Virginia is for Lovers? :

How Media Coverage Shaped Loving v. Virginia

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Late one night in July of 1958, a newly married Virginian couple lay sleeping peacefully together in their bed. Suddenly, they were awoken by the bright glare of flashlights in their faces and strange voices demanding to know why they were together in the same bed. The husband gestured to the marriage certificate proudly displayed on their wall, to which the Sherriff replied, “That’s no good here.” The newlyweds were Richard Loving, a white man, and Mildred Loving, a woman of African and Native American descent. At this time it was illegal to marry a person of another race due to Virginia’s Racial Integrity Act of 1924, so they travelled to the District of Columbia in order to wed. However, they were unaware that their living together as a couple was in itself a violation of Virginia’s laws. As a result, the couple was subsequently indicted in January of 1959 and sentenced to one year in prison. After spending much time disputing their arrest in local and state level courts, the Loving case eventually made it to the United States Supreme Court in April of 1967, and then the case Loving v. Virginia was widely covered in newspapers across the country, both locally and nationally. This paper seeks to analyze the media message that was sent out about the Supreme Court case, Loving v. Virginia because newspapers can greatly influence the views and opinions of their readers through what

1. The best scholarship on the history of miscegenation and miscegenation as it relates to the Supreme Court case Loving v. Virginia is by Peter Wallenstein, Tell The Court I Love My Wife: Race, Marriage, and Law: An American History (New York: Palgrave Macmillan, 2002), "Virginia Hasn't Always Been for Lovers: Interracial Marriage Bans and the Case of Richard and Mildred Loving," Virginia Magazine Of History 112 (September 2004), and “The Right to Marry: Loving v. Virginia,” OAH Magazine of History 9 (Winter 1995). In his monograph and his journal articles, he seeks to expose the effects miscegenation laws have had on the institution of marriage and on family life in American history. Tell The Court I Love My Wife gives readers a detailed overview of the reasons that miscegenation and the separation of races came to be such a deeply rooted entity over the course of United States history, how Loving changed it, and how it is seen today. Rachel Moran has also contributed some great scholarship to the field, Interracial Intimacy: The Regulation of Race and Romance (Chicago: University of Chicago Press, 2001). Moran, like Wallenstein, argues that miscegenation greatly affected the racial identities of many, and also negatively affected marriage and family life for a long period of time. Editors Beverly Keever, Carolyn Martindale, and Mary Ann Weston compiled a book that exposes how different racial minorities, such as African Americans, Latinos, and Asians, have been portrayed by the media over the course of time, U.S. News Coverage of Racial Minorities: A Sourcebook, 1934-1996 (London: Greenwood Press, 1997). Jennifer Hoewe and Geri Alumit Zeldes combined the ideas of media and miscegenation in their study of how Loving v. Virginia was portrayed by the media, “Overturning Anti-Miscegenation Laws: Coverage of the Lovings’ Legal Case Against the State of Virginia,” Journal Of Black Studies 4 (2012). These scholars argue that newspaper coverage tended to favor the Lovings.
they chose to include in their articles and how they choose to include it. The Lovings were represented as being a quiet, ordinary couple that loved one another very much and deserved to live happily together in the state of Virginia. Ultimately, the media aimed to gain support for the couple and form a public opinion that sympathized with the Lovings’ plight.

Prior to the Civil Rights Movement, media coverage of African-Americans was scarce. Black Americans were second-class citizens within society and newspapers during this time reflected that. Newspapers often belittled the achievements of black citizens in an attempt to mask the sense of white supremacy and racist ideals that many white people in America held at the time. This former practice of belittling the accomplishments of black people can be seen throughout the newspaper coverage of Jackie Robinson’s signing to the Brooklyn Dodgers in April of 1947. Major newspapers chose not to acknowledge the fact that prior to Jackie Robinson’s contract signing, African Americans had been barred from playing on major league baseball teams. Robinson was also viciously harassed by his fellow Dodgers teammates during his first season because he was black. This also went grossly unreported throughout newspapers at the time. Though Jackie Robinson would later be regarded as one of the most influential and crucial Civil Rights figures, newspapers of the time did not reflect this in the slightest. The lack of coverage of Civil Rights struggles further supported the illusion that racial discrimination was not a major problem in America, when in actuality cruelty and discrimination toward African Americans was rampant.

