What's Special About Meditation?
Contemplative Practice for American Lawyers

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I. INTRODUCTION

There are many ways to explain meditation, what it is, what it does, how it works. Meditation, it is said, is a way to evoke the relaxation response. Meditation, others say, is a way to train and strengthen awareness; a method for centering and focusing the self; a way to halt constant verbal thinking and relax the body mind; a technique for calming the central nervous system; a way to relieve stress, bolster self-esteem, reduce anxiety, and alleviate depression.

All of these are true enough; meditation has been clinically demonstrated to do all of those things. But I would like to emphasize that meditation itself is, and always has been, a spiritual practice. Meditation, whether Christian, Buddhist, Hindu, Taoist or Muslim, was invented as a way for the soul to venture inward, there ultimately to find a supreme identity with Godhead. The Kingdom of Heaven is within—and meditation, from the very beginning, has been the royal road to that Kingdom. Whatever else it does, and it does many beneficial things, meditation is first and foremost a search for the God within.¹

In the last thirty years, many have taught meditation in America. Maharishi Mahesh Yogi² and Herbert Benson³ have long

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taught concentrative techniques, in which the mediator focuses attention on a single word or mantra. More recently, the Insight Meditation Society (IMS) and Jon Kabat-Zinn, among others, have taught mindfulness meditation, also known as insight meditation or vipassana, in which the mediator cultivates an unattached awareness of one's self and surroundings. Hindus and Christians favor concentrative techniques; Buddhists, particularly those from the Theravadin school, give more attention to mindfulness.

The medical community has long recognized that meditation promotes relaxation and physical well being. To these benefits, Professor Leonard Riskin adds emotional intelligence. Specifically, Riskin suggests that mindfulness meditation can alleviate professional dissatisfaction and free lawyers from the adversarial mindsets that interfere with listening and negotiation.

Professor Riskin's position is far too modest. Meditation is no mere self-improvement tool; it is a spiritual practice. It does more than generate good feelings or superior performance; it transforms our sense of self and the world. Thus understood, meditation offers an antidote to what ails the profession—one which is both more powerful and more controversial than Riskin admits.

This response falls into two parts. Part one scrutinizes Riskin's claim that mindfulness meditation enhances emotional intelligence.

4. The Maharishi teaches transcendental meditation, in which the mediator receives a secret word or sound to repeat mentally while sitting comfortably. Assuming a passive attitude, he or she goes back to the mantra if thoughts come into his or her mind. See Benson, supra note 3, at 85.
8. Mindfulness meditation typically begins with a focus on breathing. As the meditation progresses, however, the mediator expands awareness to include sounds, images, body sensations, feelings and thoughts, labeling them as they occur. See Goldstein & Kornfield, supra note 5, at 58-59; Kabat-Zinn, supra note 6, at 64.
9. See, e.g., S.N. Goenka, Moral Conduct, Concentration and Wisdom, in Entering the Stream 96, 111 (Samuel Bercholz & Sherab Chodzin Kohn eds. 1993) (claiming that the development of insight is the "unique element" in the Buddha's teachings, "to which he gave the highest importance"); Edward Conze, Buddhist Meditation 28 (1896) (noting that mindfulness "occupies a central place in Buddhism, much more so than in other religious or philosophical traditions").
10. See Kabat-Zinn, supra note 6; Benson, supra note 3.


It argues that the experience of mediators and scientific research both indicate that psychological techniques more effectively cultivate such intelligence. Emotional intelligence entails something more than self-awareness. It requires a change in thinking.

Part two of the response challenges Riskin's effort to sever meditation from religion. That part argues that religious intention is central to meditation. While such intention need not posit a God, it does provide a vision of life's ultimate purpose. Such a vision is potentially controversial. Yet, at the same time, it offers a potent remedy for lawyer dissatisfaction. The vision most relevant to American lawyers, however, is found in the Western religions, not Buddhism.

