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"I Made a Promise to a Lady": Law and Love in *BtVS*

[1] As with the world at large, two things grip the central characters in *BtVS*, their search for love and their search for a law to direct their lives. From the moment that Buffy outlines her dating technique to Willow in the first programme, "Welcome to the Hellmouth" (1001) to the moment in the final episode when Buffy suggests redefining the rule that says that there should only be one Slayer ("Chosen," 7022), references to love and law run through the series. The critical literature on the series has regularly examined the role of love in *BtVS* (see, for example, DeKelb-Rittenhouse (2002) and Spah [2002]). Law has received less attention, the focus usually being on the larger concept of authority (see, for example, Buinicki and Enns (2001) and McClelland [2001]). The interaction between law and love in the series has so far escaped analysis. This article will seek to demonstrate that this is a loss because this interaction is another important example "of the shows' underlying implied discussion of feminism, religion, politics and so on" (Kaveney 3). Moreover, the discussion of this topic takes a different direction to that that is to be found elsewhere. In *BtVS*, in contrast to standard literary treatments such as *King Lear*, where the pursuit of law and the pursuit of love are seen as being inimical (Kahn), the two quests for love and law are increasingly linked as *BtVS* develops, so that in the end the pursuit of love and the pursuit of law become conjoined.

[2] Insofar as the critical literature has analyzed law in *BtVS* it has usually been seen as an absent figure. Buinicki and Enns, for example, argue that Buffy and Angel

operate as executioners who have been authorized by a sovereign power and have the right to decide who should die and who should live without need of lawyers, judges, or juries.

The evidence for this position seems to be clear. Law, seen in traditional terms as state law, is usually an irrelevance in *BtVS* and is never accepted by Buffy or the Scooby Gang on its own terms. Early in the first season Giles says that the police would not believe in the existence of vampires whilst Buffy observes of them, "[t]hey couldn't handle it [the supernatural] if they did come" ("The Harvest," 1002) (Early, 2002). As Clark and Millar have noted, the police are normally portrayed as being incompetent and easily thwarted, even when they act within their own jurisdiction. Thus, for example, in "Ted" (2011) the police fail to notice that the "man" that Buffy has "murdered" is in fact a robot whilst in "Becoming," Part 2 (2022) Buffy is easily able to escape capture by the police, a feat she later repeats with Faith in "Bad Girls" (3014).

[3] Despite their lack of faith in the police Buffy and the others do not completely ignore state law and accept that "the human world has its own rules" ("Villains," 6020). What they do not acknowledge is state law's hegemony. State laws demand total and unquestioning obedience. Ignorantia juris non excusat (ignorance of the law is no defence). Thus, normally, "the legal subject is to all intents and purposes a 'servant' of the law" (Goodrich 111). Buffy and the Scooby Gang, however, decide when state law's writ will run and when they must intervene. From the moment in the second episode of the first season, "The Harvest" (1002), when Willow hacks into the city plans for Sunnydale, it is clear that they do not accept that they are the "servants" of state law and that this law will not always bind them. The pursuit of vampires and demons regularly involves them in a range of activity, from trespass through theft to assault, which is contrary to state law.

[4] In the main the critical literature on *BtVS* to date has emphasized the anarchistic elements of the programme. *BtVS*, it has been said, is about "young heroes . . . struggling against all the various authorities to which they are subject" (Clark and Miller). Thus Colonel Macnamara's description of Buffy and the Scooby Gang as anarchists ("New Moon Rising," 4019)* and thus Topping's category, "Authority Sucks," "a category for would-be anarchists everywhere" (Topping 3), in his episode guide *Slayer*. Yet, although it is true to say that state law is the law that Buffy and the Scooby Gang have least regard for, it would not be true to say that, because they are aware of its limitations, they have no regard for it at all. The acknowledgement that "the human world has its own rules" is real and not merely rhetorical. It leads Buffy to be willing to turn herself into the police when she thinks she has killed Katrina in "Dead Things" (6013) and it means that her initial reaction to Warren's murder of Tara is to let human law take its course ("Villains"). Nonetheless, at the same time, state law is regularly broken by Buffy and the Scooby Gang; their relationship with state law is thus a complex one.

[5] Theft provides a good example of the nuances of Buffy and the Scooby Gang's attitude towards state law. When Giles steals documents from the Watchers' Council library this occasions no adverse comment ("Bring on the Night," 7010). Similarly the theft of the Box of Gavrock from the Mayor of Sunnydale incurs no criticism, nor does Xander's theft of a police car ("Choices," 3019; "Two to Go," 6021). Buffy's attempt to steal a knife from a shop is, however, more problematic ("Bad Girls," 3014) whilst Dawn's kleptomania causes both Buffy and the Scooby Gang deep angst ("Older and Far Away," 6014) and Anya feels the necessity to excuse her acts of burglary by telling herself that they were the result of a spell ("Him," 7006). Theft is sometimes acceptable and even meritorious; sometimes it is not. The distinction drawn is between those thefts that are necessary because of the need to defeat vampires and demons and those that are not. Dawn's behaviour stems from personal traumas and has to be expiated by either returning the goods or paying for them ("Entropy," 6018), Anya's burglary spree is excusable, if at all, because of the magical effects of RJ's letterman jacket and Buffy's attempted theft, whilst ostensibly necessary because she needs weapons to fight the demon Balthazar, in fact results from her brief flirtation with Faith's nihilism and is thus inexcusable. The other thefts are, however, essential in furtherance of the battle with supernatural evil. The need to comply with state law has to be balanced against a greater good. When Willow takes things she needs for a spell from the Magic Box without paying for them Anya describes her actions as burglary whilst Willow seeks to justify them by claiming that her spell

