Scandal-Making & Censorship: How Caroline Norton Eluded Two Communicative Strategies Meant to Punish 'Deviant' Women

Tracy Walker
Department of History, Barnard College
Senior Thesis
Professor Deborah Valenze
17 April 2019

Table of Contents

Acknowledgments

Caught up in the, retrospectively, far-fetched notion that I would never finish my thesis, I had not considered what it would feel like to finally be handing it in. Naturally, there is a lot of relief, but what I overwhelmingly feel is gratitude towards everyone that helped me through this process. It may be cliché, but it is certainly also true.

Thank you to my suite-mates, Phoebe, Leyla, Judy, Vanessa, and Ginny, for bearing with me as I said the word "thesis" at least ten times a day and for listening to my half-developed ramblings.

Thanks to my fellow seminar members, Sarah, Phoebe, Lily, Emily, and Beth. I love hearing about your work, and I'm proud of all of us for getting here.

Thank you to my siblings and brother-in-law: Lindsay, Ryan, Kelly, and Ash. Our Walker Clan group provided welcome relief on stressful days. Lindsay deserves a special shoutout for actually reading the thing, you are a hero.

Thanks to my dear friends, Cille and Paul. Frankly, it is not often that people are genuinely interested in hearing about a thesis, but both of you always have been, and I could count on a welcome space to talk out what I was thinking with you two.

Thank you to my dad. I know my thesis has made coordinating our schedules difficult, but you were always understanding. I am free for dinner now, basically any time!

Thanks to my step-dad and, especially, to my mom. Mom, you have been there for me every step of the way. I know our conversations have taken up a fair bit of your time, and I hope the end product is worth your above-and-beyond efforts in helping me remain calm.

Thank you to my academic advisor, Professor Tiersten. I honestly do not think that I would be graduating without your help negotiating Barnard's red tape.

Finally, thank you to Professor Valenze, my thesis advisor. You always believed in me, even when I was questioning myself and my work (which was a lot), and I cannot express how much that meant to me.

If I missed anyone, please know that I am very tired, and I want to thank you, too.

Introduction

The democratization of reading in nineteenth-century Britain widened the scope of the population exposed to cultural and political information, it allowed people of all socioeconomic classes and both genders to gain access to reading materials in some form, and it created a space where daily news and ideas were widely shared and discussed. However with this increased access to information those in positions of power and education were concerned about the extent to which these changes could undermine ideals of Victorian Britain to the detriment of society. The number of female writers grew at this time and, by increasingly engaging with the public sphere, came to be seen as challenging the traditional domestic gender roles that were the norms of society. Writers spread more and more communicative material that similarly undercut Victorian values. Public demand popularized the reporting of divorce courts as never before due to the availability of cheap publications like penny-newspapers. The resulting interest in such reporting led to a level of celebrity and infamy for those involved, and, increasingly, novels began to dwell upon similar themes, though less overtly. The prevalence of writings which touched upon topics like adultery concerned conservative members of society, especially when they considered the consequences such literature could have on ‘the fairer sex’. Two communicative strategies were primarily used in an attempt to control those publications and the people involved with them: scandal-making and censorship.

The duality of scandal-making and censorship, while diametrically opposed, were similar in that they went to great lengths to target women. In the case of marital litigation and its publicity, wives who were accused of adultery were demonized far more than husbands, and, even if they were found innocent, the accusation was enough to taint their reputation forever. To

many of the people that propagated scandals, the public shaming faced by the women would deter other wives from acting similarly. Censorship focused on women in multiple ways, but its primary assumption was that the young female reader was the individual who most direly needed protection because of her vulnerability to suggestion. In the name of protecting these women, those who advocated for censorship would prevent them from reading press reports of marital trials or even novels and poetry that dealt with similar taboos. Without the widespread dissemination of those publications, which often portrayed the harsh realities of gender relations, it would be much more difficult to awaken young women to what was an inherently unequal political, legal, and social position. The call to protect women was, in reality, a call to protect the status quo that would punish women who did not fit the mold. As a vivacious woman accused of adultery and a writer who did not shy away from controversial topics (in her fiction and in her political writings), I argue that Caroline Norton was subject to the full thrust of both of these strategies for control and represented exactly the type of feminine rebellion that fascinated and terrified onlookers. Her writings posed a distinct challenge to the educational and legal practices that secluded women's minds and limited their experiences. Yet through careful manipulation of social skills and diplomatic language that reassured such critics that she was on their side (whether or not that was really true), Caroline Norton managed to retain some respectability and earn a fairly substantial living as a writer.

My interest in this topic was initially spurred by my fascination with adultery trials, the treatment of women within them, and the relative celebrity that these scandalous cases achieved. As I did more reading on the subject, I was struck by the case of Caroline Norton because, of all the criminal conversation suits that I read, no woman had a public platform quite like Norton's.

Another woman wrote a memoir of her experience in the legal system years beforehand, but she was not in a social position to be taken seriously in her grievances, and Caroline Norton *was* in a position to fight public dismissal and figure out a way to gain people's attention. The struggles of Caroline Norton enabled me to truly appreciate how many factors were involved in scandals like these. The democratization of the press, the public fervor for these cases, the backlash against the popularity, the concern that female adulteresses and readers were undermining women's prescribed role: all of these elements should have totally destroyed her chance at rebuilding a successful life, but they did not. Granted, Caroline Norton did not achieve the kind of success that would have represented a total vanquishing of these forces, but she adeptly manipulated the society that was content to see her as a morally corrupt woman in a way that made her unique.

Historiography

I am indebted not only to Hathitrust and *The Times* digital archive for the primary sources I analyze in this thesis, but also to the diligent work of scholars before me who did what I could not. As my topic evolved over a period of several weeks in my senior year, I unfortunately did not have the capability to travel to Britain to visit the necessary family archives and pore over their collections. The work of Jane Gray Perkins, Alice Acland, Barbara Leckie, Randall Craig, among others, gave me access to primary source documents essential to my argument, and I am very thankful for the rigor applied to their research.

The secondary sources that I used cover a span of topics, including women in the press, the rise of women's magazines, the woman reader, various biographies of Caroline Norton, the construction of gender in Britain's nineteenth-century, and the impact of adultery in newspapers and novels. Mary Poovey's *Uneven Developments* and Barbara Leckie's *Culture and Adultery*

were especially influential in shaping my argument. Poovey's focus on the ideological constructions that placed women in certain roles made me critically analyze how scandal and censorship played a part in that work and how Caroline Norton fought the forces that would dictate her life even as she suffered in differing from the ideals that they imposed. *Culture and Adultery* specifically looks at how the divorce court press exploded in popularity and argues that Caroline Norton used the parameters of that reporting to shape the depiction of adultery in her own work, while simultaneously positioning herself as the victim through the genre of melodrama. Leckie's argument focuses on proving the similarities between these types of publications, and, while she does touch on how Caroline Norton skillfully positions herself not as a radical but as a fighter for woman's protection, I felt as though there could be more focus on Caroline Norton as a literary politician, someone who recognized the social, political, and cultural forces that felt threatened by her and the ways in which, even though she was targeted by them, she never allowed them to fully subsume her.

Chapter I

The Active Ingredients of Scandal

I dare say it is partly vanity which made me feel so angry at what was alleged - it was done to mortify me & it did mortify me - but there was another reason. I was prepared to resist the accusation, or endure the false decision, of having sinned…I was prepared to have my feelings & conduct made the subject of public discussion - but I was not prepared for more than the perversion of facts.[1]

Scandal, Wives, and Marital Litigation in the 19th Century

History has proved, in many different contexts, that humans are particularly interested in witnessing those things that are salacious and untoward. Behind closed doors, gossip and secrets abound at all levels of society, and, for those directly involved, their lives are often characterized by a strategic necessity either to suppress such rumors or to choose the perfect time to publicize them. The latter idea of publicity is the factor that defines what becomes a scandal. It is the widespread invasion, examination, and discussion of private affairs that is so compelling to those on the outside looking in, even as the process of exposure and its findings may be distasteful to many. Britain in the nineteenth century had its fair share of scandals, and a significant portion of them can be traced to increased popular interest in marital litigation over the course of the period.[2] The legal trials of George and Caroline Norton, beginning with George Norton's 1836 criminal conversation action against his wife's alleged lover and Britain's current Prime Minister, Lord Melbourne, were of special interest to the public.[3] The nature of the initial suit, an

---

[1] James O. Hoge, ed., Clarke Olney, ed., The Letters of Caroline Norton to Lord Melbourne, Caroline Norton to Lord Melbourne, July 1, 1836, 94.

[2] A. James Hammerton, *Cruelty and Companionship: Conflict in Nineteenth-Century Married Life*, (London, U.K.: Routledge, 1992), 133.

[3] Diane Atkinson, *The Criminal Conversation of Mrs. Norton: Victorian England's "Scandal of the Century" and the Fallen Socialite Who Changed Women's Lives Forever,* (Chicago, IL: Chicago Review Press, 2013), 2.

accusation of adultery, was enough to be interesting, but the prominence of those involved made it even more so: an accused Whig PM, a disgruntled Tory husband, and a young, beautiful writer and wife meant that, either way the suit was settled, its legacy would outlast the announcement of the verdict.

Wives involved in various marital legal suits, like Caroline Norton, were loathe to have their private lives under intense scrutiny in the public setting of the courtroom, but unlike their husbands they often had no other alternative. Women who initiated legal action did so as a last resort to escape the legal purgatory that was meant to 'protect' them. Yet those protective laws more often treated them merely as their husband's property and relegated them to the domestic sphere, evident in rulings like those that reinforced a husband's ability to immediately claim any and all of his wife's independent earnings.[4] With legal precedent firmly on their side, it was also much easier for men to sue for divorce, and they could do so merely on the grounds of adultery. Their wives, on the other hand, needed to prove adultery in addition to proving one of the difficult to verify and legally vague definitions of incest, bigamy, desertion, or cruelty.[5] Criminal conversation trials like George Norton's especially illustrated the extent to which husbands could use litigation as a form of blackmail and revenge.[6] Launched by the husband against his wife's alleged lover, criminal conversation suits required the lover, if found guilty, to pay damages to the husband, and further "equated women's services with property that belonged to a man".[7]

---

[4] Mary Poovey, *Uneven Developments: The Ideological Work of Gender in Mid-Victorian England,* (Chicago: University of Chicago Press, 1988), 84.

[5] Ibid.

[6] Lawrence Stone, *Uncertain Unions & Broken Lives: Intimate and Revealing Accounts of Marriage and Divorce in England,* (Oxford, U.K.: Oxford University Press, 1993), 35.; Ibid., 45-46.

[7] Poovey, *Uneven Developments*, 76.

Trials of this sort were extremely effective in forever tainting the reputations of women indirectly accused because, even if they were cleared of any wrongdoing, the public had already seen "a full light shed upon the most private sexual practices and desires".[8] Wives in this position would be publicly humiliated either way, and their total exclusion from the court proceedings meant that implicated wives were unable to defend themselves in front of the many witnesses or to stop the case from going to trial in the first place.[9]

A key element of scandal's publicity is an audience with which to engage. In the case of marital litigation, there were plenty of people willing to express their opinions on a subject that was usually too taboo to discuss under ordinary circumstances. Topics like "adultery [became] - through a public, communal, and legal discourse - sensational, scandalous, *and* legitimate".[10] Legal cases provided a space to host public discussion on marital woes, even if that discussion became a debate on the merits of spreading knowledge of these suits. Though there were many critics of marital trial literature's proliferation who feared the effect such stories would have on the minds of 'vulnerable' audiences, readers' demands were far too great to diminish the notoriety of these cases, and newspapers, especially, published the details in great numbers.[11] The trials were indeed notorious, and the lasting impact of infamy fell harder on wives than any other party because of their marginalized position within the law. Contemporary nineteenth-century audiences, however, typically did not bemoan the difficulties that wives faced from the

---

[8] Barbara Leckie, *Culture and Adultery: The Novel, the Newspaper, and the Law, 1857-1914.* (Philadelphia, PA: University of Pennsylvania Press, 1999), 110.

[9] Alice Acland, *Caroline Norton*, (London, U.K.: Constable and Company, 1948), 89.

[10] Leckie, *Culture and Adultery*, 110.

