



TRIBUTE

Being an Icon: Reflections on Sandra Day O'Connor

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Justice Sandra Day O'Connor's passing in December inspired an outpouring of tributes to the rancher's daughter who blazed a trail through Stanford, legal practice, the Arizona legislature, and the state trial and appellate courts to arrive at the Supreme Court of the United States. She served as the Court's 102nd Justice and the first woman Justice in the institution's almost 200-year history. Justice O'Connor was both a world historical figure and a one-of-a-kind personality. She has been justly celebrated for her tremendous accomplishments as well as her extraordinary personal grace. This reflection offers some insight into what she looked like up close. It considers her professional bridge-building, her unique strength of character, her commitments as a judge, and what her passing signifies for our democracy.

I. "FWOTSC"

When Justice O'Connor appeared before the Senate Judiciary Committee in 1981, more than 100 million Americans watched on television.¹ More press credentials were issued than for the Watergate hearings,² and she was questioned before a larger television audience than the one that tunes in for a typical Super Bowl.³ After her unanimous Senate confirmation, she spent almost twenty-five years on the Supreme Court and cast the decisive vote in

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1. EVAN W. THOMAS, *FIRST: SANDRA DAY O'CONNOR* 141 (2019).

2. Evan Thomas, *Behind the Scenes of Sandra Day O'Connor's First Days on the Supreme Court*, *SMITHSONIAN MAG.* (Mar. 2019), <https://perma.cc/2BWJ-G6GV>.

3. *See, e.g.*, Helen Coster, *Super Bowl TV Audience Rises Slightly to 99.9 Million Viewers*, *REUTERS* (updated Feb. 3, 2020, 10:08 PM EST), <https://perma.cc/C2TL-SS7W>.

330 cases.⁴ From this powerful position at the center of the Court, she built a reputation for both pragmatic opinions and personal fortitude.

Justice O'Connor never sought renown for its own sake and always wielded this power with purpose. She understood that her role as the "First Woman on the Supreme Court" (which she would shorthand as "FWOTSC") was a weighty responsibility, because "it's good to be first, but you don't want to be the last."⁵ And she was indeed the perfect "first" to expand possibilities for the five women who succeeded her on the Court and to inspire girls and women everywhere.

Only two percent of law students were women when Justice O'Connor attended Stanford, but they are now the majority of law students across the United States.⁶ When she graduated from law school, she was famously offered a legal secretary position at one firm and volunteered at the San Mateo County District Attorney's office in order to secure her first legal job. The career that followed changed what it looked like to be a judge, a leader, a lawyer, and a professional.

The impact of her visible presence on the highest court accelerated social progress because it transformed the collective consciousness—affecting not only how women saw their own opportunities but also who men thought could get the job done. That is why Justice O'Connor's singular personal characteristics matter so much. While watching her brilliantly do the job of a Supreme Court Justice, everyone was struck by *how* she carried out those responsibilities—with courage and composure, integrity and civility, fairness and good faith. She arrived on the scene at just the right time and was just the right person to change the scenery. As Judge J. Harvie Wilkinson observed about her momentous role: "Someone to her right or her left, or without her flinty pragmatism and indefatigable public energy, could not have carried off the transition nearly so well."⁷ And she was never polarizing. Indeed, few Americans, few people anywhere, have been admired and beloved by such a wide range of people.⁸

4. Evan Thomas, *Historian Evan Thomas on Justice Sandra Day O'Connor*, CBS NEWS (Dec. 3, 2023, 10:00 AM EST), <https://perma.cc/G3SV-XYKP>.

5. THOMAS, *supra* note 1, at xii.

6. See, e.g., *Stanford Celebrates 13 Women's History Makers*, STANFORD REP. (Mar. 15, 2022), <https://perma.cc/T7EQ-ZKVZ>.

7. THOMAS, *supra* note 1, at 404.

8. See Lisa Kern Griffin, *Sandra Day O'Connor's "First" Principles: A Constructive Vision for an Angry Nation*, 120 COLUM. L. REV. 2017, 2018 (2020) (reviewing THOMAS, *supra* note 1).

II. “How Did She Do It All?”

A common question about Justice O'Connor concerns “how she did it.” Justice Elena Kagan once commented that she was the “Joe DiMaggio of Supreme Court Justices.”⁹ DiMaggio did hit about the same number of home runs as Justice O'Connor wrote majority opinions, but home runs do not leave much room for disagreement. The way that Justice Kagan explained the comparison, rather, is that they both “made it look easy.”