II. MINDFULNESS MEDITATION AND EMOTIONAL INTELLIGENCE

Professor Riskin argues that mindfulness meditation induces relaxation and awareness, and that this state of mind in turn improves performance, particularly the social skills associated with lawyering. Riskin relies heavily on psychologist Daniel Goleman's survey of the scientific research on emotional intelligence, the interpersonal aptitudes that lead to success in life.

Although mindfulness meditation may increase emotional intelligence, the link is far weaker than Riskin admits. Evidence from mediators, as well as Goleman's work itself, indicates that meditation does relatively little to foster emotional intelligence. For this purpose, psychotherapy and other psychological approaches prove more effective.

A. The Experience of Mediators

The experience of mediators indicates that meditation is a rather ineffective means for increasing social skills. As Riskin admits, many mediators have difficulty integrating their insights into everyday life. For example, IMS co-founder, Jack Kornfield spent ten

12. See id. at 630.
13. See id. at 642.
14. See id. at 646.
16. See id. at 39 (discussing "personal intelligences," the precursor of "emotional intelligence").
17. See Riskin, supra note 11, n.131 ("People who do develop great mindfulness skills and experience significant insights face challenges integrating them into their everyday lives.").
18. See Jack Kornfield, A Path With Heart (1995) (observing that "we encounter graceful masters of tea ceremonies who remain confused and reticent in intimate relations, and yogis who can dissolve their bodies into light, but whose wisdom..."
B. Goleman's Work

The superiority of psychological approaches is also suggested by Daniel Goleman's work. A close reading of the research he surveys shows that meditative consciousness bears only limited relevance to emotional intelligence, which consists of five skills. Admittedly, by fostering self-awareness, mindfulness meditation may further the first skill, knowing one's emotions, which is the "keystone" of emotional intelligence. Yet, the self-awareness required for emotional intelligence differs substantially from that cultivated in mindfulness meditation. Emotional intelligence involves a specialized self-awareness. This awareness focuses solely on emotions, not on the wide array of sounds, images, sensations, and thoughts observed during mindfulness meditation.

The self-awareness critical to the second skill, managing emotions, differs even more from the attitude cultivated during formal meditation. Managing emotions does not rely on the prolonged detachment present in meditation. Instead, that skill entails the recognition of an emotion, followed by a challenge to the thought that triggered the emotion. Mindfulness meditation makes no such challenge.

Take, for example, Goleman's method for soothing anxiety. He prescribes a "combination of mindfulness and healthy skepticism." The first step is self-awareness, catching a worrisome episode as soon as possible, so that one can apply a relaxation technique. But, "[t]he relaxation method, though, is not enough in itself. Worriers also need to actively challenge the worrisome thoughts; failing this, the worry spiral will keep coming back." The next step is taking "a critical stance" by asking questions that challenge one's underlying assumptions. One might ask, for example: "Is it very probable that the dreaded event will occur? Is it necessarily the case that there is only one or no alternative to letting it happen? Are there constructive steps to be taken? Does it really help to run through these same anxious thoughts over and over?" By contrast, mindfulness meditation prescribes only nonjudgmental observation.

Furthermore, self-awareness becomes progressively less important to the remaining three emotional intelligence skills. In the third skill, motivating oneself, such awareness plays a limited role. Self-awareness helps control distracting thoughts, but does not actually generate motivation. Goleman does not mention self-awareness with respect to the last two skills, empathy and handling relationships. In fact, both skills are at odds with mindfulness. Empathy involves unconscious mimicry of others, not the deliberate self-examination associated with meditation. Handling relationships requires acting skills that can actually suppress such examination.

Given this research, it is not surprising that Goleman does not discuss meditation in his book on emotional intelligence. A Goleman observes elsewhere, the strength of Western psychology lies in its description of waking state awareness, where it "has charte aspects of what would be called 'karma' in the East in far greater detail and complexity than any Eastern school of psychology."