[11] Ibid., 100.

legal system, as evident by the fact that accused adulteresses, even if found innocent, could never totally rid themselves of the label and air of immorality.[12] The majority of people were not ready to advocate for married women's legal rights in the nineteenth-century. Accusations like wives' adultery threatened one of Britain's most prized institutions: the "sanctity of the family".[13] Cases that revealed the cracks behind the ideal naturally attracted attention and criticism, especially when those cases involved well-known people. Scandal threatened aspects of all of their lives, but women, who were charged with maintaining domestic happiness even in the face of marital troubles, often received a larger portion of the blame because of a perceived failure in their household responsibility. It was not uncommon for women involved in trials to step back from public life in the aftermath of their cases in order to (hopefully) diminish further gossip, yet Caroline Norton, in many ways, leaned into the public discussion because of a determination to tell her own, long misunderstood, story and regain what respectability she could.

Caroline Norton, Positioned to be a Subject of Speculation

Caroline Norton was no stranger to attention and being the subject of gossip, though admittedly on a much smaller and less malevolent scale, before the criminal conversation trial of 1836. As a beautiful and outgoing young woman, Caroline could come across as somewhat uncouth in the eyes of the older matrons of polite society. Lady Cowper (Lord Melbourne's sister) described Caroline and her sisters as

> strange girls. They swear and say all sorts of odd things to make the men laugh. I am surprised so sensible a Woman as Mrs. Sheridan should let them go on so. I

---

[12] Atkinson, *The Criminal Conversation of Mrs. Norton*, 23.

[13] Leckie, *Culture and Adultery*, 110.

> suppose she cannot stop the old blood coming out. They are remarkably good looking…and certainly clever.[14]

Caroline and her sisters, by this estimation, appear to be rather showy and performative, pointedly around men. Her comment regarding 'old blood' is certainly an allusion to Richard Brinsley Sheridan and his wife Elizabeth Linely, Caroline's paternal grandparents, whose connections to the stage (he was a playwright, she was an actress) only further contributed to the "slightly louche reputation" of the Sheridan family.[15] Caroline's own father was convicted of a criminal conversation suit and had to pay 1,500 pounds in damages.[16] In conjunction with the fact that the family was frequently in financial straits, the unsavory events of their past kept them at the edge of the fashionable world in London. Nevertheless, enough regard still existed for the deceased Richard Brinsley Sheridan to bestow apartments at Hampton Court upon his widowed daughter-in-law, Caroline's mother, where she and her children would be counted as "civilized gipsies" under the watchful eyes of the beau monde.[17]

Coming from a literary family, it is no surprise that Caroline turned to the written word to express herself throughout her life. Her first work, a witticism based on a popular series, was published when she was only eleven with the endorsement of her mother, and it gave her a taste for an eventual literary career.[18] In her lifetime, Caroline wrote for many reasons, but a very important one was financial necessity. Her marriage to George Norton in 1826 revealed that neither had as much money as the other believed, and they "soon found themselves almost

---

[14] Lady Cowper as cited in Atkinson, *The Criminal Conversation of Mrs. Norton*, 54.

[15] Randall Craig, *The Narratives of Caroline Norton*, (New York, NY: Palgrave MacMillan, 2009), 3.

[16] Atkinson, *The Criminal Conversation of Mrs. Norton*, 29.

[17] Atkinson, *The Criminal Conversation of Mrs. Norton*, 24.

[18] Acland, *Caroline Norton*, 22.

completely dependent on Caroline's literary earnings and her family's Whig connections".[19] Caroline needed her work to sell well not just as a matter of pride but also of survival because, in many ways, she was the primary breadwinner for her family. In that role, Caroline was formally breaking with expectations of married women; wives were supposed to guard the sanctity of the family in the comfort and privacy of the domestic sphere, not supersede their husbands' ability to provide in such an expressive and public manner. Reckoning with Lady Cowper's words perhaps it is not so surprising that Caroline Norton was living unconventionally, but what is telling is how her growing literary celebrity was mediated by the public. The gender hierarchy should have automatically seen married women's publications as subversive, for "only as long as [a wife's] domestic labor was rhetorically distinguished from paid labor could the illusion persist that there *were* separate spheres".[20] Reviewers, at least before Caroline Norton's separation from her husband, thus doubled down on the domestic imagery in their reviews to mitigate this social breach.

In his March 1831 feature of Mrs. Norton as part of *Fraser's Magazine*'s "Gallery of Illustrious Literary Characters," William Maginn spent more time deriding *New Monthly Magazine*'s February 1831 representation of Caroline (an image of the authoress staring into the distance, illustrated by John Hayter) and delineating the reasoning behind their own lithograph (illustrated by Daniel Maclise) than applauding her literary merits.[21] *Fraser's* particular issue with *New Monthly*'s image was its "straining after effect" and Maginn asked, "what has a lady,

---

[19] Poovey, *Uneven Developments*, 62.

[20] Poovey, *Uneven Developments*, 78.

[21] William Maginn, "'The Gallery of Illustrious Literary Characters.' No. X Mrs Norton," *Fraser's Magazine* (March 1831), 222, https://babel.hathitrust.org/cgi/pt?id=mdp.39015023083176;view=1up;seq=233;size=50.; Craig, *The Narratives of Caroline Norton*, 6.

the head of a household, to do with staring at the stars or any other wondrous body stuck over head?"[22] Hayter's drawing of Caroline deep in thought, with additional emphasis also placed on her bosom, was nonsensical to Maginn, and he "[displayed] her as the modest matron making tea in the morning for the comfort and convenience of her husband".[23] Maginn positioned her against other authoresses by claiming that she had escaped some of the "rubs" to which female writers are generally liable.[24] He was certain, from the look on her face, that Mrs. Norton spent her nights contemplating poetry and prose, and thus "literature is relegated to nocturnal hours", and "the comfort and convenience of her husband," take precedence.[25] Maginn would have had no way of knowing in 1831 that Caroline's writings were keeping her family afloat, but his aggressive placement of her in subordination to her husband reveals how threatened the public was by female writers in reviewers' attempts to usurp the narratives of the latter. One of the closing lines of his piece celebrating Caroline's work sounds like a thinly veiled threat, when Maginn wrote "we think that a lady ought to be treated, even by Reviewers, with the utmost deference - except she writes politics, which is an enormity equal to wearing breeches".[26] Female writers, then, had a line that they could not cross without exposure to derision: politics. Caroline Norton's writings were acceptable so long as they did not stray too far into the public sphere of men, but, in a few short years, Caroline Norton would find herself writing on exactly that and frequently having to respond to her critics.

---

[22] Maginn, "'The Gallery of Illustrious Literary Characters.' No. X Mrs Norton," 222.

[23] Ibid.

[24] Ibid.

[25] Craig, *The Narratives of Caroline Norton*, 9; Maginn, "'The Gallery of Illustrious Literary Characters.' No. X Mrs Norton," 222.

[26] Maginn, "'The Gallery of Illustrious Literary Characters.' No. X Mrs Norton," 222.

John Hayter, "The Honorable Mrs. Norton," *New Monthly Magazine*, February 1831 as reproduced in Randall Craig, *The Narratives of Caroline Norton* (New York: Palgrave MacMillan, 2009), 6, figure 1.

Daniel Maclise, "The Author of 'The Undying One,'" *Fraser's Magazine*, March 1831, 222, https://babel.hathitrust.org/cgi/pt?id=mdp.39015023083176;view=1up;seq=233;size=50.

The criminal conversation trial of 1836 embroiled Caroline in scandal and left her with a shameful reputation, but she recognized her own tendency to be a subject of gossip before that instance where her private life was on full display. Though historians should be careful not to read too many biographical elements in her work, *Kate Bouverie, and Other Tales and Sketches, in Prose and Verse* does hint at some self-recognition. Randall Craig placed particular emphasis on a passage in connection to "Gertrude, the middle of the three sisters (like Norton)" which dealt with her social defiance.[27] Norton wrote,

> Taunted and reproached at home, alternately caressed and sneered abroad, Gertrude always entered a ballroom with a vague spirit of defiance against uncommitted injuries. At once affecting to scorn, and making faint endeavors to conciliate the world; beautiful in person; harsh in manner; fearless by nature; she said everything, and did everything that came into her head, and the consequence was as might be expected. She was flattered by those she amused; courted by those to whom her notice gave a sort of notoriety; admired by many; and abused by the whole of her acquaintance.[28]

It is debatable how much of herself Caroline wrote into this description of Gertrude, but Craig's note of Caroline and Gertrude's exact same placement among their sisters does seem as though it would convey some aspects of Caroline's experience, and her words showcased a self-awareness of her societal position. *Kate Bouverie* was published in 1835, so these feelings of being paraded about and verbally censured were present before the criminal conversation action and likely stemmed from a sense of isolation and notoriety among the fashionable circle. Caroline Norton was by no means the only female writer of her age, but it was hardly the expected role of women, and she further differed from expectations by clearly craving the independence that her

---

[27] Craig, *The Narratives of Caroline Norton*, 4.

[28] Caroline Sheridan Norton, *Kate Bouverie, and Other Tales and Sketches, in Prose and Verse*, 2 Vols., (Philadelphia: E. L. Carey and A, Hart, 1835), 29-30, https://babel.hathitrust.org/cgi/pt?id=msu.31293006710994;view=1up;seq=31.

literary pursuits brought her from what was a very unhappy marriage. After beginning to publish more readily during her marriage, she increasingly invited her friends and London's literati to her home in a bid to enjoy society, and contrary to many 'proper' women, she did not see a problem with going out alone or hosting parties in George's absence so long as she was truly innocent of any rumors of misconduct.[29]

Her naivety in this matter is startling when one considers the self-awareness she possessed about how she was perceived in public as well as her experiences with male entitlement, evident from her letters to Lord Melbourne. One such letter, from 1832, detailed an astonishing liberty taken at a house party in Scotland, "during which Caroline (who was without George) had entertained the guests and been at her merriest, the eldest son of the Earl of Tankerville had come into her bedroom at two in the morning expecting to sleep with her".[30] Evidently, she had a sexually loose reputation, even though it was unwarranted, and it was occurrences of that nature which proved how much she was misunderstood by many of those in her social circle. On December 19th, 1839, she further wrote to Lord Melbourne "that I am worse off than another woman might be, because my name, my family, & something in myself, makes me an object of attention and curiosity - and turns all that was a flattery into insult".[31] Written three years after the criminal conversation suit, Caroline's words provide an interesting perspective on her situation. It appeared to her that, should another woman have been implicated, that woman would not have had as much attention given to her as Caroline had. Lord Melbourne,

---

[29] Margaret Forster, *Significant Sisters: The Grassroots of Active Feminism,* (London, U.K.: Martin Secker & Warburg Limited, 1984), 20-21.; Ibid., 24.

[30] Forster, *Significant Sisters*, 31.

[31] James O. Hoge, ed., Clarke Olney, ed., *The Letters of Caroline Norton to Lord Melbourne,* Caroline Norton to Lord Melbourne*,* December 19th, 1839, 155.

though perhaps only writing so to preserve his own reputation, seemed to be of similar sentiments when he wrote to her on April 10, 1836 and said,

> I have always told you that a woman should never part from her husband whilst she can remain with him. If this is generally the case, it is particularly so in such a case as yours: that is, in the case of a young, handsome woman, of lively imagination…whose celebrity and superiority have necessarily created many enemies.[32]

Any woman who had implicitly been accused of adultery with the current Prime Minister likely would have faced an extraordinary amount of attention from the public, but Lord Melbourne and Caroline might be correct in their estimation of her increased notoriety simply because of the extent to which she had incurred a reputation before the trial and her determination to engage in her own campaign to defend herself and to apply for greater rights for separated wives in its aftermath.

A. James Hammerton, in *Cruelty and Companionship*, wrote that one of the benefits of divorce case publicity was that, "most importantly, the public focus now extended far beyond the sensational dalliances of the aristocracy and the rich" because of the establishment of the Divorce Court in 1857 and its increasing number of middle and working-class cases.[33] Such cases are beneficial to learning more about how marriage functioned at all levels of society, but rarely did these cases themselves become sensational, and their individual contributions to public discourse were thus limited. Marital cases involving the gentry were naturally going to achieve greater attention because of their litigants' relative celebrity, and the debates that their cases ignited were instrumental to the eventual creation of the Matrimonial Causes Act of 1857, which

---

[32] Letter from Melbourne to the Hon. Mrs. Norton, April 10th, 1836 as cited in W. M. Torrens, *Memoirs of William Lamb, Second Viscount Melbourne*, (London, U.K.: Ward, Lock and Co., 1890), 408.

[33] Hammerton, *Cruelty and Companionship*, 103.

allowed a separated wife to become "legally a *feme sole*".[34] The discussion surrounding the litigation involving Caroline and George Norton was essential to the shaping of the law, but the infamy of their story was in large part a reason why that was the case. Yet, the histories or relative celebrity of those involved in marital law cases would not have been enough to gain a fraction of the public's attention without the true partner of scandal: the commercial press.

