestic relationship between two individuals of the same sex by providing that a “[m]arriage between one man and one woman is the only domestic legal union that shall be valid or recognized in this State.”⁵ Domestic partnerships, civil unions, and similar efforts to provide some sort of state recognition for unmarried couples are now also

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1. *Official Results*, N.C. STATE BOARD OF ELECTIONS (June 13, 2012), <http://results.enr.clarityelections.com/NC/36596/85942/en/summary.html>.

2. *Id.*

3. N.C. GEN. STAT. § 51-1.2 (2011) (effective June 20, 1996).

4. Campbell Robertson, *North Carolina Voters Pass Same Sex-Marriage Ban*, N.Y. TIMES (May 8, 2012), <http://www.nytimes.com/2012/05/09/us/north-carolina-voters-pass-same-sex-marriage-ban.html>.

5. N.C. CONST. art. XIV, § 6.

unconstitutional in North Carolina, for both heterosexual and same-sex couples.⁶

I closely followed the events leading up to the vote on Amendment 1 and the aftermath. Doing so was not difficult. Local and national newspaper articles,⁷ news stories,⁸ and blog posts⁹ appeared regularly. Yard signs, both pro-Amendment and anti-Amendment, were placed in yards across the state.¹⁰ Community groups, churches, and universities sponsored teach-ins and panel discussions.¹¹

Personally, I had a vested interest in the defeat of Amendment 1. I had recently moved to North Carolina from Florida, a state that had amended its Constitution to ban same-sex marriage in 2008.¹² I had hoped I was moving to a state where it would only be illegal but not unconstitutional for my partner and me to marry. However, while I was disappointed, I was not particularly surprised when the North Carolina legislature voted to place an antimarriage equality initiative on the ballot.

6. Elizabeth Hartfield, *Amendment One North Carolina: Anti-Gay Marriage Measure Passes*, ABC NEWS (May 8, 2012, 9:33 PM), <http://abcnews.go.com/blogs/politics/2012/05/amendment-one-north-carolina-anti-gay-marriage-measure-passes/> (“meaning that civil unions and potentially other types of domestic partnerships will no longer be legally recognized”).

7. See Craig Jarvis, *Poll Shows Confusion over Scope of N.C. Marriage Amendment*, NEWS & OBSERVER (Raleigh, N.C.) (Mar. 30, 2012, 5:47 AM), <http://www.newsobserver.com/2012/03/30/1968592/poll-shows-confusion-over-proposed.html>; Karissa Minn, *Q & A on Amendment One Details*, SALISBURY POST (Apr. 22, 2012, 12:00 AM), www.salisburypost.com/News/042212-NC-marriage-amendment-sidebar-qcd; Elizabeth Hartfield, *North Carolina To Vote on Same-Sex Marriage Ban*, ABC NEWS (May 8, 2012, 6:00 AM), <http://abcnews.go.com/blogs/politics/2012/05/north-carolina-to-vote-on-same-sex-marriage-ban/>; Dion Beary, *Amendment One in North Carolina Will Expose Generational Gap*, YAHOO! NEWS (May 7, 2012), <http://news.yahoo.com/amendment-one-north-carolina-expose-generational-gap-180000580.html>.

8. See Brian Montopoli, *Same-Sex Marriage Measure Set for Vote in North Carolina*, CBS NEWS (May 7, 2012, 9:43 AM), http://www.cbsnews.com/8301-503544_162-57428963-503544/same-sex-marriage-measure-set-for-vote-in-north-carolina; Mimi Schiffman, *Amendment One in the Eyes of North Carolina Families*, REESE NEWS (May 7, 2012, 4:51 PM), <http://reese.news.org/2012/05/07/amendment-one-in-the-eyes-of-north-carolina-families/44392/>.

9. See Pam Spaulding, *North Carolina's Amendment One: 10 Facts You Need To Know*, PAM'S HOUSE BLEND (Apr. 9, 2012, 8:57 AM), <http://pamshouseblend.firedoglake.com/2012/04/09/north-carolinas-amendment-one-10-facts-you-need-to-know/>; Bob Young, *North Carolina Is So Much Better than This*, CARETAKER BOB (May 2, 2012), <http://caretakerbob.tumblr.com/post/22251942294/north-carolina-is-so-much-better-than-this>.