Whatever coverage black people did receive, especially in Southern newspapers, tended to be included in a very racist and stereotypical manner, thus adding to the racial prejudices and

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2. Jackie Robinson was the first African American baseball player to be contracted onto a Major League baseball team in America. He is regarded as a Civil Rights hero for bravely breaking the “color barrier” in America’s favorite pastime.
discrimination that were, at the time, deeply rooted around the entire country. For the most part, Northern newspapers rarely included coverage of black people, in an attempt to mask the racial tension that was evident throughout America during this period in time. As a result, most Northern white Americans who were not exposed to this type of discrimination in their daily lives, as Southerners were, remained relatively unaware of what was occurring. Black people were always referred to as “negro” or “colored” in newspapers. It is important to note that these terms were not capitalized, as it offers less respect to those individuals. They were also not afforded the courtesy of using titles such as Mr., Mrs., or Miss when being referred to. Photos of African-Americans were often not included in newspaper articles, and some papers even went to such extremes as airbrushing out their faces in photos. Southern newspapers were criticized for their lack of coverage of racial discrimination, but Northern newspapers were criticized for mainly covering racial injustices that occurred in the South, rather than injustices that were occurring in their own territory.

As a result of the brutally unjust murder of Emmett Till in 1955, many newspapers began to do away with the practice of using race labels, such as “negro” and “colored” in a derogatory sense when referring to black people. When it was used, newspapers began to capitalize “Negro,” suggesting that African American people deserved more respect than they formerly received. The Emmett Till case was widely covered throughout the nation, and was arguably the first time that national attention was drawn to the violence towards African Americans that was occurring.

4. Emmett Till, a fourteen-year-old African American boy, was brutally and unjustly murdered in Money, Mississippi on August 28, 1955. He was killed by two white men for supposedly flirting with a white woman, which was then illegal due to the Jim Crow laws in the South. His mother, Mamie Till, ordered that his funeral be open casket so that the nation could see the racial discrimination and brutality that was occurring in the South at the time. The information about the case was broadcasted at a national level and successfully gained a great deal of sympathy for black people who were constantly being discriminated against and persecuted for the color of their skin.
occurring in the South. It came as a shock to many and signaled that immense change was necessary and greatly contributed to the beginning of the Civil Rights Movement.\textsuperscript{5}

After the onset of the Civil Rights Movement in the late 1950s, there was a dramatic rise in the media coverage of the African American population and the racial discrimination that was directed towards them. A study conducted over thirty years using major newspapers from Boston, New York, Atlanta, and Chicago found that “civil rights coverage accounted for from 69 to 79 percent of the 1960s total coverage.”\textsuperscript{6} This was due to the high volume of Civil Rights protests that were occurring throughout the country in various peaceful forms including Freedom Rides, marches, sit-ins, voter registration drives, and attempts to integrate schools, along with more violent protests, such as race riots. All of these events were controversial and intense, and thus they made for great news stories. The newspapers could not resist including them.

Non-Southern newspapers often painted the suffering black population and peacefully protesting Civil Rights activists as being the “good guys,” and the angry, racist, white Southerners who were attacking them were often presented as being the “bad guys.” Black women also began to be referred to using courtesy titles such as “Mrs.” and “Miss” in newspapers. The attitudes toward black people in the media were changing for the better as a result of the Civil Rights Movement. The rise in coverage aided the activists in their attempt to raise awareness of the hardships that African Americans faced in the Jim Crow South,\textsuperscript{7} as well as to convey their messages of racial equality to the masses. By the mid-1960s, around the time that the Loving case was gaining a great deal of national recognition, even Southern newspapers

\textsuperscript{5} Keever, Martindale, and Weston, 87-102.
\textsuperscript{6} Ibid., 88.
\textsuperscript{7} Jim Crow laws were a de facto set of laws put in place in the Southern United States following the Reconstruction period. They discriminated against African Americans and caused a great deal of brutality in the South. The Civil Rights Movement fought against these injustices.
began covering the racial issues that were occurring in the South, rather than suppressing them as they had in the past.