The Press and its Discussion of Marital Woes

As early as 1740, publications of divorce trials flooded the market in Great Britain, and the dawn of the nineteenth-century did nothing to diminish readers' keen interest in the details of these cases.[35] In fact, it became such an issue in the eyes of its critics that even Queen Victoria made a statement in 1868:

> These cases, which must necessarily increase when the new law [the 1857 Matrimonial Causes Act] becomes more and more known, fill now almost daily a large portion of the newspapers, and are of so scandalous a character that it makes it almost impossible for a paper to be trusted in the hands of a young lady or boy. None of the worst French novels from which careful parents would try to protect their children can be as bad as what is daily brought and laid upon the breakfast-table of every educated family in England, and its effect must be most pernicious to the public morals of the country.[36]

Commentators on the validity of publishing these cases were usually of two minds, either, like Queen Victoria believed, the lascivious details would penetrate the minds of the British people and corrupt them or the publicity was beneficial as "a form of punishment" and shame.[37] Both views regarded those in the trial negatively regardless of the verdict. Caroline Norton's

---

[34] Poovey, *Uneven Developments*, 84.

[35] Stone, *Uncertain Unions*, 38.

[36] Queen Victoria as cited in Leckie, *Culture and Adultery*, 93.

[37] Ibid., 96.

experience with the press varied widely; she could be defended, she could be ridiculed, or she could be the one to initiate a discussion. The press did not discriminate, and all views could find a home in a publication to further the scandal's life once the courtroom was dismissed.

Displeasure and debates between various parties were not uncommon on the pages of publications, as seen by *The Times* back-to-back rebuttals to Ministerial writers in the days following the Norton v. Melbourne criminal conversation suit.[38] As a newspaper aligned with the Tory cause, *The Times*' was not impressed by Lord Melbourne's part in the scandal, and it would not hesitate to use Lord Melbourne's alleged involvement in George and Caroline's marriage in a bid to depose Melbourne's Whig government. Unsurprisingly, its writers vocalized their disapprobation on several occasions to discredit the Whigs, and, in a prior publication, they "called the existing Administration the "*Crim-con-nell Cabinet*" in a witty play on words.[39] Ministerial writers, on the other hand, were not amused and demanded a retraction. The subsequent exchange continued *The Times*' satirical tone and took aim at Lord Melbourne once again. Expressing that they were not too attached to their moniker for the administration, they asked,

> What does our cotemporary *[sic]* think of the substitution of 'Magdalen Ministry' for '*Crim-con-nell cabinet*?' We suppose it will not be disputed that Lord Melbourne had the delicacy to lend Mrs. Norton a book which purported to 'prove that Mary Magdalen was the most virtuous of her sex.' …By all means, then, let our Government be the 'Magdalen Ministry,' and not the '*Crim-con-nell Cabinet*.' We only wish we could get rid of the substance as readily as we can get rid of the name.[40]

---

[38] "A Ministerial evening print reproaches us with having called the existing Administration the 'Crim-con-." *Times* [London, England] 24 June 1836: 3. The Times Digital Archive, http://tinyurl.galegroup.com/tinyurl/9Qdn74.

[39] Ibid.

[40] Ibid.

While *The Times* does not directly accuse Lord Melbourne of anything too unscrupulous, their mocking tone makes clear their feelings for the Prime Minister and their conviction that he should not be in charge of the government. What is even more interesting is the comment regarding Mrs. Norton because of its apparent liberality, for it seems to place the blame on Lord Melbourne for leading her astray rather than coming down too harshly upon the woman herself. *The Times* continued that line of thinking the next day, June 25th, 1836, with their statement that,

> we believe that in the very peculiar visits Lord Melbourne was proved to have paid to Mrs. Norton he violated not only the decorum, but even the decenoies [sic], of English society; and that, too, under circumstances which show him to be obtrusive and uncultivated, and thoughtless or ungenerous in the extreme. Do we blame the lady in the same degree? Far, very far from it.[41]

In their eyes, having asked Lord Melbourne for a position for her husband, Caroline Norton had little choice but to accept his visits to repay him. *The Times* accepted the court's verdict of 'Not Guilty', but they almost entirely blamed Lord Melbourne for the circumstances under which the duo were suspected.[42] The analysis is not perfect; they do not properly account for the fact that there was plenty of evidence that Caroline enjoyed and sought out Lord Melbourne's company and that the Norton's marriage was strained, but evidently, the goal of the Tory paper was to condemn Lord Melbourne and, by extension, the Whig government for being a corrupting force. Caroline, comparatively, was let off with a much lighter sentence in *The Times*' pages, but what need did its writers have to judge a married woman's behavior when society's ideas about what was proper would do that for them? The emphasis on Lord Melbourne's blame in the matter was

---

[41] "The writers in the Ministerial press appear to have found in the recent trial of 'NORTON v. MELBOURNE'." *Times* [London, England] 25 June 1836: 4+. The Times Digital Archive, http://tinyurl.galegroup.com/tinyurl/9QdpN8.

[42] Ibid.

undoubtedly politically motivated, as some suspect the whole trial was, in an attempt to remove the Whigs from power. Lord Melbourne's friendship with Caroline happened to be the chosen scandal to exploit in that cause, with little to no thought given to how it would affect Caroline's life.

If *The Times* positioned Caroline as less culpable, there were plenty of other publications which were willing to punish her brazenness with their pen. One such publication was *The Satirist; or Censor of the Times*. While they had plenty to say during the criminal conversation trial of 1836, they continued to deride her for years afterward. On August 18, 1839, they published such a piece, entitled "The Muse of Mrs. Norton".[43] They speak of her new collection of songs, and they write one of their own to play off as part of her collection, noting how "the song cannot fail being sung by every 'lovely woman' who 'stoops to folly'".[44] Its contents are thus,

Air - *Take back the virgin page*.
Give back my virgin fame,
Unspotted at sixteen;
And let my maiden name
Again be seen.
Let all my thoughts be pure,
Pure as e'en *you* require;
From MEL keep me secure,
I do desire.

Yet let me keep the ring;
Oft shall my heart renew,
When I of noodles sing,
Dear thoughts of you.
Like you, so blind and dull -

[43] "THE MUSE OF MRS. NORTON." *The Satirist; or Censor of the Times*, 18 Aug. 1839, p. 262. 19th Century UK Periodicals, http://tinyurl.galegroup.com/tinyurl/8SXsG0.

[44] Ibid.

Like you, so dull and blind,
the world of dolts is full:
Oh! poor mankind!

Haply, when from your eyes
I now in freedom roam,
You'll pay some dirty spies
To watch my home:
Fancy may trace *faux pas*,
Perchance at least a score;
But I'll avoid *éclât* -
I'll lock the door!

And as reports are made,
Which witnesses may keep,
I shall not be afraid,
Where'er I sleep.
So may the words I write
Not simple GEORGE surprise;
You, noble and polite,
Can *advertise*.[45]

The structure is taken from Thomas Moore's Irish melody, and it parallels it exactly.[46] The original message of Moore's poem details the love one person has for another and the inability to properly express it, but *The Satirist*'s version is one of a conniving wife, very obviously supposed to represent Caroline, who is unhappy in her marriage and subsequently attempts to hide her infidelity. Three years after the trial, and the case of "MEL" and "GEORGE" was still lingering in the national conversation. Caroline's status as an authoress who continued to publish after the initial eruption of the scandal was clearly an important reason for the memory living on, and her unconventional life, at least in the eyes of *The Satirist*, denoted her complicity even if the verdict did not.

---

[45] "THE MUSE OF MRS. NORTON." The Satirist; or Censor of the Times, 18 Aug. 1839, p. 262. 19th Century UK Periodicals, http://tinyurl.galegroup.com/tinyurl/8SXsG0.

[46] *The Poetical Works of Thomas* Moore, (London, U.K.: Frederick Warne and Company, 1872), 202.

The Satirist's lampooning of Caroline was flagrant enough to invite the thought of prosecuting for libel, and there were other publications that were even more overt in their cruel and unwarranted defamation of Mrs. Norton. In her 1855 pamphlet, "A Letter to the Queen on Lord Chancellor Cranford's Marriage and Divorce Bill," Caroline described a review which

> attributed to me a paper I did not write, and never saw; "On the Grievances of Woman;" and boldly setting my name, in the index, as the author,—proceeded, in language strange rabid and virulent, to abuse the writer; calling her a "SHE-DEVIL" and a "SHE-BEAST." No less than one hundred and forty-two pages were devoted to the nominal task of opposing the Infant Custody Bill, and in reality to abusing me. Not being the author of the paper criticised, I requested my solicitor to prosecute the Review as a libel. He informed me that being a married woman, I could not prosecute of myself; that my husband must prosecute: my husband—who had assailed me with every libel in his power! There could be no prosecution: and I was left to study the grotesque anomaly in law of having my defense made necessary,—and made impossible,—by the same person.[47]

When women were married, their legal status ceased its independent existence and essentially their husbands absorbed all of their legal rights. The same logic that voided any 'legal' agreements made between a husband and wife was at play here: a man could not contract with or be sued for libel by what was part of himself. Though the 1836 criminal conversation suit was, in many ways, a battle between Caroline and George, her name was not listed as the defendant for that very reason. Married women were not supposed to act independently in legal matters and ideally had their husband's approval when they did bring forth suits, but married women's legal action did not universally fall in line with that sentiment.[48] A few women might have been

---

[47] Caroline Norton, "A Letter to the Queen on Lord Chancellor Cranworth's Marriage and Divorce Bill," Victorian Women Writers Project, 76-77, http://webapp1.dlib.indiana.edu/vwwp/view?docId=VAB7092. [The copy text for this on-line edition is the printed edition published The Hon. Mrs. Norton. "A Letter to the Queen on Lord Chancellor Cranworth's Marriage and Divorce Bill." (London: Longman, Brown, Green and Longmans, 1855).]

[48] S. M. Waddams, *Sexual Slander in Nineteenth-Century England: Defamation in the Ecclesiastical Courts, 1815-1855*, (Toronto, Canada: University of Toronto Press, 2000), 165.

capable of evading that ideal, usually at the risk of paying for all the costs themselves, but Caroline Norton's husband would allow her no such luxury. As she said herself, George Norton had already done everything in his power to libel Caroline and was the root cause for the publication's censure. No evidence existed to suggest that he would thus be supportive in a libel case but that, rather, he would go to great means to sabotage it. Mrs. Norton, then, had no legal recourse when she read malicious abuse about her person in the press, whether it was directly from George Norton or not, and she could only personally respond to those attacks.

Various corners of the press certainly had their say in the legal battles of George and Caroline, and, when they could not express all that they wanted to in court, the estranged couple also took to the commercial press to air their grievances. Amidst their legal battle of 1853, in which George Norton refused to pay Caroline's allowance and the latter incurred a debt in order to impel her creditor to sue her husband, both husband and wife wrote to *The Times* on separate occasions in order to publicly correct what misconceptions they thought had been spread.[49] Caroline's complaint, in particular, dealt with the damaging tales that George Norton continued to promote,

> To save himself from the payment of 500l. a-year, due to my creditors on a formal covenant, Mr. Norton has uttered this falsehood [his stipulation with her was, that he should be liable only if 'I received no aid from the late Lord Melbourne's family'], and raked up from the ashes of the past an old, refuted slander [that of the alleged affair], on which for two hours yesterday he himself in person, and the counsel he employed, examined and cross-examined me on topics which had nothing to do with the case, but which were to imply degradation and shame.[50]

---

[49] CAROLINE NORTON., et al. "'Thrupp V. Norton.'." *Times* [London, England] 20 Aug. 1853: 8. The Times Digital Archive, http://tinyurl.galegroup.com/tinyurl/9Qdof5.

[50] Ibid.

Bringing up the alleged relationship with Lord Melbourne in an attempt to discredit Caroline was ultimately not what won him the case, but it speaks to the extent of that accusation's notoriety lingering over Caroline fifteen years later. In 1836, the court had acquitted Lord Melbourne of any sexual relationship with Caroline Norton without calling a single witness in Melbourne's defense. If the judicial system deemed him innocent, then, by extension, Caroline was innocent too. Yet, she faced severe long-term consequences as a separated wife. Lord Melbourne could move freely, but neither Caroline nor George Norton could initiate a divorce: she was unable to prove an additional act of incest, bigamy, desertion, or cruelty, and George needed a conviction in a criminal conversation suit to petition Parliament for a divorce. As long as she had no recourse through the courts to properly advocate for her grievances, Mrs. Norton would do so herself, and publishing provided her with a place to try and mitigate the scandalous gossip that plagued her. The legal battles of George and Caroline Norton perfectly illustrate the aura of infamy that pervaded sensational marriage cases of the nineteenth-century: the public's interest, the disreputable histories of those involved, and the extent to which the press provided a space outside of the courtroom to fuel the fire ensured a level of celebrity and difficulties for the litigants. Caroline Norton, especially, emerged with a disdain for the legal codes meant to protect women and a determination to use her celebrity to regain her reputation and to enact change. She would not be censored.

