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Screaming to be Heard: Black Feminism and the Fight for a Voice from the 1950s - 1970s

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SCREAMING TO BE HEARD: BLACK FEMINISM AND THE FIGHT FOR A VOICE FROM THE 1950s-1970s

Preston D. Mitchum

INTRODUCTION

“Bitch.” “Whore.” “Mammy.” “Matriarch.” “Aunt Jemima.” “Smart-Ugly.” These pejorative expressions have been used to describe and degrade Black women, specifically Black feminists, historically and unfortunately, even today. Smart-ugly, for example, formed the way most Black women were forced to develop their intellect at the expense of their social lives. In essence, Black women who were ‘smart’ were automatically viewed as unattractive because a pretty, smart Black woman was thought not to exist. Black women have been involved in an ongoing battle with the struggle for equality because of being associated with two traditionally discriminated groups: Blacks and women.

As Michele Wallace poignantly explains, “[Black women] exist as women who are Black who are feminists, each stranded for the moment, working independently because there is not yet an environment in this society remotely congenial to our struggle – because being on the bottom . . . We would have to fight the world.” Though pessimistic in nature, Wallace’s statement

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1 Please note that the word “feminism” is not generally defined as only exclusive to women. However, throughout this paper, I will use “Black feminism” and “Black feminists” to refer to the political, social, and economic experiences of Black women during the civil rights and women’s rights movements, specifically the first-and-second waves of feminism.

2 Kimberle’ Williams Crenshaw, Mapping the Margins: Inersectionality, Identity Politics, and Violence Against Women of Color, 43 STAN L. REV. 1241 (1991). (“I capitalize ‘Black’ because Blacks, like Asians, Latinos, and other ‘minorities,’ constitute a specific cultural group and, as such, require denotation as a proper noun.” Out of respect, I also choose to capitalize ‘White’ though some scholars argue that they are not a specific cultural group).

3 See LINDA K. KERBER, ET AL., WOMEN’S REFOCUSING THE PAST AMERICA 710 (7th ed. 2011).

4 Id.

5 Id.

6 See generally MICHELE WALLACE, A BLACK FEMINIST’S SPEECH FOR SISTERHOOD VILLAGE, Village Voice 6-7 (July 28, 1975), for a discussion of feeling forced to decide between being “Black” or a “woman,” but never combining the two.

7 Id.
provided a realistic assessment of Black feminism, which resonated with many Black feminists because of the alienation of being from two oppressed groups.\(^8\)

Feminism, particularly Black feminism from the 1950s – 1970s, was a dangerous concept because it destroyed the perception of the “face of feminism.” That face was typically depicted as a middle-class White woman. On one hand, this changing face compelled people to question the power dynamic between Black women and White women.\(^9\) On the other hand, it also forced people to question the subordination of Black women by Black men.\(^10\) Several concepts require further inquiry.

First, during the civil rights movement and other events from the 1950s - 1970s, Black women had to battle Black men and White women for a voice in the racial and gender equality debate.\(^11\) Second, White women in the middle-to-upper echelon of society were not accepting of ideas of class and sex oppression by Black women during the women’s liberation movement.\(^12\) Lastly, Black men believed that Black feminism was threatening to the overall goal of the Black community during the civil rights movement.\(^13\) Since the “personal was political,”\(^14\) Black men and White women did not want to burden themselves with another oppressed group that was not identical to their specific groups.\(^15\) Unfortunately, for Black feminists, who were concerned with

\(^8\) Id.
\(^9\) Mwanamke Mwananchi, Mumininas Of Committee For United Newark (The Nationalist Woman) 4-5 (1971).
\(^10\) Id.
\(^12\) Id.
\(^13\) Id.
\(^14\) Kerber, supra note 3, at 709. (Black women often contended that in consciousness-raising sessions, they have gone beyond White women’s revelations because they were dealing with the implications of race and class as well as sex. Therefore, they attempted to relate their oppression to that of Black men and White women).
\(^15\) Id.
both racial and gender-related oppression, it was difficult to decide if one group was more oppressed than the other.

To further explain the frustration experienced by Black women under the oppression of Black men and White women, Patricia Monture stated:

[w]hen are those of you who inflict racism [and sexism], who appropriate pain, who speak with no knowledge or respect when you ought to listen and accept, going to take hard looks at yourself instead of at me. How can you continue to look to me to carry what is your responsibility? I will not carry your responsibility any more. Your pain is unfortunate. But do not look to me to soften it. Look to yourself. 16

From Monture’s language, it becomes clear that not only did Black women want to have their voices heard, they also wanted to be actively involved in the women’s rights and civil rights movements. Because of racist and sexist attitudes toward Black women, however, White women and Black men were two barriers that prevented Black women from effectively participating in these social movements. 17

Though a modern concept in legal theory, social movements have been visible for hundreds of years. 18 Two examples of such movements are the women’s liberation and civil rights movements. 19 Like Black men and White women, Black women wanted to participate in their respective movements. 20 However, many Black women started to recognize the emergence

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16 Marlee Kline, *Race, Racism, and Feminist Legal Theory*, 12 HARV. WOMEN’S L.J. 115, 115 (1989) (citing to Monture, *Ka-Nih-Geh-Heh-Gah-E-Sa-Nonh-Yah-Gah*, 2 CAN. J. WOMEN & LAW 159, 168 (1986)). (Monture was a feminist legal theorist, attorney, and political activist. She has written several works on sexist and racist regimes in *Thunder in My Soul: A Mohawk Woman Speaks*).

17 See generally MARY MCLEOD BETHUNE, CLOSED DOORS, IN SISTERS IN THE STRUGGLE: AFRICAN AMERICAN WOMEN IN THE CIVIL RIGHTS-BLACK POWER MOVEMENT 14-20 (Bettye Collier-Thomas & V.P. Franklin eds., 2001).


19 Id.

of Black male chauvinism and other sexist attitudes within civil rights organizations, as well as overt racism from women’s liberation organizations.\textsuperscript{21} After Black women realized their voices were not going to be heard as loud as those of their counterparts, they began to form other coalitions focusing on “sisterhood.”\textsuperscript{22} Nonetheless, Black women learned important lessons from the conflict of racial consciousness and feminist values.\textsuperscript{23}

Disregarding the voices of Black women as inessential to the women’s rights movement creates an historical inaccuracy. This article is a response to the leading voices in feminism and expounds its central claim in five parts. Part I of this article explores early historical moments in the women’s liberation social and political movements, and how they affected traditional ideas of race and womanhood. Part I only provides a brief overview of evangelism, suffrage, protective legislation for women, and coalition-building. Although this section admittedly offers a concise framework of women’s liberation, it is necessary to answer the ultimate question of what is feminism.