will help Buffy ("Triangle," 5011). Story lines that focus on the fight with vampires and demons serve to emphasise instances when it is necessary to break state law. Nonetheless, on a day-to-day basis, compliance with the dictates of state law is still an important matter in *BtVS*.

[6] A definition of law that encompasses more than state law will give an even deeper appreciation of the role of law in *BtVS*. Pluralistic legal systems exist in Sunnydale. Alongside state law there is the law that Buffy and the Scooby Gang enforce for much of the first three seasons; this is the law of the Watchers' Council, a law that has "existed longer than civilization" ("Graduation Day," Part 1, 3021). It would be a misconception to see this as merely being *like* law. Theorists such as Durkheim once conceived of law as being something that was and could only be an emanation of the state (Durkheim 68). However, more recently legal theorists have argued that different legal systems commonly exist alongside one another in contemporary societies. In addition to state law there is non-state law.

[N]on-state legal orders range from the interstices within, or areas beyond the reach of, state legal systems where custom-based norms and institutions continue to exert social control, to the rule-making and enforcing power of institutions like corporations and universities, to the normative order that exists within small social groups, from unions, to sports leagues, community associations, business associations, clubs and even the family. (Tamanaha 116)

Seen thus the law of the Watchers' Council is as much law as is the law of the state of California. Buffy and the Scooby Gang are therefore not, as McClelland has argued, dispensing vigilante justice. The nature of "justice" of this type is exemplified by the "irrational mass hysteria" (Breton and McMaster) that directs the actions of "Mothers Opposed to the Occult" in "Gingerbread" (3011). Instead, in applying the law of the Watchers' Council, they are doing something very different; they are working with a structure that is seeking to impose an established normative legal order.

[7] While she is working for the Watchers' Council, Buffy finds herself in a traditional, hierarchical, patriarchal, command structure. Although the existence of the Watchers' Council is not revealed until the third season ("Faith, Hope and Trick," 3003) the role of the Watcher as her "commander," the term that Wesley is later to use to describe the position in "Consequences" (3015), is clear from early on when Buffy obeys Giles' instruction to break a much-wanted date in order to join him in a hunt for the Anointed One ("Never Kill a Boy on the First Date," 1005). Giles is, at least in part and at least in principle, her line-manager. Although the programme departs from some of the conventional forms of the police series genre, not least in the emotional relationship that Buffy develops with her "commander" from early in the first season ("Never Kill a Boy on the First Date"), such that he both "instructs and nurtures" her (Owen 26), at this point in *BtVS* Buffy is a police officer and *BtVS* is a police series (Bradney). It is pertinent that in "What's My Line," Part 1 (2009) both her vocational aptitude test and Giles suggest Buffy consider law enforcement as a job once she leaves school. Law at this point is thus very much central to the lives of Buffy and the Scooby Gang.

[8] Buffy and the Scooby Gang demonstrate a similar ambivalence to the law of the Watchers' Council to that that they display towards state law. It exists and they acknowledge it but increasingly they rebel against it. Central to the law of the Council is the proposition "kill vampires and demons." Buffy finds herself unable wholly to obey this rule from very early on when she realizes that Angel, even though he is a vampire, will never hurt her ("Angel," 1007). As the series develops so the number of vampires and demons who cannot be killed grows either because Buffy has a short-term, tactical alliance with them, as in the case of Spike in "Becoming," Part 2 (2022), or because they are not evil, as in the case of Whistler in the same programme. The proposition "kill vampires and demons," the law of the Watchers' Council, and the proposition "kill some vampires and demons," the actual behaviour of Buffy and the Scooby Gang, are fundamentally different in quality, with the latter including an element of choice and discretion.

