The Journal of Appellate Practice and Process

Volume 6 | Issue 1 Article 6

2004

Enforcing Brown in the Little Rock Crisis

Tony A. Freyer

ENFORCING *BROWN* IN THE LITTLE ROCK CRISIS

Tony A. Freyer*

In modern America no issue revealed more explicitly the compromise of aspirations than the desegregation of public schools. The Supreme Court in *Brown v. Board of Education* declared as a fundamental value "separate educational facilities are inherently unequal." [1] A year later in *Brown II* the Court based its decision on the likelihood of resistance, holding that the implementation of educational equality should proceed "with all deliberate speed,"[2] and so acknowledged that the idea of educational equality was a relative truth.[3] In the twentieth century no instance of opposition to that constitutional principle was more significant than the Little Rock desegregation crisis.[4]

---

* University Research Professor of History and Law, University of Alabama. For essential assistance I am grateful to Marjorie F. Freyer and, for continuing support, Dean Kenneth C. Randall, The University of Alabama Law School Foundation, and the Edward Brett Randolph Fund. I thank, too, Joel E. Anderson, Chancellor of the University of Arkansas at Little Rock, for giving me a copy of the report cited below.

1. *Brown v. Bd. of Educ.*, 347 U.S. 483, 495 (1954) (declaring government-sanctioned segregation unlawful in schools operated by states); *see also Bolling v. Sharp* 347 U. S. 497 (1954) (declaring government-sanctioned segregation unlawful in schools operated by District of Columbia).

2. *Brown v. Bd. of Educ.*, 349 U.S. 294, 301 (1955).

3. On the decisional process, context, and long-term impact of *Brown*, see Richard Kluger, *Simple Justice: The History of* Brown v. Board of Education *and Black America's Struggle for Equality* (Vintage 1977); James T. Patterson, Brown v. Board of Education: *A Civil Rights Milestone and Its Troubled Legacy* (Oxford U. Press 2001); Mark V. Tushnet, *Making Civil Rights Law: Thurgood Marshall and the Supreme Court, 1936-1961* (Oxford U. Press 1994); Dennis J. Hutchinson, *Unanimity and Desegregation: Decisionmaking in the Supreme Court, 1948-1958*, 68 Geo. L.J. 1 (1979); and Michael J. Klarman, Brown, *Racial Change, and the Civil Rights Movement*, 80 Va. L. Rev. 7 (1994).

4. Concerning the Little Rock crisis and its continuing place in American history, see Tony Freyer, *The Little Rock Crisis: A Constitutional Interpretation* (Greenwood Press 1984) [hereinafter Freyer, *Little Rock Crisis*]; *Understanding the Little Rock Crisis: An Exercise in Remembrance and Reconciliation* (Elizabeth Jacoway & C. Fred Williams eds., U. Ark. Press 1999); Juan Williams, *Eyes* on *the Prize: America's Civil Rights Years, 1954-1965* at 91-119 (Viking Penguin 1987); Tony Badger, *"The Forerunner of Our Opposition": Arkansas and the Southern Manifesto of 1956*, 56 Ark. Historical Q. 353

On September 3, 1957, Governor Orval E. Faubus claimed that civil disorder threatened to erupt, and in defiance of federal authority ordered the state's National Guard to block desegregation of Central High School. For three weeks, Faubus, President Dwight D. Eisenhower, the local school board, the local black community, the NAACP, and the federal judiciary were embroiled in intractable confrontation. When on September 20 the federal court found that his assertions concerning disorder were unsubstantiated, Faubus complied with the order to withdraw the Guard. However, after nine black young people entered the school on September 23, a few rabble-rousers galvanized the crowd outside Central, forcing their withdrawal. The next day President Eisenhower dispatched combat-ready paratroopers to the city and federalized the Arkansas National Guard in order to enforce the court's desegregation mandate. Although troops remained at Central High until the academic year ended, a small group of segregationist-supported youths harassed the nine black students relentlessly.[5]

Tension again mounted during the summer of 1958. Faubus sought a nearly unprecedented third-term gubernatorial nomination, and the United States Supreme Court in a special August term considered whether Arkansas authorities had violated the Constitution during the fall confrontation. The governor won a landslide victory, and the Court decided against Arkansas public officials in *Cooper v. Aaron*.[6] In the wake of these events, the city's high schools were closed. Not until local white moderates, informally aided by blacks, mobilized support