The Loving case, like many other Civil Rights events, drew newspaper coverage because the topic was very controversial. At the time, many Americans did not believe in interracial marriage, especially in the South, where the Lovings had lived their entire lives. This was due to the fact that prior to the Civil Rights Movement, many people believed that African Americans were unequal to whites and in extreme cases, believed that they should not be classified as human beings. This is where the desire for separate races stems from. In fact, anti-miscegenation laws, which are laws that ban interracial marriage and were mainly intended to separate the races, have been in place in the United States since the colonial period. Maryland was the first state to put an anti-miscegenation law in place, which they did in 1661. Virginia implemented its first law that restricted marriage between members of different races in 1691, over three hundred years before the Lovings’ case legalized interracial marriage. These laws that were implemented so many years ago specifically legally prohibited sexual relations, and later marriages, between white people and non-white people. Laws such as this continued to be executed in states across the nation up until Loving v. Virginia overturned them and declared them unconstitutional. Through the implementation of these laws, states were able to legally discriminate against non-white people and regulate a part of citizens’ lives that was very private and personal. Anti-miscegenation laws were the last legal form of segregation that remained in the country after the Civil Rights Act of 1964, which prohibited discrimination based on race, ethnicity, religion, and gender, was passed and the removal of these laws meant a huge step

toward racial equality. The Lovings, a simple couple from rural Virginia made this all possible due to their belief that the law cannot say who can and cannot love one another.\(^9\)

A marriage between a white individual and a black individual, such as the marriage between Richard and Mildred Loving, was especially frowned upon in the eyes of American Southerners in the 1950s and early 1960s, when the Lovings were wed. There was a strong belief in the separation of races, so much so that the judge who originally convicted the Lovings of violating Virginia’s Racial Integrity Act of 1924, Leon M. Bazile, gave this statement as his reasoning behind his decision:

> Almighty God created the races white, black, yellow, Malay, and red, and he placed them on separate continents. And but for the interference with his arrangement there would be no cause for such marriages. The fact that he separated the races shows that he did not intend for the races to mix.\(^{10}\)

They were subsequently banished from the state of Virginia, the place that they had called home all their lives, and were told that they could not return to the state as a couple for twenty-five years, or else they would risk facing a year of imprisonment.\(^{11}\)

When the Lovings’ challenged Virginia’s anti-miscegenation laws, which had been deeply rooted in the state’s history, and in the South in general, it caused a great deal of debate. Some individuals were strongly opposed to the possible removal of these types of laws, such as Americans living in the Southern United States who wanted to cling on to their racist ideals and attempted to justify them by saying that the races were never intended to mix. But, there were some individuals who believed that the laws were a true abomination and that it was morally wrong to say who can and cannot marry and that it was a limitation of the freedoms that our


\(^{10}\) Quoted in Wallenstein, 217.

country’s constitution guarantees. Newspapers at this time tended to sympathize with the plight of the Lovings. This paper will analyze articles about the Loving case from the *New York Times*, a Northern-based newspaper, and the *Washington Post and Times-Herald*, a Southern based newspaper, in order to draw conclusions about how the media portrayed the Lovings and how their coverage of the case helped to reshape the American public opinion of anti-miscegenation laws and the Loving case in general.

Articles printed in the *New York Times* about the Loving case explicitly stated the fact that Mildred Loving and Richard Loving were members of two separate and unequal races, as this was a relevant piece of information and was crucial to understanding the context of the case. When the Loving case was just beginning to gain national recognition, the papers only identified Mrs. Loving as being one race, “Negro.” In two different *New York Times* articles, both printed in December of 1964, the phrase “a white man and his Negro wife” is used to describe the Lovings racial backgrounds. However, articles printed by the *New York Times* after the year 1964 tended to highlight the fact that Mildred actually identified herself as being part of two different races. She was now referred to as being “part Negro and part Indian” or “half-Negro, half-Indian.” This subtle shift in description suggests that the message the *New York Times* wanted to send out to its readers about the Lovings had also shifted and was intended to justify the Lovings’ marriage. Because some considered a marriage between a black person and a white person especially heinous, the fact that Mildred Loving was a member of multiple races

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15. Wallenstein, 13.
might have lessened the severity of some individual’s opposition to the legalization of interracial marriages. The Racial Integrity Act of 1924 did not explicitly prohibit marriages between members of the Caucasian race and members of certain Native American tribes, as a way to protect the descendants of Pocahontas and John Rolfe, who married in Virginia in 1614.\textsuperscript{16} Knowing this, the \textit{New York Times} may have begun to add this information about Mrs. Loving in an attempt to nullify the fact that she also possessed some African ancestry. As a result, this could change the public’s opinion of the Loving’s marriage and individuals who were originally opposed to their union could begin to support the Lovings.