[9] From his first meeting with her, Giles notes Buffy's recalcitrant attitude towards authority ("Bad Girls," 3014). However Buffy's reluctance to obey orders, whether from her Watcher or from her school principal, is different in kind from her desire not to obey a law that tells her to kill Angel. The former represents a degree of rebelliousness to be expected in a programme about a "transgressive woman warrior" (Early 4). The latter, however, represents a rejection of the spirit of the law of the Watchers' Council. Just as Buffy and the Scooby Gang dispute state law's hegemony so they dispute the hegemony of the law of the Watchers' Council, claiming a right to choose when to obey the law and when to ignore it. Buffy refuses to be just "the instrument by which we [the Council] fight" ("Checkpoint," 5012). Thus when Wesley, acting on behalf of the Council, forbids the trade of the Box of Gavrock in exchange for Willow the trade nevertheless takes place ("Choices," 3019). When Buffy resigns from the Watchers' Council because it will not help save Angel's life, Wesley accurately describes her action as "mutiny" ("Graduation Day, Part 1, 3021). Yet in fact the hold the Council's law has had over her has always been much more precarious than might seem to have been the case; her resignation reveals but does not herald her mutiny against the laws of the Council.

[10] Buffy's rejection of the Watchers Council should not be misinterpreted. Just as Buffy is willing to obey much of state law so she frequently continues to follow the imperatives of the law of the Watchers' Council, even after her resignation from the Council. As Giles observes, "essentially their agenda is the same as ours: they want to save the world and kill demons" ("Checkpoint," 5012). But Buffy's willingness to obey the law of the Watchers' Council is limited by her awareness that it, like state law, rests on an inaccurate account of the world. State law ignores the existence of vampires and demons; the law of the Watchers' Council depends on the proposition that all vampires and demons are evil. Buffy, and indeed the Scooby Gang, know this to be too simplistic. In a demon bar Buffy tells the Slayers in Training, "[r]emember. . . [t]here's not a being in here that wouldn't gladly rip your throat out" and then turns to greet her friend Clem, a loose-skinned demon, with a hug ("Potential," 7012); hers is an ethically complex world that resists "the sententious morality of black-and-white distinctions" (Pender 35). For this reason she also finds that she cannot accept the rules of the Initiative, which uncompromisingly divides the world into humans and Hostile Sub Terrestrials,

believes the latter to be "just animals. . . plain and simple" and holds to the thesis "[d]emons bad, people good" ("Doomed," 4011; "New Moon Rising," 4019). Breaking Oz and Riley out of an Initiative prison underlines Buffy's rejection of their ethos ("New Moon Rising"). Buffy's later willingness to work once again with the Watchers' Council is on her own terms, terms that preclude any suggestion of obedience to the will of the Council or, in the final analysis, its law ("Checkpoint"). Similarly her later contact with the Initiative involves her co-operating with them to a limited extent but not being co-opted by them ("Out of My Mind," 5004; "As You Were," 6015; "The Killer in Me," 7013). Moreover, the insistence on the priority of individual discretion over blind obedience to the legal rule "kill vampires and demons" is not just limited to Buffy. When Buffy interprets the rule as applying to Anya, after Anya has once more become a vengeance demon, both Xander and Willow disagree, refuse to help Buffy and succeed in ensuring that the law is not applied ("Selfless," 7005).

[11] As Green and Yuen suggest, *BtVS* "can be viewed as a morality play". One theme in this play concerns the need to have the "existentialist determination to fight [evil]" (Wall and Zyred 59). It is this fight that Willow explicitly enlists herself in in "Choices" when she elects to go to university in Sunnydale (3019). But if evil is to be fought, how does one decide what is evil and how the fight is to be carried on? Law normally offers an answer to both these questions. For Buffy, however, the laws available to her exemplify what South has termed the technological society, "dominated by the rational deliberation about means, while forgetful of the need to consider ends" (South 94). Such a society is one that "dehumanizes humans" (South 98) and this process of dehumanization is something that Buffy resists even when, superficially, the fight against evil suggests that she should act otherwise. Significantly, when Wesley refuses to trade the Box of Gavrock for Willow's life, seeking to apply the law "kill vampires and demons," Buffy asks him "[a]re you made of human parts?" and, when Giles counsels the need to consider the matter rationally, Buffy says to him "[w]hy are you taking his [Wesley's] side" ("Choices," 3019). Rational deliberation about means is inappropriate, Buffy believes, when it is the end that should be considered. Giles and she are to have a similar conversation when the question of whether or not Dawn should be killed in order to save the world is raised ("The Gift," 5022). Moreover, Buffy not only rejects the notion that either state laws or the laws of the Watchers' Council can be the final determinant of what she does; she also rejects another obvious answer to the question, how does one determine the right course of action, when, in "Consequences" (3015), she refuses to accept Faith's suggestion that Slayers do not need the law because they are the law, that personal discretion is all there is. "There are limits to what we can do. There should be" Buffy tells Xander and Dawn in "Villains" (6020). Buffy both does not want and wants a law that is external to her. Yet, if Slayers are not the law, and if both state law and the law of the Watchers' Council offer only rules with provisional value, needing to be tested before they are obeyed, how are Buffy and the Scooby Gang to decide how to behave? What finally is the law?