Although Justice O'Connor did make it look easy, she was more complex than the iconic portrait might suggest: a pioneer with traditional tastes, a rare talent with a down-to-earth approach, an exacting boss but a generous mentor, thoroughly practical yet passionate about our loftiest democratic ideals.

First among the contrasts: She deployed legendary energy and had a relentless work ethic but never acted out of urgency. Despite the enormous pressure on her, the Justice exhibited no signs of stress. No matter the task, her most common exhortation to her clerks was just to calmly “do the work.” That work involved late hours and weekend sessions in chambers because every corner of a case was explored and every word of an opinion examined. When she went to oral argument, she had considered all the potential claims and was primed to ask the first, and most incisive, question.¹⁰ It turns out that she also counseled her colleagues to take this determined and methodical approach. When Justice Ginsburg joined the Court and was disappointed that her first assignment was to draft a technical ERISA opinion, Justice O'Connor advised her: “Ruth, now you just do it! Just do it!”¹¹ At Justice O'Connor’s memorial, the Chief Justice recounted her offering him the same wisdom about a case—to just “get it done.”¹²

The way that Justice O'Connor herself got things done was by focusing intently. Long before mindfulness became a common term, she was completely present in every moment. Conversations with her involved an almost uncomfortable amount of eye contact, and her steely gaze and preternatural stillness could make it seem as though the air had stopped moving around her. The self-possession was no indication of the fast-paced thinking underneath

9. See Seneca Women, *A Special Tribute to Justice Sandra Day O'Connor*, YOUTUBE, at 03:56 (Sept. 23, 2017), <https://perma.cc/M92R-6BXN> (to locate, select “View the live page”).

10. This was her approach to her work as a state senator as well. Her Democratic colleague Senator Alfredo Gutierrez once commented that she “worked interminable hours and read everything there was,” and her knowledge made it “impossible to win a debate with her.” Ed Magnuson, *The Brethren’s First Sister: Sandra Day O'Connor*, TIME (July 20, 1981), <https://perma.cc/W4B8-9JU9>.

11. THOMAS, *supra* note 1, at 286.

12. John G. Roberts, Jr., *Eulogy for Justice Sandra Day O'Connor*, 76 STAN. L. REV. 1863, 1863 (2024).

the surface—where she was locked in, making calculations, and paying close attention.¹³ She maintained unflinching calm, however, because she knew that almost no situation is improved by showing strain or reacting in anger.

Calm and relaxed are not, of course, the same thing. Few people would describe Justice O'Connor as relaxed. Even an outing to “smell the roses”—or, in the case of an annual tradition with her clerks, to see the cherry blossoms on the tidal basin in Washington—was a tightly scheduled forward march that took place regardless of inclement weather.

Though Justice O'Connor was disciplined and precise, she was never the least bit dour. The emotions she *did* show were often joy and enthusiasm. Her personal magic was the ability to appear iconic and be ordinary at the same time—to forge a warm connection with other people. She had a mischievous sense of humor, laughed often, and smiled with a sparkle in her eyes. She loved a wicked joke or silly skit. She threw herself with vigor into riding horses, climbing mountains, casting her fly-fishing rod, playing sports or cards, cooking, entertaining, and of course going out dancing with her beloved husband John. She was incredibly vivid—and every place she entered got a little bit brighter.

The momentum Justice O'Connor embodied was both physical and mental. She either focused on the present moment or looked forward, but she never looked backward. She accomplished so much in part because she conserved energy by expending it in one direction only. The time to worry about a decision, she would often say, “is before it is made,”¹⁴ because “second thoughts don’t do you a lot of good.”¹⁵ She held no grudges and harbored no grievances.¹⁶ She was never bitter about disadvantages, never dwelled on disappointments, and never carried forward disagreements against opponents of her position in a case.¹⁷ As Justice Stephen Breyer remembered, she could lighten a contentious situation by reminding everyone that “tomorrow is a new day.”¹⁸

13. I recently saw a photograph of her calmly walking away from a grizzly bear who intruded on a fishing trip. She appeared perfectly poised, even after deploying a can of bear spray.

14. THOMAS, *supra* note 1, at 206.

15. *Id.* at 339.

16. See Kathleen M. Sullivan, *A Tribute to Justice Sandra Day O'Connor*, 119 HARV. L. REV. 1239, 1251 (2006) (noting that Justice O'Connor responded to “the overt professional sex discrimination she encountered with remarkable resilience and resourcefulness” and “wasted no energy on self-pity”).