(1997); D.L. Chappell, *Editor's Introduction*, 56 Ark. Historical Q. ix (1997); Adam Fairclough, *The Little Rock Crisis: Success or Failure for the NAACP?* 56 Ark. Historical Q. 371 (1997); Tony A. Freyer, *The Little Rock Crisis Reconsidered*, 56 Ark. Historical Q. 361 (1997) [hereinafter Freyer, *Little Rock Reconsidered*]; John A. Kirk, *The Little Rock Crisis and Postwar Black Activism In Arkansas*, 56 Ark. Historical Q. 273 (1997); C. Fred Williams, *Class: The Central Issue in the 1957 Little Rock School Crisis*, 56 Ark. Historical Q. 341 (1997).

5. Unless otherwise noted, the historical material in this discussion is drawn from Freyer, *Little Rock Crisis*, *supra* n. 4, although that text will be cited occasionally for emphasis.

6. 358 U. S. 1 (1958).

for a special school board election in the spring of 1959 did the crisis finally end.[7]

From 1954 to 1959, segregationists appealed to white supremacy, states' rights, and class consciousness in their opposition to desegregation; integrationists advocated the constitutional value of equal opportunity and interracial brotherhood in their support of it. Both groups held to these views as a matter of absolute principle.[8] By contrast, school officials, state and federal authorities, and for some time Faubus too, supported desegregation, primarily out of deference to the Constitution as expounded by the Supreme Court. President Eisenhower used this justification when he ordered the paratroopers of the 101 Airborne to Little Rock: "Our personal opinions about the [*Brown*] decision have no bearing on the matter of enforcement," he said.[9] The moderates who won the school board election that ended the confrontation in the spring of 1959 were even more explicit. The Supreme Court's *Brown* decision, the moderates exclaimed, "however much we dislike it, is the declared law and is binding upon us. We think that the decision was erroneous and that it was a reversal of established law upon an unprecedented basis of psychology and sociology." But, they continued, "we must in honesty recognize that, because the Supreme Court is the court of last resort in this country, what it has said must stand until there is a correcting constitutional amendment or until the Court corrects its own error."[10]

---

7. *See* Tony Freyer, Cooper v. Aaron, in *The Oxford Companion to the Supreme Court of the United States* 197 (Kermit L. Hall ed., Oxford U. Press 1992); Hutchinson, *supra* n. 4, at 73-86.

8. For the values and interests of the black community, the segregationists, state and federal government officials, and white moderates, see Freyer, *Little Rock Crisis*, *supra* n. 4; Badger, *supra* n. 4; Freyer, *Little Rock Reconsidered*, *supra* n. 4; Fairclough, *supra* n. 4; Kirk, *supra* n. 4; and C. Fred Williams, *supra* n. 4.

9. Robert A. Burt, *Constitutional Law and the Teaching of the Parables*, 93 Yale L.J. 455, 475 (1984) (quoting radio-television address of Sept. 24, 1957, by President Eisenhower); *see also* Michal R. Belknap, *Federal Law and Southern Order: Racial Violence and Constitutional Conflict in the Post*-Brown *South* 27-52 (U. Ga. Press 1987); Freyer, *Little Rock Reconsidered*, *supra* n. 4.

10. Henry M. Alexander, *The Little Rock Recall Election*, 17 Eagleton Inst. Cases in Prac. Pol. 10 (McGraw-Hill 1960). For more on the moderates, see Badger, *supra* n. 4; Freyer, *Little Rock Reconsidered*, supra n. 4; Allison Graham, *Remapping Dogpatch: Northern Media on the Southern Circuit*, 56 Ark. Historical Q. 334 (1997); Elizabeth Jacoway, *Down from the Pedestal: Gender and Regional Culture in a Ladylike Assault on*

Following the decision of *Brown I*, school board superintendent Virgil Blossom envisioned a program of substantial integration, but by the announcement of *Brown II* in 1955 major revisions had occurred. As finally publicized, the Blossom Plan required only token desegregation of one high school (Little Rock Central) in 1957; similarly limited desegregation would gradually take place in several phases throughout the rest of the system over an unspecified number of years. The "Phase Program" was flawed in several ways. Many black children would be required to walk or be bused miles past white schools to designated segregated ones. Although several of the black schools were new, the academic content of their curricula was inferior to that in the white schools. Ominously, Central was located in a working-class white neighborhood, which meant that many of those least receptive to racial cooperation would first confront desegregation. The school board gave as the fundamental rationale for its program the reluctant but determined commitment to follow the Supreme Court's 1954 opinion as the "law of the land."[11]