[12] "Pangs" (4008) focuses on the difficulty of deciding what the law is. Faced with Hus, a vengeance spirit for the Chumash indians, the indigenous inhabitants of the Sunnydale area who were wiped out by colonial settlers, Buffy's first inclination is to kill him. Willow, however, contends that they ought to help Hus in his quest to redress the wrongs of the past; Hus, in her view, is yet another exception to the general rule "kill vampires and demons." The matter is debated throughout the episode with Buffy emphasising the legal nature of the decision that they are making by telling Xander that the choice of whether or not to kill Hus is "the question before the court." Although in the end Buffy kills Hus in self-defence this provides no general resolution to the question that the programme has explicitly raised, when should vampires and demons be killed?

[13] At the culmination of the second season Buffy, as she is later to say, "knew what was right" ("The Gift," 5022) and killed Angel in deference to the Council's law, obedient to her mission to save the world. Increasingly, however, her ambivalence about the Council's law leaves her unclear as to what the correct course of action is. Her rejection of the Initiative's authoritarian ethos has taught her the negative lesson that "[y]ou can't beat evil by doing evil" ("First Date," 7014) but not any positive lesson about what it is that she should do. In "This Year's Girl" (4015) Buffy tells Riley that he cannot blindly obey the Initiative and must instead himself choose how he should fight vampires and demons, but in reality she is herself uncertain about her path. In seeking an answer to this question the centre of attention thus shifts over the seventh season of *BtVS* from the application of the law to an inquiry into what the law is. Even when not central to the plot of individual episodes this question of what she should do, what the law is, remains an important subtext. The answer to the question lies in love.

[14] Love, like law, is given an extended definition in *BtVS*. Unsurprisingly love in part is eros. It would be strange if a programme about adolescents and post-adolescents did not concern itself with eros. Buffy's relationship with Angel, Xander's entanglement with Anya, and Willow and Tara's love for each other are all about eros (although they are also about something other than eros). But love is more than just eros in *BtVS*, more than just "boyfriend love" ("Intervention," 5018); love is also agape.

[15] Friendship is a recurrent topic in *BtVS*. The need to make friends is seen as an intrinsic part of the human condition. Those who are friendless literally become invisible ("Out of Sight, Out of Mind," 1011; "Storyteller," 7016). Cassie Newton's certain knowledge of her own imminent demise causes her to lose interest in her classes, knowing that she has no future to be educated for, but it does not stop her starting a new friendship with Dawn ("Help," 7004). Friendship is its own end. In part, in *BtVS*, friendship is the ordinary attempt to find people to, as Cordelia puts it, "hang with" and "be accepted" ("Welcome to the Hellmouth," 1001). However, sometimes it can be more than that. The importance of Buffy and the Scooby Gang's reiteration of the fact that they love each other, particularly at moments of crisis, should not be underestimated. It is meant literally. It at this point that friendship becomes agape. Agape, as well as eros, creates bonds, obligations and rights. What those obligations and rights are and how can they be acknowledged are perennial questions in *BtVS*.

[16] Spah's use of the concept of courtly love in analysing Spike's pursuit of Buffy provides a starting point for an account of the relationship between law and love in *BtVS*. As Spah notes

the key point to Courtly Love literature lies in revealing the power of love to ennoble the lover, to elevate him to a higher moral plane. (Spah 12)

Spike's passion for Buffy causes a change in his behaviour, at first because he hopes this will mean that Buffy will then reciprocate his feelings but later simply because his love requires that change. In "Triangle" (5011) Spike calls Buffy's attention to the fact that he is helping people who have been hurt by the troll, Olaf, rather than feeding on them, hoping to enhance his position in her eyes. However, when, seven episodes later, he refuses to tell Glory that Dawn is the key that she seeks, even though Glory tortures him, he does so because to do otherwise would "destroy her [Buffy]. I couldn't live her being in that much pain" ("Intervention," 5018). On this occasion he does not tell Buffy what he has done. It is love that commands his behaviour, not hope of any reward. In the final episode of Season Five his love for Buffy will mean that he joins the battle with Glory and tries to safeguard Dawn even though he expects to die in the fight ("The Gift," 5022). When Doc asks Spike why he, a vampire without soul, is protecting Dawn, Spike's answer is simply "I made a promise to a lady." Love has become part of the law determining how Spike should behave.

[17] Spike is not unique in letting love become part of their law. At the end of Season Five, Buffy saves the world by her suicide; an action prompted by her love for her sister, who must die if she does not ("The Gift," 5022). Season six culminates in a novel problem for Buffy and the Scooby Gang when Willow tries to bring about an apocalypse. The law "kill vampires and demons" is of no assistance in this situation. Buffy and the others struggle to prevent the end of the world whilst also saving Willow. Xander's final solution to the dilemma is repeatedly to remind Willow of his love for her ("Grave," 6022). Love determines how he behaves, forbidding any attempt to kill Willow. Similarly, though Buffy and Giles seek to stop Willow ending the world, neither tries to kill her. Love limits their actions, preventing their behaving in the way they have done when faced with other attempts to create an apocalypse. In smaller ways as well love guides Buffy and the Scooby Gang. Love, whether agape or eros, leads Buffy to have the Initiative remove the chip from Spike's brain ("The Killer in Me," 7013). Love, both agape and eros, leads Willow and Xander to protect Anya from Buffy ("Selfless," 7005).