The fact that Richard Loving was employed as a construction worker also appears frequently throughout the \textit{New York Times} articles about Loving. The description of the couple now transforms into, “Richard P. Loving, a white construction worker, and his part-Negro, part-Indian wife, Mildred.”\textsuperscript{17} This information was often added to suggest that the Lovings were merely a simple, blue-collar couple residing in rural Virginia and that they were not looking to cause any trouble. Richard Loving once told a reporter, “we are not just doing it because someone had to do it and we wanted to be the ones . . . We are doing it for \textit{us}—because we want to live here.”\textsuperscript{18} The only thing that the Lovings wanted was the ability to live happily together in Virginia, surrounded by their family and friends.

Richard’s occupation as a construction worker would also insinuate that he was not highly educated and thus, it could be that they were both not educated enough to be aware that they were violating a law in the first place. In actuality, the Lovings were truly unaware that they were breaking the law by being married to one another and living together in Virginia, so it would only be fitting that the newspapers included this aspect of Richard’s life in their

17. Wallenstein, 220.}
description to try and convey that message. The Lovings were both raised in Caroline County, Virginia where relations between the races tended to be very civil. In fact, the Lovings met because they were families were friends. Having been brought up in a setting where they were not taught that it was wrong to associate with members of another race, they would not know that the rest of Virginia and a number of other states generally discouraged it. In fact, Mildred Loving once said of their arrest, “I woke up and these guys were standing around the bed . . . They told us to get up, get dressed. I couldn’t believe they were taking us to jail.” \(^{19}\) This statement thoroughly expresses how shocked she was to find out that their marriage was illegal.

The idea that the Lovings were simply a modest family who were not looking to cause trouble is further supported in an article printed by the New York Times on January 24, 1965 that was entitled “Virginia Ban on Interracial Marriages Goes to Federal Court This Week.” Within the article, it is stated that, “According to their lawyers, the Lovings are not civil rights marchers ‘or even pioneers.’” The article then continues to describe how Mildred and Richard Loving felt about their case and about their interracial marriage, which in turn, does a thorough job of evoking sympathy from readers. In the article, Mr. Loving is quoted as saying, “They said I had to leave the state once, and I left with my wife. If necessary, I will leave Virginia again with my wife, but I am not going to divorce her.” After reading this, the reader is able to get to know the Lovings on a deeper level, and see them as something more than just an interracial couple, consisting of one white man and one partially black, partially Native American woman. They were a couple fighting for their right to marry because they were genuinely in love with one another. This is achieved even further in the article when they include a quote from Mildred Loving that says, “All we want to do is go back home to Virginia, build a home, and raise our children. We loved each other and got married. We are not marrying the state. The law should

\(^{18}\) Wallenstein, 216.
allow a person to marry anyone he wants.” This allows readers of the paper to see that the Loving Case was truly about love. After reading the two quotes from the Lovings that were included in the article, there would be a great deal of sympathy evoked in favor of the Lovings, and it would hopefully become more clear that anti-miscegenation laws were a horrible violation of rights.

The New York Times overall support of the Lovings in Loving v. Virginia can be seen in the many articles printed over the course of their trial. The Times printed an article on February 17, 1967, entitled “16 Catholic Prelates Attack Mixed Marriage Bans” which revealed that many members of the Roman Catholic church were asking the United States Supreme Court to overturn anti-miscegenation laws. The Prelates did not support them and believed them to be morally wrong. In publishing this article in their newspaper, the Times was indirectly exercising their own support of the Lovings’ case by exposing the opinions of another group that closely aligned with their own opinion and the message that they wanted to send out to their readers. The article begins by saying, “Sixteen members of the Roman Catholic hierarchy in the United States asked the Supreme Court today to strike down state laws that prohibit racial intermarriage,” and then continues to say, “They said such laws restricted the free exercise of religion and the right to have children.” Though it is generally expected that newspapers will remain unbiased, they can shape the message that is sent out to their readers through the content that they include in their articles. By including this information, the New York Times is suggesting to its readers that they should be in support of the Lovings.