Between 1955 and early 1957 desegregation clashes in Hoxie, Arkansas (where integration ultimately prevailed),[12] and elsewhere pressured Faubus to tilt toward the segregationists. Meanwhile, even as the federal courts upheld the Blossom Plan over a challenge from black parents represented by the local NAACP branch's lawyer, Wiley Branton,[13] the board experienced the intensity of the segregationist campaign during a school board election in the spring of 1957.

Surreptitiously, the school board urged the Justice Department to intervene. Department officials declined, but these initiatives prompted a federal judge to make a remarkable

---

the Southern Way of Life 56 Ark. Historical Q. 345 (1997); Mark Newman, *The Arkansas Baptist State Convention and Desegregation, 1954-1968*, 56 Ark. Historical Q. 294 (1997).

11. Tony A. Freyer, *Objectivity and Involvement: Georg G. Iggers and Writing the History of the Little Rock School Crisis*, in *Crossing Boundaries: The Exclusion and Inclusion of Minorities in Germany and America* 172, 180-88 (Larry Eugene Jones, ed., Berghahn Books 2001); C. Fred Williams, *supra* n. 4.

12. *See Hoxie Sch. Dist. v. Brewer*, 137 F. Supp. 364 (E.D. Ark. 1956), *aff'd*; 238 F.2d 91 (8th Cir. 1956); *Hoxie Sch. Dist. v. Brewer*, 135 F. Supp. 296 (E.D. Ark. 1955) (granting temporary restraining order).

13. *Aaron v. Cooper*, 143 F. Supp. 855 (E.D. Ark. 1956), *aff'd* 243 F.2d 361 (8th Cir. 1957).

suggestion. Judge John E. Miller, who had decided for the school board in the desegregation suit, privately offered to delay the desegregation of Central temporarily at the school board's request. Eventually board members decided against such action, but not before they had informally discussed the matter with Faubus or his lawyer, William J. Smith. As the political heat on the governor mounted, he quietly initiated a suit in state court in August 1957 to request a stay in the desegregation of Central. At the trial Faubus testified that he believed disorder was imminent; Blossom, however, claimed that he did not share the governor's concern. Blossom's testimony presented a public image that was inconsistent with the board's private activities during the summer. The state court granted the delay, which the federal court immediately overruled. Faubus ordered the National Guard to Central, setting off a confrontation with the federal court.[14]

The board then asked the federal tribunal to postpone the desegregation of Central temporarily. School officials covertly requested the aid of U.S. Marshals while they publicly remained committed to the position that Superintendent Blossom had taken during the state trial. At no time did the Little Rock school board initiate litigation—as had Hoxie school officials—to enjoin Faubus or others from interference with the Phase Program. The refusal to take responsibility for the enforcement of desegregation continued after the paratroopers established order and in spite of unremitting harassment of the nine black students by segregationist sympathizers in Central. Ultimately, in the spring and summer of 1958, the board filed the *Cooper v. Aaron* suit, which sought a two and one-half year stay, rather than implementation, of desegregation. Coinciding with Faubus's reelection bid, this suit led to the yearlong closure of the city's high schools.[15] The school board's appeal to constitutional values without a corresponding willingness to enforce those values thus constituted a strategy of failure.

---

14. The evidence supporting these statements includes previously unavailable reports of the Federal Bureau of Investigation, manuscript material from the NAACP Legal Defense Fund, private files, and interviews with participants. *See* Freyer, *Little Rock Crisis*, *supra* n. 4, at 98-109; 112 nn. 51-56; 113 nn. 57-66; 114 nn. 67-84 (describing then-secret negotiations, state-court proceedings, and response of federal courts, and providing citations to FBI reports, NAACP memoranda, private files, interview notes, and published works); *see also Thomason v. Cooper*, 254 F.2d 808 (8th Cir. 1958).

15. *Cooper*, 358 U. S. 1; *see also* n. 4, *supra*.