[18] The manner and degree to which love comes to act as law in *BtVS* should not be exaggerated. It is not that love becomes the only law. Jowett has drawn attention to the fact that love is not portrayed as an unconditional good in *BtVS*, citing Tara's condemnation of Quaismodo for loving selfishly and without a moral compass (Jowett 69). When Spike is first introduced into the series he undoubtedly loves Drusilla but that does not make his actions, even when they are in pursuance of that love, praiseworthy ("School Hard," 2003). His desire to kill Buffy is, in part, for example, prompted by the fact that doing so will please Drusilla. Love, to be good, must have the right context. It is therefore significant that the imperatives of state law and the dictum "kill vampires and demons" remain important through all seven seasons, providing an environment in which love can operate. Nevertheless, increasingly love supplies the test for these lesser forms of law at moments of crisis. When Buffy and the Scooby Gang find themselves in the position where they have to, in Bauman's words,

place our bet on that conscience which, however wan, alone can instill the responsibility for disobeying the command to do evil. . . (Bauman 250)

they place their bet on love. Love supplements and at times supplants the rigidities of state law and the law of the Watchers' Council. Buffy, in an alternative universe where she has never moved to Sunnydale and met either Giles or the Scooby Gang, is governed only by her obedience to the law of the Watchers' Council ("The Wish," 3009). Killing vampires is the only thing she thinks she is good at and, when she does meet Giles, she has no interest in his search for ways to make the world better. Buffy fights and dies and does not even notice Angel as he sacrifices his life for her. As Money writes

[h]ow does a human become less human? By disregarding love, by becoming inflexible, by operating as a machine without choice, knowledge, or wisdom. (Money 102)

Without love, Buffy is just a killer whose inclinations are legitimated by the Council's law. Outside of the alternative universe of "The Wish," Buffy's desire is to be both a Slayer and to be human. Thus Buffy refuses to let the Shadow Men infuse her with the energy of a demon in order to give her the power to fight the First Evil because to do so would make her "less human" ("Get it Done," 7015). Nor is this limited to Buffy. Riley too must learn to temper the rules of the Initiative with love, finding out that it is wrong to be "in a totally black and white space, people versus monsters. . . it ain't like that. . . " ("New Moon Rising," 4019), so that he can become human. Eventually his love for Buffy, eros that has become agape, will lead him to let Buffy decide whether or not Spike, Hostile 17 in Riley's eyes, should have his chip removed ("The Killer in Me," 7013).

[19] The connection made between law and love in BtVS stands in marked contrast to some previous literary treatments of the subject. In *King Lear* Lear, like Buffy and the Scooby Gang, seeks to align law and love. His trial of his daughters at the beginning of the play enables each of them to plead the extent of their love for him and there then follows his judgment on that pleading. But, unlike *BtVS*, *King Lear* shows law and love as being separate and in conflict. Lear can be a king and rule by law or he can be a father and love and be loved but he cannot do both at the same time. His attempt to do so means that he fails both in law and in love.

[W]e realize in the course of the play that a fully realized love moves in dimensions of sympathy, forgiveness, and mercy that negate the distinctions of friend and enemy, as well as judge and wrongdoer, that are necessary to the legal order. Love stands outside of all political order. No program of law can bring love into the state. (Kahn 173)

Cordelia's love for Lear is of a different category of things to law. It cannot be expressed in the language of a trial. "What shall Cordelia speak? Love, and be silent" (Act I, Scene I, 62-63). What Goneril and Regan can plead as love is not in fact love. The attempt to bring love into law by dividing his property and lands between Goneril and Regan, whilst at the same time remaining King, leads to Lear's losing both his daughters and his crown.

Love and law cannot be brought into a unitary, harmonious order. Love will always move beyond law; law will always threaten love. (Kahn 169)

From the perspective of *King Lear* it is not surprising that, whilst Buffy and the Scooby Gang increasingly seek to marry law and love in *BtVS*, failures in love are a recurring theme of the series. *King Lear* teaches that Buffy and the Scooby Gang are in search of a chimera. However, powerful though *King Lear* is, there are alternative accounts of the interaction of law and love to the bleak message that is to be found in *Lear*; accounts that sit more easily with the series and add to its analysis.

[20] In *Living Lawfully: Love in Law and Law in Love* Bańkowski writes of "the articulation of autonomy with heteronomy, freedom with regulation, love with law" (Bańkowski 11) and goes on to say

[m]y argument is that this is not to be seen as the never ending oscillation from one to the other, of it being our fate to be pushed from one side to the other with no principle of choice. Instead, I want to argue that the articulations here should be seen, not as contradictories, but rather as tensions. They are worked out in a middle area which is risky and uncertain but one which we must inhabit if we are to live as the beings that are we, at the same time autonomous and heteronomous.