Chapter II

First Comes Scandal, Next Comes Critics

When Mr Norton allowed me, I say, to be publicly subpœnaed in court, to defend himself by a quibble from a just debt, and subpœnaed my publishers to meet me there, he taught me what my gift of writing was worth... It was meant to enable me to rouse the hearts of others to examine into all the gross injustice of these laws,—to ask the "nation of gallant gentlemen," whose countrywoman I am, for once to hear a woman's pleading on the subject.[51]

Publications as a Force of Social Change

The nineteenth-century saw a wider conversation occur regarding the social effects of literature which those in a position of social power deemed scandalous. Salacious literature included the press, with its coverage of marital court cases, as well as 'sensationalist' novels and poetry. Without explicit mention, Caroline Norton's life seemed to provide the seedbed from which such literature grew, and her impact on culture, through the lens of a patriarchal Victorian society, continued to be sexually and politically charged. A debate which primarily concerned the ability of the written word to adversely influence vulnerable members of the British populace was, intentionally or otherwise, tailored to rebuke a socially prominent female author like Norton even as it kept her socially distinguished. And the targets and victims of such salacious literature? It should come as no surprise that female readers were the primary group that "paternalistic surveillance" wanted to 'protect', in a bid to further enforce the Victorian ideal of the 'angel in the house' - everything that Caroline Norton was not.[52] Women who represented that ideal were hardly contented with being oppressed, but they lacked the experiences that

---

[51] Norton, "A Letter to the Queen on Lord Chancellor Cranworth's Marriage and Divorce Bill," Victorian Women Writers Project, 152.

[52] Kate Flint, *The Woman Reader*: 1837-1914, (Oxford, U.K.: Oxford University Press, 1993), 4.; Coventry Patmore, *The Angel in the House*, v. 2, (Cambridge and London, U.K.: Macmillian and Co., 1863), 1.

would encourage them to challenge the status quo and agitate for more. Novels, written by Caroline Norton and other women, provided a space in which women could explore other ways of life and question their own.

In addition to female readers, young readers were also seen as particularly vulnerable to the effects of 'obscene publications' and in need of protection from them.[53] The suggested method of censorship was ethically ambiguous and hypocritical across class and gender lines, as a few members of Parliament believed a book with provocative elements could be safe in their own hands but morally dangerous in the hands of lower-class people.[54] Lord Campbell's "proposed amendments to the Obscene Publications Act"[55] in 1857 allowed "police the right to enter and search premises on the authority of any magistrate who could be convinced of the likelihood that obscene publications were being kept for sale or exhibition there".[56] The majority of the Lords were unenthusiastic about Campbell's plan because they believed "that the bill failed either to give adequate definition to the offence or to strike a balance between executive effectiveness and the protection of individual liberties".[57] The changes advocated by Campbell represented an effort to police the reader rather than the content, so arguably obscenity could apply to almost any work of literature. Campbell's peers were typically not in agreement, yet letters of support written by "clergymen of all denominations . .. many medical men . . . fathers

---

[53] Leckie, *Culture and Adultery*, 41; Ibid., 29.

[54] "The same volume of poetry enjoyed by a gentleman in his home, for example, might be circulated in cheap editions to a broader and more vulnerable reading public. In some cases, in other words, a copy of Ovid or Dryden or Shakespeare might be a 'bad book'," Leckie, *Culture and Adultery*, 42.

[55] Leckie, *Culture and Adultery*, 36.

[56] M. J. D. Roberts, "Morals, Art, and the Law: The Passing of the Obscene Publications Act, 1857", *Victorian Studies* 28, no. 4 (Summer 1985): Indiana University Press, 610.

[57] Roberts, "Morals, Art, and the Law", 610.

of families . . . young men who themselves had been inveigled into those receptacles of abomination" helped to pass the bill.[58] Women who supported such measures certainly existed too, but the number of men who wrote in is telling - men from various societal positions all expressed concern over obscene publications and all were in a position of social control over women. Questions of privacy clearly kept the law from confiscating a personal collection of novels or newspapers, but the extent to which the Victorian period legislated publications and its broad support from men revealed a desire to do just that.

Concerning the Female Reader

Authors in nineteenth-century Britain increasingly tailored their novels to be read by the burgeoning demand of their most avid consumers: women.[59] For moralists like William R. Greg, unsavory publications (he focused on novels) were especially damaging in the case of young women since

> in the youth of women more especially, there is a degree of exaltation of mind and temper which, beautiful as it is, and deeply as we should grieve over its absence, partakes of, or at least has a strong tendency to degenerate into, the morbid and unsound. It may add to the interest of a tale, but it renders it unfaithful as a picture of life, unsafe as a guide to the judgment, and often noxious in its influence on the feelings.[60]

Greg touched upon several aspects of the general argument against such literature for women, especially the assumption, spoken of as a given, of a 'natural' difference between the sexes, and he demonstrated how those ideas were used for centuries to uphold social, cultural, and political

---

[58] Roberts, "Morals, Art, and the Law", 610.

[59] Leckie, *Culture and Adultery*, 29.

[60] William R. Greg, *Literary and Social Judgments*, (New York, NY: Henry Holt and Company, 1876), 91, https://babel.hathitrust.org/cgi/pt?id=mdp.39015063552213;view=1up;seq=99.

norms in Britain and subsequently limited women's agency.[61] W. R. Greg's comments may seem laughable in present-day, but his comments had far-reaching consequences for all women, including Caroline Norton. He began by patronizing women's 'exaltation of mind' by calling it beautiful, yet he bemoaned its uncontrollability, keeping his adjectives, like his argument, appropriately at surface level. The phrase 'as a guide to the judgment' revealed the extent to which texts for young women were meant to be educative, but only on appropriate topics, for if the publications were deemed dubious, they acted as a poison. Accompanying such language was a clear desire to prohibit women from exposing themselves to the perceived toxicity of uncouth literature. Marital cases or novels dealing with adultery and other marital woes were thus believed to infect the female reader's body, and "the very policies mobilized to protect these readers contributed to the eroticization of the female reading body and a conflation of the female reader with the adulterous reader".[62] Such a public discussion could in fact border on eroticization through its voyeuristic qualities and seemingly created a cycle whereby debating the merits of censoring female readers from untoward material only ended up creating more of the latter.

While censorship on a widely personal basis was unfeasible in Britain and lacked full governmental support, patriarchal powers still dictated young women's education. In the years

---

[61] "that the construction and deployment of these images performed critical ideological work at midcentury, that they were intimately involved in the development of England's characteristic social institutions, the organization of its most basic economic and legal relations, and in the rationalization of its imperial ambitions," Poovey, *Uneven Developments*, 2.

[62] Leckie, *Culture and Adultery*, 28.

before World War I, Vera Brittain described how her aunt's boarding school in Surrey policed the young girls' reading of newspapers:[63]

> We were never, of course, allowed to have the papers themselves - our innocent eyes might have strayed from foreign affairs to the evidence being taken by the Royal Commission on Marriage and Divorce or the Report of the International Paris Conference for the suppression of the White Slave Traffic.[64]

Brittain's experience occurred in the Edwardian period, but her story revealed the staying power of Victorian values. Schools were a still place where female readers were subject to whatever censorship was deemed necessary and "despite the development of educational opportunities [in the 19th century], the idea that marriage and maternity would be the most important elements in a girl's future remained the underlying assumption informing most sectors of secondary education until the First World War".[65]

Marriage and motherhood were determined to be a natural eventuality in a woman's life, and its peaceful preservation was subsequently the primary task dominating the 'ideal' wife's life. In 1833, Peter Gaskell expressed just what was expected of such wives in his time:

> The moral influence of woman upon man's character and domestic happiness, is mainly attributable to her natural and instinctive habits. Her love, her tenderness, her affectionate solicitude for his comfort and enjoyment, her devotedness, her unwearying care, her maternal fondness, her conjugal attractions, exercise a most ennobling impression upon his nature, and do more towards making him a good husband, a good father, and a useful citizen, than all the dogmas of political economy.[66]

---

[63] Flint, *The Woman Reader*, 129.

[64] Vera Brittain, *Testament of Youth* (1933), 39., as cited in Flint, *The Woman Reader*, 129.

[65] Flint, *The Woman Reader*, 118.

[66] Peter Gaskell, *The Manufacturing Population of England, Its Moral, Social, and Physical Conditions and the Changes Which Have Arisen from the Use of Steam Machinery; with an Examination of Infant Labour*, (1833; reprint, New York, NY: Arno Press, 1972), 165., as cited in Poovey, *Uneven Developments*, 8.

The natural state for women is thus one of domestic servitude, ensuring that a man can reach his full potential through his wife's selflessness. The apparent universality of these sentiments left little room for women to question those notions, especially if their education was crafted by the removal of publications that appeared to subvert this social structure. Vera Brittain's aunt, in banning her pupils from full access to newspapers, tried to keep the young women from ideas that could corrupt them and ruin the 'natural' course of their lives: marriage, children, and domestics. Young women were led to believe in a world where marriage guaranteed protection and happiness, but Caroline Norton's writings offered an opposing visual that educated women on how the marriage state could legally oppress them.

Emily Davies, an advocate for female education, and Caroline Norton had several important things in common: they were both published female writers who advocated for the advancement of women's rights in their particular fields of interest, and they both downplayed the radical aspects of their arguments to make them more palatable to the public.[67] In her *Thoughts on Some Questions Relating to Women, 1860-1908*, Emily Davies wrote of middle-class women's lack of knowledge in "On Secondary Instruction as Relating to Girls". Although she did not discuss censorship, she was also troubled by what she believed were the insipid novels and newspaper reports that middle-class women read and bemoaned the limited access they had to advanced knowledge.[68] While she did not explicitly call for censorship of the publications that so worried Lord Campbell, she believed that women deserved a more legitimate

---

[67] Poovey, *Uneven Developments*, 81.

[68] Emily Davies, 'On Secondary Instruction as Relating to Girls' (1864), *Thoughts on Some Questions Relating to Women*, *1860-1908*, (Cambridge, U.K.: Bowes and Bowes, 1910), 71., as cited in Flint, *The Woman Reader*, 121.

education, and her reasons for advancing that message fall in line with a Victorian standard that placed women's importance on their role as wives and mothers. She assured her audience that,

> "we are not encumbered by theories about equality or inequality of mental power in the sexes. All we claim is that the intelligence of women, be it great or small, shall have full and free development. And we claim it not specially in the interest of women, but as essential to the growth of the human race. This is not the place to discuss whether women have, or ought to have, any other than merely domestic relations. I take the commonly received theory that except as wives, mothers, daughters, or sisters, women have no raison d'être at all; and on this neutral ground I urge the impolicy of neglecting female education".[69]

Davies may have been rhetorically appealing to the established social order so as to achieve her aim, but it is also entirely possible that she would continue to concede to norms that aimed to shield women from knowledge that would disrupt the role of 'contented' wife and mother. In any case, she did not seem to comprehend the educational value of work like Caroline Norton's, which usually revealed the ways in which the law and society failed to protect women whose relationships did not reflect the Victorian ideal.

While she did advocate for traditional gender roles, Davies nevertheless mingled with a crowd of social liberal women (including Barbara Bodichon) who were perceived as revolutionary, and she did participate in the suffrage movement, though she tried to shield her involvement.[70] Caroline Norton, on the other hand, "was reviled by self-proclaimed advocates of women's rights like Harriet Martineau for what they saw as Norton's selfish reasons in advocating for legal change, and Norton herself explicitly denounced the 'wild and stupid

---

[69] Davies, 'On Secondary Instruction as Relating to Girls', 73.

[70] Andrew Rosen, "Emily Davies and the Women's Movement, 1862-1867," *Journal of British Studies* 19, no. 1 (Autumn, 1979): Cambridge University Press, 116.; Rosen, "Emily Davies and the Women's Movement", 103.; Rosen, "Emily Davies and the Women's Movement", 116.

theories'[71] that women should have rights equal to men's".[72] Norton, even as she attempted to placate the gender ideologies in place, was nevertheless a lightning rod for scandal that increasingly radicalized her - whether or not she would admit it. The press' marital court transcripts of the Norton's trials, her responses in the press, and her own writings described the torment she had to endure as a woman with no legal rights. Her intentions may only have been to evoke sympathy from lawmakers, but her methods incited debate as to the decency of her publications and very well may have fostered resentment towards gender norms in women's minds on her behalf. Her writings often seemed to or outrightly proclaimed to advance an agenda which aimed to elicit sympathy regarding the vulnerable position of wives, and while the argument for censorship did exist, there was nothing in place to stop Caroline Norton's words from reaching a wide audience.