17. See Stephen Breyer, Opinion, *The Supreme Court I Served on Was Made Up of Friends*, N.Y. TIMES (Apr. 3, 2024), <https://perma.cc/2LMS-FBPL>.

18. Stephen G. Breyer, *A Tribute to Justice Sandra Day O'Connor*, 119 HARV. L. REV. 1239, 1244 (2006).

And no matter what she encountered the next day, Justice O'Connor always held her own because she was resilient. Her childhood adventures “getting it done” on a Depression-era desert ranch are an oft-cited source of her self-reliance.¹⁹ She knew how to stand up for herself but never had unnecessary fights. As the consummate well-trained lawyer, she had learned never to take anything personally, and she was self-contained enough to not worry about anyone else’s approval. When she joined the Court, she knew little about the intricacies of federal constitutional law and received minimal instructions about the Court’s rules. John O'Connor’s diaries, however, state that she “never once suggested or implied that the job was, even for a moment, beyond her.”²⁰

So Justice O'Connor demonstrated independence and bravely served as a pioneer. But it is also important to understand that she was in no way a loner. As a colleague, she was collaborative by nature, and she readily granted credit and gave others the benefit of the doubt. She really believed that “we do not accomplish anything in this world alone.”²¹ For example, when she received the assignment to draft a decision requiring the admission of women to the Virginia Military Institute, Justice O'Connor suggested that Justice Ginsburg write the landmark discrimination opinion instead, saying: “This should be Ruth’s.”²² Selfless and generous with her power, she treasured Justice Ginsburg as a colleague during the twelve years they served together.

We tend to refer to Justice O'Connor as a trailblazer, but what she wanted to be was a bridge builder.²³ According to a poem she liked to cite, the point of a bridge is “so others may pass” after you have traveled across yourself.²⁴ She built bridges between people as well. To this day, the Justices credit her with establishing the tradition of a weekly lunch so that they would engage with each other directly, and perhaps find the occasional compromise. Described by her colleagues as the “glue” of the Court, she thought that their collegiality “was vital to getting [the] work done in a manner the country would respect.”²⁵

Fellow feeling extended not just to her colleagues but to everyone around her. The parting message she prepared thirty-six years before her memorial

19. See generally SANDRA DAY O'CONNOR & H. ALAN DAY, *LAZY B: GROWING UP ON A CATTLE RANCH IN THE AMERICAN SOUTHWEST* (2002).

20. THOMAS, *supra* note 1, at 189.

21. DENNIS ABRAMS, *WOMEN OF ACHIEVEMENT: SANDRA DAY O'CONNOR* 41 (2009).

22. THOMAS, *supra* note 1, at 286.

23. *Id.* at xii (“She saw herself as a bridge between an era where women were protected and submissive toward an era of true equality between the sexes.”).

24. The preceding lines in the poem read: “You have crossed the chasm, deep and wide—; Why build you the bridge at the eventide?” See *id.* at xv.

25. C-SPAN, *Justice Sonia Sotomayor Tribute to Justice Sandra Day O'Connor*, YOUTUBE, at 04:10 (Dec. 18, 2023), <https://perma.cc/FWR5-RPHG>.

service was this: “Our purpose in life is to help others along the way. May you each try to do the same.”²⁶ Her concern for others ran so deep that sometimes she inserted herself in surprising ways—playing matchmaker, supervising how much her clerks exercised, and offering strong opinions about professional goals. Other people mattered to her, and she saw them in full.

Some powerful people can make others feel less important, but Justice O'Connor wanted to elevate everyone around her.²⁷ She even shared generously of herself when afflicted with illness, making a difference to countless families. She spoke openly about her husband's dementia, and she also heartened other cancer survivors by confronting the disease in an “honest, practical, and ultimately optimistic” way.²⁸

At the end of each Court Term, she also wrote personal letters to her clerks and later sent notes to celebrate their milestones and achievements. There are thousands and thousands of these notes from “SOC” in the world, every one of them treasured as I treasure my own small collection. Every one of them is a talisman that has buoyed someone when they needed it most.

Though giving, Justice O'Connor was also demanding and tough. She was not fond of excuses or prone, during our clerkships, to effusive praise about our work. She expected everyone to follow her “get it done” rule. In the clerks' office in her chambers, there was a faded piece of paper taped to the wall with a Xeroxed image of her hand, and the following message: “If you want a pat on the back, lean here.”²⁹ She showed that she cared by actually caring for people, just like she showed what could be done by actually doing it.

