

In Memoriam

Donald Songer, esteemed scholar and beloved teacher and mentor, died suddenly as this issue was in production. Professor Songer, the most recent recipient of the Lifetime Achievement Award of the American Political Science Association's Law and Courts Section, was a strong and generous supporter of this journal, having published two articles and served as a reviewer three times in the few years since its inception. Don will be deeply missed, but his memory will be cherished, here and among the entire community of law and courts scholars.