Are Writers to Blame?

Awakening the consciousness of their readers was and is often the goal of writers, and if this disrupted societal norms, conservatives did in fact have something very real to fear from the literature they wanted to censor. The writings of Caroline Norton, whether it was her political pamphlets or her novels and poetry, helped to advance women's awareness of the unfairness of their legal state and indirectly propelled more radical women to form societies that addressed this disparity.[73] While their arguments were inherently flawed, advocates for censorship did

---

[71] Caroline Norton, "English Laws for Women in the Nineteenth Century." A Celebration of Women Writers, https://digital.library.upenn.edu/women/norton/elfw/elfw.html. [The copytext for this on-line edition is a microfilm reproduction of English Laws for Women in the Nineteenth Century, by Caroline Sheridan Norton (1808-1877). It was printed for private circulation in 1854. History of Women, Reel 285, no 1918. New Haven, Connecticut: Research Publications, 1975].

[72] Poovey, *Uneven Developments*, 21.

[73] Poovey, *Uneven Developments*, 21.

anticipate that such works could bring about a social upheaval. Conservatives believed women possessed a tendency to be swept away by sensationalist novels and newspaper accounts, but it is also a matter of interest to investigate how those critics perceived writers, especially female writers like Norton.

A major concern for conservative debaters was the depiction of life that they saw represented in those publications, and the established patriarchal order was wary of women's increasing consciousness. Increasingly, female writers' depictions of imperfect relationships, while representative of what many women experienced, vividly clashed with what society long professed to believe regarding the roles of men and women. W. R. Greg lamented that the literature of the day was

> to a great extent in the hands of writers whose experience of life is seldom wide and never deep, whose sympathies have not yet been chastened or corrected, whose philosophy is inevitably superficial, whose judgment cannot possibly be matured, and is not very likely to be sound. The result is that we are constantly gazing on inaccurate pictures, constantly sympathizing with artificial or reprehensible emotions, constantly admiring culpable conduct, constantly imbibing false morality.[74]

W. R. Greg saw such literature as an endless cycle: its uneducated authors would corrupt their readers and beget more material. In his mind, men had the necessary education and training to craft worthwhile literary observations of society, and women did not. Nor did he think that women should or could handle men's extensive pedagogy, as their minds were not capable of that advanced development. The warped justifications that Greg used were inherently untrue, but his exploitation of society's belief in women's inferiority meant that even if a woman was writing eloquently and clearly on an event inspired by her own experiences, she could still easily

---

[74] Greg, *Literary and Social Judgments*, 91.

be discredited and needed to be corrected. Caroline Norton never wrote any fiction that explicitly mirrored her life, but her mistreatment at the hands of men and the law did inspire elements of her work. Norton's 1863 novel, *Lost and Saved*, could justifiably be criticized for an extremely unrealistic happy-ending for its heroine, but it was the plausibility of the character's misfortunes that invoked the ire of critics, their concern at Caroline's attempt to shed light on the mistreatment of women was masked in charges that the Hon. Mrs. Norton's work was vulgar.

The plot of *Lost and Saved* is, in its essentials, about a young woman named Beatrice Brooke who falls in love with Montagu Treherne. Montague convinces Beatrice to run away together, where a day-trip to Venice quickly becomes a week-long stint in Egypt. Marriage is discussed, Beatrice falls very ill, and Montagu, convinced that Beatrice is going to die, 'marries' Beatrice in a non-legitimate and non-binding ceremony - after which, Beatrice quickly recovers. They do not publicize the 'marriage' because of Montagu's intended inheritance, but, when Beatrice becomes pregnant, she urges Montagu to reveal the marriage, and he reveals that it had been a sham. Nevertheless, she decides to continue believing she is his wife. It soon becomes apparent that Montagu is having an affair, and when she gives him evidence of it, he leaves her alone to fend for their child by herself. As the title indicates, the novel ends with Beatrice socially redeemed following "Montagu accidentally poisoned and Beatrice free to marry a rich and sympathetic man who loves her".[75] Caroline's realistic portrayal of Beatrice's hardship might appear to be undercut by what was a pretty imaginary ending, but in its own way it continued to be subversive. A woman in Beatrice's situation would not have been redeemable in 1863 Britain, but Caroline defied convention and made her so.

---

[75] Basic summary courtesy of Leckie, *Culture and Adultery*, 128-129.

Lost and Saved's reception was quite polarized: its general readers loved it, enabling the novel to go through four editions, but critics harshly reviewed it. To the *Illustrated London News*, the novel was "painful and repulsive" and nearly the entire novel was improper.[76] Its popularity amongst general readers was a concern for conservative reviewers who believed Norton's novel propagated adultery and further validated the latter with the heroine's eventual redemption. Truthfully, *Lost and Saved* represented a searing critique of the ways in which society, especially high society, put women at a social disadvantage rather than representing a promotion of adultery, but both threatened the social norms of Victorian Britain. Evidently, there was serious backlash against the novel because Caroline had to defend herself in the pages of *The Times*. Her powerful letter commented on the hypocrisy of the novel garnering the attention that it did, but it also contained reassurances meant to mollify her critics. In reflecting upon the reasons for writing *Lost and Saved*, Norton said,

> no earnest writing or earnest striving in any cause is entirely without result; and a novel is as likely a mode as any other (a more likely mode with some minds) of waking attention to certain facts. It is complained that this is not a book for the very young. I did not write it for the very young; I should not give novels to the very young, any more than I should teach my daughter French out of *Gil Blas*, though that was a general fashion in the last generation. I myself read no novels - saw no plays - nor ever attended the opera till I was married. And to those who object to a story of the cruel vices of fashionable life, written with a moral purpose and an effort at warning, I must say that this last amusement struck me then with a surprise which no after familiarity has ever obliterated. The Opera is unquestionably the favourite amusement of the English aristocracy. Now, what are the plots of the principal operas?[77]

---

[76] *Illustrated London News* as cited in Acland, *Caroline Norton*, 147.

[77] THE AUTHOR OF LOST AND SAVED, "Lost And Saved," Times, 18 June 1863, p. 8, *The Times Digital Archive*, http://tinyurl.galegroup.com/tinyurl/8xfPb7.;
Gil Blas is a "picaresque novel by Alain-René Lesage, published in four volumes—the first two in 1715, the third in 1724, and the fourth in 1735" The Editors of Encyclopaedia Britannica, "Gil Blas: Novel by Lesage," *Encyclopaedia Britannica*.

Several operas enjoyed by the upper classes had plots containing various forms of profligacy, and Norton commented on the double standard at play, highlighting that those pieces were performed in a setting which primarily excluded lower sects of society. As with the censorship debates, art that erred on the scandalous side was forgivable if contained to a certain economic class. The democratization of reading meant that, unlike the opera, there existed a greater opportunity for *Lost and Saved* to reach a wider audience, regardless of whether they were her intended recipients.

The allusion to her own girlhood, and what she did not do, is of note because her rhetoric continued to align with conservative ideals in an attempt to rebuff wider criticism. It is difficult to believe, however, that Caroline's early literary ambitions were unaided by novels. One might argue that Caroline solely intended *Lost and Saved*'s awakening to certain facts for the upper classes, in an attempt to impel them to police their behavior towards those without the means of protecting themselves, but with the novel's focus being a young woman led astray, *Lost and Saved* certainly can be read as an indirect warning to women, especially young women. The consciousness that Norton alluded to in *The Times*, if initiated in young women, was precisely the fear of conservatives, and Norton's admission of literature's ability to arouse social and political consciousness could open the doors for more overt criticism of writers in addition to policing readers.

Caroline Norton explored, rather than shamed, women's sexuality in *Lost and Saved*'s heroine, Beatrice. Sensationalist novels were often characterized by their sexual energy, and that feature was of more concern to reviewers than any other.[78] Overt sexuality was contrary to the

[78] Flint, *The Woman Reader*, 275.

image of the motherly and pure wife pedaled by conservatives, and its "disruptive potential was greeted with particular anxiety when it was located in novels written by women".[79] *Lost and Saved*, in dealing with adultery, did not portray female desire as passive and instead subverted expectations of a traditional relationship between husband and wife, and its plot worried those who believed that female readers would be inflamed by its contents. Beatrice's decision to believe herself married to Montagu even after her discovery of the sham marriage ceremony was in many ways characteristic of a naive young woman, but it held the educated male accountable for his deception: Beatrice had believed that she and Montagu were legally married, and he put her in a position where, for reasons of love and social standing, she had to maintain her claim. In the wake of Montagu's infidelity, Beatrice asserted that right, saying, "I am your wife, Montagu, and this woman is another man's wife; I have the same right to resent treachery that her husband would have".[80] Caroline created an outspoken and sexually-independent character without positioning Beatrice as the cause of her misfortunes.

Her own reputation as a sexually-loose woman meant that Caroline had to be careful in toeing the line of acceptable controversy in the literary world. Had *Lost and Saved* given the impression of being directly drawn from her own experiences, the novel's commentary would have been more clearly political. Norton understood how public interest in her person could draw people to her work, but she deliberately avoided any unmistakable similarities to her own life. Fiction provided a measure of protection to Caroline's reputation while still highlighting inequalities that she saw. *Lost and Saved*'s depiction of women's mistreatment advocated for the

---

[79] Flint, *The Woman Reader*, 275.

[80] Caroline Norton, *Lost and Saved*, v. 2, 204, as cited in THE AUTHOR OF LOST AND SAVED, "Lost And Saved," Times, 18 June 1863, p. 8, *The Times Digital Archive.*

advancement of women's rights, though less obviously than her political writings. Historians cannot ascertain the total truth of her assurance that the novel was not meant for young women, but its contents absolutely could have provided a warning to them. More women than ever were reading novels in that era, and public discussion of young women's reading habits was under intense scrutiny. In that context, her work could have significant ideological impact.

The success of Caroline Norton in publishing her novels and pamphlets, when they clearly aimed to raise her reader's consciousness, is surprising. Justin MacCarthy, a liberal writer for *The Westminster Review* and defender of sensationalist novels, expressed ambivalence about the plot of *Lost and Saved*, but he did see a redemptive aspect in the novel as "a practical protest, more or less direct and bold, against the tacit arrangements by which fiction in our day is expected to ignore all the perplexities, dangers, and sufferings springing from the relations between man and woman".[81] Victorian censorship operated on the 'noble' cause of protecting its women from seemingly corruptive literature, but such protection only served to disservice women by keeping realities of the world from them. Caroline Norton wanted to expose the cruelties that could be inflicted on married women, from which they had little to no legal recourse, and awaken them from the patriarchy's enforced seclusion of their minds. MacCarthy went even further in his critique of literature and stated that "women have especial need, as the world goes, to be shrewd, self-reliant, and strong; and we do all we can in our literature to render them helpless, imbecile, and idiotic".[82] Books with helpless protagonists who rely upon men, in MacCarthy's mind, bred helpless women who were easily exploited by them, in a statement that

---

[81] Justin MacCarthy, "Novels with a Purpose," *Westminster Review* 82 (July-Oct 1864), 46, https://babel.hathitrust.org/cgi/pt?id=uc1.c032045185;view=1up;seq=56.

[82] MacCarthy, "Novels with a Purpose," 48.

used the same logic as conservatives yet arrived at a wildly different conclusion. Instead of faulting the female reader, men and the legal and social systems which deprive women of marital rights are rebuked. While *Lost and Saved*'s heroine certainly began in a subjugated state, she awakened to her mistreatment, confronted her seducer, and eventually redeemed herself. Regardless of her past notoriety and censorship debates, Norton was as prominent a public figure as any in a society which saw her as 'unnatural', warranting an investigation into the reasons for her success.