Part II of this article explores the meaning of “feminism” and whether it had a similar denotation for Black and White women. Part II specifically focuses on feminism as a historical social movement to end sexist oppression in the mid-twentieth century and provides insight into a race-sex analogy in feminist discourse.\textsuperscript{24} Specifically, it considers how bourgeois White women wanted to solely discuss “women’s oppression” and women of color wanted to discuss “women’s oppression plus race and class.” This section also considers, and ultimately rejects, White women’s addition of the race-sex component to the women’s liberation movement.

\begin{thebibliography}{99}
  \bibitem{21} \textit{Id.}
  \bibitem{22} \textit{Id.}; see also \textit{Farganis, supra} note 18.
  \bibitem{23} \textit{Id.}
  \bibitem{24} See \textit{Bell Hooks, Feminist Theory: From Margin to Center} 17-31 (South End Press, Boston, 1984) [hereinafter \textit{Hooks, From Margin to Center}], for a discussion on the social movements of feminism, the political advances made because of feminism, and the comparison of “civil rights” and “women’s rights.”
\end{thebibliography}
Part III of this article provides an overview of the women’s rights movement, including how the interplay of race, anti-sexism rhetoric, and liberation shaped the movement. Moreover, this section intimates that the women’s liberation movement was successful only because of the intersectionality of women and their contributions.

Part IV depicts the frustrations of Black women after realizing they would have to compartmentalize their discrimination as either exclusively “sexist” or “racist.” This section examines how racism, civil rights, and feminism intertwined during the civil rights and women’s rights movements. This section also observes the sexist attitudes during civil rights demonstrations, such as the 1963 March on Washington, and the racist sentiments of women’s rights organizations in the nineteenth century.

Lastly, Part V discusses the positive contributions made by Black women despite not being formally recognized by both groups. This section also notes that once their voice was recognized, Black feminists such as bell hooks and Pauli Murray proved that Black feminism would not be monolithic.

I. THE WOMEN’S LIBERATION MOVEMENT: A HISTORICAL SYNOPSIS

During the 1800s, women were viewed as the subordinates of men. The nineteenth century, however, moved from considering women as “subordinate” to men to “different” from

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26 See Kathleen Neal Cleaver, Racism, Civil Rights, and Feminism, in CRITICAL RACE FEMINISM 35-40 (Adrien Katherine Wing ed., 1997), for a discourse on women’s rights leaders that promoted equality for women, albeit White women, but were insulted at the notion that Black men would receive constitutional guarantees before them.

27 Farganis, supra note 18, at 39.
men. Feminist historian Nancy Cott suggested that how these differences were observed depended on historical interpretation.

The women’s liberation movement had four important historical moments, and as with any social and political movement, it is important to explore each in its context: (1) evangelism and the abolitionist movement; (2) voting rights by suffragists; (3) twentieth-century push for protective legislation for women; and (4) creating separate mainstream women’s liberation organizations, such as the National Organization for Women (“NOW”), joining a Black feminist organization like the Combahee River Collective, or becoming aligned with civil rights organizations, such as the Southern Christian Leadership Conference (“SCLC”) or the Student Nonviolent Coordinating Committee (“SNCC”). In each phase, there has been concern with women being completely committed to equality while not discounting racial differences.

A. Evangelism and the Abolitionist Movement

In one early phase of the first wave of the women’s rights movement, women, albeit White women, were involved in evangelical churches for psychological and social outings. During these outings, women discussed health, family, and suffrage, but later turned their conversations to their relationships with God. Starting in the 1820s, these women turned their

28 Id.
29 Id.
30 KERBER, ET AL., supra note 3; see also SMITH, supra note 11.
31 Id. at 46.
32 See id.
33 Id. at 47.
focus to social reforms, temperance societies, and educational groups, specifically focusing on antislavery.\textsuperscript{35}

In the nineteenth century, slavery and racism uncovered the inequality that existed in America.\textsuperscript{36} Women’s influence became less important because of a heightened focus on domesticity and the creation of separate gender roles.\textsuperscript{37} Nonetheless, while the increase in educational activities and social reforms were to create better mothers and teachers, it also succeeded in producing a new breed of women.\textsuperscript{38} These new women were more focused on equal rights and women’s liberation; however, similar to previous movements involving women, such as the 1848 Seneca Falls Convention, only the voices of middle-to-upper class White women were included.\textsuperscript{39}

The Seneca Falls Convention emphasized the subordinate role of women in the nineteenth century.\textsuperscript{40} This inappropriate treatment was documented in the \textit{Declaration of Sentiments and Resolutions}, which was modeled after the Declaration of Independence as a way of highlighting the contradiction of “all men are created equal.”\textsuperscript{41} The Seneca Falls Convention helped women to mobilize around many important concerns.\textsuperscript{42}

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\textsuperscript{35} \textsc{Caroll Smith-Rosenburg}, \textit{The Female World of Love and Ritual: Relations between Women in Nineteenth Century America}, \textit{Signs} 1-30 (1975).
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\textsuperscript{36} \textsc{Farganis, supra note 18, at 47.}
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\textsuperscript{37} Id.; see also Martha Minow, ‘Forming Underneath Everything That Grows:’ Toward A History of Family Law, 1985 Wis. L. Rev. 819, 835-836 (1995), for a discussion of how the gender spheres ideology curtailed the political, social, and economic rights of women.
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\textsuperscript{38} Id. at 48.
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\textsuperscript{39} See id.
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\textsuperscript{40} \textsc{Farganis, supra note 18, at 48.}
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\textsuperscript{41} Id.
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First, Seneca Falls explained that “the law gave men power to ‘deprive [women] of liberty and to administer chastisement.” 43 Second, Seneca Falls brought attention to the denial of property rights, lack of education, and hypocritical standards of morality placed on women. 44 Lastly, Seneca Falls allowed women to describe how enfranchising women would help the political process because of women’s “distinct way of thinking about political issues.” 45 Women began questioning sex-stereotypes and familial structures. 46

Overall, although the rhetoric in the Seneca Falls Convention was based on “male oppression over women,” 47 White feminist leaders at the forefront of the women’s liberation movement drafted the Declaration without any reference to race.