Thus, Goleman's favorite tool for developing emotional intelligence is psychotherapy, particularly cognitive therapy. Psychotherapy utilizes awareness, not for its own sake, but to clear a space

32. See Goleman, supra note 15, at 43. These skills are "knowing one's emotions," "managing emotions," "motivating oneself," "recognizing emotions in others," and "handling relationships." Id.

33. See id. (quoting self-awareness with "recognizing a feeling as it happens") (emphasis in original).

34. Id.

35. Id. at 69.

36. See id. at 68-69.

37. Id. at 69.

38. Id.

39. Goleman describes a similar approach to anger. Here, one uses "self-awareness to catch cynical or hostile thoughts as they arise, and write them down. On angry thoughts are captured this way, they can be challenged and reappraised." Spring 2002 What's Special About Meditation? 131

40. See id. at 62 ("One way of defusing anger is to seize on and challenge thoughts that trigger the surge of anger.").

41. See id. at 78-81 (describing how self-awareness helps one to master the distracting emotions that interfere with concentration).

42. See id. at 86-96.

43. See id. at 98 (implying in infants); id. at 104 (research indicating that reflection of empathetic spouses track one another); id. at 146 (use of mirroring marital therapy).

44. See id. at 119 ("People who make an excellent social impression... are skillful actors. However, if these interpersonal abilities are not balanced by an awareness of one's own needs and feelings... they can lead to... a popularity won at the cost of one's true satisfaction.").

45. Notwithstanding his expertise on the subject, see Daniel Goleman, T Meditative Mind (1977), Goleman does not discuss meditation in Emotional Intelligence. See Goleman, supra note 15, at 349 ("meditation" not listed in index).

46. See Daniel Goleman, Psychology, Reality, and Consciousness, in PATHS, supra note 18, at 18, 20.

47. Goleman notes that psychotherapy can be used to increase self-awareness see Goleman, supra note 15, at 54 ("Self-awareness is fundamental to psychological insight; this is the faculty that much of psychotherapy means to strengthen."); id. at 70, speed post-constuctive behavior, id. at 180, and treat obsessive compulsive behavior, id. at 225.
It is often said that mindfulness is about being present in the moment, but it can also involve looking at things from different perspectives. The power of cognitive therapy stems from techniques such as reframing which attach new meaning to life events.

Such approaches develop a state of mind very different from that produced by mindfulness meditation. For example, Coleman's discussion of self-motivation draws upon separate research conducted by psychologists Martin Seligman and Mihaly Csikszentmihalyi. Seligman describes the optimistic thinking patterns that lead to success, whereas Csikszentmihalyi describes how people enter into flow, the mental state that supports great achievement. Such states of mind do not involve the careful uncovering of thoughts and perceptions that characterizes mindfulness meditation. Optimism depends on a distinctive explanatory style that often distorts the truth, not an investigation into reality. Flow is a state of absorption that resembles concentrative meditation more than mindfulness.

Indeed, Csikszentmihalyi speculates that Hindu meditation may be a system for maintaining flow.

Tony Schwartz's experience with tennis illustrates nicely how optimism and concentration are more effective than mindfulness alone. Schwartz began his tennis training with Tim Galloway and used nonjudgmental awareness to eliminate the critical thinking that sabotages success. Finding Galloway's insights initially poe but ultimately insufficient, Schwartz turned to sport psycholo James Loehr for a more powerful approach. Loehr did more than tivate nonjudgmental awareness. Like Seligman, he offered niques for generating positive states of mind.