10. See Barry Falls Jr., *Amendment One Controversy Brings Out the Worst in North Carolina*, YAHOO! NEWS (May 3, 2012, 6:51 PM), <http://gma.yahoo.com/amendment-one-controversy-brings-worst-north-carolina-225100546>.

11. See Adam Owens, *Marriage Amendment Debate Rages One Week Before Vote*, WRAL.COM (May 1, 2012), <http://www.wral.com/news/state/nccapitol/story/11041815>; Ben Steelman, *Faith Leaders on Both Sides of Amendment One*, STAR NEWS ONLINE (Apr. 20, 2012, 9:09 AM), <http://www.starnews.com/article/20120420/ARTICLES/120429993>.

12. FLA. CONST. art. I, § 27 (2008) (“Inasmuch as marriage is the legal union of only one man and one woman as husband and wife, no other legal union that is treated as marriage or the substantial equivalent thereof shall be valid or recognized.”).

North Carolina was the only state in the south that had not already amended its Constitution in this way,¹³ and as they say, the writing was on the wall.

Because I was moving from a state where my relationship had no recognizable legal status, determining whether to move to North Carolina did not require me to factor in the loss of any benefits, both tangible¹⁴ and intangible,¹⁵ into the already complex spreadsheet I had created to assist with the decision. I am not sure how we would have decided if those concerns had been a part of the analysis. As it was, we did not have to consider whether the professional opportunity awaiting me in North Carolina would be worth the personal loss of having our relationship invalidated.

This Essay, however, is neither an analysis of Amendment 1 nor an exploration of my personal stake in it. Rather, this Essay is about how Amendment 1 made me a better classroom teacher. During the semester that Amendment 1 was in the news, I was teaching Decedents' Estates, a course about the disposition of a person's property when that person dies. The first part of the course is about the distribution of property when a person dies intestate, or without a will. In that situation, a state statute¹⁶ determines who will inherit the decedent's property. A surviving spouse is always entitled to inherit at least some of the decedent's estate.¹⁷ The second part of the course focuses on distribution of the decedent's estate when the decedent has left behind a valid will. In addition to covering topics such as the technical requirements for a will, we also spend time discussing concepts such as testamentary capacity and the types of interpersonal relationships that are relevant when determining how a decedent's property should be distributed.

A lesbian professor teaching Decedents' Estates to a diverse group of students against the backdrop of Amendment 1 can only be described as a perfect storm for the ideal opportunity to blend doctrine, theory and real life in a law school classroom. As I often tell my students, Decedents' Estates is one of the most interesting subjects they will study

13. Robertson, *supra* note 4.

14. See M.V. Lee Badgett, *The Economic Value of Marriage for Same-Sex Couples*, 58 DRAKE L. REV. 1081, 1084-1100 (2010) (describing the advantageous way married couples are treated by various entities, including the state and public or private employers).

15. See *Dealing with Arguments Against*, ACLU, <http://gbge.aclu.org/relationships/dealing-arguments-against> (last visited Oct. 28, 2012) (providing that some intangible benefits include the respect received through the legal recognition of marriage and the positive assumptions made about married persons).

16. N.C. GEN. STAT. § 29 (2011).

17. *Id.* § 29-14.

during law school. At its core, the course is about family, property, money, and death. Amendment 1, at its core, is about North Carolina's right to delimit family composition. Incorporating discussions about Amendment 1 into Decedents' Estates simply made pedagogical sense.

In this Essay, I share three reasons why Amendment 1 made me a better teacher. Each of the reasons focuses on one of the three critical components of a successful classroom: the teacher, the students, and the subject matter. Amendment 1 allowed me to reevaluate what I know and believe about each of the components and as a result, I am a better teacher.

II. THE TEACHER

*"[E]very human life presents a negotiation between public and private identity."*¹⁸

A piece of advice often given to teachers is to be authentic.¹⁹ There are two components to this bit of advice. The first is perhaps more straightforward: be yourself in the classroom.²⁰ Simply put, this piece of advice reminds teachers not to adopt a teaching persona that is radically different from the professionalized version of their true selves.²¹ The underlying message is that teachers are most effective in the classroom when they are not preoccupied with the image they are presenting to the class.

The second component of this piece of advice is more complex. This component invites, even encourages the professor to "inject something of [her]self into the course."²² It is the second component I wish to focus on.

