hours of sleep a night was sufficient. He also commissioned an oversized teapot from Josiah Wedgewood.

Coffee and tea permeate the Enlightenment's intellectual scene. Many of the era's leading figures can be seen reading and writing far into the night, feverishly chipping away at the old order's verities. Johnson himself was known to polish off 24 cups of tea at a sitting. Alexander Pope complained that he could not sleep ("Fools rush into my Head, and so I write"), and William Hogarth's prints are littered with sleep-deprived characters dozing at work and play. It was in 1758, according to the *Oxford English Dictionary*, that the word *insomnia* entered the English language.

Coffeehouses, which first appeared in London around 1650, quickly proliferated and became a center of British intellectual and political life.

What, asks Schmidt, did the new regime of caffeine, clocks, and clerics promote? Rationalism, work, productivity—and the decline of dreaming.

Goodbye to the Grind!

"The Opt-Out Revolution" by Lisa Belkin, in *The New York Times Magazine* (Oct. 26, 2003), 229 W. 43rd St., New York, N.Y. 10036.

"I don't want to be on the fast track leading to a partnership at a prestigious law firm," says Katherine Brokaw, who left that track in order to stay home with her three children. "Some people define that as success. I don't."

She is not alone. Before they ever bump up against a "glass ceiling," more and more highly educated, high-powered professional women are rejecting the workplace and the grim climb upward in favor of stay-at-home motherhood, reports Belkin, a former *New York Times* reporter who now works from home as a freelance writer and biweekly *Times* columnist.

Surveys of professional women show that, depending on the profession, between one-fourth and one-third are out of the work force. A canvass of women from the Harvard Business School classes of 1981, 1985, and 1991 found only 38 percent working fulltime. *Fortune* magazine checked on 108 women who'd made its list of "most powerful" women over the years and found that at least 20 had left their jobs (most of them voluntarily) for a less high-powered existence.

In less than a decade, "the number of children being cared for by stay-at-home moms has increased nearly 13 percent," Belkin says, quoting census data. And in just two years, the percentage of new mothers returning to work fell by four percentage points, to 55 percent in 2000. Two-thirds of the mothers who work in

"the crucial career-building years (25–44)" do so only part-time. And many women gain more control over their work schedule by striking out on their own: Since 1997, the number of businesses owned or co-owned by women has jumped 11 percent.

None of this is what feminists in the 1970s envisioned, Belkin says, but it could be the start of a different revolution. Because so many women have exercised the option to downshift, more men are now doing so, too. "Sanity, balance and a new definition of success, it seems, just might be contagious."

PRESS & MEDIA

License to Hunt

"Judging Reputation: Realism and Common Law in Justice White's Defamation Jurisprudence" by John C.P. Goldberg, in *University of Colorado Law Review* (Fall 2003), 290 Fleming Law Bldg., 401 UCB, Boulder, Colo. 80309–0401.

After the First Amendment, there's no more sacred text in journalism than the Supreme Court's unanimous 1964 decision in *New York Times v. Sullivan*. By requiring plaintiffs in certain cases to prove that a defamatory statement had been made with "actual malice"—that is, with knowledge or reckless disregard of its falsity—the Court freed news organizations from having to worry much about libel or slander suits by the public officials they cover.

As Goldberg, a law professor at Vanderbilt University, explains, the Court's seemingly unstoppable expansion of that privilege in later years led one of *Sullivan*'s authors, Justice Byron White, to conclude that the ruling ought to be scrapped. White, who served on the Court from 1962 to 1993, joined the *Sullivan* majority and was one of a bare majority of five justices that three years later extended the *Sullivan* principle from public officials to "public figures" more generally. That made it harder for movie actors, professional athletes, and other celebrities to sue successfully for libel or slander. But White argued against a further expansion of *Sullivan* in a 1971 case, and he angrily dissented in a 1974 case in which the Court ruled 5–4 that even *private* figures had to prove negligence to collect any damages, and actual malice to be eligible for punitive damages. Press freedom, he said, "does not carry with it an unrestricted hunting license to prey on the ordinary citizen."

White saw *Sullivan* as granting a limited privilege to foster democratic debate, and he objected to reading into the ruling any broad "free speech" principles, as some justices, leading constitutional scholars, and the press were all inclined to do. Before *Sullivan*, defamation law had been almost entirely left to state courts and legislatures. White didn't want the federal government to completely displace state tort law.

He was unimpressed by arguments from Justice Hugo Black and others that freedom of the press required complete immunity from liability for defamation. News reporting, in White's view, was not so different from other skilled occupations, and ought

EXCERPT

Bigger than the Bomb

Typos have an uncanny ability to survive reading and re-reading. If there is anything that could survive a nuclear attack, it is probably typographical errors.

—Thomas Sowell, columnist and economist, quoted in *National Review* (Nov. 10, 2003)