The federal government approached desegregation in Little Rock cautiously. Undoubtedly influenced by the Eisenhower administration's "southern strategy," which sought to win northern black voter support while at the same time appealing to conservative Democrats, federal officials privately explained to the city's school representatives that they would act in desegregation litigation only upon a formal request from local authorities or the federal court. Shortly before Central High School was scheduled to open in compliance with the Blossom Plan, Faubus privately discussed federal intervention with a Justice Department official and was told the same thing.

In addition, the southern desegregation struggle was central to the Cold War propaganda battle between the United States and communist governments. Even so, the Eisenhower administration's primary foreign policy concern was strengthening the country's democratic image among African, Asian, and Latin American nations; the intrinsic justice of furthering the cause of public school desegregation itself was of secondary importance.[16]

Nevertheless, in part responding to appeals from federal judge Ronald N. Davies—a Republican who was temporarily assigned to Little Rock from North Dakota—Attorney General Herbert Brownell quietly authorized an FBI investigation. Davies received a thoroughly documented 400-page report indicating that Faubus's claims about violence were essentially groundless. Meanwhile, the Justice Department tried without success to persuade Branton to withdraw the desegregation suit. Federal inaction and miscalculation encouraged defiance. In the September 20 trial involving the governor, the Justice Department did not introduce the FBI report. The Department failed to do so probably because the report not only revealed the inaccuracy of Faubus's claims about impending conflict, but it also documented the embarrassing contradiction between Blossom's public statements and private actions regarding the

16. Michael S. Mayer, *Eisenhower's Conditional Crusade: The Eisenhower Administration and Civil Rights, 1953-57* (unpublished Ph.D. dissertation, Princeton U. 1984) (on file in Annex A, Firestone Library, Princeton U.); Mary L. Dudziak, *The Little Rock Crisis and Foreign Affairs: Race, Resistance, and the Image of American Democracy*, 70 S. Cal. L. Rev. 1641 (1997); Azza Salama Layton, *International Pressure and the U. S. Government's Response to Little Rock*, 56 Ark. Historical Q. 257 (1997).

same issue, as well as Judge Miller's questionable offer to delay desegregation. But the government's decision not to use its conclusive evidence sent a clear message to Faubus: Federal officials would enforce desegregation only in extreme circumstances.[17]

The segregationists had continued to heighten tension prior to September 3, 1957; after their experience in Hoxie, however, they had avoided a direct clash with federal authority. But Faubus's withdrawal of the guard and the admission of the Little Rock Nine to Central created a vacuum in the Arkansas capital, which the segregationists rushed to fill. The ensuing disturbance caused the first and only significant break in the government's cautious policy, when Eisenhower enforced desegregation with combat troops. Even some defenders of racial justice condemned this action as heavy handed; consequently, federal officials returned to their more familiar course of careful moderation during the rest of the crisis.

Pro-segregationists and the NAACP were the opposite poles between which local and federal officials struggled. The die-hard segregationists' hate-filled, racially charged rhetoric, efforts to arouse class conflict, periodic resort to violence, and quixotic states-rights appeals had little influence without support from the mainstream political establishment. For a brief period in 1958-59 the segregationists had a wider political impact due to Faubus's states-rights shift, but they never believed that the governor was sincerely committed to their cause. Their distrust proved justified when Faubus retreated from an adamant segregationist stance after the moderates won the special school board election in the spring of 1959. With this victory, segregationists again became only peripherally significant despite their continued visibility.[18]

During the crisis the influence of the NAACP and Little Rock's divided black community was important but also

---

17. Freyer, *Little Rock* Crisis, *supra* n. 4, at 101-07. Regarding the particular matter of Judge Miller's conduct, see Memo. from Ronald N. Davies, Senior J., U.S. Dist. Ct. (D.N.D.), to author (Mar. 1980) ("I did not have any idea of Judge Miller's involvement until reading the FBI report. I considered Judge Miller's actions, as set out in the report, if true, to be wholly inappropriate and unbecoming a federal judge.") (original on file with author). On the government's request that Wiley Branton withdraw the suit, see Interview with Wiley Branton (Dec. 11, 1979) (interview notes on file with author).