Over the years, I have struggled with determining how much of my personal life should be known by my students. I have tended to fall on the "not very much" end of the continuum. Other than information that is available on my curriculum vitae, I do not share very much at all about

18. *Lana Wachowski's HRC Visibility Award Acceptance Speech (Transcript)*, HOLLYWOOD REPORTER (Oct. 24, 2012, 5:00 AM), <http://www.hollywoodreporter.com/news/lana-wachowskis-hrc-visibility-award-382177>.

19. See, e.g., Carrie Donovan, *Sense of Self: Embracing Your Teacher Identity*, IN THE LIBRARY WITH THE LEAD PIPE (Aug. 19, 2009, 6:00 AM), <http://www.inthelibrarywiththeleadpipe.org/2009/sense-of-self-embracing-your-teacher-identity>; MICHAEL HUNTER SCHWARTZ, SOPHIE SPARROW & GERALD HESS, *TEACHING LAW BY DESIGN: ENGAGING STUDENTS FROM THE SYLLABUS TO THE FINAL EXAM 111* (2009).

20. See SCHWARTZ, SPARROW & HESS, *supra* note 19, at 111.

21. See Donovan, *supra* note 19.

22. HOWARD E. KATZ & KEVIN FRANCIS O'NEILL, *STRATEGIES AND TECHNIQUES OF LAW SCHOOL TEACHING: A PRIMER FOR NEW (AND NOT SO NEW) PROFESSORS 30* (2009).

my life outside of law school with my students. On one hand, it is a matter of relevance. If I do not have a good answer to the question of how this nugget of personal information contributes to the teaching and learning of the subject matter of the class, I do not share. And, even if I decide to share information, I often do so in the way of a hypothetical. For example, several years ago I purchased a house during a semester when I was teaching Property Law. Subsequent to the closing, I learned my sellers had been quite creative in their answers to questions I had asked about the house. I was able to develop several hypothetical problems about contract rescission and fraudulent misrepresentation without ever divulging the source material for the facts.

On the other hand, I know that part of my reluctance to being more open with my students is about fear. More than twenty years ago, not long after I began my career as a law professor, I wrote an article entitled “It is Better to Speak.”²³ In that article, I explored the sense of isolation and invisibility I often felt as a law school student, especially because of my race, gender, and sexual orientation.²⁴ One of the challenges I set for myself in that article was to be a role model for my students, especially those “who may not be white, or may not be male, or may not be straight.”²⁵ As much as I want that to be the case, and on my good days I believe that I am that role model for my students, there are other days when I suspect that my fear gets in the way.

Professor Parker J. Palmer has written that “teaching is a daily exercise in vulnerability.”²⁶ According to Professor Palmer:

I need not reveal personal secrets to feel naked in front of a class. I need only parse a sentence or work a proof on the board while my students doze off or pass notes. No matter how technical or abstract my subject may be, the things I teach are things I care about—and what I care about helps define my selfhood.²⁷

Like Professor Palmer, I want my students to be as enthusiastic as I am about the subjects I teach. I know that is unrealistic, especially when I am teaching a course such as Decedents’ Estates that all students at my school are required to take. Still, I am disappointed (in myself, and if I am being honest, also in my students) and even a little hurt if I cannot

23. Angela D. Gilmore, *It Is Better To Speak*, 6 BERKELEY WOMEN’S L.J. 74 (1990-91).

24. *Id.* at 74-76.

25. *Id.* at 79.

26. Parker J. Palmer, *The Heart of a Teacher: Identity and Integrity in Teaching*, CHANGE MAG., Nov.-Dec. 1996, 6 available at http://www.couragerenewal.org/images/stories/pdfs/tr_heart.pdf.

27. *Id.*

ignite in them a certain level of excitement about the class. Realizing I feel that way about topics in which I have no vested, personal interest, for example Section 2-207 of the Uniform Commercial Code and the Rule Against Perpetuities, I had to question how I would feel about my students' discussions of Amendment 1. Would I personalize their comments? Would I allow pro-Amendment 1 remarks to affect my relationship with the class?

My students know that I am black and female the moment I step into the classroom. I suspect that many also know I am a lesbian because I am not at all closeted and a simple Google search or cursory review of my scholarship reveals that information.²⁸ I wondered, however, if, in the name of authenticity, I should preface any discussion of Amendment 1 with an announcement of my sexual orientation. Would that encourage students to discuss the topic openly or would they be more likely to censor their remarks based on their preconceived notions of my perspective on the issue?