The Times’ evident support for the Lovings’ can further be seen in the article “Virginia Suit Scores Mixed Marriage Ban,” which describes the Supreme Court finally agreeing to accept the Lovings’ appeal and hear their case. The reason that this article shows support for the Lovings is because it solely includes information about what they were appealing to the court,
and says nothing about the appeals of the opposing side, the state of Virginia. Within the article are statements such as, “Virginia’s anti-miscegenation statutes, the appeal says, violate constitutional guarantees of due process and equal protection of the laws, the right of privacy, and the right of freedom to marry” and “The violation of civil rights guaranteed by Federal laws is also alleged.”

Though these are not explicitly stated as being the views of the newspaper, the fact that they have chosen to include only the Lovings’ appeals and make no attempt to justify the legislation of Virginia shows that they are in support of their case, and hope that they will be victorious in the end.

About a year before Loving v. Virginia overturned anti-miscegenation laws, the New York Times printed an article displayed a very explicit opinion about anti-miscegenation laws being unfair and unjust. In this article, titled “Miscegenation Nears Test in High Court,” the author wrote, “Although the United States Supreme Court has long since struck down all other types of laws that create discriminatory racial classifications, it has never ruled directly on an anti-miscegenation law, and so had not yet gotten around to declaring them unconstitutional. This delay is significant. These laws do seem to express the white man’s ultimate objection to equality with the nonwhite...” This is not even an example of the newspapers using the opinions of other to express their own views, this is the author’s own opinion of the anti-miscegenation laws. It is an explicitly biased statement in support of the Lovings plight, and against the Virginia legislature’s disregard for human rights and equality for all citizens residing within its boundaries.

In an article printed on April 11, 1967, just months before the Supreme Court decided that the anti-miscegenation laws were unconstitutional, “Marriage Curbs By States Scored,” the

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20. Graham, “The Law: Miscegenation Nears Test in High Court”
newspaper highlighted the fact that there was more support for the Lovings than for against them. The article states, “In more than two hours of argument today, in which almost every member of the court took part, no statement from the bench suggested that the antimiscegenation laws might be constitutionally valid.”22 This account suggests that out of all of those present in the court during the trial, almost none of voiced that they were in support of the anti-miscegenation laws due to their violation of the constitution and thus, their violation of individual rights. The fact that the writer chose to include this statement suggests that the Times itself believes that there is no chance that the Lovings won’t be victorious at the end of their case. They want to send this message out to the public so that they will support the Lovings, rather than supporting the state of Virginia.

Another very widely read and well-respected paper that printed a great deal about the Loving case is the Washington Post and Times-Herald. There are many similarities between the way that the Post and the Times presented the Lovings in their news articles. Like the Times, the Post also experienced a noticeable shift in describing Mildred’s racial identity. In their earlier articles, the Washington Post only describes Mildred as being “Negro.” In fact, one article was titled “White Man, Negro Wife Challenge Virginia Bans.”23 However, shortly after the beginning of 1965, there is a shift in the Post’s description of Mildred from being “Negro” to being “part-Indian and part-Negro.” This shift occurred in an article printed on January 3, 1965, which is a few weeks earlier than the shift in the Times’ description of Mildred that occurred on January 24th of that same year.24 However, this shift in the Washington Post’s description of Mrs.

Loving does not remain consistent and it does not always appear in the articles that she is also Native American. In an article printed just a month later, on February 13, 1965, the Lovings are described as being “a white Virginian and his Negro wife.”\textsuperscript{25} This inconsistency could be attributed to the fact that at this point in time, Washington D.C., where the \textit{Washington Post} is based, was still very much a Southern area and it would be more controversial to consistently refer to Mildred as being part black and part Native American than it would for the \textit{New York Times} to do so, because the \textit{Times} is a Northern based newspaper. People in the North were generally more accepting of interracial marriages than people in the South at this time.

In general, the \textit{Post} also offers more varied descriptions of the Lovings than the \textit{Times}. Once the shift in Mildred’s description occurs, their descriptions are not as scripted and consistent as those in the \textit{Times}. They do not always refer to Mildred as being partly black and partly Native American and to Richard as being a construction worker. For example, in an article printed in October of 1966, titled “Virginia ‘Biology’ Based on Delusion,” the Lovings are initially described as “Loving and Loving, man and wife.”\textsuperscript{26} It is not distinguished that they are both members of separate races until the article’s second paragraph. In another article also from October of 1966, they are identified as being “Richard and Mildred Loving, an interracial couple living in Caroline County, who were arrested and pleaded guilty in a felony charge because they got married.”\textsuperscript{27} The article never explicitly states that Richard is white and that Mildred is part black and part Native American. This information could have been omitted so that Southern readers would not immediately be opposed to the Loving’s union.