Justice O'Connor was so vibrant that losing her, even after her long illness, felt like a light went out. It was an extraordinary blessing to be her clerk and to stand in a little bit of that light for a little bit of time alongside my co-clerks. I am aware as well that I am but one of many. Her impact is magnified across the hundreds who loved her as family, friend, colleague, or mentor, the thousands who knew her and were touched by her, and the millions who admired her or felt the effect of her wise decisions.

26. In Celebration of and in Thanksgiving for the Life of Sandra Day O'Connor 3 (2023), <https://perma.cc/S2GF-ZEGH>.

27. Her mother Ada Mae Day once said of Justice O'Connor: “She isn't the type who would try to high-hat anyone.” Ed Magnuson, *The Brethren's First Sister*, TIME (July 20, 1981, 12:00 AM EDT), <https://perma.cc/ZH42-C66K>.

28. THOMAS, *supra* note 1, at 251.

29. *Id.* at 294.

III. “Here Lies a Good Judge.”

The Justice’s decisions in some cases—including her flexible accommodations to preserve reproductive freedom and affirmative action—have been overturned. But Justice O’Connor’s legacy has always had more to do with the “how” than the “what,” and her model commitments to process, engagement, fairness, and flexibility transcend any particular decision. On the Court, she represented not only the expansion of opportunity but also the construction of consensus. More than once, she stated that she might want her epitaph to be: “Here Lies a Good Judge.”³⁰ She was much more than a judge, but she was indeed an especially good one.

Her absence, along with subsequent transitions, left an empty space where there was once a moderate core of the Court. The Justice crafted centrist opinions, was “not constrained . . . by rigid doctrine,”³¹ and relied on no formulas. Like the “Cowgirl Hall of Famer” that she was, you could not fence her in. She was open to new information and perspectives and aware that the future would bring changed circumstances. So she sought just outcomes and desirable compromises—hybrids where necessary—to leave room for later modification and accommodate competing points of view. But her sensitivity to context did not mean she lacked courage or clarity. The moderate position is often a heroic one because it means enduring criticism from all sides.³²

Justice O’Connor also focused on the facts and how decisions would impact people—she cared much less about how an opinion sounded when announced, and she assiduously avoided rhetoric that would either sing or sting.³³ According to Justice Sotomayor, Justice O’Connor relied on her wide range of professional roles as well as her identity as a wife and mother to reason through decisions, and Justice Ginsburg noted that she “brought to the conference table experience the others did not possess.”³⁴ “Context matters,” as

30. *Id.* at 404.

31. *Id.* at 313; *see also* Sullivan, *supra* note 16, at 1252 (stating that Justice O’Connor had a “common law approach to constitutional controversies” and rejected “reliance upon any single grand theory or categorical interpretation”).

32. *See* JOAN BISKUPIC, SANDRA DAY O’CONNOR: HOW THE FIRST WOMAN ON THE SUPREME COURT BECAME ITS MOST INFLUENTIAL JUSTICE 273 (2005) (noting the criticism she received from Justice Scalia on the accommodations she made to preserve reproductive rights for a time); THOMAS, *supra* note 1, at 262-64 (noting similar criticism from Justice Blackmun, who was on the opposite side of the *Roe v. Wade* divide).

33. *See* THOMAS, *supra* note 1, at 280 (commenting that the writing style of O’Connor opinions was “almost willfully dull”); *see also* JEFFREY TOOBIN, THE NINE: INSIDE THE SECRET WORLD OF THE SUPREME COURT 223 (2007). In fact, she crossed out any line a clerk inserted into an opinion draft that she regarded as even vaguely “snippy.” THOMAS, *supra* note 1, at 280.

34. Ruth Bader Ginsburg, ‘A Woman’s Voice May Do Some Good,’ POLITICO (Sept. 25, 2013, 5:13 AM EDT), <https://perma.cc/5DMA-NKRA>.

Justice O'Connor wrote in *Grutter v. Bollinger*,³⁵ and she appreciated the way in which different approaches might affect people and institutions.