And this is what I learned from Amendment 1. Incorporating Amendment 1 into the classroom discussion did not require anything unique from me. Being authentic in the classroom did not mean that I had to announce my sexual orientation publicly. Authenticity simply required, as Professor Palmer describes it, teaching from the undivided self.²⁹ It meant recognizing that my identity, "the intersection of the diverse forces that make up my life,"³⁰ influences everything I do, including my teaching. Authenticity meant that I had to acknowledge to myself my personal interest in Amendment 1 and then teach in a way that encouraged students to not only learn the law, but also to recognize, understand, question and confirm their own biases and perspectives.³¹

Authenticity also did not mean striving to be neutral when discussing Amendment 1.³² In fact, I sometimes used the pronouns "I" and "we" when talking about Amendment 1, thereby putting myself in the class of people whose relationships would not be legally recognized if the amendment were passed. I used this language with the goal of subtly reminding lesbian, gay, and bisexual students that they were not alone.

28. The fifth link found by a Google search performed on October 8, 2012, using the search term "law professor Angela Gilmore," resulted in an ACLU article that described me as being in a committed relationship with my female partner and unable to adopt because I am gay. *Overview of the Lofton Case*, ACLU OF FLA. (Dec. 1999), http://www.aclufl.org/take_action/students/case_of_the_month/1999/overview1299.cfm.

29. Palmer, *supra* note 26.

30. *Id.* at 4.

31. Donovan, *supra* note 19.

32. *Id.*

Interjecting something of myself into the classroom simply means collapsing the space between my personal self and my professional self so that I am not disconnected from my students or the material.³³ That reminder from Amendment 1 has made me a better teacher.

III. THE STUDENTS

“No one cares how much you know, until they know how much you care.”³⁴

Successful classroom teaching requires that the teacher create a space where students can learn; a place where dialogue is encouraged and students feel safe to participate.³⁵ Tips for creating such an environment range from the obvious—be prepared, thoroughly understand the subject matter, know the students’ names³⁶—to perhaps the less intuitive—acknowledge your weaknesses.³⁷

Amendment 1 reminded me of the importance of a safe learning environment, especially when discussing issues about which students may have strong, often personal feelings. Of all the courses I teach, Decedents’ Estates is the one that offers the most opportunities for students to imagine how the law would affect them personally. It is in Decedents’ Estates, more often than in any other course I teach, that students envision themselves as clients. Many of the topics in Decedents’ Estates are personal and cut close to the heart in ways that commercial law and property law topics do not. The topics we discuss in class raise issues for students about their own mortality and the mortality of the people they love. I did not want the discussion of Amendment 1 to be an instance where learning was negatively impacted because of a student’s personal relationship to the issue of marriage equality.

My students are diverse in ways that I cannot always readily identify. Just like my students can see some of my identity markers when I walk in the room, so too can I see some of theirs. I have a pretty good idea of the gender, age and racial diversity in my classroom; however, I usually do not know much about diversity of sexual orientation and religious tradition, to name just a couple of the sometimes invisible identity markers.³⁸ As Professor Palmer has written, “the students we teach are

33. Palmer, *supra* note 26.

34. Attributed to Theodore Roosevelt, among others.

35. SCHWARTZ, SPARROW & HESS, *supra* note 19, at 108.

36. Katz & O’Neill, *supra* note 22, at 34.

37. SCHWARTZ, SPARROW & HESS, *supra* note 19, at 110.

38. William N. Eskridge, Jr., *A Jurisprudence of “Coming Out”: Religion, Homosexuality, and Collisions of Liberty and Equality in American Public Law*, 106 YALE L.J. 2411, 2418 (1997) (“At the most superficial level, religion and sexual orientation are usually not apparent to casual observation and are not known unless the person self-identifies.”).

larger than life and even more complex.”³⁹ My default is to assume the class composition reflects the diversity that exists generally in society.⁴⁰

In order to create a positive learning environment for our students, we must recognize and respect their diversity. The United States Supreme Court validated the importance of diversity among law students in *Grutter v. Bollinger*,⁴¹ by not striking down as unconstitutional the race-conscious admissions policy used by the University of Michigan Law School.⁴² Among other things, the Court accepted that one of the benefits of diversity is that it promotes “cross-racial understanding” and the breaking down of racial stereotypes.⁴³