In the article printed after the Lovings’ won their trial in the United States Supreme Court, the description of the Lovings is unfolded throughout the course of the entire article. In the third paragraph, it says “Mrs. Loving, an attractive, slender 27-year-old Negro . . .” and then in the fourth paragraph it goes on to say, “Her white husband . . .” In the following paragraph, it says “The 33-year-old Loving, who like his wife was born near their present home in rural Caroline County . . .” Mildred Loving is described using a courtesy title, which became common in Southern newspapers at this time, and this shows that the newspaper respects her, just as the newspaper’s readers should. This article says nothing about Richard’s occupation, but it does say that he was born in a rural area, which could suggest that they live a relatively blue-collar lifestyle. This article also paints Mildred Loving as being a very strong-willed and hopeful woman when it says “Mrs. Loving . . . said she never had any doubt that the Supreme Court would eventually uphold their 1958 marriage.” The general legal importance of their case is noted when the article says, “in addition to removing the shadow of illegitimacy from children in interracial families and assuring a woman’s rights to such benefits as social security and workmen’s compensation, the decision will make it easier to move against any Southern official who seeks to block an interracial marriage.” This particular statement foreshadows how many lives will be positively affected and changed because of this decision in this landmark Supreme Court case.

The Washington Post also ran more articles that were explicitly biased in favor of the Lovings than the Times did. One of the articles in which this is especially true is “Virginia ‘Biology’ Based on Delusion.” The title itself suggests that the entire concept of having anti-miscegenation laws in place is entirely flawed and absurd. The article states, “

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29. Lederberg, “Virginia ‘Biology’ Based on Delusion”
Loving, man and wife, have appealed to the Supreme Court to reaffirm the brotherhood of man in its most fundamental aspects.” This asserts the idea that the Post believes that putting restrictions on who can and cannot marry is a violation of basic human rights, and they sympathize with the Lovings plight. When they describe them as “Loving and Loving, man and wife,” it also shows that they recognize the fact that they are a married couple, which at the time, the state of Virginia did not do. The article later says, “Social acceptance is a more honest definition of race than pseudo-biology.” The ‘pseudo-biology’ that this article refers to is the way in which states with miscegenation laws usually place restrictions on who is allowed to marry whom. For example, at this point in time, Virginia’s miscegenation laws operated under a “one-drop” policy, meaning that anyone with one drop of anything other than Caucasian blood was considered “colored.” The article references to laws concerning racial identity in Missouri at this time, and says that the state “forbids a ‘white person’ to marry anyone who is ‘one-eighth’ or more Negro or Mongolian.” The objective of this article is to dispel the idea that it is acceptable to legally define what constitutes someone as being white, black, or any other race and whom they are allowed to marry as a result of this definition.

In January of 1965, over a year before the previously mentioned article was printed, the Post featured an article titled “Doomed Miscegenation Law Still Plaguing Servicemen.” The article does reference the Loving case in the first few paragraphs, but the article is more concerned with the fact that some men in the Army, Navy, and Air Force who are members of interracial marriages are being sent to live in states where their marriage is not legally recognized. It says that there are “uncertainties that face a mixed couple in a state which has an anti-miscegenation statute. Prosecution remains a possibility, and the whim of a local sheriff or

district attorney may trigger it.” This further proves that the Post agrees with the fact that placing bans on interracial marriages is an infringement of individual rights.

The placement and length of the articles printed in the New York Times about the Loving case can be analyzed in order to assess how important the paper’s editors thought the case was. Over the course of the case, the articles began to increase in length and were also placed closer to the front page as the trial gained more and more recognition across the nation.

Some of the first articles printed in the New York Times about the Lovings were “Virginia Asked to Explain Laws on Mixed Marriages” and “Mixed Marriage Ban is Fought in Virginia.” They were both printed in December of 1964 and both briefly described that the Lovings’ case had made it to the state level courts in Virginia. Both articles were each only four paragraphs long and did not include a great deal of information regarding the Lovings or their trial. The first article mentioned was printed on page 23 of the newspaper, and the second article was printed even further back on page 45. While this suggests to readers that the case does deserve recognition, it does not suggest that it will go on to become a landmark Supreme Court case and a monumental event in the Civil Rights Movement.