Rather than arguing that law and love are separate, irreconcilable spheres he suggests that "law and love both need each other, are both locked together" (Bańkowski 103). What causes love may be unknown and even unknowable, but its consequences are susceptible to rational enquiry. "[A] mysterious explosion of love carries within it the bond of rules and rationality" (Bańkowski 101). To love is to incur predictable obligations in behaviour; love brings law. Thus Buffy and the Scooby Gang use love not as an excuse to avoid thinking about their conduct, a justification for acting on impulse, but as an argument in a debate about their actions. For Xander, for example, their love for Anya means that Buffy and he should think of some way of dealing with Anya's work as a vengeance demon other than enforcing the law "kill demons" ("Selfless, 7005). Love limits and guides law. Buffy's refusal to engage in this debate, her insistence that on this occasion she knows how the law should be applied because she is the law, is a failure in both love and law; a failure in both because, in the end, Willow shows that there is a way to protect Anya's potential victims without killing Anya so that law and love can be combined. What Buffy and the Scooby Gang increasingly strive for in *BtVS* is a consciousness of both love and law and an attempt at Bańkowski's "risky and uncertain" settlement of the tensions between the two. When Giles asks Buffy why she had the chip removed from Spike's brain, thus effectively loosing a vampire on the world and breaching the law "kill vampires and demons," Buffy initially gives her reason as being "instinct" ("First Date," 7014). However, a few moments later, she reasons that, since Spike has gained a soul, he has to be given a chance to be good of his own free will without being electronically muzzled by the chip. Love, whether agape or eros, has resulted in the articulation of an argument for limiting the application of the law. Later it will be Spike who, as Buffy's "champion," freely sacrifices his life to save the world, love having become part of his law, thus vindicating Buffy's judgment ("Chosen, 7022).

[21] Like Bańkowski, Goodrich, in his consideration of love and law, challenges the notion that they are necessarily to be seen as being separate and hostile. In his analysis of the work of the medieval courts of love, courts established to determine disputes between lovers and putative lovers, he argues that, in these courts, "[a]n ethical dispute or differentiation of right and wrong was decided as a question of love" (Goodrich 30). Although Goodrich's account of these courts treats them as being on a par with and operating alongside traditional state courts the normative standards of the courts of love were very different from those to be found in state courts (Goodrich 69). "[T]he courts of love place law face to face with an ethics of emotion and a phenomenology of relationship" (Goodrich 31). The courts of love, on this argument, did not simply apply traditional state legal categories and concepts to relationships of love but, instead, created new ways of legal thinking "adequate to the nature and metaphysics of such disputes" (Goodrich 52). It is this that makes them germane both to consideration of *BtVS* and *King Lear*.

[22] The problem in aligning law and love in *King Lear* arises not out of the innate hostility between the two but because of the type of law that is to be found in *Lear*. *Lear* emphasises the power of law. Law in *Lear* is coercion, the King's rule. When Lear loses the power to coerce, law is still about power, the power of whoever succeeds in usurping the power of the King. The trial of Gloucester in the third act of the play, which results in his having his eyes gouged out, has the same form as Lear's trial of his daughters at the beginning of the play. Judgments are imposed and the law pays no regard to the person who is the victim of the judgment. The violence and coercive nature of the law is merely more obvious in Gloucester's trial. The link between law and coercion and, indeed, between law and violence has been a common theme of Western jurisprudence. Hart, for example, identifies one of the key questions for jurisprudence as being how "law and legal obligation differ from, and *how they are related to*, orders backed by threats" (Hart 7, emphasis added). Cotterrell argues that "law is experienced as a matter of power" (Cotterrell 17), power being "an experience of having the ability to coerce" (Cotterrell 4). Finally, Cover suggests

[l]egal interpretation takes place in a field of pain and death. . . A judge articulates her understanding of a text, and as a result, somebody loses his freedom, his property, his children, even his life. (Cover 1601)

If law is coercive, still more if law is violent, then *King Lear* is correct and law and love are inimical. Love, whether agape or eros, is always about affection and intimacy; law, on the other hand, on this account, is aggressive and detached. Thus the vital question raised is: law may often be coercive, but must this always be so? Goodrich answers this question in the negative. Increasingly, as the series develops, so does Buffy.

[23] In the hands of Buffy, law appears to be uncompromisingly and inevitably violent: how else could it be for someone who is the Slayer? Vampires and demons die in virtually every episode of *BtVS*, executed in accordance with the law. Buffy herself underscores the apparent violence of her role when, in "Earshot" (3018), having persuaded Jonathan not to commit suicide, she remarks "it's nice to be able to help someone in a non-slaying capacity." However, in analysing the nature of law in *BtVS*, it is necessary to distinguish the actuality of the series, the description of what happens in each episode, from its reality. Vampire and demon deaths are the actuality of the series. In reality however, in all seven seasons of *BtVS*, vampires and demons do not, in the usual sense of the word, die.