While *Grutter* focused on the value of racial and ethnic diversity, the law school classroom is enriched by all types of diversity.⁴⁴ However, in order for diversity to have its greatest impact, it must not only be present, but respected. The mere existence of students of different races, cultures, religions, genders, sexual orientations and backgrounds in a classroom does a lot to promote understanding and break down stereotypes.⁴⁵ A

39. See Palmer, *supra* note 26, at 1.

40. See Gary J. Gates & Frank Newport, *Special Report: 3.4% of U.S. Adults Identify as LGBT*, GALLUP (Oct. 18, 2012), <http://www.gallup.com/poll/158066/special-report-adults-identify-lgbt.aspx> (showing that 3.4% of U.S. adults identify as lesbian, gay, bisexual or transgender and finding that nonwhite, younger, and less educated Americans were more likely to answer “yes” to the following question: “Do you, personally, identify as lesbian, gay, bisexual, or transgender?”); Frank Newport, *Mississippi Is Most Religious U.S. State*, GALLUP (Mar. 27, 2012), <http://www.gallup.com/poll/153479/Mississippi-Religious-State.aspx> (finding that forty percent of Americans nationwide are very religious, thirty-two percent of Americans are nonreligious, and twenty-eight percent of Americans are classified as moderately religious, and that fifty percent of the residents of North Carolina are also classified as very religious).

41. See *Grutter v. Bollinger*, 539 U.S. 306, 324-44 (2003).

42. *Id.* at 343. As of this writing, the Court is revisiting the constitutionality of the use of race in admissions decisions, at least at the undergraduate level, in *Fisher v. University of Texas at Austin*, 631 F.3d 213 (5th Cir. 2011), *cert. granted*, 132 S. Ct. 1536 (U.S. Feb. 21, 2012) (No. 11-345).

43. *Grutter*, 539 U.S. at 330; see also Kevin R. Johnson, *The Importance of Student and Faculty Diversity in Law Schools: One Dean’s Perspective*, 96 IOWA L. REV. 1549, 1553 (2011) (“Put simply, the Supreme Court concluded that diversity among the students in a law school generally contributes to a better legal education than that offered by a more homogeneous student body. This has become the conventional wisdom that is warmly embraced by the vast majority of leaders in higher education today.”)

44. See Kelly Strader et al., *An Assessment of the Law School Climate for GLBT Students*, 58 J. LEGAL EDUC. 214, 215 (2008) (“The analysis here is based on two assumptions: that the presence of a diverse student body contributes to both the richness of the legal education experience and ultimately to the ability of the legal community to serve groups that have historically been subject to discrimination; and that the presence of GLBT students on law school campuses contributes substantially to these goals.”).

45. See generally Johnson, *supra* note 43, at 1566 (discussing different kinds of diversity that can enrich the law school classroom).

classroom where those students are encouraged to contribute and feel safe doing so does even more.

Remembering and respecting the diversity of the students in my Decedents' Estates class reminded me that students may be affected by classroom discussions in ways I may not anticipate. Amendment 1 may have been intensely personal for some students because it was a denial of the validity of certain personal relationships. Accordingly, I did my best to facilitate the discussion of Amendment 1 in ways that did not provide opportunities for students, especially any LGBTQ students, to feel that they were being personally attacked.⁴⁶ I tried to employ teaching strategies that made students feel safe to contribute and that discouraged assertions of unsupported opinions that did not move the conversation forward.

I do not know how successful I was; nothing notable happened during any class discussions about Amendment 1. However, at different times during the semester two of my students shared information with me that was completely unrelated to the reasons that they stopped by my office. One student told me she was bisexual and the other informed me that his brother was gay. I attribute their disclosures to our classroom conversations about Amendment 1.

IV. THE SUBJECT MATTER

*"[T]he subjects we teach are as large and complex as life, so our knowledge of them is always flawed and partial."*⁴⁷

Like many law professors, I grapple with the depth versus breadth coverage issue. Should the syllabi for my classes include more in-depth coverage of fewer topics or a generalized, survey approach of more topics?⁴⁸ For example, my Decedents' Estates class is a three-credit course. It is a prerequisite for several other courses offered by my law school and the subject matter is regularly tested on the bar examination. After including the core topics of the course, especially the ones that prepare students for upper-level courses, the bar exam and problems they will likely see in practice, there is little room left in the syllabus for anything else. Because most textbooks contain much more material than most professors can reasonably cover in the allocated credit hours,