Around the same time that the New York Times began to point out that Mildred Loving was part black and part Native American, the articles about Loving v. Virginia began increasing in length. On January 24, 1965, the Times printed this article “Virginia Ban on Interracial Marriages Goes to Federal Court This Week,” which dedicated 19 lengthy paragraphs to explaining the case. Many articles concerning the Lovings that followed this were also longer in length, which was a reflection of the increasing coverage of Civil Rights and the increasing

34. “Virginia Ban on Interracial Marriages Goes to Federal Court This Week,” New York Times, January 24, 1965
recognition that the Loving case was receiving. In February of 1966, the United States Supreme Court delayed the Lovings’ hearing and suggested that they take their case back to state courts instead. The Times printed an article about this, called “U.S. Court Defers on Race Question.”35 The article was fifteen paragraphs long. Shortly after, in March of 1966, an extensive article about how the Lovings’ case was soon expected to reach the United States Supreme Court was printed, and it was titled “Miscegenation Nears Test in High Court.”36 The article also consisted of fifteen paragraphs about miscegenation and the Lovings’ case, but this time, a large photo of Mr. and Mrs. Loving seated next to one other was included.

Finally, when the Supreme Court gave their verdict in Loving v. Virginia that anti-miscegenation laws were banned across the country on June 12, 1967, the Times printed multiple articles about it that appeared in the paper on June 13, 1967. One of those articles, titled “Justices Upset All Bans On Interracial Marriage: 9-to-0 Decision Rules Out Virginia Law—15 Other States Are Affected”37 was featured on the front page of the newspaper. It had fourteen paragraphs and included a picture of the Chief Justice at the time, Earl Warren, and a picture of the Mildred and Richard Loving. The second article was titled “Excepts From Supreme Court’s Ruling on Virginia’s Ban on Miscegenation”38 and it also included fourteen very lengthy paragraphs that further summarized the court’s decision.

The articles printed about the Loving case in the Washington Post were generally longer than those printed in the New York Times. The first articles printed about Loving v. Virginia were both only five paragraphs, but then they are generally pretty lengthy articles, usually consisting

of ten paragraphs or more. “Virginia ‘Biology’ Based on Delusion”\textsuperscript{39} dedicated twelve paragraphs to the Lovings, “Lovings’ Case Remanded to State Courts”\textsuperscript{40} devoted eleven paragraphs, “Ban On Miscegenation Is Hit in Va. High Court”\textsuperscript{41} had fifteen paragraphs, and “Doomed Miscegenation Law Still Plaguing Servicemen”\textsuperscript{42} gave a hefty thirty-one paragraphs to the topic of anti-miscegenation laws. This emphasizes that the \textit{Post} recognized how important and influential \textit{Loving v. Virginia} would eventually become from the very beginning and that the \textit{Post} wanted the public to have a great deal of information and details about the case because of this.

However, unlike the \textit{New York Times}, the article that the \textit{Washington Post} published after the Supreme Court had decided to overturn anti-miscegenation bans was not featured on the front page, it was placed further back in the paper on page A11. It was titled “Victor in Mixed Marriage Case Relieved: ‘I Feel Free Now . . .’”\textsuperscript{43} and it consisted of thirteen paragraphs discussing the Lovings’ final victory in their attack on anti-miscegenation bans in Virginia, and how it would ultimately change the lives of many in a positive manner.

\textit{Loving v. Virginia} has indeed changed the lives of many and still continues to be relevant in American society to this day, especially in regard to the continuing debates over gay marriage that are extremely prevalent in today’s media. The \textit{Loving} case continues to be cited in cases concerning gay rights, such as California Proposition 8 and in \textit{Hollingsworth v. Perry}. An article printed in the \textit{New York Times} on June 5, 2012 called “Gay-Marriage Issue Moves Closer to Justices” referenced \textit{Loving v. Virginia} and said, “Supporters of same-sex marriage are hoping

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\begin{enumerate}
\item Lederberg, “Virginia ‘Biology’ Based on Delusion”
\item Chapman, “Lovings’ Case Remanded to State Courts”
\item Carter, “Doomed Miscegenation Law Still Plaguing Servicemen”
\item Dewar, “Victor in Mixed Marriage Case Relieved: ‘I Feel Free Now . . .’”
\end{enumerate}
\end{footnotesize}
that, on the contrary, the Supreme Court might be persuaded to view this as an opportunity like the one it took in 1967 in the landmark Loving v. Virginia ruling when it declared that laws banning interracial marriage were unconstitutional.\textsuperscript{44}

