Law Careers Advising
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Center for Careers and Life After Brown
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Law Careers Advising

Law Careers Advising is a collaboration between the Office of the Dean of the College and the Center for Careers and Life After Brown. We support students and alumni interested in legal education and careers through individual advising, internet resources and a multitude of events and programs designed to inform students and alumni about the study and practice of law at all stages of their exploration and preparation for law school application. Among the events we organize annually are the Brown Law School Recruitment Fair, dean and alumni panels that present individual law schools and address various aspects of the application process, legal education, and practice.

This handbook is primarily intended for those who are preparing to enter the application process for fall 2013 admission. However, it is a useful guide for all students and alumni in the early stages of researching the pathways to law school and legal practice. As law requires substantial academic and professional commitment, we encourage all students to engage in self-reflective practices as they develop an interest in law and to explore the field broadly through their academic and extracurricular, volunteer and employment pursuits.

Advising consultations with Deans George Vassilev, Stephen Lassonde, and Ann Gaylin are available during office hours and by appointment. We ask that students and alumni complete our Office Registration Form and submit it to our office before meeting with one of the Law Careers Advising deans. The form is available on our web site. [http://brown.edu/Administration/Dean_of_the_College/advising/documents/Registration_Form.pdf](http://brown.edu/Administration/Dean_of_the_College/advising/documents/Registration_Form.pdf). Please consult the site for office hours and event information or contact our office if you wish to schedule an appointment. Alumni not near campus are welcome to consult with us over the phone. When you meet with Deans Vassilev, Lassonde, or Gaylin to discuss your law school application, please bring your resume and a draft of your personal statement if you wish to discuss them. Check our website for upcoming information sessions, law school visits, and other events.
Self-Assessment

We encourage you to think about your academic and career plans in the broader context of your strengths, interests, and long-term objectives. This self-reflective practice should guide you to select courses, extracurricular activities, internships and civic projects that develop your understanding of law and its intersections with society, policy, intellectual tradition, and practical applications to resolve problems—from those of your future clients, to those of society at large, domestically and internationally. Before embarking on the law school admission process, consider carefully if this is the right choice for you at this time. Given the major commitment of time, effort, and resources it will take to get through law school, it is a question well worth asking yourself.

How do you know that you are ready? A good place to start might be the websites for the law schools that interest you. Are you excited about the course descriptions, clinical opportunities, and special academic programs? You might also ask yourself if you are feeling a bit burned out on school? Is there anything else you would like to try before you begin law school and embark on a legal career? Do you think that some work experience might help clarify your reasons for going to law school? Have you been trying without success to write your personal statement? Are your credentials strong enough for admission to the schools that interest you the most? If you wish to discuss any of these or other questions, feel free to consult the Law Careers Advising deans in office hours, by phone or via e-mail.
# Law School Admission Timeline

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<th>Summer</th>
<th>Fall</th>
<th>Fall-Winter</th>
<th>Summer-Fall</th>
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<td>* LSAT (June)</td>
<td>* LSAT (October)</td>
<td>* Complete financial aid applications</td>
<td>* Matriculate to law school</td>
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<td>* Register with the Credential Assembly Service (CAS)</td>
<td>* Write essay</td>
<td>* Schools make their decisions</td>
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<td>* Research potential schools</td>
<td>* Gather Recommendations</td>
<td>* When admitted, pay seat deposit</td>
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<td></td>
<td>* Determine where to apply</td>
<td>* Attend accepted students open houses at law schools</td>
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<td>* Complete admission applications</td>
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## Application Systems and Components

To apply to law school you have to navigate several interlinked systems and submit a number of documents to support your candidacy. We recommend you familiarize yourself with these application systems and components early so that you can arrange for the completion and submission of all required documents in a timely fashion. The Law Careers Advising deans arrange a number of information sessions throughout the academic year to help you better understand the technical requirements of the law school application. The basic elements of the application are described below.