46. SCHWARTZ, SPARROW & HESS, *supra* note 19, at 127.

47. Palmer, *supra* note 26, at 1.

48. See Barbara Glesner Fines, *Lessons Learned About Classroom Teaching from Authoring Computer-Assisted Instruction Lessons*, 38 WM. MITCHELL L. REV. 1094, 1101-03 (2012).

adding topics not found in the textbook may not seem like a wise decision.⁴⁹

The decision to incorporate discussions of Amendment 1 into Decedents' Estates, however, did not require me to revisit the depth versus breadth debate. Amendment 1 was not a new topic. Rather, Amendment 1 provided me with opportunities to have richer, fuller, more comprehensive discussions of topics that were already included in the syllabus. Thus, the decision to include discussion of Amendment 1 in my Decedents' Estates class was easy. I thought the challenge would be doing so in ways that did not disrupt the flow of the class. I was wrong. Because the substance of Amendment 1 was integrally related to the subject matter of the course, it was easy to incorporate discussions of it into the class. For example, as noted in Part I, the first part of Decedents' Estates covers intestate distribution. In order to determine who will inherit a decedent's property, we must establish whether the decedent left behind a spouse.⁵⁰ Discussion of Amendment 1 allowed us to explore the definition of spouse under North Carolina law, and how that definition might be altered if Amendment 1 was approved or defeated. The second part of Decedents' Estates covers distribution of property by will. In North Carolina, a person has the testamentary capacity to execute a valid will if, among other things, the person has a clear understanding of "the persons who are the natural objects of his bounty."⁵¹ Amendment 1 allowed us to discuss who might be considered the natural objects of a person's bounty, especially whether someone with whom one was in a relationship that was unrecognized and in fact disfavored by the law, could be such a person.

Amendment 1 reminded me that law school does not occur in a vacuum. Law students remain a part of the larger world and are aware of what is going on outside the four walls of the law school. Social media, such as Twitter and Facebook, make it easy for students to stay on top of current events. Failure to incorporate relevant items in class would only make me appear uninformed or disinterested.

The key is to incorporate the topics into the classroom in ways that are organic and that do not introduce the topics as very important issues. Finding where they fit naturally within the syllabus, rather than including them because it is the right thing to do, respects the integrity of the subject matter. It is also important to incorporate the topics in ways that

49. *See id.*

50. N.C. GEN. STAT. § 29-1 (2011).

51. *Shoaf v. Shoaf*, 727 S.E.2d 301, 305 (N.C. Ct. App. 2012) (quoting *In re Staub's Will*, 90 S.E. 119, 121 (N.C. 1916)).

respect the diversity of the students and recognize that for some students the discussion is more than academic.⁵²

V. CONCLUSION

Like many North Carolina residents, I was disappointed when Amendment 1 was approved.⁵³ The only reasons I could think of for constitutionalizing discrimination on the basis of sexual orientation were hate, ignorance, or irrational fear.⁵⁴ Moving to a jurisdiction where my relationship would be validated⁵⁵ was tempting, but not a real option. Realizing Amendment 1 has made me a better teacher provides absolutely no consolation, but as they say, I guess it is better than nothing.

52. SCHWARTZ, SPARROW & HESS, *supra* note 19, at 25, 126-27.

53. See April Davis & Clayton Bauman, *People Unhappy with Amendment One Passing Speak Out Across NC*, WITN.COM (May 10, 2012, 7:18 PM), http://www.witn.com/home/headlines/People_Unhappy_With_Amendment_One_Passing_Speak_Out_Across_NC_150875215.html.

54. See Hemant Mehta, *If You Oppose Marriage Equality, What Else Am I Supposed to Call You?*, FRIENDLY ATHEIST (Aug. 2, 2012), <http://www.patheos.com/blogs/friendlyatheist/2012/08/02/if-you-oppose-marriage-equality-what-else-am-i-supposed-to-call-you>; see also Josh Birch, *National Coming Out Day: A Straight Perspective*, HUFFINGTON POST COLLEGE (Oct. 15, 2012, 5:01 PM), http://www.huffingtonpost.com/josh-birch/national-coming-out-day_b_1959548.html.

55. See *Winning the Freedom To Marry: Progress in the States*, FREEDOM TO MARRY, <http://www.freedomtomarry.org> (last updated Nov. 8, 2012) (providing a list of states that either celebrate same-sex marriages or recognize those that were performed elsewhere).