B. Voting and Suffragists

Many Black feminists during the nineteenth and twentieth centuries were concerned with the difficulties of suffrage and voting. 48 Black feminists realized that suffrage was less about allowing Black feminists to visibly participate in women’s liberation, and more about forming strategic alliances with those seeking the vote for Blacks. 49 Many individual Blacks supported woman’s suffrage because they believed it was the best vehicle to help the race. 50 However, others were dissuaded from joining the woman’s suffrage movement because they were unsure of the leadership’s (i.e. White women’s) position on Black women’s enfranchisement. 51

43 Id.
44 FARGANIS, supra note 18, at 48.
45 Id.
46 Id.
47 See ANNE F. AND ANDREW M. SCOTT, ONE HALF OF THE PEOPLE: THE FIGHT FOR WOMEN SUFFRAGE 56, (Philadelphia: J.B. Lippincott, 1975), where the authors interprets: “the history of mankind is a history of repeated injuries and usurpations on the part of man toward women, having in direct object the establishment of an absolute tyranny over her.”
48 FARGANIS, supra note 18, at 48.
49 Id.
51 Id.
feminists, in large part, rejected the notion that suffrage concerned a true representation of all women because of the systematic structure of keeping Black men and women disenfranchised. 52 Nonetheless, suffragists demanded that women should be able to vote as citizens and that enfranchising women would continue progressive reform in the United States. 53 Oftentimes, men argued that women would vote as women because they were “pure in spirit, selfless in motivation, and dedicated to the preservation of human life,” 54 and as such, “[f]emale voters would remake society and turn government away from war and corruption.”

However, without focusing on issues of race and class during the women’s liberation movement, it was difficult to understand how the single act of enfranchising women, without more, would help progressivism. Certainly this statement does not attempt to trivialize women’s enfranchisement. Obtaining the right to vote was an arduous process; however, this sentence critiques this accomplishment based on the failure to discuss intersectionality based on the racial components of voting and securing the right to vote. Statements like “women would vote as women” discounted the intersectionality of race, class, and sexual orientation of women that would make their voices as unique as men.

C. Protective Legislation for Women

From the 1920s to the 1960s, Black and White feminists remained in reformist battles playing important roles in the debates over protective legislation for women. 55 World War II involved reassessments of the roles of Blacks, women, and their inter-relationship. 56 In large part, women went from the role of homemaker to maintaining positions in factories to help men

52 Id. at 118.
53 Id.
55 FARGANIS, supra note 18, at 49.
56 Id. at 50.
fighting in war.\textsuperscript{57} Once World War II ended, however, women needed to reassess the value of domesticity.\textsuperscript{58} As part of this valuation, feminists mobilized to discuss protective labor legislation and whether women would be compensated for their “exploitable status.”\textsuperscript{59}

Two groups emerged from the debates over protective legislation for women.\textsuperscript{60} On one hand, reformists advocated broadened protections for all workers, regardless of gender.\textsuperscript{61} On the other hand, other groups advocated for more specific protective laws for women because of women’s “unequal [bargaining] power in the marketplace labor force, rather than their maternal nature.”\textsuperscript{62}

To promote protective labor legislation and other reformist struggles, Black and White feminists entertained the idea of coalition-building with men.\textsuperscript{63} For White feminists, the vital decision was whether women should join pre-existing organizations that helped their concerns. For Black feminists, however, the question was whether they should join White feminists in this struggle or establish separate groups and create new agendas to help with their specific goals.

D. Coalition Building

Building coalitions with organizations helped Black feminists to have their voices heard. Problems with intra-group conflict with feminist and Black organizations became apparent because of the dilution of voices of women, specifically Black women.\textsuperscript{64} Two organizations are highlighted: (1) NOW and (2) the Combahee River Collective.

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\textsuperscript{57} Id.
\textsuperscript{58} Id.
\textsuperscript{60} Id. at 181.
\textsuperscript{61} Id.
\textsuperscript{62} Id. at 182.
\textsuperscript{63} FARGANIS, supra note 18, at 49.
\textsuperscript{64} Id. at 50.
NOW was formed out of the ideas generated by Betty Friedan’s *The Feminine Mystique*.\(^{65}\) First, NOW helped professional women who were concerned with government-controlled issues.\(^{66}\) Second, NOW helped begin a movement for predominantly White, middle-class women.\(^{67}\) NOW did not provide an avenue for women in the non-professional workforce or for women of color.\(^{68}\) In 1974, Black feminists separated and established the Combahee River Collective, an organization created to “combat the manifold and simultaneous oppressions that all women of color face . . . .”\(^{69}\)

Black feminists believed it was important to create a separate Black feminist group.\(^{70}\) The National Black Feminist Organization (“NBFO”) was created and became connected to movements of Black liberation of the 1960s and 1970s.\(^{71}\) The 1960s was a pivotal time to encourage those who thought in terms of racism of “whiteness versus blackness” to think of sexism as “maleness versus femaleness.”\(^{72}\) However, this never became a discussion of “male blackness versus female blackness” and “white femaleness versus black femaleness.” Therefore, despite asserting male dominance and female subordination as the issue, the critical problems between Black and White feminists were disregarded.

The central concern disregarded by White feminists was the combination of racist *and* sexist sentiments that Black women encountered.\(^{73}\) Black feminists needed to look more deeply into their experiences since no one ever considered their specific oppression a top priority.\(^{74}\) A

\(\text{\textsuperscript{65}}\) *Id.*
\(\text{\textsuperscript{66}}\) *Id.* at 51.
\(\text{\textsuperscript{67}}\) *Id.*
\(\text{\textsuperscript{68}}\) *Id.*
\(\text{\textsuperscript{69}}\) *Kerber, et al.*, *supra* note 3, at 707.
\(\text{\textsuperscript{70}}\) *Id.* at 708.
\(\text{\textsuperscript{71}}\) *Id.*
\(\text{\textsuperscript{72}}\) *Id.*
\(\text{\textsuperscript{73}}\) *Id.*
\(\text{\textsuperscript{74}}\) *Id.*
major concern was racism and the lack of intersectionality in the mainstream women’s liberation movement. Although Black feminists attempted to include different variables (e.g., race and class) in the definition of feminism, they explained that, “we had no way of conceptualizing what was so apparent to us, what we knew was really happening.” Black feminists knew what was happening was the failure of White women to recognize intersectionality when defining feminism in the women’s liberation movement.