### Law School Admission Council (LSAC)

LSAC is the central hub for all application information. Start you research on their web site [www.lsac.org](http://www.lsac.org). LSAC is a non-profit organization that coordinates the admission process for law schools in the United States and Canada. LSAC is responsible for developing and administering the LSAT and runs the Law School Credential Assembly Service (CAS). In addition, LSAC provides information and data related to law school admission and legal careers.
Law School Credential Assembly Service (CAS)

CAS is the centralized application service for all law schools administered by LSAC. In order to apply to law school, you must register with CAS. You will then submit all of your undergraduate transcripts to CAS, along with other information about yourself. Letters of recommendation are also submitted through CAS. CAS then distributes all of this information, including your LSAT scores, to the law schools to which you apply. Subscribe to CAS in the summer before you apply or early in the fall. For more information, visit the CAS website at www.lsac.org.

Flex App and Individual School Applications

In the 2012 application cycle, LSAC introduced Flex App, a new system that combines elements of a common application with individualized, law school-specific components. You register with LSAC to complete the Flex App and to submit materials to CAS. The Flex App system is brand new, and some individual school application components may be imperfect. Contact LSAC or the individual school admission office for assistance if you experience difficulties with the system. You are responsible for reading all application instructions and understanding the admission policies and procedures for the individual schools to which you are applying.

Law School Admission Test (LSAT)

Applicants to law school must take the Law School Admission Test (LSAT). The LSAT consists of four sections: reading comprehension, analytical reasoning (or logic games), logical reasoning, and a writing sample. In addition, there is an unscored section to pre-test items for use in future LSAT administrations. The LSAT is offered four times per year, usually in June, late September/early October, December, and February. The latest exam that we recommend for 2013 admission is October 10th, 2012. Your scores are sent to law schools as part of your CAS report. LSAT registration information, as well as detailed descriptions of the test, and preparation materials can be found at http://www.lsac.org/JD/LSAT/about-the-LSAT.asp. Be aware of test registration regulations, including test administration, cancellation dates, and reporting policies. You should plan to take the LSAT exam in time to submit your application reasonably early and when you are best prepared for the exam itself. All LSAT scores are reported to CAS and become part of your record. Law schools consider multiple LSAT scores differently; some average multiple scores, others regard the higher or the most recent score exclusively. It is best to take the exam once after comprehensive preparation and practice.
Transcripts

You will need to order transcripts from the Office of the Registrar at Brown and from the registrar at any other postsecondary school where you have taken courses or earned either an undergraduate or graduate degree. Please note that if you have taken courses at RISD, you must submit a RISD transcript. You must use LSAC’s Transcript Request Forms when you approach the Office of the Registrar in order to have your transcript sent to CAS. More information about transcript requirements is available on the LSAC website here: http://www.lsac.org/JD/Apply/cas-requesting-transcripts.asp.

Study Abroad or Foreign Transcripts

Transcripts for course work abroad are required if:
you are applying to a law school that requires the authentication and evaluation feature (http://www.lsac.org/JD/Apply/cas-internationally-educated-apps.asp) of the Credential Assembly Service (CAS); and you received your bachelor's degree from an institution outside of the United States, its territories, or Canada; or you were directly enrolled at such an institution outside the US, its territories, or Canada, and the total amount of work you completed at all of these institutions combined is the equivalent of more than one year of undergraduate study in the United States, its territories, or Canada.

Copies of all international educational records must be submitted in the original language. If the transcript or other required documents are not in English, a translation must be included. Individual law schools may have specific requirements. Make certain you are aware of those as you explore law schools to which you will apply.

Academic Record (GPA)

Since there is no particular concentration law schools prefer, they are interested in the breadth and depth of your academic record as the context to your GPA. As you explore your academic and career interests during your Brown studies, take advantage of the open curriculum to develop broad-based competencies in the areas that interest you the most. Brown's Office of the Registrar reports our grading standards each year to LSAC, including the fact that letter grades at Brown do not bear numerical equivalents. LSAC nonetheless will calculate a GPA for law school applicants based on the transcript. Brown does not validate LSAC’s computation of the GPA; however, experience has shown that LSAC uses the following rubric in assigning quality points: A=4.0, B=3.0, and C=2.0. We do not know how grades of S are interpreted, but believe that these are left out of the GPA calculation. Taking one or two courses S/NC judiciously should not hamper the competitiveness of your academic record. Mandatory S/NC courses taken as part of your concentration requirements should not cause any problems. Grades in courses taken at other U.S. universities or colleges will be calculated into the
overall Grade Point Average by LSAC. If you have taken courses at RISD and select the S/NC option at Brown, the letter grades assigned at RISD will appear on the RISD transcript. Note that you are required to submit your RISD transcript to LSAC. These grades will be calculated into your GPA.