Chapter III

A Literary Politician

But I have a position separate from my woman's destiny; I am known as a writer; and I will not permit it that Mr Norton's letter shall remain on the Journals of Great Britain, as the uncontradicted record of my actions. I will, as far as I am able, defend a name which might have been only favourably known, but which my husband has rendered notorious. The little world of my chance readers may say of me after I am dead and gone, and my struggles over and forgotten–"The woman who wrote this book had an unhappy history;" but they shall not say–"The woman who wrote this book was a profligate and mercenary hypocrite."[83]

Navigating Rough Waters

Literary politicians are those with the requisite social and written skills to charm others and create pathways that will facilitate their ambitions, whether strictly personal or with more widespread goals. They often turn to the page to express themselves, but their social maneuverings are just as, if not more, important in receiving social acclaim for their work: they go from gathering to gathering, keeping themselves in the public eye, and nurture relationships that will help them. While not gender-esxclusive, the role was often the only way that women in the nineteenth-century could enact change or promote themselves, since they could not run for office or draft policy. Caroline Norton was the preeminent example of a literary politician in her time. In an era that did its best to both publicly expose and censor women who did not fit the 'angel in the house' mold, it was in Caroline Norton's best interests to find a way to appear to appease critics who would exploit her struggles to further their own interests.

Victorian England was inherently a space of gender tension because of the opposing forces that tried to dictate what women like Mrs. Norton could or could not do.[84] Women with

---

[83] Caroline Norton, "English Laws for Women in the Nineteenth Century," A Celebration of Women Writers, 126.

[84] Margaret Beetham, *A Magazine of Her Own? Domesticity and Desire in the Woman's Magazine 1800-1914*, (London, U.K.: Routledge, 1996), 36.

scandalous reputations often retreated from social life and effectively censored themselves. Yet, Caroline Norton navigated these waters differently. As someone who idolized the social and political prowess of the "great Whig ladies" as well as London's literary circles, Caroline Norton took immeasurable pleasure from being seen and heard and wanted to attain similar accolades.[85] In the aftermath of the 1836 criminal conversation trial, she did not become a silent recluse in the hopes that the world of Victorian Britain would forget about her alleged discretions. Caroline Norton ventured forth and used her specific skill set to build herself back up and regain control over her narrative. She never totally redeemed herself from the unseemly elements that marked her past, unlike her heroine in *Lost and Saved*, but that is not to say that Mrs. Norton did not strategically maintain a certain level of respectability. Caroline had a supportive family and loyal friends, all of which she used to increase her connections and further her literary career and political interests, but she was constantly kept on the edge of the fashionable circle by high-class women and her own impulsive nature.

Utilizing one's connections is and was the way of the world, and Caroline Norton certainly knew how advantageous her relationships could be even before she had to deal with the aftermath of the criminal conversation trial. Through her grandfather's political and literary legacy, Caroline became close to powerful men like Lord Melbourne and Samuel Rogers, a socially prominent poet and frequent entertainer.[86] Caroline would have met many people of social and literary importance at Rogers' home, fostering relationships that would serve her well in her life and career. While Caroline's relationship with Lord Melbourne, on the other hand, did

---

[85] Acland, *Caroline Norton*, 50.

[86] Acland, *Caroline Norton*, 41.

bring trouble, she initially took full advantage of their friendship, using her connection with him to obtain a lucrative form of employment for her husband in 1830. Through Melbourne's political career, Caroline found the social and political connections that she sought.[87] Lord Melbourne, rightfully, kept some distance between them after 1836, but he never wholly abandoned her, nor did her other friends. Abraham Hayward, another man of letters and a lifelong friend, praised her 1845 poem "The Child of the Islands" in the *Edinburgh Review*, calling it "great poetry, true poetry".[88] The merit of Hayward's review is debatable, but the endorsement from such an esteemed literary gentleman would have only helped Caroline's reputation as a writer. No evidence exists to claim that she explicitly asked for positive public feedback, but a letter to Samuel Rogers, at least, revealed that she would not hesitate to express dismay at a less complimentary view of her work. Upon Mr. Rogers denoting her writing as "Fugitive Pieces", she wrote to him, "Ah, little did I think you would have sacrificed me, your friend, for a 'bon mot'".[89] It was a carefully crafted rebuke that would remind her old friend of the extent to which she had already had her reputation tainted at the expense of others' ambitions. She was a woman who was aware of how charming she could be on paper as in person and, one would argue, was practical enough to use those abilities to gain what she could, whether it be literary renown, financial benefits, or political allies.

Mrs. Norton's wit and openness was effective in charming many men of London's intellectual scene, but, excluding her family circle and a few female friends, she usually alienated socially prominent women, to the detriment of her social status. The Duke of Devonshire

---

[87] Acland, *Caroline Norton*, 53; Ibid., 56.

[88] Hayward in the *Edinburgh Review*, as cited in Acland, *Caroline Norton*, 155.

[89] Caroline Norton to Samuel Rogers, as cited in Acland, *Caroline Norton*, 155.

publicly admired Caroline, but his sister, Lady Granville, had this to say about the poetess in a diary entry dated September 16, 1828:

> I hear Mrs. Norton is to be at Chatsworth [the Duke of Devonshire's famous place in Derbyshire]. I am sorry that we are to have an original among us, somebody impossible to like and ungracious to dislike. I am happy to think that Craddock and Walewski are to be with us; a great relief to the sober part of the community to have such game for her to point at.[90]

Coming from the same social circle, the extremely different reactions of brother and sister are notable. It is easy to ascertain a resentful tone in Lady Granville's depiction of Mrs. Norton, which seems to stem from the latter's tendencies to court attention. As this letter was written in 1828, it is possible that after the 1836 trial it was not quite so 'ungracious' to dislike a woman implicitly accused of adultery. If Caroline was outspoken before the trial, it is interesting to see how a woman of similar social position as Lady Granville would describe her afterwards. A letter from Lady Eastlake in September 1854, while Caroline was in Italy for her son's marriage, did capture a perception of Mrs. Norton similar to Lady Granville's when Lady Eastlake wrote,[91]

> Several evening we went to the Piazza to listen to the band … Mrs. Norton generally joined us there, and I studied her. She is a beautiful and gifted woman; her talents are of the highest order, and she has a fine memory, and wit only to be found in a Sheridan. No one can compare with her in telling a story… but she is rather a professed story-teller, and brings them in, both in and out of season, and generally egotistically. Still she has only talents; genius she has nothing of, or of the genius nature; nothing of the simplicity, the pathos, the rapid changes from mirth to emotion.
>
> No, she is a perpetual actress, consummately studying and playing her part, and that always the attempt to fascinate - she cares not whom.
>
> Occasionally I got her to talk thinkingly, and then she said things which showed great thought and observation, quite oracular and not to be forgotten. I felt at first that she could captivate me, but the glamour soon fell off. If intellect and

---

[90] Acland, *Caroline Norton*, 51; Lady Granville's diary entry as cited in Jane Gray Perkins, *The Life of the Honourable Mrs. Norton, With Portraits*, (New York, NY.: Henry Holt and Company, 1909), 19.

[91] Perkins, *The Life of the Honourable Mrs. Norton*, 253.

> perfect self-possession and great affected deference for me could have subjugated me, I should have been her devoted admirer.[92]

As with Lady Granville, she described a woman who liked to be the center of attention, though Eastlake imbued Norton with more deference than Granville did. Mrs. Norton's manner of interacting with people, observed as it was by Lady Eastlake, gave an impression of being very practiced to please and to entertain. Whether it was because Lady Eastlake saw through her or that she was prejudiced against her from the start of their acquaintance, Caroline did not manage to beguile that lady as she did so many of her other friends. Caroline intended her confidence and warmth while out at public functions to assuage people's hesitancy in accepting her presence there. Mrs. Norton could always rely on her sisters' socially advantageous marriages as well as influential friends (like the Duchess of Sutherland) to open what doors they could for her, but the fact of the matter is that "[m]any of the great houses were closed to her except for large balls or fêtes".[93] In slowly winning over those that she could, Caroline harbored greater ambitions to be welcomed again into those great homes and to forge connections with those whose friendship could give her pleasure as well as eminence.

Caroline Norton was, without a doubt, capable of politely addressing her critics, whether they were social or literary, but she also did not forget any slights she received in upper-class society and often resolved to have the last word in those matters. In Jane Gray Perkins' 1909 biography of Caroline Norton, *The Life of the Honourable Mrs. Norton*, Perkins captured the tension that Norton provoked in her work, in this case through *Lost and Saved*:

---

[92] Letter from Lady Eastlake as cited in Perkins, *The Life of the Honourable Mrs. Norton*, 254.

[93] Acland, *Caroline Norton*, 101.

> The trouble was that under Mrs. Norton's treatment the whole threadbare situation became alive, convincing, a thing of her own day, her own class, her own and others' observation; and, as such, we can hardly wonder that it was judged unfit to be given to the reader for whom all English fiction of that day was especially prepared and adapted - the young unmarried girl.[94]

Perkins noted that Norton needed to tread carefully with her subject matter and admitted that perhaps Caroline did not entirely pull off a respectable presentation of the plot. The argument was that too much felt real in *Lost and Saved*, including character sketches, often unflattering, directly based on people that Mrs. Norton was personally acquainted with.[95] The principal example of an unflattering representation in *Lost and Saved* was that of the fictional Marchioness of Updown, allegedly inspired by one of the influential Court ladies "who did what they could to prevent Mrs. Norton from showing her face there again after the Melbourne incident".[96] It would be difficult to interpret that portrayal as much besides a small form of revenge that Caroline was able to mete out. Yet her representation of real people in *Lost and Saved* was done with precaution, she waited over twenty years to create such a portrait, by which time Caroline had again been received at court and the lady in question was not on the scene (although, that would not stop Norton's contemporaries from recognizing her subject).[97] While it may seem petty, Caroline clearly held grudges against such women, whose belief in their own superiority over Caroline barred her from important social settings. Her impulsive nature always seemed to overcome her restraint eventually, especially where it concerned George Norton, and this was the greatest threat to maintaining a respectable persona.

---

[94] Perkins, *The Life of the Honorable Mrs. Norton*, 278.

[95] Ibid., 278-279.

[96] Ibid., 279.

[97] Perkins, *The Life of the Honorable Mrs. Norton*, 279.

The Dichotomy in her Performativity

Caroline's best strategy in mitigating the forces of scandal-making and censorship was to act as a politician would, to manipulate the general feelings of the time in which she lived in a way that would support her cause. In advocating for women's rights, she did so by dismissing the "wild and stupid theories" held by women who advocated for similar policies yet who embraced their own radicalism.[98] In defending *Lost and Saved*, she was agreeable and reassured her critics that young unmarried women were not her intended audience. Regardless of whether or not she believed what she said, Caroline Norton was aware that optics mattered, and when she was cool-headed, she was adept at telling critics what they wanted to hear. The danger lay in the moments when the Hon. Mrs. Norton was hot-tempered and quick to follow her natural reaction. On occasion, that reaction was advantageous. The anger that George Norton provoked during their 1853 trial (relating to responsibility of debts) and the announcement that Mr. Norton was not guilty led an aggravated Caroline to declare that, "I do not ask for my rights. I have no rights; I have only wrongs".[99] Her statement was met with cheers, and it cleverly reinforced what happened to women when their husbands, who were tasked with their protection by the absorption of their legal rights in marriage, failed to shield them. Caroline Norton frequently positioned her requests for increased women's rights as merely a request for protection, helping to distance herself from radical female agitators, and her avowal that she was not asking for her rights, while not entirely true, fell in line with that strategy.

---

[98] Norton, "English Laws for Women in the Nineteenth Century." A Celebration of Women Writers, 171.

[99] Caroline Norton as cited in Acland, *Caroline Norton*, 198.

If Caroline Norton was capable of an impulsive-yet-intelligent reaction, then she, like everybody, was also prone to the more frequent hasty-and-detrimental ones that undermined her position as a literary politician. In the aftermath of another trial dealing with monetary disagreement, this one occurring in 1838, Caroline's thoughtlessness, and its potential consequences, are evident. Caroline believed that George Norton's victory was largely due to his deceit and the schemes of Tory politicians, and the situation reminded her of the 1836 criminal conversation trial, where Tory politicians encouraged George's accusation against Melbourne as a larger political maneuver. As a result, she "determined, by publishing her account of the case, to expose her husband's lies and the way Lord Abinger had misused his judicial power" in the 1838 case.[100] Before she could do so, Lord Melbourne stopped her. It was the first year of Queen Victoria's reign and, as her Prime Minister, Lord Melbourne could not afford for the criminal conversation scandal to be revived through arguments in a newspaper.[101] While she initially agreed to his request, her reticence did not last. In a Letter to the Editor from September 1853, Caroline renewed the argument between her and George, even as she declared that, "there is no story so false, no scandal so foul, that it shall wring from me any further reply. I have too strong a faith in English justice to deem further reply necessary".[102] At this point, her family and friends were thoroughly tired of her need to correct the public record regarding her and George's disputes. Caroline claimed that George's legal advisor at the time insisted on pushing the case forward "'rather than admitting Mrs. Norton's innocence by not proceeding,' so that they could

---

[100] Poovey, *Uneven Developments*, 68.