II. WHAT IS FEMINISM?: “IF IT CAN MEAN EVERYTHING, IT MEANS NOTHING”

This section answers several difficult questions surrounding feminism in the 1950s to the 1970s. For example, what was a feminist during the civil rights and women’s liberation movements? Did the meaning change when various factors, such as race and class, became intermingled? Was “feminism” a nebulous, ambiguous category for women that wanted to be politically active in the mid-twentieth century? Social movements, depending on who was at the forefront, contributed to the ever-changing definition of feminism.

Social movements have been described as “the conflict action of agents of the social classes struggling for control of the system of historical action.” Historically, a social movement begins when people are organized around ideological beliefs, and those individuals want to create changes on the basis of a belief system.

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75 Id. at 711.
76 Id. at 708.
77 See generally id.
78 HOOKS, FROM MARGIN TO CENTER, supra note 22. (examining the meaning of feminism and attempting to arrive at a consensus about feminism and ultimately concluding that “if feminism can mean everything, it means nothing.” Hooks interprets “feminism” as a social and political movement to end sexist oppression).
79 FARGANIS, supra note 18, at 41.
81 FARGANIS, supra note 18, at 41.
Prior to the 1950s and 1960s, feminism referred to a social and political movement with the ultimate goal of redressing the subordination of women.\textsuperscript{82} When Black women added race to the gender equation, White women in higher echelons vigorously battled to ignore the racial discourse from the women’s liberation movement, which equaled a purely “gender movement.”\textsuperscript{83} Unfortunately, intragroup conflict between White women and Black women, as well as Black men and Black women, contributed to the weakening of social movements.

Considering how multifaceted women’s interests were in the 1960s, and still are today, it was difficult to come to a consensus on a single definition for feminism, let alone mobilize a powerful social movement around its unclear concept.\textsuperscript{84} As Carmen Vasquez explained:

\begin{quote}
[w]e can’t even agree on what a ‘Feminist’ is, never mind what she would believe in and how she defines the principles that constitute honor among us. In key with the American capitalist obsession for individualism and anything goes so long as it gets you what you want, Feminism in America has come to mean anything you like, honey. There are as many definitions of Feminism as there are feminists, some of my sisters say, with a chuckle. I don’t think it’s funny.\textsuperscript{85}
\end{quote}

The experience of not agreeing on one definition of feminism was not atypical, especially for feminist leaders in the civil rights and women’s liberation movements.\textsuperscript{86} Many Black feminists, however, believed it was impossible to agree with White women on the meaning of feminism because of the varied experiences of women depending on their race, ethnicity, sexual orientation, and class.\textsuperscript{87}

\textsuperscript{82} SHIRA TARRANT, MEN AND FEMINISM 13 (2009).
\textsuperscript{83} See HOOKS, FROM MARGIN TO CENTER, supra note 24.
\textsuperscript{84} Id.
\textsuperscript{85} CARMEN VASQUEZ, ‘TOWARDS A REVOLUTIONARY ETHICS’, IN COMING UP 11 (January1983).
\textsuperscript{86} TARRANT, supra note 82.
\textsuperscript{87} See id. (discussing a woman’s experience of gender oppression depending on race, ethnicity, and class, and to understand that these variables are not separate systems of oppression).
As a way of ensuring that their voices would not be weakened, Black feminists introduced the term “intersectionality” to the feminist discourse.88 Intersectionality was used as social and political rhetoric to argue that White women discounted race, gender, and the specific oppressions Black women encountered.89 During the first and second wave of feminism, Black feminists contended that their life experiences could not be described as merely “the problems of Black men plus the problems of White women.”90 Black women were confronted with problems of racism, sexism, and classism solely because they were Black women, and their viewpoints could not be explained with the narratives of Black men and White women.91 Black women had to tell their own story, and thus, Black feminist thought became separate and distinct from the idea of “feminism” because other perspectives needed to be included.92

Feminism was challenged principally through issues of race, gender, and sexual orientation.93 How did Black women combat the ideas of White racism, which was apparent in the women’s liberation movement?94 Furthermore, how were Black women supposed to enter into the race-sex discourse in the women’s liberation and civil rights movements?95

In the early 1970s, many Black feminist leaders began exploring the analogies between racism and sexism as similar forms of oppression.96 bell hooks, a Black feminist critic, criticized

88 Id.
89 Id.
91 TARRANT, supra note 82.
92 Id.
93 For other significant publications concerning Black feminist thought and historical intersectionality, see BELL HOOKS, FEMINIST THEORY AND OUTLAW CULTURE (Routledge Classics, 1994); See also ANGELA DAVIS, WOMEN, RACE, AND CLASS (The Women’s Press Ltd., 1982).
94 FARGANIS, supra note 18, at 223.
95 Id.
White women for their repeated comparisons of the “plight of ‘women’ and ‘Blacks.’” Hooks maintained that these comparisons caused the alienation of Black women from the mainstream feminist discourse.

Moreover, the race-sex analogy of the women’s liberation movement, where White women “used [B]lack people as metaphors,” was interpreted as “quintessentially opportunistic, parasitic, and [a] marginalizing practice.” Hooks disapproved of White women’s use of the race-sex component in the women’s liberation movement. As Part V addresses in further detail, though civil rights attorney, Pauli Murray, used this race-sex analogy during the Title VII equal employment opportunity debate regarding the inclusion of “sex,” hooks concluded that feminism was used as a movement toward the end of sexist oppression. The difference in approach by hooks and Murray indicates the non-monolithic nature not only of feminist thought, but specifically of Black feminist thought.