Résumé
You will need to have a polished and up-to-date résumé to submit with your law school applications. The Law Careers Advising deans can discuss your résumé with you but for longitudinal help preparing your résumé, meet with a career advisor at CareerLAB. Consult their web site for valuable tips:
http://brown.edu/campus-life/support/careerlab/resources/tip-sheets/tip-sheets

Letters of Recommendation
Most law schools require two letters of recommendation but may accept a third. Each law school has its own requirements, so it is important that you take the time to learn about the guidelines for the schools to which you will apply. Many schools require letters from two faculty members, though they will often accept recommendations from work supervisors, as well. Applicants who have been away from Brown for a few years are more likely to have a combination of letters from faculty and employers. You can have your letters sent directly to LSAC’s Letter of Recommendation Service (LOR), which is part of CAS. Through the LOR, you can designate specific letters of recommendation for specific schools. If you are planning to take a few years off before applying to law school and want to keep letters of recommendation on file in the interim, set up an account with Interfolio at www.interfolio.com and have your letters sent there. When you are ready to apply, you can direct Interfolio to send your letters to LSAC’s Letter of Recommendation service.

Letters of recommendation provide admission committees with important qualitative information not available in other parts of your application. This is why it is important for your letter-writers to focus on the quality of your work as well as your developed intellectual and interpersonal skills necessary for success in the legal profession (e.g., analytical reasoning, written and oral communication, research, work habits, commitment, leadership, and collaboration abilities, etc.).

Recently, LSAC introduced a new Evaluation Service that some schools may require your recommenders to complete. This Internet tool is a questionnaire used to evaluate candidates on a number of cognitive and behavioral attributes across six categories (intellectual skill, personal qualities, integrity and honesty, communication, task management, working with others). Again, be sure that you understand the guidelines for each of the schools to which you plan to apply. For all details about letters of recommendation and evaluation visit the page below:
http://www.lsac.org/JD/Apply/cas-lor-evaluations.asp.

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**Personal Statement**

Law schools require you to submit a “personal statement” limited to 500 words or fewer. We do not recommend that you tailor your essay to specific schools; rather, write a general statement that you can submit to all schools. If you have a particular interest in a school and something in your background or aspirations fits that school’s mission or practices, you may customize your personal statement to reflect this. Ensure that this custom element fits harmoniously within your general narrative. The personal statement instructions are generally quite broad: “Write a statement about yourself,” or “Tell us something about yourself.” Though the vagueness of the prompt can be daunting, the personal statement offers an opportunity for you to introduce yourself to admission committees on a more personal level, allowing them to learn about you beyond the information presented in other parts of your application. An effective personal statement offers a clear and memorable portrait of you—your interests, experiences, personality, skills, and ambitions. Because personal statements are personal, there is no one format or approach that will work well for everyone. We offer a few tips below. It is best that you develop your personal statement through multiple revisions and that you work longitudinally with The Writing Center on those. The Writing Center works with both students and alumni. Consult [http://www.brown.edu/Student_Services/Writing_Center/](http://www.brown.edu/Student_Services/Writing_Center/) for further details.

**Tips on Writing the Personal Statement**

**Be original.**

Guess the top 3 most common personal statement topics and avoid them. In particular, skip the “Why I want to be a lawyer” dissertation; instead, tell an original story or relate an experience that is consistent with a desire to attend law school. In other words, “Show, don’t tell.”

**Avoid corny or flashy tricks.**

Some candidates will try to be clever in order to make their application stand out, but we recommend that you avoid this strategy. Do not write an epic poem about your quest to enter law school, draw a picture as your personal statement, write in stream-of-consciousness style, write your obituary in which you look back on a career as Chief Justice, or write a short story in which you are on trial and the admission committee is the jury.
Keep it personal.
The essay is called a “personal” statement for a reason. Many students try to impress admission officers with essays on philosophy, Russian politics, or the need for prison reform. Avoid this tactic. A well-written essay on current events or an academic subject might win awards, but it is not the best way to show an admission committee what you will contribute to their program. Use this essay to discuss something about your background, interests, commitments, and life plan. If these are linked to specific knowledge areas and expertise, draw connections to those specific areas, as long as you do not make them the backbone of your narrative.