Today, the Richard and Mildred Loving are regarded as being Civil Rights heroes, though that was never their initial intention. Their resilience and unwavering attempts to ban anti-miscegenation laws so that their marriage would be legally recognized and they would be allowed to live together in their home in Caroline County, Virginia paid off and resulted in interracial marriages becoming legal across the entire nation. There were a few articles printed in the many years following the Loving case that chronicled the process that has been made since the United States Supreme Court made their decision on June 12, 1965. Twenty-five years later, on June 12, 1992, the \textit{Times} printed a 33-paragraph story that celebrated the anniversary of \textit{Loving v. Virginia} titled “A Mixed Marriage’s 25\textsuperscript{th} Anniversary of Legality.”\textsuperscript{45} The article showcases the true love that was exchanged between the couple through a quote from Mr. Loving speaking with his attorney while the trial was still ongoing in which he says, “Mr. Cohen, tell the Court I love my wife, and it is just unfair that I can’t live with her in Virginia.” This has since become a relatively well-known quote, and is even the inspiration behind the title of Peter Wallenstein’s book about the Lovings and their interracial marriage, \textit{Tell The Court I Love My Wife: Race, Marriage, and Law: An American History}. The article ends with a quote from Mrs. Loving that says, “A few people are still hostile, but attitudes toward people have really changed. The Old South is going away,” which highlights that Mildred herself believed that things had changed for the better since the \textit{Loving v. Virginia} decision was made.

Both of their obituaries that were printed in the New York Times also reflect this. In Richard Loving’s obituary, printed on July 1, 1975, includes a quote from former Supreme Court Chief Justice, Earl Warren, in which he says, “There can be no doubt that restricting the freedom to marry solely because of racial classification violates the central meaning of the equal protection clause.” The following paragraph then continues with, “After the decision, the Lovings returned to their Virginia home to raise their three children.”\(^{46}\) The combination of these two paragraphs asserts the idea that the Loving’s fight paved the way for many future interracial couples and interracial families, and also acknowledged that their fight also resulted in their own sort of “happily ever after.”

Mildred’s obituary, which was printed in the *New York Times* on May 6, 2008, dedicated a solid twenty-five paragraphs to her story.\(^{47}\) It introduces her by saying, “Mildred Loving, a black woman whose anger over being banished from Virginia for marrying a white man led to a Supreme Court ruling overturning state miscegenation laws . . .” which gives her a great deal of credit for the decision that was made by the Supreme Court in 1965 and for the banning of anti-miscegenation laws in general, as she was definitely deserving of. It then goes on to describe the proceedings of the entire case from its beginning to the very end. Her obituary also includes a quote from Dr. Martin Luther King Jr. in which he says, “When any society says that I cannot marry a certain person, that society has cut off a segment of my freedom.” This compares Mildred Loving’s fight for the freedom to marry whomever you wish to the beliefs of Dr. Martin Luther King Jr., who is arguably the most famous and well-regarded Civil Rights activists to have ever lived. The article concludes with the statement “Mrs. Loving stopped giving

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\(^{46}\) Richard P. Loving; In Landmark Suit: Figure in High Court Ruling on Miscegenation Dies,” *New York Times* , July 1, 1975.

interviews, but last year issued a statement on the 40th anniversary of the announcement of the Supreme Court ruling, urging that gay men and lesbians be allowed to marry.” This further demonstrates what an accepting and progressive individual Mrs. Loving was, and also highlights the case’s relevance to civil rights matters that are still occurring today.

Mrs. Loving once said, “We weren’t bothering anyone. And if we hurt some people’s feelings, that was just too bad. All we ever wanted was to get married, because we loved each other.” Just two years after the Loving v. Virginia decision was made, the state of Virginia adopted “Virginia is for Lovers” as their official state slogan. Thanks to the efforts of Richard and Mildred Loving, this includes members of interracial marriages, and as of October 16, 2014, also includes members of gay marriages. Now, Virginia is for all kinds of lovers, regardless of their race or sexual orientation.

48. Wallenstein, 251.