During the women’s liberation movement, Black and White women did not share a common vision of equality. The Black feminists wanted to bring attention to race and class as variables under feminism. But bourgeois White women interested in women’s rights were satisfied with the simple definition of feminism that predominated at the time because it placed

97 BELL HOOKS, AIN’T I A WOMAN: BLACK WOMEN AND FEMINISM 141 (South End Press, 1981) [hereinafter HOOKS, BLACK WOMEN AND FEMINISM].
98 Id. at 140.
99 Id.
100 Id. at 140.
101 Mayeri, A Common Fate of Discrimination, supra note 96.
102 See PAULI MURRAY, MEMORANDUM IN SUPPORT OF RETAINING THE AMENDMENT TO H.R. 7152, TITLE VII (EQUAL EMPLOYMENT OPPORTUNITY) TO PROHIBIT DISCRIMINATION IN EMPLOYMENT BECAUSE OF SEX 4-5 (April 14, 1964), for a discussion of the comparison of the struggle of Blacks and women, and why “sex” should be included in Title VII as a protected class against employment discrimination.
103 BELL HOOKS, FEMINISM: A MOVEMENT TO END SEXIST OPPRESSION, IN FEMINISM AND EQUALITY 75 (Anne Phillips ed., 1987) [hereinafter HOOKS, END SEXIST OPPRESSION].
104 Id. at 63.
105 Id.
them in the same social category as other oppressed people.\textsuperscript{106} Therefore, depending on the race and social status of women in the liberation movement, the definition of feminism wavered between “male chauvinism” and “male chauvinism plus race and class.”

Inherent in the plain meaning of women’s liberation was the dismissal of race and class as factors for feminism.\textsuperscript{107} In the 1950s and 1960s, Black women did not define women’s liberation as merely gaining equality with men.\textsuperscript{108} All too often, women of color in the lower stratum of society were reminded that women did not share a common social status in the women’s liberation movement.\textsuperscript{109} Women, even those at the forefront of the movement, were not comfortable with making women’s liberation synonymous with equalizing the social status of men and women.\textsuperscript{110} This idea was typically apparent among Black feminist leaders.

In \textit{Woman Power: The Movement for Women’s Liberation}, Black feminist Cellestine Ware explained, “Radical feminism is working for the eradication of domination and elitism in all human relationships. This would make self-determination the ultimate good and require the downfall of society as we know it today.”\textsuperscript{111} Ware’s statement emphasized the consensus among Black feminists in the women’s liberation movement. Her statement highlighted the belief that both sexism and racism were necessary in the feminism discourse and not solely sexism as understood by White women.

The social class of women has often determined the definition of feminism for Black and White women.\textsuperscript{112} During the women’s liberation movement, it was necessary for feminism to be

\textsuperscript{106} \textit{Id.}\textsuperscript{107} \textit{Id.}\textsuperscript{108} \textit{Id.}\textsuperscript{109} \textit{Id.}\textsuperscript{110} \textit{Id.}\textsuperscript{111} CELLESTINE WARE, \textit{WOMAN POWER: THE MOVEMENT FOR WOMEN’S LIBERATION} 3 (Tower Publication, New York, 1970).\textsuperscript{112} HOOKS, END SEXIST OPPRESSION, \textit{supra} note 103, at 69.
interpreted in a way that included Black and poor women. 113 Given the juxtaposition of Black feminist thought and White feminist thought, oppressed groups of women were relegated under the “[W]hite, bourgeois, hegemonic dominance of [the] feminist movement.”114

During the women’s liberation movement, feminism could have been defined as the social and political movement to end the tyranny of sexist oppression.115 This definition neither privileged women over men nor would have limited the topic of conversation to the power dynamic between women and men.116 White women defined feminism in a way that obscured the specific problems of Black women.117 Because Black women knew that being “Black” and being a “feminist” were not mutually exclusive, they began to form other groups in the 1960s and 1970s that centered on Black feminist thought.118 First, however, it was important to understand the race-sex dilemma that manifested during the civil rights and women’s liberation movements.

The race-sex comparison119 that emerged in the early 1960s was intended to improve divisions between the Black civil rights movement and women’s liberation movement and place Black women at the center of the civil rights and feminist debate.120 However, the interplay

113 Id.
114 Id. at 70.
115 Id. at 71.
116 Id.
117 Id. at 75.
118 See generally PATRICIA HILL COLLINS, BLACK FEMINIST THOUGHT: KNOWLEDGE, CONSCIOUSNESS, AND THE POLITICS OF EMPOWERMENT (2d ed. 1991), for a discussion on challenging White feminist discourse and the interrelationship of race, gender, and class.
119 Please note that this is not a full discussion on the race-sex analogy. Since this paper covers Black feminism, racism of White women, and sexism of Black men, this discourse is limited to the specific analogy to race and sex during the antebellum period. For more information, please see Paulette M. Caldwell, A Hair Piece: Perspectives on the Intersection of Race and Gender, DUKE L.J. 365, 373 (1991) (“Considering actual or apparent differences between race and gender may lead to important insights, which in turn may assist in conceptualizing new approaches to challenging oppression based on either.”); see also Catherine A. MacKinnon, Reflections on Sex Equality Under Law, 100 YALE L.J. 1281, 1289 (1981) (“[S]exism must be like racism, or nothing can be done.”)
120 Mayeri, A Common Fate of Discrimination, supra note 96, at 1052.
between these two movements often obscured Black women’s experiences.\textsuperscript{121} Black men and women used the race-sex analogy for different reasons than those who agreed with slavery: one reason was to empathize with women and the other reason was to justify the subordination of women.\textsuperscript{122}

Former slaves like Sojourner Truth often addressed the White woman-Slave analogy by narrating Black slaves’ own experiences of suffering and strength.\textsuperscript{123} Proponents of slavery had other ideas in mind in comparing marriage and slavery in a way that legitimated White control over Blacks and male dominance of women as “natural” and “divine.”\textsuperscript{124} As such, analogies in the antebellum period were being drawn between racial and sexual subordination to reinforce the White woman’s movement and obscure Black women’s plight as separate from White women’s.\textsuperscript{125}

The idea of comparing the struggles of ‘Blacks’ and ‘women,’ however, was dangerous to Black feminists because it disregarded the separate struggle that Black women encountered: one based on race and the other based on gender. Nonetheless, these analogies continued to be used during the women’s liberation movement and even helped to uncover the overt and covert sexism and racism of Black men and White women.\textsuperscript{126}

\textsuperscript{122} Mayeri, \textit{A Common Fate of Discrimination}, supra note 96, at 1053.
\textsuperscript{123} NEIL IRVIN PAINTER, DIFFERENCE, SLAVERY AND MEMORY: SOJOURNER TRUTH IN FEMINIST ABOLITIONISM, IN THE ABOLITIONIST SISTERHOOD 139, 153 (Jean Fagan Yellin & John C. Van Horne eds., 1994) (observing that Sojourner Truth “made her persona as different from the educated [W]hite women who made her famous as they thought it possible to be.”)
\textsuperscript{124} Mayeri, \textit{A Common Fate of Discrimination}, supra note 96, at 1053.
\textsuperscript{125} \textit{Id.}
\textsuperscript{126} See FARGANIS, supra note 18, at 39-65.
III. **WHITE WOMEN + MIDDLE CLASS = WOMEN’S LIBERATION MOVEMENT?**