Do not recycle your résumé.
Some students make the mistake of devoting their personal statement to summarizing their accomplishments. Your personal statement can certainly concern something impressive you have done, but should not just recycle your résumé. Think of your personal statement as an opportunity to add something new to your application portfolio. Show, don’t tell.

Contribute to the law school community.
Law school admission officers are looking for interesting students who will help make their school a vibrant learning community. They are looking for diversity in interests, background, and experience. Think about your personal statement as a chance to step out-side of the GPA/LSAT numbers in your application and illustrate why admitting someone with your background and experiences will make their school a better place.

Make it easy to read.
Write clearly. Use declarative sentences in the active voice wherever possible. Organize each paragraph around a topic, theme, or idea as you would in a closely-argued paper. Do not try to distinguish your essay with its physical features—use a regular font (e.g., Times New Roman, or Calibri), ordinary margins, white background, etc. Admission committees care about typos, grammar, topic sentences, and transitions. Proofread your essays very carefully. Elegant writing is rewarded while sloppiness earns negative attention.

Some questions that might be helpful to consider as you begin your draft:
What have you learned from your extracurricular or work experiences, and how have those experiences contributed to your growth?
When does time disappear for you?
Have you had to overcome any unusual obstacles or hardships (economic, physical, familial, etc.) in your life? What were these obstacles and how did you face them?
What might be unique, special, or distinctive about your life story or experiences?
Addenda and Diversity Statements

Each law school-specific portion of the application enables you to submit brief addenda about anything you wish to add that does not properly belong in the personal statement. You may choose to complete an addendum that contextualizes an element of your application or background. Be factual and brief and avoid normative statements that may confuse rather than inform. Different parts of the application may include space for additional brief comments such as “Diversity statements”. We suggest you think about diversity broadly in terms of the unique characteristics that define you as an applicant who will contribute to making the law school incoming class more dynamic and broad-based. Diversity is not merely culturally determined; it can also encompass competencies developed through activities and education.

Institutional Action and Dean Certifications

Law school applicants are required to report and explain any infractions against their college or university’s code of conduct. You must report any institutional action that is above the level of Reprimand even if it does not appear on your academic transcript, did not result in separation from the University, and/or if you believe the offenses to be minor. Reprimands will continue to be part of your Brown internal record. You will also be asked to report any semesters in which you were not in good academic standing or were the subject of suspension for unacceptable academic performance.

In addition to asking you to report institutional action, some schools and programs will require you to have a dean at Brown either certify that you have not been the subject of disciplinary action or state in writing the facts of any procedure and/or sanction against you. In most cases, reporting disciplinary action will not jeopardize your chances of admission as long as you have taken full responsibility for your actions and demonstrate self-reflection and personal growth. Truthfulness is integral to being a successful attorney. It is therefore essential that you take seriously your responsibility to report institutional action. Failure to report institutional action on your applications may be regarded by the law schools as a lapse in ethical judgment. Moreover, you will be asked once again to report institutional action on applications to the bar after you have completed law school. Failure to report institutional action could later jeopardize your admission to the bar. Deans Vassilev, Lassonde, and Gaylin are available to consult with you about the process of reporting institutional action.
Submitting Your Dean Certifications

Please submit your dean certification forms, along with stamped envelopes to Mariel Notar-Francesco in University Hall 213. Please anticipate 1-2 weeks for your certifications to be sent to the schools requesting it. If you are reporting institutional action, include a statement describing the incident in question and call the office to make an appointment with Dean Vassilev, Lassonde, or Gaylin to discuss it. Please include your contact information with your dean certifications.

Mailing Address:
Pre-Law Advising, Attn. Mariel Notar-Francesco
Brown University
Box 1828
Providence, RI 02912

For FedEx/UPS/DHL Deliveries:
Pre-Law Advising, Attn. Mariel Notar-Francesco
Brown University
1 Prospect Street
University Hall 213
Providence, RI 02912

Application Process

The application process requires you to manage the elements described in the previous sections in a thoughtful and timely manner. Ensure that you are well aware of the details and the time-line for the various elements of the application. Reflecting on your educational and career objectives, exploring school information, choosing where to apply and what type of programs are best suited to your background and aspirations requires careful thought and longitudinal preparation.