[24] When vampires die in *BtVS*, "they desiccate into powder, leaving no messy residue or unpleasant trace of death" (Owen 27). The reality of death is rarely present in *BtVS*. When it is found, as in the death of Joyce, Buffy's mother, in "The Body" (5016), its usual absence makes its presence all that much stronger. Joyce's death is physically discreet, there are no marks of death on her body and the moment of death takes place off screen and, indeed, outside the time frame of the episode, but, nevertheless, psychically it is traumatic for those who live on, its effects being central to two episodes ("The Body"; "Forever," 5017) and a permanent, periodic referent for *BtVS* thereafter. Joyce is known both to those in *BtVS* and to the viewers. She figures in the first episode of *BtVS* and makes regular appearances in the series until her death. Whilst she is a minor character, her changing relationships with Buffy, Giles and the others are important arcs in the development of the series (Bowers, Williams). By contrast the vampires that Buffy disposes of are largely ephemeral, often lacking even a name, their death rarely being referred to in episodes after their demise. Their removal leaves no "messy residue" in either physical or emotional terms. The death of demons has greater physical presence in *BtVS*, since demons do not dust in death, but, like vampires, their characters and again their names are usually unknown to the viewer. The violence of the application of the law by Buffy consequently has a cartoon quality to it. And, as Willow says in "Goodbye Iowa" (4014), cartoons are not documentaries; they are not about things that happen. The style of "The Body" separates it from other episodes of *BtVS*. "Music plays an important role at a number of different levels in *Buffy the Vampire Slayer*" (Halfyard 1). "The Body" is unusual in *BtVS* in that it is an episode that has no music other than that that accompanies the opening and closing credits. Instead the emphasis in the episode is on silence and heightened real-life sounds. Equally, in a series that "without its jokes. . . would be little more than your average teen melodrama action horror hybrid" (Wilson 79), this is an episode without jokes and with precious little humour. "The Body" documents the consequences and impact of death in minute detail. Thus it serves to emphasise that death is one thing, a matter of reality, whilst the slaying of vampires and demons, though a constant feature of *BtVS*, is merely something that is part of the actuality of the episodes. Some of the other deaths on *BtVS* are likewise distanced from the slaying of vampires and demons. When Faith accidentally kills that the Mayor's secretary, Allan, "this man bleeds. The way the series deals with this event, in multiple episodes, highlights the seriousness and consequences of killing" (Wilcox 13). Similar points can be made about the death of Tara and its consequences at the end of Season Six.

[25] What in reality is violent in *BtVS* is not the slaying of vampires and demons, this being a parody of violence, but that which leads up to the slaying. It is the fact that the law is applied without thought of its effect on either those whom it applies to or those who apply it that means that, as Cover writes, "[l]egal interpretation takes place in a field of pain and death." It is this that changes as *BtVS* develops and it is this that changes the nature of the law and eventually allows for there to be an interplay between law and love.

[26] Notwithstanding her doubts about the law's application to Angel, Buffy's general attitude towards the law of the Watchers' Council in the early seasons of *BtVS* is almost mechanical in its approach. She finds vampires and demons and she slays them; she applies the law. Slaying at the beginning of *BtVS* is a reflex. Buffy knows little about those whom she slays; she usually does not even know their name. In many ways her behaviour in relation to the law is very similar to Faith's later attitude towards the orders of Mayor Filkins. When the Mayor orders Faith to kill Professor Lester she does so. When the professor asks why the Mayor wants him dead Faith says, "[n]ever thought to ask" ("Graduation Day," Part 1, 3021). Similarly at the beginning of *BtVS*, Buffy and indeed the Scooby Gang have few questions about why she is slaying; it is merely that vampires are, in Xander's words "not good" ("The Harvest," 1002), her concern, in the main, being about how the slaying can most effectively be done. How does "law and legal obligation differ from, and how. . . [are they] related to, orders backed by threats" asks Hart? At this point in the development of *BtVS* the relationship between Buffy's enforcement of law and Faith's administration of orders backed by threats is very close; the coercion that Cotterrell and Cover see as being central to the law is integral to both, and law is therefore a long way from love. However, as *BtVS* develops, so this changes.

[27] Wilcox has noted the importance of the First Slayer's insistence in "Restless" (4022) that Buffy slay alone and the equal importance of Buffy's resolve that she is not alone and her demand of the First Slayer, "give me back my friends" (Wilcox 9). Notwithstanding the legend that "[o]ne girl, in all the world" is the "Chosen One," Buffy is rarely alone in her pursuit of vampires and demons. Her friendship with Xander and Willow is established in the first episode of the series ("Welcome to the Hellmouth," 1001) and it is settled that they will participate in her slaying activities in the second episode ("The Harvest," 1002). What changes through the various seasons of *BtVS* is the way in which they interact with her.