18. *See generally* Alexander, *supra* n. 10; Jacoway, *supra* n. 10.

indirect. Until shortly before the confrontation erupted on September 3, the New York headquarters of the NAACP was seldom involved with the Little Rock branch. Prior to 1956 the essentially moderate character of the black community and a record of interracial cooperation in the city encouraged a majority of the local NAACP executive committee to favor the Blossom desegregation plan. Only after the school board revised its program in favor of tokenism and gradualism did activists like Daisy Bates and Georg Iggers gain support for a court case. Although initially unsuccessful, the suit's central purpose of improving educational opportunity for young blacks fostered widespread local enthusiasm for the NAACP. Ironically, many blacks continued to vote for Governor Faubus, even during the heated third-term gubernatorial campaign of 1958. [19] Moreover, after the federal courts' early rejection of the demand for progressive integration, the NAACP was reduced to defending the limited Phase Program in *Cooper v. Aaron.*

Faubus's role was of course central. During the years preceding the crisis, not only had he pushed for economic development and aid to the poor, but also he had specifically targeted blacks as a group that deserved governmental assistance. Consequently, Faubus had moved to equalize welfare benefits and the public spending on education for whites and blacks. He and other local politicos had won places for blacks on the state's Democratic Party committees; Arkansas was perhaps the first state of the Old Confederacy to take this step. Also, Faubus had not resisted the token desegregation in Northwest Arkansas schools, and he refused to become embroiled in the Hoxie struggle.[20]

During his reelection bid in 1956, Faubus preserved his credentials as a moderate in contrast with the white supremacist campaign of his rival, James Johnson. But more complex political considerations influenced the governor's tilt toward segregation. Faubus asked the state legislature for the largest tax

19. Arkansas black voters' support for Faubus in the Delta region may be explained by their domination by planter labor relations; in Little Rock, by contrast, moderate blacks supported the governor because of his liberal economic policies and his admission, though limited, of blacks into a few Democratic Party positions. *See* Freyer, *Little Rock Crisis, supra* n. 4, at 21-24.

20. Freyer, *Little Rock Crisis, supra* n. 4, at 96-97 (quoting material about Faubus from internal NAACP memorandum).

increase in Arkansas history to address the state's heritage of retarded growth and developmental backwardness. Arkansas legislators rejected the taxes. Faubus learned that passage of the tax package depended upon the support of cotton-growing Delta counties in East Arkansas, where a majority of the state's blacks lived. Unlike the extremists who favored overt resistance, Delta politicos sought to delay compliance with *Brown* through exhaustive litigation that tested the validity of intricately conceived states-rights legislation. After his 1956 reelection, Faubus and the Delta leadership made a private deal. In the legislative session of 1957 the governor supported states-rights legislation sponsored by legislators from East Arkansas (which had been defeated in 1955) in return for votes favoring increased taxes.[21]

Concessions to states-rights legislation entangled Faubus's political future and his developmental policies in the desegregation issue. Thus, Faubus had committed himself to more than an abstract principle: He had tied his political fortunes to a strategy of delay, testing states-rights laws through repeated litigation. Through the tense, segregationist-troubled spring and summer of 1957, Faubus met secretly with school board representatives, the Justice Department, and even the segregationists themselves to encourage a court test of the states-rights measures. The governor hoped that litigation would result in a federal order like that handed down in Hoxie, which had brought about desegregation and halted the segregationists' resistance campaign.[22]

During nearly three weeks of confrontation after September 3, Faubus repeatedly affirmed his willingness to accept a final court order. The public and secret negotiations with the Eisenhower administration and its representatives were intended to make federal officials responsible for enforcing desegregation, thus removing from Faubus the political stigma of involvement in the implementation of the Phase Program. As

21. *See* Freyer, *Little Rock Crisis*, *supra* n. 4, at 63-86; Kermit L. Hall, *The Constitutional Lessons of the Little Rock Crisis*, in *Understanding the Little Rock Crisis: An Exercise in Remembrance and Reconciliation* 123-40 (Elizabeth Jacoway & C. Fred Williams eds., U. Ark. Press 1999); Roy Reed, *The Contest for the Soul of Orval Faubus*, in *Understanding the Little Rock Crisis: An Exercise in Remembrance and Reconciliation* 99-106 (Elizabeth Jacoway & C. Fred Williams eds., U. Ark. Press 1999).