Deciding Where to Apply

Many students approach this question by immediately thinking of a few top-rated schools and then deciding that those schools are the only ones they want to attend. While reputation is an important factor, you can also consider a range of more substantive criteria. You might start by determining which schools accept students with GPA's and LSAT scores similar to yours, since these numbers inform much of the admission process. You can determine which schools are in your range based on your LSAT score and grade point average. There is a number of LSAT/GPA calculators on the Internet. We recommend that you explore LSAC's system first: https://officialguide.lsac.org/Release/OfficialGuide_Default.aspx. Boston College has designed a different system that you may find useful, as well: http://www.bc.edu/offices/careers/gradschool/law/lawlocator.html.
Choosing Law Schools

Beyond the numbers, you might consider location, as well as particular areas of the law in which you are interested. While all law schools teach essentially the same curriculum, some specialize in certain areas of the law (e.g., public interest, government, corporate law). Some law schools also have special clinics or combined degree programs that might interest you. Finally, law schools disclose the rates at which their graduates pass the bar and find employment. Research these rates before deciding where to apply.

Learning About Individual Schools

Law Careers Advising organizes a number of programs, including Brown’s Law School Recruitment Fair, admission dean panels, and information sessions that expose you to information about legal education and particular law schools. We encourage all students and alumni to attend so that they can interact with admission officials in person. There are several good sources of information about different schools on the Internet. Explore several different schools’ web sites. Most of them offer extensive information about the school, the faculty, the courses, and special programs or clinics. The ABA/LSAC Official Guide offers an online, searchable database of law schools which you can search by keywords, geography, average LSAT, and other criteria. To access the online database, consult the site below.


Good printed resources include the ABA/LSAC Official Guide to ABA Approved Law Schools and The NAPLA/SAPLA Book of Law School Lists. These and other guide books are available for your reference in 213 University Hall.

Number of Schools to Which to Apply

Some students and alumni apply to only 2 or 3 schools, especially if they are certain of the geographical area where they want to be, while others apply to 12 or more. We recommend that students apply to six to ten schools across a range of options, typically including one or two dream schools and two good safety schools. Choose the bulk of the schools on your list by the fit of your credentials with their GPA/LSAT ranges.
Early Decision and Early Action Programs

Most law schools have Early Decision Programs, Early Action Programs, or both. Those are designed for applicants with particular interest in and suitable background for a specific law school. Individual law schools programs vary in their regulations and requirements, and it is your responsibility to be aware of all details for the specific programs of interest to you. Law schools also have specific deadlines for these types of application processes. We recommend that you consider Early Decision Programs only if the strength of your application and your interests are a particularly good match for the school’s admission requirements. In most cases, applicants are better off applying to a balanced list of schools than to a single one.

Early Action Programs are non-binding, meaning that you can apply to other law schools and are not bound by an obligation to accept an admission offer. If you apply through an Early Action Program, you will be informed about the admission decision earlier than regular applicants.

Early Decision Programs are binding. You will be required to sign an agreement that you will accept the school’s offer if you are admitted and will withdraw your application from all other law schools.

Fees and Fee Waivers

The application process involves the payment of several fees. For a list of LSAT and CAS fees, including exam registration, postponement, relocation, and cancellation, consult: http://www.lsac.org/JD/LSAT/lsat-fees.asp. Individual Law schools have application fees, as well. A list of those is available here: https://officialguide.lsac.org/Release/SchoolsABAData/SchoolsAndLocation.aspx. Applicants with a high level of financial need may qualify for application and LSAT fee waivers through LSAC and individual law schools. Information about LSAC’s fee waiver program can be found on the web site below: http://www.lsac.org/JD/LSAT/fee-waivers.asp. Schools’ policies about application fee waivers vary. You should check the policy for each school to which you wish to apply.
Deferring Admission

Generally, deferrals are allowed for specific reasons such as fellowships, enriching work, academic opportunities, or compelling personal circumstances. Deferrals must be requested in writing shortly after you have been admitted and are decided on a case-by-case basis. Criteria and rules for deferral vary from school to school. Thus, before requesting a deferral from any law school, be sure you fully understand their deferral policy. We do not recommend applying to law school with the intention of asking for a deferral. If you believe you will need an additional year or two before attending law school, we strongly advise you to postpone your application until you know that you are ready to start your legal education. This can not only help you gain clarity about your decision to pursue legal education and career, but can also strengthen your admission credentials. Consult with Deans Vassilev, Lassonde, or Gaylin if you have questions about deferral or about when you should be applying for admission to law school.