[28] In the beginning Willow's description of herself and Xander as "the Slayerettes" in "Witch" (1003) underlines their subordinate role. Although they help Buffy, with their assistance at times being vital, at first, as Giles says, "when it comes to Battle, Buffy must be prepared to fight alone" ("School Hard," 2003). By the end of the third season though, they are themselves directly involved in slaying activities; "the Slayerettes" have become "the Scooby Gang" ("Graduation Day," Part 2, 3022). More importantly they have begun to discuss with each other why they are doing what they are doing. Thus, for example, Willow's decision to continue her education in Sunnydale when she leaves high school is because she wishes to emulate Buffy's attempts to "fight evil"; something she tells Buffy that Buffy does out of choice, not because it is her destiny ("Choices," 3019). The conjoining of Buffy, Giles, Xander and Willow into "We" in order to defeat Adam at the end of the fourth season ("Primeval," 4021), the discussion of whether or not to kill Hus in "Pangs" (4008) and Buffy's description of herself and the Scooby Gang as a "unit" in ""Checkpoint" (5012) are all examples of the increasing involvement of the Scooby Gang in Buffy's work.

[29] Notwithstanding Petrova's observation, citing the episode "Selfless" (7005), that "[t]he Slayer is the one who must maintain the difference between good and evil" and be willing to "cut all ties with family and friends," it is in fact Buffy's ability to connect with other people that gives her work its particular legal character. In the intimate space of friendship and love, law is decided. The emotionless, remote judge giving judgment from on high, the paradigm of law enforcement in traditional Western jurisprudence, is the antithesis of the application of law in the later seasons of *BtVS*. Like the courts of love described by Goodrich, Buffy and the Scooby Gang's encounter with law increasingly places them "face to face with an ethics of emotion and a phenomenology of relationship" where the contestability of law and the fact that it is decided not by any one individual but contested within the framework of a network of loving relationships changes the nature of the law that is being applied. *BtVS* has ceased to be about the summary execution of law and instead

a subtle pacifist-oriented sensibility has been woven into the ongoing Buffy narrative; in a fairly consistent manner, the Chosen One and her surrogate family, Giles and the Slayerettes, evince a tendency to eschew killing when possible and to solve problems non-violently. (Early, 2003, 61)

Buffy's slaying, when it does occur, is a "restrained, reluctant violence" (Tjardes 76) legitimated, at least in part, by the fact that those whom she loves approve of her actions.

[30] The culmination of the seventh season provides the final and most complete example of the conjoining of law and love in *BtVS*. For much of the series, in anticipation of the deaths that will be occasioned by the final battle with the First Evil and uncomfortable with what she has come to perceive as the superiority that her Slayer-status gives her, Buffy distances herself from those around her. Increasingly she claims a peremptory right to decide what happens ("Selfless," 7005; "Lies My parents Told Me," 7017; "Dirty Girls," 7018) and, in doing so, alienates those around her so that in the end she is expelled from her house by her sister and her friends ("Empty Spaces," 7019). She finds herself unable to successfully fight the First Evil's agent, Caleb, and she is separated from those whom she loves. Like Lear she has lost both love and law. However, unlike Lear, in Buffy's case this results from her failure to love, not from her attempt to have both. It is Spike's declaration of unconditional love, motivated not by any hope that it will be reciprocated but by a need to speak the truth,

[w]hen I say I love you, it's not because I want you, or because I can't have you. It has nothing to do with me. I love what you are, what you do, how you try. I've seen your kindness and your strength. I've seen the best and the worst of you and I understand with perfect clarity exactly what you are. You are a hell of a woman ("Touched," 7020)

that gives Buffy renewed strength and direction ("End of Days," 7021). As a result she is able to reconnect with her friends and formulate a plan to defeat the First Evil ("Chosen," 7022). Vital to her renewed acknowledgement of the importance of her love for her friends and theirs for her is the fact that she seeks their approval of her plan rather than seeking to impose it on them. She knows once again, as she has known in earlier seasons, that it is not for her to make law on her own and that if law is to be applied (and, in this instance, if the law about there being only one Slayer is to be changed) this will require the joint and willing efforts of everyone. Law and love have to be conjoined.

[31] In *Angel*, Angel demands that "w[e] live as though the world was what it should be, to show it what it can be" ("Deep Down," 4001). The application of law in *BtVS*, in the later seasons, conforms with this imperative. This particular morality play rejects a centuries-old dominant tradition of law as patriarchy and power in favour of a notion of law as intimacy and discretion. In doing so the series adds yet another level of complexity to its text. Levine and Schneider may be right in arguing that subtexts in the series such as this are not central to the success of *BtVS* in terms of audience figures, but this is not to the point. The early success of Dickens may have lain in his ability to write soap operas and Shakespeare's original achievement may owe much to the sex, comedy and violence that pervade his plays, but the enduring attention that these works excite comes from the web of ideas and language that critics find within the texts: so it is with *BtVS*, and, as this article has sought to demonstrate, the interaction of law and love law plays a part in this.

Editors' Note: See Pasley 262-63.

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