The Justice was also humble about the Court's role and willing to proceed incrementally because she "preferred to live in the world of the possible, to go for better if best was not immediately obtainable."³⁶ She was an "extraordinary and wise judge," according to Justice Kagan, who was well-suited to casting the deciding vote.³⁷ (And Justice O'Connor preferred a term like "deciding" vote to the idea of being a "swing" vote because the latter sounded "fickle" to her.) Among her predecessors, she had particular admiration for Oliver Wendell Holmes, who saw the law not just as "logic" but as "experience."³⁸ Here she shared common thinking with Justice Ginsburg, who often cited Benjamin Cardozo's observation that justice is not "taken by storm" but "wooed by slow advances."³⁹

So the Justice honored precedent, advanced the law incrementally, and sought solutions that were both workable and flexible. She was open to competing points of view and could navigate through emotional debates. She set standards intended to adapt to evolving facts and circumstances, and she was committed to ongoing dialogue. Those essential characteristics of her jurisprudence led some scholars to conclude that she lacked a theory of the Constitution.⁴⁰ She did not much care what academics thought of her opinions, but even her detractors began to comment after her retirement that the Court had lost her "knack for expressing the views of the moderate majority of Americans more precisely than either Congress or the president."⁴¹

With Justice O'Connor's absence from the Court, this moderation and minimalism have all but vanished—and a sense that the Court itself is neither the primary instrument of social change nor intended to have the last word on every issue along with it. Her approach was always to keep the conversation going. And she allowed "argument[s] [to] evolve through the delicate balance between legislatures elected by the people and judges sworn to protect the

35. *Grutter v. Bollinger*, 539 U.S. 306, 327 (2003).

36. THOMAS, *supra* note 1, at 82.

37. *See Seneca Women*, *supra* note 9, at 02:30.

38. *Id.* at 222.

39. *See Dahlia Lithwick, The Irony of Modern Feminism's Obsession with Ruth Bader Ginsburg*, ATLANTIC (Jan./Feb. 2019), <https://perma.cc/6EUX-RCSW>.

40. *See Linda Greenhouse, The First and Last of Her Kind*, N.Y. REV. (Nov. 7, 2019), <https://perma.cc/DXY7-VTHA> (reviewing THOMAS, *supra* note 1).

41. Jeffrey Rosen, *Why I Miss Sandra Day O'Connor*, NEW REPUBLIC (July 1, 2011), <https://perma.cc/6HBA-SL4E>. Justice Kagan similarly referred to her "unerring instinct for what the citizenry would accept" as her unique brilliance. THOMAS, *supra* note 1, at 402. And Joan Biskupic said of her compromise positions on reproductive rights that "the vast middle of America approved." BISKUPIC, *supra* note 32, at 274.

Constitution.”⁴² When the Justice narrowed the scope of a decision, she intended to foster broad debate beyond the Court and encourage the development of consensus. Like the Framers of the Constitution,⁴³ she imagined the branches of government as a solar system through which power ebbed and flowed as the bodies orbited each other. As a result, she resisted both categorical judicial decisions and heavy-handed moves by the other branches. In the *Hamdi v. Rumsfeld* case on the detention of enemy combatants, for example, she felt inspired to pen the one conspicuous “line” to appear in any of her 643 opinions: “[A] state of war is not a blank check for the President when it comes to the rights of the Nation’s citizens.”⁴⁴

The notable shift to a Court at the center of the solar system may have something to do with a meaningful change in the Justices’ professional identities over time. Justice O’Connor served in the executive, legislative, and judicial branches of the Arizona state government. But the current Supreme Court, for the first time in its history, has not one member who was elected to any legislative or executive position, let alone a member with significant experience of state courts.⁴⁵ At the time of the 1954 *Brown v. Board of Education* decision that declared segregated schools unconstitutional, only *one* of the nine justices had previous experience as a federal judge.⁴⁶ Since Samuel Alito replaced Justice O’Connor in 2006, *every* justice has been a former federal judge.⁴⁷ Without some perspective on the necessary give-and-take between the branches, the Court may have a diminished understanding of the incentives of political officials, the strengths and weaknesses of the other branches, and the adjustments required to share power and continue the conversation.

Justice O’Connor may not have adhered to “grand visions” for the law, but she *did* have such a vision for our Republic. And that vision is conversation and collective endeavor itself. “She wanted to decide the case before her and provide a bit of guidance to the lower courts as necessary but leave the rest to

42. THOMAS, *supra* note 1, at 264; *see also* Cass Sunstein, *Problems with Minimalism*, 58 STAN. L. REV. 1899, 1907 (2006) (calling Justice O’Connor the Court’s “leading minimalist”).