In short, Loehr recognized that peak performance is more acting than meditation. His approach to tennis illustrates this cognition. Loehr studied videotapes of top players and discovered that they recovered from peak performance requires "a delicate balance between discipli movements and flexibility, willful effort and letting go, consci

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47. See, e.g., id. at 72 (noting the usefulness of cognitive therapy in treating depression).
48. For example, research indicates that a critical component in successful cybertherapy is the patient's ability to focus on inner states. Such focus begins with Genuinely Focusing 51-62 (1988). See also Ron Kurtz, Body-Centered Psychotherapy 73-73 (1990) (describing a psychotherapy in which one establishes mindfulness as a basis for evoking experience); Gay Hendricks & Kathryn Hendricks, At the Speed of Life 103-04 (1994) (describing nonjudgmental attention as the starting point for therapy).
49. See Coleman, supra note 15, at 74 (describing reframing as one of the most potent antistress techniques); Connair Andreas & Steve Andreas, Heart of the Mind 72-84 (1988) (describing a reframing technique).
50. See Coleman, supra note 15, at 77-86.
52. See Mihaly Csikszentmihalyi, Flow (1990).
53. Optimists attribute bad events to temporary, specific, and external causes, and good events to permanent, universal, and internal causes. See Seligman, supra note 44-50. Traditional meditation does not foster these optimistic thinking patterns. See Clark Freshman, et al., Adapting Meditation to Promote Negotiation Success: A Guide to Variables and Specific Support, 7 Harv. Negot. L. Rev. 67, 68 n.59-60 (2002) ("It is important to pay more attention than traditional meditation in- structors often do to positive emotions. Too often, meditation instructions focus on opening up awareness to pain and unpleasant emotions. After all, much of the strongest empirical support shows positive emotions related to better negotiation results") (emphasis in original, footnotes omitted).
54. Pessimists, "though sadder, are wiser." Id. at 109. Studies show that they judge more accurately their control in situations, as well as their level of skill. See id.
55. See Csikszentmihalyi, supra note 52, at 83. Csikszentmihalyi notes that in a state of flow, a "person's attention is completely absorbed by the activity. There is no excess psychic energy left over to process any information but what the activity offers. All the attention is concentrated on the relevant stimuli." Id.
thinking and instinctive execution.\textsuperscript{64} Formal meditation plays only a small role.\textsuperscript{65}

III. MEDITATION AS SPIRITUAL PATH

Throughout his article, Riskin minimizes the role that religion plays in meditation. He gives little weight to the religious intention that supports the practice,\textsuperscript{66} and says that the accompanying teachings are "as much a philosophy or a psychology as a religion."\textsuperscript{67} Riskin's position is ecumenical. It does not distinguish mindfulness from other practices\textsuperscript{68} and finds meditation consistent with values dear to the legal profession.\textsuperscript{69}

Riskin's position, however, runs contrary to traditional understandings. Meditation "is and has always been"\textsuperscript{70} a spiritual path. As such, it offers a potentially powerful solution to the problems that plague the profession.

A. The Importance of Religious Intention

This religious dimension of meditation surfaces in the underlying intention. Meditation teachers consistently regard intention as crucial. Its importance is perhaps most obvious in the Christian practice of centering prayer.\textsuperscript{71} Taught in four simple steps,\textsuperscript{72} it begins with a simple intention and prayer is fundamentally an exercise in faith, a practice of recognizing God.\textsuperscript{73} This intention\textsuperscript{74} provides the reason for engaging in practice and distinguishes centering prayer from similar techniques. The importance of intention is also evident in tantric meditation where the goal is to develop bodhicitta, the wish to attain enlightenment in order to benefit others.\textsuperscript{75}

Intention plays a less obvious but no less important role in insight meditation. Although teachers of insight meditate with many religious trappings,\textsuperscript{76} they still usually use the Buddha's four noble truths: that life is suffering, that the suffering is desire, that suffering ends with desire, and that ending suffering is through the eightfold path.\textsuperscript{77} Although truths do not require a faith in God or in love, they supply an intangible.\textsuperscript{80} The meditation session itself provides an occasion for drawing from a variety of religious traditions.

\textsuperscript{64} Id. at 267.

\textsuperscript{65} Loehr's book for corporate executives emphasizes the importance of alternating stress and recovery, as well as the cultivation of performa skills. It discusses meditation only briefly. See James E. Loehr, STRESS FOR SUCCESS 129-30 (1997).