Feminism should be understood within the framework of the modern women’s liberation movement, which surfaced in the United States in the 1960s.\(^{127}\) Under this movement, the “cult of true womanhood” became apparent although it was greatly challenged.\(^{128}\) The women’s liberation movement became a central point for discussions of equality and racial distinctiveness.\(^{129}\) Through these discussions, White women’s racism against Black women became clearer.\(^{130}\)

The interplay of race and gender during the women’s liberation movement had great importance. First, questions of race had an effect on the representation of other power relationships, mainly gender, class, and sexual orientation.\(^{131}\) Second, race had historically contained an additional level of oppression that gender did not.\(^{132}\) Thus, when the two were combined, Black women’s struggles were relevant to the women’s liberation movement, but somehow their experiences were downgraded below White women’s.

Considering the importance of racial discourse, did White feminists include these discussions in the women’s liberation movement? Quite the contrary. Middle-to-upper class White women in the movement “rested upon the unstated premiss [sic] of racial (i.e. white)

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\(^{127}\) *Id.* at 39.


\(^{129}\) **FARGANIS, supra** note 18, at 39.


\(^{131}\) *Id.* at 184.

\(^{132}\) *Id.*
homogeneity and with this presumption proceeded to universalize ‘woman’s’ culture and oppression . . . .”

In *Inessential Woman*, Elizabeth Spelman highlighted a double standard by White women in the women’s liberation movement. She contended that White feminists in the 1960s discerned separate identities for Black women and other racial minorities, the one racial and the other, gender. Specifically, Spelman explained, “[t]he womanness underneath the [B]lack woman’s skin is [W]hite woman’s and deep down inside the Latina woman is an Anglo woman waiting to burst through.” White women’s determination of the gender identity of Black women as the same as their own, created a sense of alienation in the minds of Black women, especially at the peak of the civil rights and women’s liberation movements.

Embedded in the roots of the 1960s women’s liberation movement were the complicating factors of race and gender. In the *Social Reconstruction of the Feminine Character*, Sondra Farganis explained, “[t]he women’s movement had its differences; nonetheless, there has been minimal commitment, by all of those who identify with the women’s movement to the idea that women are not treated as they ought to be.” However, answering “what women” are being mistreated is just as critical as recognizing that women and men were not treated equally.

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133 *Id.* at 186.
134 *See* ELIZABETH V. SPELMAN, *INESSSENTIAL WOMEN: PROBLEMS OF EXCLUSION IN FEMINIST THOUGHT* 13, 80-113 (Boston: Beacon, 1988), as Spelman traces why White, middle-class women are the face of feminism and the women’s liberation movement and whether this has led to feminist scholars ignoring the interplay of racial, class, cultural and ethnic differences among oppressed women.
135 *Id.*
136 *Id.*
137 *Id.* at 186-87. (“Even [B]lack women’s history, which has consciously sought to identify the importance of gender relations and the interworkings of race, class, and gender, none the less reflects the totalizing impulse of race in such concepts of ‘[B]lack womanhood’ or the ‘[B]lack woman cross-culturally.’”)
138 FARGANIS, *supra* note 18, at 51.
139 *Id.* at 47.
Farganis continued, “[t]heir mistreatment might not be agreed upon . . . [but] the recognition of some form of discrimination or oppression is understood to be the case.”

Farganis’s statement is wholly inaccurate. While women were cognizant of their oppression, it was difficult for Black women and other racial minorities, unlike White women, to determine whether their subordination was a result of their race, gender, class or all three. While White women only had to fight against male chauvinism, Black women became involved in an ongoing battle against male chauvinism, White racism, and classism as exhibited by men and women.

Between the early-1950s and late-1960s, Black feminists devised a new rallying cry. Second-wave women-of-color feminists criticized the exclusion of women of color from the feminist conversation during early historical moments in the women’s movement. Moreover, women-of-color critiqued the stereotypical inclusion of “one voice” being heard from women-of-color as opposed to their varied experiences. Even during the onset of the women’s liberation movement, Black feminists struggled with being “the bridge” between separate schemes: demolishing racism and dismantling male chauvinism. This historical era was critical for civil rights legislation for Blacks and protectionist legislation for women. Black women would

140 Id.
141 SPELMAN, supra note 134.
142 HIGGINBOTHAM, supra note 130, at 187.
144 But see Hawley Fogg-Davis, BUFF. WOMEN’S J.L. & SOC. POL’Y 2, 4 (1996). (“Black women’s organized public criticism of white feminists’ racism pre-dates the Second Wave considerably. Sojourner Truth’s 1851 “Ain’t I a Woman?” speech at the Women’s Rights Conference in Akron, Ohio remains a pivotal indictment of white women’s racist depiction of black women as “not woman enough.”)
145 Nash, supra note 143.
146 Id. at 308.
147 CLEAVER, supra note 26, at 35.
begin to see the difficulties of attempting to become heavily involved, or at least visible, in both civil rights movements and well-established organizations that promoted feminism.\textsuperscript{148}

IV. “BLACK CIVIL RIGHTS,” “WHITE RACISM,” AND FEMINISM

In \textit{For Colored Girls Who Have Considered Suicide}, Ntozake Shange writes, “[b]ein alive and bein a woman and bein colored is a metaphysical dilemma I haven’t conquered yet . . . .”\textsuperscript{149} Black feminists struggled in a world where they would not be accepted for their contributions to the civil rights and women’s liberation movements. Black feminists have been subjected to systematic racist and sexist attitudes from both White and Black counterparts.\textsuperscript{150} For Black women, gender did not represent a category distinct from White women.\textsuperscript{151} This is because the race of White women automatically placed them into the dominant society, regardless of gender, from which Black women were excluded.\textsuperscript{152}

Many Southern-based struggles to end segregation could not be achieved during the 1950s and 1960s without the efforts of Black feminists.\textsuperscript{153} Black feminists made significant contributions to the Montgomery Bus Boycott, voting rights campaigns, and the end of educational segregation.\textsuperscript{154} Black feminists also raised money for the National Association for the Advancement of Colored People (“NAACP”), sheltered young activists, marched in demonstrations, and even went to jail.\textsuperscript{155} Yet, when Black feminists wanted to participate vocally in the movement and have their voices heard, they were unable to do so.\textsuperscript{156}