43. The Framers were intrigued by the model of the solar system and occasionally referenced the orbiting planets as a metaphor for the balance of powers in the Federalist Papers. *See* THE FEDERALIST NO. 9, at 66-71 (Alexander Hamilton) (Clinton Rossiter ed., 1961); THE FEDERALIST NO. 14, *supra*, at 94-100 (James Madison); THE FEDERALIST NO. 58, *supra*, at 354-59 (James Madison); THE FEDERALIST NO. 65 *supra*, at 394-99 (Alexander Hamilton).

44. *Hamdi v. Rumsfeld*, 542 U.S. 507, 536 (2004).

45. *See* Akhil Reed Amar, *Clones on the Court*, ATLANTIC (Apr. 2015), <https://perma.cc/UCB5-QTD8>.

46. *Id.*

47. *Id.*

the democratic process.”⁴⁸ She believed in lines of communication among the Justices, between the branches of government, and throughout the citizenry. And she wanted to “encourage our imperfect democracy to find its way forward on its own.”⁴⁹ When she withdrew from public life after her dementia diagnosis, her October 2018 farewell letter called upon citizens to “participate actively in their communities,” “put[] country and the common good above party and self-interest,” and “hold[] our key governmental institutions accountable.”⁵⁰ As Chief Justice Roberts said in a recent tribute, “She sounded the alarm about the growing lack of appreciation of what it means to be a citizen.”⁵¹

Because Justice O'Connor believed that we cannot take our civic institutions for granted, she left a light on for us, a spark of her optimism about our democracy. In 2009, she founded the online resource iCivics to introduce students to the structure of our government and the protections in our Constitution. She also dedicated her retirement to advancing an independent judiciary and the separation of powers. And she worked tirelessly and traveled far to encourage developing countries to live under the rule of law. These are the lessons she considered her primary legacy, not any decision she issued from the bench. Through iCivics, this legacy continues to grow—today, the program reaches almost 10 million users a year in all fifty states.⁵²

Even at what seems a dispiriting moment in our public affairs, Justice O'Connor would never give up on the democratic ideal of engagement. As President Biden said in her eulogy, to her, we were all “partners in the great work of deciding our collective destiny.”⁵³ She thought of America as essentially *constructive*, perhaps her favorite word. And she will be remembered most for choosing civil discourse, advancing civic education, and being a committed citizen.

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Two exquisite moments from Justice O'Connor's farewell ceremonies in December 2023 stand out. She loved the Supreme Court building—though she

48. Oona A. Hathaway, Opinion, *I Clerked for Justice O'Connor. She Was My Hero, but I Worry About Her Legacy*, N.Y. TIMES (Dec. 3, 2023), <https://perma.cc/5BVK-WRVG>.

49. *Id.*

50. Letter from Sandra Day O'Connor to the American People (Oct. 23, 2018), <https://perma.cc/9QQW-ZGAD>.

51. Zach Montague, *Chief Justice Extols Legacy of Sandra Day O'Connor*, N.Y. TIMES (Apr. 4, 2024), <https://perma.cc/6RLM-68NF>.

52. *See Our Commitment to Students*, ICIVICS, <https://perma.cc/DQ29-RDP6> (last updated Aug. 15, 2024).

53. *Remarks by President Biden at Memorial Service for Justice Sandra Day O'Connor*, WHITE HOUSE (Dec. 19, 2023), <https://perma.cc/BLP6-NS5M>.

was a person of faith, her biographer Evan Thomas aptly called it her marble temple.⁵⁴ On a bright and cold and blustery day, she was carried up to the Court for her lying in repose, and she approached the “Equal Justice Under Law” phrase engraved on the west pediment. Her clerks—almost 100 of us—lined the steps, and just as she reached the top, an enormous gust of wind swept over the proceedings. It felt fitting. Justice O'Connor’s personality was indeed a force of nature.

The next day, a gorgeous rendition of “America the Beautiful” played at the conclusion of her memorial service at National Cathedral, per her own request and plan. It was both moving and hopeful. Because though she was a clear-eyed pragmatist, she was also the most idealistic of American patriots. And she chose that song because she cherished this country, from its physical landscapes to its constitutional architecture. The lessons she taught left behind a roadmap for upholding its ideals and passing them on to the next generation. She knew that she made a difference, and she believed in our capacity to do so as well.

54. *Evan Thomas’ Eulogy of Justice Sandra Day O’Connor*, C-SPAN, at 00:42 (Dec. 19, 2023), <https://perma.cc/UBN2-J8V8> (to locate, select “View the live page”).