22. Freyer, *Little Rock Crisis*, *supra* n. 4, at 87-114.

soon as the federal court specifically ordered him to comply with federal authority, the governor readily did so. Only after the Justice Department's failure to use the FBI Report assured him of the administration's overriding caution, and the enormous criticism of the use of paratroopers that resulted from the one significant exception to that policy persuaded him that it would be politically expedient to do so, did Faubus embrace an unequivocal segregationist stance consistent with that of his rival James Johnson.[23]

In Little Rock the response to *Brown* demonstrated that judicial lawmaking could foster public acceptance of desegregation. But the chief consequence was a confrontation over the scope, character, and legitimacy of federal authority that obscured the ideal of equal educational opportunity and narrowed the reach of the constitutional rule established in *Brown* and reaffirmed in *Cooper v. Aaron.*

A comprehensive report analyzing the Little Rock School District[24] demonstrated that in 1997 Little Rock community attitudes and claims of constitutional rights had meaning most visibly and immediately as ongoing federal-court intervention and the controversial remedy of busing. The report's survey data gave a clear picture of the city's public opinion in the mid-1990s. Among white households, fifty-six percent supported "sending my child to a racially integrated school"; African American households approved of that statement by a margin of sixty-eight percent.[25]

But interracial popular approval of desegregation in principle disintegrated when considered in terms of particular outcomes. The only specific desegregation program a white majority supported was magnet schools, which fifty-two percent of whites characterized as effective.[26] African Americans, by contrast, were divided in their response to this question: "Has

23. *Id.* at 115-170.

24. Joel E. Anderson et al., *Plain Talk : The Future of Little Rock's Public Schools—University Task Force Report on the Little Rock School District* (U. Ark. Little Rock 1997).

25. *Id.* at 55.

26. *Id.* at 56. But even though a significant number of white parents express support for the LRSD's magnet schools, many white children attend private schools. *Id.* at 27 (indicating that nearly fifty percent of the city's white children do not enroll in LRSD schools).

desegregation had a positive, negative, or no effect on the quality of education in the LRSD?" Thirty-three percent perceived a positive effect, twenty-two percent a negative effect, twenty-four percent no effect, and twenty-two percent were not sure. White opinion was more clear-cut: Eighteen percent replied that desegregation had a positive effect, fourteen percent saw no effect, and eighteen percent were undecided. The proportion of whites, however, who perceived a negative effect was fifty percent.[27]

Regarding busing as a constitutionally sanctioned tool for bringing about compliance with federal court desegregation orders, the difference between the groups' responses was still more pronounced: Sixty-eight percent of white opinion stated that cross-town busing was not effective, while only sixteen percent stated that it was effective. By contrast, forty-three percent of African American households considered such a remedy effective. On questions that asked whites and African Americans whether creating *one-race* neighborhood elementary, junior high, and high schools was acceptable, whites approved of such an outcome by an average seventy-two percent; whereas African Americans disapproved of such a result by thirty-nine percent and favored it by forty percent.[28]

This divided public opinion reflected enormous challenges facing the LRSD. Security measures were needed to address discipline and safety concerns. Yet state law that sanctioned an incongruity between the school district's boundary and the city's limits contributed to potential bankruptcy.[29] Ultimately, however, these issues were symptomatic of a fundamental reality: *white flight.* A return of between five and eight thousand white students to the city's public schools would alleviate the system's financial woes and likely bring unitary status, a level of racial integration permitting an end to federal judicial supervision. After forty years, the report urged whites to understand the alienation African Americans felt as a result of their history of discrimination; African Americans, it pointed out, needed in turn to have faith that their children would

27. *Id.* at 55-56.
28. *Id.*
29. *Id.* at 161-67.

continue to receive material resources from the white taxpaying majority if federal court intervention ended.[30]

The Little Rock Nine's courage and determination continued to inspire faith in the ideal of equal justice. Ernest Green, the oldest of the Nine, observed that

> [t]he thing integration demonstrated is that, as you challenge the system, it doesn't stop with schools. It extends to include all other arrangements and relationships. Once you open Pandora's box and let the genie out, you can't put the genie back in.[31]

In Little Rock the courts and the democratic process ensured that a more meaningful fulfillment of the nation's democratic and constitutional ideals would demand greater commitment and striving. "We're all a work in progress," Melba Patillo Beals, also of the Nine, has said. "We just have to not lose faith and keep trying."[32] Here was the enduring lesson of Little Rock, a lesson America has not yet fully grasped.

30. *Id.* at 30-41, 64, 67-77.

31. Audrey Edwards & Craig K. Polite, *Don't Let Them See You Cry*, Parade 10, 13 (Feb. 16, 1992).

32. Assoc. Press, *Desegregation a "Work in Progress"* Tuscaloosa News 3B (Aug. 10, 1997).