\textsuperscript{148} \textit{Id.}
\textsuperscript{149} NTOZAKE SHANGE, NO MORE LOVE POEMS, \textit{IN FOR COLORED GIRLS WHO HAVE CONSIDERED SUICIDE WHEN THE RAINBOW IS ENUF} 45 (1977).
\textsuperscript{150} CLEAVER, \textit{supra} note 26, at 39.
\textsuperscript{151} \textit{Id.}
\textsuperscript{152} \textit{Id.}
\textsuperscript{153} \textit{Id.} at 35.
\textsuperscript{154} \textit{Id.}
\textsuperscript{155} \textit{Id.} at 35-36.
\textsuperscript{156} \textit{Id.} at 38.
Certainly this is not to say that Black women were not able to make some statements during civil rights demonstrations. However, this assertion does attempt to highlight the historical fallacy that most historians provide when the civil rights movement is recounted. Oftentimes, the main images depicted are that of Black men in front of picket lines, and of course, Rosa Parks. That is not, however, an accurate illustration of the civil rights movement.\footnote{See id. at 36.} As civil rights and human rights leader Ella Baker has stated, “the number of women who carried the movement is much larger than the number of men.”\footnote{PAULA GIDDINGS, WHEN AND WHERE I ENTER: THE IMPACT OF BLACK WOMEN ON SEX AND RACE IN AMERICA 284 (Harper Collins Publishers, Inc., 1984).} Therefore, it is critical to trace the voices of women during this movement although they were attempting to be diluted.

During the civil rights movement, identity politics played a significant role in the Black feminists’ agenda.\footnote{See id.} Black feminists worked to distinguish themselves from Black men and White women.\footnote{Id.} The most difficult part was drawing a line between encompasing an “all-inclusive” society while simultaneously maintaining their own sense of identity.\footnote{Id.} Though re-creating this new image, many Black male leaders in the civil rights movement did not want Black feminists to become actively involved and vocalized their male chauvinist attitudes.\footnote{See id. at 312.}

Some Black male leaders, however, worked diligently to eradicate racism against Black women, but many questioned who this benefited. Black male activists “[w]anted their female kin to get out of the white man’s kitchen and back into their own.”\footnote{Id. at 312.} This impulse to protect women originally derived from slavery when Black men sometimes shielded Black women from

\footnote{157 See id. at 36.} \footnote{158 PAULA GIDDINGS, WHEN AND WHERE I ENTER: THE IMPACT OF BLACK WOMEN ON SEX AND RACE IN AMERICA 284 (Harper Collins Publishers, Inc., 1984).} \footnote{159 See JACQUELINE JONES, LABOR OF LOVE, LABOR OF SORROW: BLACK WOMEN, WORK, AND THE FAMILY, FROM SLAVERY TO THE PRESENT 311 (2d ed. 2010).} \footnote{160 Id.} \footnote{161 Id.} \footnote{162 See id. at 312.} \footnote{163 Id.}
the slaveholder’s whip. The justification of “protection” was used to help Black men become elevated in leadership roles while also relegating Black women to subordinate positions in the civil rights movement.

In male-dominated organizations, such as the Black Panther Party, Black women were rejected as leaders because Black men believed they needed to “[r]ecapture [their] balls’ at all costs.” Black male leaders, believing it was their duty to protect Black women, furthered the gender spheres ideology and placed them in a subordinate position throughout the civil rights movement, particularly in demonstrations. The best example of this subordination occurred during the 1963 March on Washington.

“You are already represented . . . We have Mahalia Jackson.” This is the response civil rights leader, Dorothy Height, was given when questioning Black male leaders about the lack of visible presence of women leaders during the 1963 March on Washington. When Height informed the organizers that Jackson was singing during the March on Washington, and not speaking about civil rights, she was disregarded. Because of male chauvinism and protectionist attitudes, Black women’s participation in the March on Washington was not taken seriously by Black men. Black men wanted women to only focus on issues of race and not gender. The condescending statement, “this is not about sexism,” made it appear as though

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164 Id. at 311.
165 Id.
166 Id. at 312.
167 HEIGHT, supra note 25, at 87.
168 Id.
169 Id.
170 Id.
171 Id. at 86.
172 Id.
Black women did not recognize that the March on Washington was for combating racial issues in America.\textsuperscript{173}

The 1963 March on Washington did, however, serve a purpose for Black women leaders.\textsuperscript{174} First, it caused them to recognize the insensitive treatment by Black men toward Black women.\textsuperscript{175} Second, it created a dialogue among Black feminist leaders.\textsuperscript{176} Nevertheless, Black feminists agreed that race was the primary source of oppression as opposed to gender.\textsuperscript{177} As such, White feminism became subject to critique as Black feminists recounted women’s liberation.\textsuperscript{178}

Black feminists were cognizant of the racial discrimination they encountered in the nineteenth century.\textsuperscript{179} However, White feminists did not confront the same problems as Black feminists concerning social, educational, and political inequality.\textsuperscript{180} Black feminists were often excluded from aligning themselves with White feminists when demonstrating on behalf of suffrage and voting rights.\textsuperscript{181} This became particularly clear for Black feminists during the famous suffrage parade, cosponsored by the National American Woman Suffrage Association (“NAWSA”) and the National Woman’s Party (“NWP”).\textsuperscript{182}

In the NAWSA newspaper, \textit{the Woman's Journal}, White women stated that they “[c]ould not march in the parade if any African American women participated.”\textsuperscript{183} Nevertheless, Mary

\textsuperscript{173} \textit{Id.}
\textsuperscript{174} \textit{Id.} at 90.
\textsuperscript{175} \textit{Id.}
\textsuperscript{176} \textit{Id.}
\textsuperscript{177} JONES, \textit{supra} note 159, at 315.
\textsuperscript{178} \textit{Id.} at 316.
\textsuperscript{179} TERBORG-PENN, \textit{supra} note 50, at 118.
\textsuperscript{180} \textit{Id.}
\textsuperscript{181} \textit{Id.}
\textsuperscript{182} \textit{Id.} at 121.
\textsuperscript{183} \textit{Id.}
Church Terrell and other Black suffragists planned to participate in the parade.\(^{184}\) In NAACP’s magazine, *The Crisis*, it was stated:

> In spite of the apparent reluctance of the local suffrage committee to encourage the colored women to participate, and in spite of conflicting rumors that were circulated and disheartened many of the colored women from taking part, they are to be congratulated that so many of them had the courage of their convictions and that they made such an admirable showing in the first great national parade.\(^{185}\)

Though Black feminists should be congratulated for their contributions to the suffrage parade, it is also important to note that NAWSA’s “compromise” allowed Black suffragists to participate, but only if they marched in the back of the parade.\(^{186}\) This affirmation of segregation by White feminist organizations and leaders forced Black feminists to choose between their blackness and femaleness, which was a choice many refused to make.\(^{187}\) This ‘choice’ caused Black feminists to create their own agenda and find their own voice in the equality debate.