[101] Poovey, *Uneven Developments*, 68.

[102] "CURRIE and WOODGATE, "The Hon. Mr. And Mrs. Norton," Times, 9 Sept. 1853, p. 8, The Times Digital Archive, http://tinyurl.galegroup.com/tinyurl/9Qdvw9.

publicly humiliate her.[103] Her continued interference, some would argue, accomplished that without any external help and emphasized the extent to which she could not stay away from wading into public discussion. When she wrote in level-headedness, that impulse to discuss was not a major issue, but it could further damage her reputation when she wrote in anger.

In her role as a literary politician, Caroline Norton wrote many pamphlets in an effort to further the reforms that she felt were necessary in women's legal status, and to be listened to, it was essential for Mrs. Norton to write in such a way that denoted respectability in her character. Her goals were inherently at odds with the ideals that Victorian society perpetuated, and it was the way in which she presented these ideas that would affect the extent to which she would gain support. Mrs. Norton's work may not have been the specific target of a censorship campaign, but her publications would have fallen under the purview of censors who wanted to limit public exposure to pieces that breached the conservative expectations of women. To make her work more palatable, Caroline went to great lengths to maintain that the laws needed to be changed only to better protect women, not raise their positions to those of men. In her pamphlet, "English Laws for Women in the Nineteenth Century," she maintained that her only goal was to enact changes in the law and that "to publish comments on my own case for the sake of obtaining sympathy; to prove merely that my husband has been unjust, and my fate a hard one, would be a very poor and barren ambition".[104] With this as her opening, it is thus surprising to note how much personal bitterness is imbued in the text. One such example would be the comparison of her situation to the Duc de Praslin's assassination of his wife:

---

[103] Ibid.

[104] Norton, "English Laws for Women in the Nineteenth Century," A Celebration of Women Writers, 1.

> When morning broke, she was dead; but many a proof remained of the desperate resistance and agonized efforts to escape, made by that wretched woman before her doom was completed. Do the advocates of the doctrine of non-resistance consider that her duty would have been to submit tranquilly to the fate pre-determined for her? If not, let them waive judgment in my case; for if choice were allowed me, I would rather be murdered and remembered by friends and children with love and regret than have the slanders believed, which my husband has invented of me. It is he, who has made silence impossible. With HIM rests the breaking of those seals which keep the history of each man's home sacred from indifferent eyes. He has declared himself my deadliest foe, whose dagger has too near an aim to miss my heart,–and, of the two, I hold his stab to be worse than that of the Duc de Praslin, for he would assassinate even my memory.[105]

It is questionable to claim the pamphlet's argument for women's legal rights is impersonal when the author expresses her rather personal preference for experiencing literal assassination as opposed to character assassination. Caroline did experience much suffering through her husband's greed and machinations, but the hyperbolic comparison detracts from what is supposed to be her larger goal, and it is difficult not to focus on how "English Laws for Women in the Nineteenth Century" became about how much she wanted to prove that George wronged her.[106]

At the time of its publication in 1854, George Norton had declared the contract between himself and Caroline, which assured her an allowance, to be void. The law supported his contention because husbands could not contract with a person who was considered legally part of themselves. A significant portion of her tract dealt with a minute explanation of Caroline's struggles with George and substantially undermined her claim that she was not seeking sympathy. Mrs. Norton wrote in an age where the acceptance of her pleas for legal change would be better won with cool-headedness and well-chosen appeals to pathos, but the text instead

---

[105] Norton, "English Laws for Women in the Nineteenth Century," A Celebration of Women Writers, 2-3.

[106] Acland, *Caroline Norton*, 201.

described intimate affairs with a tone of exasperation and desperation as she got caught up in the recent trial:

> From the moment the questioning began about Lord Melbourne, I lost all self-possession. Not because I was ashamed of having accepted his bequest; if I had thought there was shame in it, I should not have taken it:–but because I then saw all the cruel baseness of Mr Norton's intention. All flashed upon me at once. I felt that I no longer stood in that Court to struggle for an income,–but to struggle against infamy….The wild exasperation came over me, which seemed so inexplicable to those who did not know our real story. He, who had falsely accused me long ago,–he who had taken my young children, and let one of them die without even sending for me, till too late,–he who had embittered and clouded my whole existence,–who was now in my presence only to cheat me,–(as I had foretold he would do),–he was once more going to brand me before the world! I felt giddy; the faces of the people grew indistinct; my sentences became a confused alternation of angry loudness, and husky attempts to speak. I saw nothing–but the husband of whose mercenary nature Lord Melbourne himself had warned me I judged too leniently; nothing but THE GNOME,–proceeding again to dig away, for the sake of money, what remnant of peace, happiness, and reputation, might have rested in the future years of my life.[107]

Caroline, in that excerpt, was aware of how she came across in court, where her momentary anger prevented her from mounting a succinct defense, but she did not seem to realize how her pamphlet's goal of advocating for legal change was subsequently lost in personal vendettas and uncontrolled emotions. To readers, her true purpose became clear: Caroline wanted to finally present her own account of the legal trials that had plagued her because she was tired of a public perception which found her vexation unfathomable. To modern-day readers, that desire is admirable and well within her rights, but, in the nineteenth-century, critics could easily construe her piece as the work of an overemotional woman and use that to discredit her appeals for change.

---

[107] Norton, "English Laws for Women in the Nineteenth Century," A Celebration of Women Writers, 86-87.

Another pamphlet, "A Letter to the Queen on Lord Chancellor Cranworth's Marriage and Divorce Bill," came out after "English Laws for Women in the Nineteenth Century" in 1855, and it is much more advantageously worded to win her support. The direct address to the Queen meant that Norton had to be careful in her criticisms, and her watchfulness is especially evident when she wrote,

> For *this*, I believe, God gave me the power of writing. To this I devote that power. I abjure all other writing, till I see these laws altered. I care not what ridicule or abuse may be the result of that declaration. They who cannot bear ridicule and abuse, are unfit and unable to advance *any* cause; and once more I deny that this is my personal cause; it is the cause of all the women of England.[108]

The differences between the two texts are stark. Caroline Norton sees herself as serving a higher purpose in "A Letter to the Queen," and she writes to Queen Victoria not just as the leader of the monarchy but also as a wife and mother representative of all her countrywomen, successfully playing upon the pathos of her readers. A level of separation exists in her tone which did not in "English Laws for Women in the Nineteenth Century," and it is to the benefit of Norton's cause. While Caroline did use the occasional personal anecdote in her appeal to the Queen, a sense of the collective goal is evident in the epithet that she frequently invoked, that of an English wife:

> An English wife cannot make a will. She may have children or kindred whom she may earnestly desire to benefit;—she may be separated from her husband, who may be living with a mistress; no matter: the law gives what she has to him, and no will she could make would be valid.
>
> An English wife cannot legally claim her own earnings. Whether wages for manual labour, or payment for intellectual exertion, whether she weed potatoes, or keep a school, her salary is *the husband's*; and he could compel a second payment, and treat the first as void, if paid to the wife without his sanction…
>
> …If the wife sue for separation for cruelty, it must be "cruelty that endangers life or limb," and if she has once forgiven, or, in legal phrase,

[108] Caroline Norton in "A Letter to the Queen on Lord Chancellor Cranworth's Marriage and Divorce Bill" as cited in Craig, *The Narratives of Caroline Norton*, 200.

> "condoned" his offences, she cannot plead them; though her past forgiveness only proves that she endured as long as endurance was possible.[109]

An English wife could be any woman across any class, and Norton described her as one who wished to provide for her loved ones and tried to forgive and soldier on through her misfortunes: more importantly, she was innocent. Norton frequently used the case of a separated wife to demonstrate how the legal system held such women in an agonizing state of purgatory. While Caroline did acknowledge that not all women are saints, she demonstrated that laws did exist to punish bad wives but emphasized that bad husbands were able to manipulate the legal system to place their wives in destitution.

It is likely that Mrs. Norton took criticism of her earlier pamphlet to heart in her pointed denial, yet again, that her interest in reforming that agenda was purely personal. Her changed writing style, no more than a year later than "English Laws for Women in the Nineteenth Century," clearly demonstrated her determination to a larger cause. Lord Brougham, who battled her efforts to invoke members of Parliament to pass child custody legislation, even commented that, "A Letter to the Queen" was "as clever a thing as ever was written, and it has produced great good. I feel certain that the Law of Divorce will be much mended, and she has greatly contributed to it".[110] The results of both pamphlets speak for themselves: "English Laws for Women in the Nineteenth Century" was written in agitation and produced enough criticism that Caroline had to change her course, and "A Letter to the Queen" managed to persuade even her political opponents that she would be successful. Her political writing decreased after the

---

[109] Norton, "A Letter to the Queen on Lord Chancellor Cranworth's Marriage and Divorce Bill," Victorian Women Writers Project, 9-10.

[110] Lord Brougham as cited in Craig, *The Narratives of Caroline Norton*, 201.

Matrimonial Causes Act of 1857 passed, and while not achieving the overhaul of the system that was needed, she could safely feel as though she played a part through her writing in furthering equality in Britain's political system.[111]

Merely a Scribbling Woman?

Caroline Norton, in many ways, far exceeded what was expected of contemporary female writers. She wrote about politics in a true effort to bring reform, she frequently engaged in public arguments across the pages of a newspaper, and she occasionally touched upon topics in her fiction and poetry that critics felt should not be publicly dispersed. Yet, Mrs. Norton also took pains to align herself with public opinion, as she made clear that she was no feminist, and, similarly, she was not such a trailblazer that she dismissed the sort of writing in which many of her fellow women participated. Before Caroline was writing political pamphlets, she edited and wrote for various journals, like *La Belle Assemblée*, which took up far more of her time and which she relied on for income.[112] She described such journals as "light serial literature," and she felt no qualms in financially taking advantage of their popularity since she claimed even Britain's greatest authors did not "disdain to contribute their share" to them.[113] The collections themselves were usually not made up of first rate literature, but the editorship of these journals was nevertheless demanding in that many literary pieces had to be procured without an incentive to the author, as in the case of Caroline's dealings with the owner of *La Belle Assemblée*. The proprietor insisted "that the cost of the 'literary portion' be kept under 9-10 guineas, relying on

---

[111] Craig, *The Narratives of Caroline Norton*, 201.

[112] Craig, *The Narratives of Caroline Norton*, 43.

[113] Norton, "English Laws for Women in the Nineteenth Century," A Celebration of Women Writers, 26.

'gratis performance' for the rest".[114] It was a difficult job, and one that Caroline did for *La Belle Assemblée* in 1832, *The English Annual* in 1834, and the *Keepsake* in 1836.

Interestingly, for someone who had her talents praised by the like of Hayward and other influential literary men, "she was never highly rated as an editor".[115] The first issue of the *Keepsake* published with Caroline as editor was not well-received, with the *New Monthly Magazine* commenting that, "however much we may desire to say of a lady only that which is pleasant, we are compelled to state that the change (from the editorship of F. M. Reynolds) has not been advantageous to the work … the volume is made up of mere nothings".[116] Nor were her literary contributions to the journals of much substance. Her "Lament of the Poet Savage," in the second volume of *The English Annual* in 1835, was prettily worded but was an unoriginal idea based off of Samuel Johnson's biography of Richard Savage.[117] Other women, like the Countess of Blessington, had much more success with *The Keepsake*. Caroline was still only in her twenties during these stints as editor, and her lack of experience in that type of work was likely a contributing factor to her unprofitable status as editor. Nevertheless, given Mrs. Norton's position as a literary politician, it is remarkable that Caroline's connections were not more successful in curating and obtaining contributions to these journals in a meaningful way.[118] It is worth wondering if Caroline Norton is actually as talented a literary figure as her many friends

---

[114] Beetham, *A Magazine of Her Own?*, 43.

[115] Alison Adburgham, *Women in Print: Writing Women and Women's Magazines from the Restoration to the Accession of Victoria*, (Chatham, Kent: W & J Mackay, 1972), 243.

[116] The *New Monthly Magazine* cited in Adburgham, *Women in Print*, 243.

[117] Clarence Rupert Tracy, *The Artificial Bastard: A Biography of Richard Savage*, (Cambridge, MA: Harvard University Press, 1953); Caroline Norton, "Lament of the Poet Savage," *The English Annual,* v. 2, ed. Caroline Norton (London: Bull and Churton, 1835), 3-6.

[118] Adburgham, *Women in Print*, 250.

espoused, or if it was merely her abilities to navigate the world in which she lived that brought her success.