\textsuperscript{66} Riskin mentions intention only briefly in a footnote. See Riskin, Contemplative Lawyer, supra note 11, at 30, n.129 ("The effect of meditation can depend on the intention one brings to the practice. But the meditator's ostensible motivation does not necessarily determine the effect of the practice.").

\textsuperscript{67} Id. at 32 ("The teachings on which mindfulness is based are as much a philosophy or a psychology as a religion.").

\textsuperscript{68} See Riskin, Contemplative Lawyer, supra note 11, at 33-34 ("Mindfulness meditation resonates with spiritual practices from many traditions and has attracted countless people from a variety of backgrounds. Monotheistic religions include traditional practices that resemble aspects of mindfulness meditation. And practitioners of a variety of religions have explicitly adopted mindfulness meditations that derive from the teachings of the Buddha. In addition . . . the practice has found employment in many secular settings.").

\textsuperscript{69} See id. at 47-59.

\textsuperscript{70} WILBER, supra note 1.


\textsuperscript{72} 1. Choose a sacred word as the symbol of your intention to center your presence and action within. 2. Sitting comfortably and with eyes closed, set the sacred word as the symbol of your consent to God and action within. 3. When you become aware of thoughts, return ever so briefly to the sacred word. 4. At the end of the prayer period, remain in silence with your eyes closed for a couple of minutes. KEATING, supra note 71, at 139.

\textsuperscript{73} See id. at 119 ("[I]f we are concerned with a relationship, this relationship is expressed by taking the time to open one's eyes every day. The fundamental disposition in centering prayer is opening our eyes that.)

\textsuperscript{74} See id. at 49 ("It is intentionality that distinguishes Centering Prayer from other forms of prayer.").

\textsuperscript{75} See Thomas Keating, INTIMACY WITH GOD 57 (1996) ("Centering Prayer is a concentrative practice, not an exercise of attention. It is an exercise of intentionality, which is emphasized in original").

\textsuperscript{76} See BURNS, supra note 8 (describing transcendental meditation).

\textsuperscript{77} See LAMMA YIEN, INTRODUCTION TO TANTRA 54-55 (2001) ("Altho that bodhicitta is the most important prerequisite for tantric practice, it is more accurate to say that the opposite is true: that the purpose for practice is to enhance the scope of one's bodhicitta. In fact, all tantric meditations are for the sole purpose of developing strong bodhicitta.").

\textsuperscript{78} See, e.g., Schwartz, supra note 20, at 306 ("The form of Buddah's light and Goldstein brought back to America was remarkably different. The trine, rituals, ceremonies, hierarchies, and any requirement to pledge allegiance to any higher authority. There was no incense, no chanting, nor God, nor guru.").

\textsuperscript{79} See Goldstein, supra note 5, at 65-69.

\textsuperscript{80} This intention pervades the practice, see Schwartz, supra note 20 ("The practice of vipassana practice, and of Buddhism more generally, is to contemplate the nature of phenomena— including life itself—are ultimately transitory and impermanent.")
experiencing the four noble truths,⁸¹ and the instructions for meditation stress the importance of “right understanding,”⁸² particularly, the recognition that our lives are “impermanent and fleeting.”⁸³

Perhaps the best evidence of the importance of religious intention to meditation comes from Harvard Professor Herbert Benson. In 1975, Benson proposed a simple method for evoking physiological relaxation. This method required a quiet environment, a mental device (such a word or object), a passive attitude and a comfortable position.⁸⁴ Designed for persons lacking religious beliefs,⁸⁵ this technique reduced blood pressure and drug abuse.⁸⁶

Nine years later, Benson announced that this technique became more powerful when coupled with a religious intention, something he called the “Faith Factor.”⁸⁷ Providing a motive for engaging in the practice of vipassana, one begins to dismantle the illusion of a fixed and permanent self; and inspires commitment, see Jon Kabat-Zinn, Wherever You Go, There You Are (1994) (“It is virtually impossible, and senseless anyway, to commit yourself to a daily meditation practice without some view of why you are doing it, what its value might be in your life, a sense of why this might be your path and not just another tilting at imaginary windmills. In traditional societies, this vision was supplied by the culture. If you were a Buddhist, you might practice because the whole culture valued meditation as the path to clarity, compassion, and mystical experience, a path of wisdom leading to the eradication of suffering.”) (emphasis in original).