V. “AND STILL I RISE”:\(^{188}\) FINDING THE BLACK WOMAN’S VOICE

Despite Black men and White women attempting to eradicate Black feminists’ voice in the social and political process, Black women still galvanized and made positive contributions.\(^{189}\) Women’s rights activist, Maria Stewart, protested the injustice of Black feminists by stating: “We have pursued the shadow, they have obtained the substance; we have performed the labor, they have received the profits; we have planted the vines, they have eaten the fruits of them.”\(^{190}\)

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\(^{184}\) *See id.* at 121-122.


\(^{186}\) *Id.* at 122.

\(^{187}\) *Id.* at 123.

\(^{188}\) MAYA ANGELOU, *AND STILL I RISE, IN AND STILL I RISE* 41, 41-42 (1978). In her famous poem, Angelou describes the strength of Blacks for overcoming slavery and other obstacles. Angelou says despite all that “still I rise.” A brief excerpt stated: “You may write me down in history with your bitter, twisted lies. You may trod me in the very dirt, but still, like dust, I'll rise . . . .”

\(^{189}\) COLLINS, *supra* note 118, at 3.

\(^{190}\) *Id.*
Since the eighteenth century, Black feminists greatly contributed to society, but somehow, were never officially recognized.

Stewart encouraged Black feminists to define their own identity centered on self-reliance and independence.\textsuperscript{191} She explained to Black women that it was “[u]seless for us to sit with our hands folded, reproaching the whites; for that will never elevate us . . . . [p]ossess the spirit of independence . . . . Possess the spirit of men, bold and enterprising, fearless and undaunted.”\textsuperscript{192} Finally, Black women began to find their voice, which helped to make progress in social, political, and educational arenas. But finding their voice would lead some Black feminist leaders like bell hooks and Pauli Murray to reveal the non-monolithic nature of Black feminist thought.

Hooks condemned the comparison of ‘Blacks’ and ‘women’ and believed this increased the alienation of Black feminists from mainstream feminist discourse.\textsuperscript{193} Murray, by contrast, analogized the historical struggles of Blacks and women by often highlighting the “strikingly similar positions in American society” of these two discriminated groups.\textsuperscript{194} The race-sex comparison that Murray espoused, and that hooks denounced, helped during the debate of the inclusion of “sex” in Title VII of the Civil Rights Act of 1964.\textsuperscript{195} The debate over the sex provision furthered a bitter tension between women and Blacks.\textsuperscript{196}

During the Title VII debate, Representative Martha Griffiths of Michigan asked her colleagues not to leave the White women without protection under employment discrimination law.\textsuperscript{197} Like other colleagues, she believed that if “sex” was not included then “[w]hite women

\begin{itemize}
\item \textsuperscript{191} Id. at 4.
\item \textsuperscript{192} Id. at 3-4.
\item \textsuperscript{193} Mayeri, A Common Fate of Discrimination, supra note 96.
\item \textsuperscript{194} Id. (citing to supra note 102).
\item \textsuperscript{195} Id. at 1063.
\item \textsuperscript{196} Id. at 1064.
\item \textsuperscript{197} Id.
\end{itemize}
will be last at the hiring gate.""  

Griffiths continued, "[Y]ou are going to try to take colored men and colored women and give them equal employment rights, and down at the bottom of the list is going to be the white woman with no rights at all." Though an asinine statement, Griffiths appealed directly to Southern representatives from which votes were needed.

Ultimately, hooks did not agree with the repeated use of metaphors of Blacks and women in the equality debate. Though she critiqued the subordination of women, hooks included intersectionality in her discussions of sexual oppression of women, specifically how race affected sexual subjugation. On the contrary, though Murray was concerned with the plight of Blacks and women in her creation of "Jane Crow," she decided to analogize these two groups as a way of appeasing those who could directly impact antidiscrimination law. While these two women may have disagreed with particular methodologies of reaching Blacks and women, the development of Black feminist thought allowed for this discourse. Without this discourse, the voice of Black feminists would have continued to be suppressed.

**CONCLUSION**

By advocating and disseminating Black feminist thought, Black men and White women simultaneously further its development. Intersectionality is vital for the continuance of the

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198 *Id. (quoting 110 CONG. REC. 2577) (1964) (statement of Rep. Griffiths).*
199 *Id.*
200 *Id.*
201 HOOKS, BLACK WOMEN AND FEMINISM, *supra* note 97.
203 Serena Mayeri, Article, *The Strange Career of Jane Crow: Sex Segregation and the Transformation of Anti-Discrimination Discourse, 18 YALE J.L. & HUMAN. 187* (2006) ("Jane Crow" is often used to refer to sex segregation in racial desegregation plans and the realization that the plight of Blacks and women have run parallel in history).
204 See generally *id.*
205 COLLINS, *supra* note 118, at 35.
feminist movement. Feminism as a social movement to end sexist oppression turns the attention to discussions of race, class, and gender, and its ultimate effect on feminism.\textsuperscript{206}

According to poet Audre Lorde, “[O]ur future survival is predicated upon our ability to relate within equality . . . [w]e must recognize differences among women who are our equals, neither inferior nor superior, and devise ways to use each other’s difference to enrich our visions and our joint struggles.”\textsuperscript{207} The dilemma will occur, however, when White feminist leaders compare the gender and racial struggles as equal. Analogizing these struggles unintentionally excludes the voice of Black feminists since they are both Black \textit{and} female. Instead of simply focusing on the analogies of race, gender, and its effect on women, history should be revisited to accurately depict the contributions of Black feminists in the mainstream women’s liberation movement.

\textsuperscript{206} Hooks, \textit{End Sexist Oppression}, supra note 103.