It is common knowledge that, in the nineteenth-century, "women writers - with few exceptions - were less successful than their male counterparts both materially and culturally".[119] Certainly, female writers like Jane Austen and George Eliot made a name for themselves in a male-dominated field, but women like Caroline Norton and her fellow *Keepsake* editor, the Countess of Blessington, are not incorporated in the English literary canon. Their gender, the merit of their work, and the genre in which they wrote played a role in keeping women like them from reaching a higher literary peak. In the case of Mrs. Norton specifically, the matter of her reputation may have been a component, as it was often the case that, "the better the social position of the author, the more eagerly his or her books read".[120] Caroline Norton wanted to regain respectability and often did so in individual cases, but frequently, it seemed like the opportunities she was given stemmed from public interest in her scandalous past. Charles Heath, the proprietor of the *Keepsake*, certainly realized that choosing an already discussed socialite as editor in 1836, the height of the criminal conversation scandal, would bring publicity to the journal because "the name of Caroline Norton was on everyone's lips" at that time.[121] She was given a platform, but, if a work's longevity is the marker of its success, she never became a truly great writer. One of her most complimentary reviews was even dictated by the legacy of a male author, as when a *Quarterly Review* critic called her "the Byron of Modern Poetesses".[122]

---

[119] Beetham, *A Magazine of Her Own?*, 43.

[120] Acland, *Caroline Norton*, 25.

[121] Adburgham, *Women in Print*, 243.

[122] Adburgham, *Women in Print*, 243.

Caroline Norton was successful in achieving a certain amount of respectability and literary celebrity in her time, but her efforts ultimately did not reverberate long past her life precisely because of what it means to be a literary politician. Her success in her lifetime relied on her ability to presently negotiate social and political issues of her age, and her self-promotion would always be ephemeral and unable to grant her immortality. Caroline Norton did accomplish something truly remarkable in Victorian Britain, although it was to a large degree not due to the quality of her prose. She was adept at keeping herself in the public eye and was thrown into an even more intense form of celebrity after the voyeuristic criminal conversation trial in 1836, but she never allowed her infamy or her critics to silence her in her goals, and she relied on her social and political savvy to gain success. It is no small achievement to survive as a writer and reformer in an era that tried to shame and to censor women with unconventional struggles merely to protect the status quo, even as they were fascinated by their scandalous reputations.

Conclusion

It is unlikely that Caroline Norton would have had such an impact in her era without the growth of newspapers, journals, and novels as a result of cheaper manufacturing and a population ready to engage with these publications. She would have always been known among her class, but marital litigation reports and the increase in novels meant that she had numerous opportunities to reach middle, and even lower-class individuals. Nineteenth-century Britain, from this widespread readership, built a popular culture where politics, judicial proceedings, literature, and gossip intersected in the lives of everyday people. The overlap between these elements is clear in the story of Mrs. Norton, whose celebrity was forged in the fire of these forces. Popular culture, especially one with adultery as a primary interest, became something that many felt needed to be regulated. While there were individuals who were content with how those elements came together to shame, accused adulteresses in public newspapers, concern existed over giving profligacy such widespread publicity, and advocates for censorship would gag-order those trials and other damning prose in order to prevent young women from gaining access to ideas that they believed would create more deviant women.

Even before the 1836 trial, Caroline Norton was poised to become an unconventional woman in her determination to publish her work and to move in society as she wished to. That she happened to live in an age where trials of that sort gained a new following was purely coincidental, but it wrapped her reputation in an almost mythological element, where no one was truly sure what was true and what was not, but few people wanted to be closely associated with her regardless. The extent to which such trials tried to regulate women, and the subsequent regulation of the trials themselves, meant that there were multiple levels to which women were

subject to public control in an attempt to limit what they could and could not do. Caroline was never going to be the prescribed ‘angel in the house’, and she had to find a way to evade the total demonization that scandal-making and censorship would try to impose on her. Through her careful use of her friends and her public conciliations, she was able to continue living life and agitating for reform as respectably as she could while being a separated wife. Nevertheless, there was an aspect of her character, an impulsivity, that would not be restrained for very long and which required frequent damage control. Ultimately, what spurred that recklessness was a desire to tell the story of her struggles as she felt they deserved to be told and which was not possible in an era where scandal-making, especially in the press, and censorship ruled. Her literary work, perhaps with the exception of her political pamphlets, is largely unread today, but the mere fact that she was able to write prolifically was a victory in itself. Subjected to the public scrutiny and attempts to publicly control her life, Caroline Norton cleverly fought back and bowed to their ideas even as she continued to undermine them.

I feel her story has relevance from then up until today. The extent to which Mrs. Norton fought to control her own narrative in the wake of sexual politics and its public scandals is a struggle that women continue to deal with, though now with concerns like what pictures send the right message on social media apps. Society has and will continue to bring public outrage towards women who do not adhere to social norms, and boycotts or dismissals of these women are just another attempt to censor them. Though she would be loathe to admit it, in fighting against these forces of control, even as she occasionally appeared to endorse them, Caroline Norton was something of a modern-day feminist.

Bibliography

Primary Sources

"A Ministerial evening print reproaches us with having called the existing Administration the 'Crim-con-." *Times* (London, England) 24 June 1836: 3. The Times Digital Archive, http://tinyurl.galegroup.com/tinyurl/9Qdn74.

Brittain, Vera. *Testament of Youth*. (1933) repr.; 1983).

"CURRIE and WOODGATE. "The Hon. Mr. And Mrs. Norton." *Times*, 9 Sept. 1853, p. 8. The Times Digital Archive, http://tinyurl.galegroup.com/tinyurl/9Qdvw9.

Davies, Emily. 'On Secondary Instruction as Relating to Girls' (1864). *Thoughts on Some Questions Relating to Women, 1860-1908*. Cambridge, U.K.: Bowes and Bowes, 1910.

Gaskell, Peter. *The Manufacturing Population of England, Its Moral, Social, and Physical Conditions and the Changes Which Have Arisen from the Use of Steam Machinery; with an Examination of Infant Labour*. (1833; reprint, New York, NY: Arno Press, 1972).

Greg, William R. *Literary and Social Judgments*. New York, NY: Henry Holt and Company, 1876, https://babel.hathitrust.org/cgi/pt?id=mdp.39015063552213;view=1up;seq=99.

Hayter, John. "The Honorable Mrs. Norton." *New Monthly Magazine*, February 1831

Hoge, James O., ed. and Olney, Clarke, ed. *The Letters of Caroline Norton to Lord Melbourne*. United States: Ohio State University Press, 1974.

MacCarthy, Justin. "Novels with a Purpose." *Westminster Review* 82 (July-Oct 1864): 24-49. https://babel.hathitrust.org/cgi/pt?id=uc1.c032045185;view=1up;seq=56.

Maclise, Daniel. "The Author of 'The Undying One.'" *Fraser's Magazine* (March, 1831): 222. https://babel.hathitrust.org/cgi/pt?id=mdp.39015023083176;view=1up;seq=233;size=50.

Maginn, William. "'The Gallery of Illustrious Literary Characters.' No. X. Mrs Norton," *Fraser's Magazine* (March 1831): 222. https://babel.hathitrust.org/cgi/pt?id=mdp.39015023083176;view=1up;seq=233;size=50.

Norton, Caroline. "A Letter to the Queen on Lord Chancellor Cranworth's Marriage and Divorce Bill." Victorian Women Writers Project. http://webapp1.dlib.indiana.edu/vwwp/view?docId=VAB7092.

Norton, Caroline. "English Laws for Women in the Nineteenth Century." A Celebration of Women Writers. https://digital.library.upenn.edu/women/norton/elfw/elfw.html.

Norton, Caroline Sheridan. *Kate Bouverie, and Other Tales and Sketches, in Prose and Verse*, 2 Vols. Philadelphia: E. L. Carey and A. Hart, 1835. https://babel.hathitrust.org/cgi/pt?id=msu.31293006710994;view=1up;seq=31

Norton, Caroline. "Lament of the Poet Savage." *The English Annual*, v. 2. Edited by Caroline Norton. London: Bull and Churton, 1835, 3-6.

Norton, Caroline, et al. "'Thrupp V. Norton.'." *Times* [London, England] 20 Aug. 1853: 8. The Times Digital Archive, http://tinyurl.galegroup.com/tinyurl/9Qdof5.

Patmore, Coventry. *The Angel in the House*, v. 2. Cambridge and London, U.K.: Macmillian and Co., 1863. https://babel.hathitrust.org/cgi/pt?id=njp.32101066109834;view=1up;seq=9.

Perkins, Jane Gray. The Life of the Honourable Mrs. Norton, With Portraits. New York, NY.: Henry Holt and Company, 1909.

THE AUTHOR OF LOST AND SAVED. "Lost And Saved." *Times*, 18 June 1863. The Times Digital Archive, http://tinyurl.galegroup.com/tinyurl/8xfPb7.

"THE MUSE OF MRS. NORTON." *The Satirist; or Censor of the Times*, 18 Aug. 1839, p. 262. 19th Century UK Periodicals, http://tinyurl.galegroup.com/tinyurl/8SXsG0.

The Poetical Works of Thomas Moore. London, U.K.: Frederick Warne and Company, 1872.

"The writers in the Ministerial press appear to have found in the recent trial of 'NORTON v. MELBOURNE'." *Times* [London, England] 25 June 1836: 4+. The Times Digital Archive, http://tinyurl.galegroup.com/tinyurl/9QdpN8.

Torrens, *W. M. Memoirs of William Lamb, Second Viscount Melbourne*. London, U.K.: Ward, Lock and Co., 1890.

Secondary Sources

Acland, Alice. *Caroline Norton*. London, U.K.: Constable and Company, 1948.

Adburgham, Alison. *Women in Print: Writing Women and Women's Magazines from the Restoration to the Accession of Victoria*. Chatham, Kent: W & J Mackay, 1972.

Atkinson, Diane. *The Criminal Conversation of Mrs. Norton: Victorian England's "Scandal of the Century" and the Fallen Socialite Who Changed Women's Lives Forever*. Chicago, IL: Chicago Review Press, 2013.

Beetham, Margaret. *A Magazine of Her Own? Domesticity and Desire in the Woman's Magazine 1800-1914*. London, U.K.: Routledge, 1996.

Clark, Anna. *Scandal: The Sexual Politics of the British Constitution*. Princeton, NJ: Princeton University Press, 2004.

Craig, Randall. *The Narratives of Caroline Norton*. New York, NY: Palgrave MacMillan, 2009.

Flint, Kate. *The Woman Reader: 1837-1914*. Oxford, U.K.: Oxford University Press, 1993.

Forster, Margaret. *Significant Sisters: The Grassroots of Active Feminism*. London, U.K.: Martin Secker & Warburg Limited, 1984.

Hammerton, A. James. *Cruelty and Companionship: Conflict in Nineteenth-Century Married Life*. London, U.K.: Routledge, 1992.

Leckie, Barbara. *Culture and Adultery: The Novel, the Newspaper, and the Law, 1857-1914*. Philadelphia, PA: University of Pennsylvania Press, 1999.

Perkins, Jane Gray. *The Life of the Honourable Mrs. Norton, With Portraits*. New York, NY.: Henry Holt and Company, 1909.

Poovey, Mary. *Uneven Developments: The Ideological Work of Gender in Mid-Victorian England*. Chicago: University of Chicago Press, 1988.

Roberts, M. J. D. "Morals, Art, and the Law: The Passing of the Obscene Publications Act, 1857." *Victorian Studies* 28, no. 4 (Summer 1985): Indiana University Press, 609-29, https://www.jstor.org/stable/3827463.

Rosen, Andrew. "Emily Davies and the Women's Movement, 1862-1867." *Journal of British Studies* 19, no. 1 (Autumn, 1979): Cambridge University Press, 101-121, https://www.jstor.org/stable/175684?pq-origsite=summon&seq=1#metadata_info_tab_contents

Stone, Lawrence. *Uncertain Unions & Broken Lives: Intimate and Revealing Accounts of Marriage and Divorce in England*. Oxford, U.K.: Oxford University Press, 1993.

The Editors of Encyclopaedia Britannica. "Gil Blas: Novel by Lesage." *Encyclopaedia Britannica*. https://www.britannica.com/topic/Gil-Blas-novel-by-Lesage.

Tracy, Clarence Rupert. *The Artificial Bastard: A Biography of Richard Savage*. Cambridge: Harvard University Press, 1953.

Waddams, S. M. *Sexual Slander in Nineteenth-Century England: Defamation in the Ecclesiastical Courts, 1815-1855*. Toronto, Canada: University of Toronto Press, 2000.