⁸¹. See Goldstein, supra note 5, at 91 (describing the path as “To be mindful. Not cluing. Not condemning. Not identifying with things as being I or self. Moment to moment freeing the mind from defilements.”); id. at 142-43 (describing mindfulness of the four noble truths as one of the foundations of mindfulness practice); id. at 143 (“With this experience of impermanence comes a deep intuitive understanding that there is nothing in the mind-body process which is going to give lasting happiness.”).

⁸². See Goldstein & Kornfield, supra note 5, at 2 (noting that the experience of awakening is “the very heart and essence of vipassana, or insight meditation” and that the path of awakening begins with “right understanding”); Goldstein, supra note 5, at 8 (“The first step (in the path) is right understanding.”).

⁸³. See Goldstein & Kornfield, supra note 5, at 3; Goldstein, supra note 5, at 9 (noting that “right understanding” involves knowing that “all phenomena are in constant flux. There is no lasting security to be had in this flow of impermanence.”).

⁸⁴. See Benson, supra note 3, at 159-61.

⁸⁵. See id. at 175-76 (“The Relaxation Response is a universal human capacity, and even though it has been evoked in the religions of both East and West for most of recorded history, you don’t have to engage in any rites or esoteric practices to bring it forth. The experience of the Relaxation Response has faded from our everyday life with the waning of religious practices and beliefs, but we can easily reclaim its benefits.”).

⁸⁶. See id. at 177 (describing benefits of the Relaxation Response).

⁸⁷. Herbert Benson, Beyond the Relaxation Response 5 (1984) (“I’ve come to understand that the effects of [the relaxation technique], combined with the person’s deepest beliefs, can create other internal environments that can help the individual reach enriched states of health and well-being. The combination of a Relaxation-

practice, this factor encourages persistence and induces a placid state, which helps heal most illnesses.”). Indeed, his later book, during the session, he balances a powerful desire against a willingness to give up control,⁸⁹ a common theme in many religions.⁹⁰

The religious intention that sustains meditation may take many forms. It need not derive from organized religion, or affirm the tenet of God. It must, however, be a powerful vision that animates one’s life.⁹¹ It is the ultimate refrain,⁹² which gives our lives

Response technique with the individual’s belief system is what I call the “Faith Factor.” (emphasis in original). See also Joan Borysenko, Minding the Body, Meeting the Mind 111-35 (1988) (describing use of beliefs at the Harvard Mind Clinic).

⁸⁸. See Benson, supra note 87, at 146 (noting that the Faith Factor “can p at least two benefits not available through ordinary relaxation or meditation: (1) It can encourage a person to be more persistent in following a meditation program; and (2) it can combine the benefits of the Relaxation Response with those of a placebo effect.”).

⁸⁹. See id. at 82 (estimating that personal beliefs can play a major role in h 75% of physical illnesses).

⁹⁰. See Benson, supra note 5, at 160 (noting that the “passive attitude is the most important element in eliciting the Relaxation Response.”).

⁹¹. See Benson, supra note 87, at 132 (“[T]here is a fine line between the promoting desire to get well and the stressful anxiety that can overtake that for health. The Faith Factor can help you maintain the balance that can lead proveed health.”).

⁹². For statements of these themes in Christianity and Buddhism, see e.g. Bartlett, Familiar Quotations 823 (1960) (“God, give us grace to accept with joy the things that cannot be changed, courage to change the things which should be changed, and wisdom to distinguish the one from the other.”) (quoting R. Niebuhr); Alan W. Watts, The Way of Zen 70 (1957) (describing a practical passage in Buddhism: “If my grasping of life involves me in a vicious circle, how can I not grasp? How can I just let go, when trying is precisely not let go?”).