International Applicants

Law schools vary in their admission policies for international applicants. Check with each of the individual schools in which you are interested to learn about their policies. If you are not a native speaker of English, you may be required to take the Test of English as a Foreign Language (TOEFL). If you have more than a year’s worth of course-work from a foreign university, you may be required to submit a transcript from that institution. In addition, you may be required to demonstrate the ability to pay for your legal education. Legal education in the United States is financed largely through loans backed by the federal government. Foreign applicants are not eligible for these loans. Some school-based grants and scholarships are available, though these rarely cover the entire cost of legal education. At most schools, 80% or more of students graduate with some amount of debt (according to U.S. News & World Report, often in the range of $80,000 $100,000). Foreign applicants are strongly encouraged to apply as early as possible in the application process to ensure that visas and other immigration documents are completed prior to matriculation to law school, if admitted.
Financing a Legal Education

The cost of attending law school (tuition, fees, books, living expenses, etc.) can be as much as $60,000 per year. You may qualify for scholarships at individual schools based on need, merit, or other criteria. Some schools offer need but not merit-based aid, and vice-versa. However, financial aid comes mostly in the form of loans. Therefore you should expect to borrow money to cover the majority of your costs (at most schools $80,000-$100,000). Financial assistance is offered by governmental sources (e.g., Federal Direct Loans, or Federal Perkins Loans), Work-Study programs and private sources, which may be based on your credit (e.g., Graduate PLUS loans). Ensuring that your credit history and practices are in order and learning about financial options and their costs are essential for making an informed decision to matriculate to a law school or whether to apply in the first place. Law schools also vary in their policies about determining applicants’ independent status, so be sure you learn what information would be expected from your parents or legal guardians.

Financial aid and scholarship information is available on LSAC’s web site: http://lsac.org/jd/finance/financial-aid-overview.asp. Consult individual law schools’ financial offers and terms, particularly in regard to school-specific aid, repayment options and private lending. Links to most law school web sites are available here: http://lsac.org/jd/Choose/law-school-links.asp.

Current Brown students may consider a few competitive fellowships available to Brown students only such as the Liman, Baker, and Emery Fellowships. For more information about Fellowships at Brown, consult: http://www.brown.edu/academics/college/fellowships/fellowships_at_brown.
Resources Within Brown

**Law Careers Advising**
Web site: [www.brown.edu/college/prelaw](http://www.brown.edu/college/prelaw)

**Center for Careers and Life After Brown (CareerLAB)**
Web site: [http://brown.edu/campus-life/support/careerlab](http://brown.edu/campus-life/support/careerlab)

**The Swearer Center for Public Service**
Web site: [http://swearercenter.brown.edu](http://swearercenter.brown.edu)

**The Writing Center**
Web site: [http://www.brown.edu/Student_Services/Writing_Center](http://www.brown.edu/Student_Services/Writing_Center)

**Office of the Registrar**
Web site: [http://brown.edu/Administration/Registrar](http://brown.edu/Administration/Registrar)

**Office of Student Life**
[http://www.brown.edu/Student_Services/Office_of_Student_Life](http://www.brown.edu/Student_Services/Office_of_Student_Life)

**Brown Alumni Association**
Web site: [http://alumni.brown.edu](http://alumni.brown.edu)

Outside Brown

**Law School Admission Council (LSAC)**
Web site: [www.lsac.org](http://www.lsac.org)
E-mail: LSACinfo@LSAC.org
Phone: 215.968.1001
Address: Law School Admission Council, 662 Penn Street, Newtown, PA, 18940

**LSAT Dates**
Consult [http://www.lsac.org/JD/pdfs/testdateweb.pdf](http://www.lsac.org/JD/pdfs/testdateweb.pdf) for all domestic and international dates, as well as for special dates for Sabbath observers. For registration information, visit [www.lsac.org](http://www.lsac.org).

Saturday, February 11, 2012
Monday, June 11, 2012
Saturday, October 6, 2012
Saturday, December 1, 2012
Monday, December 3, 2012
LAW CAREERS ADVISING
OFFICE OF THE DEAN OF THE COLLEGE & CENTER FOR CAREERS AND LIFE AFTER BROWN

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