⁹³. Jon Kabat-Zinn similarly recognizes the importance of intention in meditation. His first book acknowledged the importance of a session. See Kabat-Zinn, supra note 6, at 31 (“The attitude with which you use the practice of paying attention and being in the present is critical.”). His book emphasized the importance of intentionality in sustaining the practice of meditation has to do with our values and with our personal blueprint for what we want. It has to do with first principles. This is the level of intentionality we require to keep your meditation practice vital.” Kabat-Zinn, supra note 80, at 68 (describing philosophical or religious convictions). Kabat-Zinn, supra note 80, at 75 (describing your hope to bring meditation into your life in any kind of long-term, committed you will need a vision that is truly your own—one that is deep and tenacious a lies close to the core of who you believe yourself to be, what you value in your life, where you see yourself going.”).

⁹⁴. See supra text accompanying note 49.
Interestingly, Western religions generally adopt different contemplative practices than those found in the East. Western religions rely more heavily on vocal prayer\textsuperscript{109} and visualization,\textsuperscript{109} practices that speak more directly to those who still live in the world.\textsuperscript{110} Verbal prayer utilizes the cognitive capacities that underlie emotional intelligence,\textsuperscript{111} and visualization is a particularly powerful tool for personal transformation.\textsuperscript{112}

Indeed, such practices may be a necessary preparation for those who ultimately do retire from the world. John Engler argues that "you have to be somebody before you can be nobody."\textsuperscript{113} He claims that Buddhism presumes a normal ego and that vipassana cannot be successful for those lacking a sense of self.\textsuperscript{114} Likewise, in Hinduism, yogis often retire from the world after completing a career as a householder.\textsuperscript{115} American lawyers should be so lucky.

IV. Conclusion

It is obviously daring to discuss mental health and religious practices in legal education. Legal education usually confines itself to developing intellectual skills. Yet, even lawyers are human beings,

\textsuperscript{108} See id. at 322 (describing prayer as one of the five pillars of Islam); RICHARD J. FOSTER, PRAYER (1992) (describing twenty-one types of Christian prayer, of which only two utilize silence).

\textsuperscript{109} St. Ignatius relied heavily on conscious reflection and visualization. See The Spiritual Exercises of St. Ignatius (Anthony Mottola trans.1964); KEATING, supra note 71, at 22 (describing Ignatius's influence).

\textsuperscript{110} Indeed, even Theravadin Buddhism uses vocalization to cultivate loving-kindness. See KORNFIELD, supra note 18, at 19-21 (describing technique in which one recites a set of phrases, such as "May I be happy" about oneself, then about one's friends and family, and then finally to all persons, including one's family); SCHWARTZ, supra note 20, at 328 (finding that this technique sometimes prompts "a very palpable, welcome emotional shift . . . I could literally feel my heart softening and my anger, anxiety, or even fear diminishing").

\textsuperscript{111} See supra text accompanying note 49.

\textsuperscript{112} That is the conclusion of those who study brainwave activity during meditation. See SCHWARTZ, supra note 20, at 149 ("Visualization coupled with brainwave training . . . has led to physiologic change, emotional tranquilization and a degree of mental control seldom reached in meditation without long practice."); ELMER GREEN of the Morningstar Foundation; ANNA WISE, THE HIGH PERFORMANCE MIND 63-67 (1997) (suggesting the use of visualization to induce deep meditation).

\textsuperscript{113} Engler, supra note 21, at 118, 119.

\textsuperscript{114} See id.: KORNFIELD, supra note 18, at 246 ("At least half of the students at our annual three-month retreat find themselves unable to do traditional Insight Meditation because they encounter so much unresolved grief, fear, and wounding.").

\textsuperscript{115} In India, one moves through four stages of life: student, householder, retirement, and the state of saṃyāsa (one who neither hates or loves anything). See SMITH, supra note 105, at 81-87.