

TWO AMERICAS • LUMINARIES • ACTIVIST

Jane Crow

Pauli Murray and the Law That Was Not Yet Written

Prepared for the Two Americas Archive

September 13, 2026

Contribution Track • ERA V–VII • Durham, North Carolina

Who She Is

Anna Pauline "Pauli" Murray was born in Baltimore in 1910, but after her mother's death and her father's institutionalization, three-year-old Pauli was sent to Durham, North Carolina, to be raised by her aunt and grandparents. She spent her career naming things that did not yet have names — coining the term "Jane Crow" for the double bind of race and sex discrimination, writing a legal compilation Thurgood Marshall is reported to have called the movement's "bible," co-founding the National Organization for Women, and becoming, in 1977, the first Black person perceived as a woman ordained an Episcopal priest.

Durham, 906 Carroll Street

Murray grew up at 906 Carroll Street in Durham's West End neighborhood, a house her grandparents Robert and Cornelia Fitzgerald bought in 1898 for \$200. Robert Fitzgerald had been blinded during the Civil War; by Murray's own account in her 1956 memoir *Proud Shoes*, he "supervised the building of the house by touch," and she called it "a monument to Grandfather's courage and tenacity." She graduated from Durham's Hillside High School in 1926 and Hunter College in New York in 1933.

Rejected by Chapel Hill, 1938

Unable to afford graduate tuition at a Black institution offering a comparable program, Murray applied in 1938 to the University of North Carolina's all-white graduate sociology program, seeking to study under sociologists Howard Odum and Guy B. Johnson. The university rejected her application under the state's segregation laws. She wrote directly to UNC President Frank Porter Graham; he replied that the exclusion was, in his words, essentially out of his hands, and urged patience. A campus straw poll at the time found 82 of 120 UNC graduate students in favor of admitting a Black student anyway. The NAACP, including Thurgood Marshall, declined to take the case — Murray was a New York resident, not a North Carolinian, and the organization judged the standing risk too high. The episode drew national press coverage.

Jane Crow

Murray entered Howard University Law School in 1941, the only woman in her entering class, on Marshall's own recommendation. A professor's open dismissal of women in law crystallized her coinage of "Jane Crow" — later formalized in her 1965 article with Mary Eastwood, "Jane Crow and the Law: Sex Discrimination and Title VII." She graduated first in her class in 1944.

The Book Thurgood Marshall Called the Bible

Two distinct pieces of Murray's legal writing are often folded together in retelling, and they deserve to be kept separate. In 1944, as a Howard seminar paper, she wrote "Should the Civil Rights Cases and *Plessy v. Ferguson* Be Overruled?" — NAACP attorney Spottswood Robinson later said in 1963 that he carried this paper with him when he joined the *Brown v. Board* defense team in 1953 and used it directly in drafting the briefs. Separately, in 1950, Murray published *States' Laws on Race and Color*, a 746-page compilation of segregation statutes commissioned by the Methodist Church's Woman's Division of Christian Service. Thurgood Marshall is widely reported to have called it the "bible" of the

civil rights legal movement — a characterization repeated by multiple institutional sources, though no primary-source citation for his exact original wording has been located.

NOW and the Collar

Murray co-founded the National Organization for Women in 1966, later distancing herself from the organization over what she saw as its inattention to Black and working-class women. In 1977, following the death of her longtime partner Irene Barlow, she was ordained an Episcopal priest — the first Black person perceived as a woman to hold that distinction. She died of cancer on July 1, 1985, in Pittsburgh.

NC Local Lens

Murray's North Carolina story is entirely a Durham story, not a Cumberland County one — no Fayetteville connection is documented, and none is claimed here. The Carroll Street house was named a National Treasure by the National Trust for Historic Preservation in 2015 and designated a National Historic Landmark by the National Park Service on December 23, 2016. It now operates as the Pauli Murray Center for History and Social Justice, with the restored building's renovation completed in September 2024.

Sourcing Caveats for Future Sessions

The Marshall "bible" quote: corroborated by two independent institutional sources (Smithsonian NMAAHC, UC Berkeley Law) but no primary-source citation for Marshall's exact original wording, date, or venue was located — cite as widely reported, not as a verbatim quotation.

Two documents, not one: the 1944 Howard seminar paper and the 1950 States' Laws book are frequently conflated in popular accounts — this entry keeps them distinct and that distinction should be preserved in any future edit.

Eleanor Roosevelt correspondence: Murray's broader friendship with Roosevelt in later years is very well documented, but no direct Roosevelt letter tied specifically to the 1938–39 UNC rejection was confirmed in this research pass — verify against Murray's memoir *Song in a Weary Throat* or the Schlesinger Library's Murray papers before stating a direct link.

"Jane Crow" article date: sources vary between 1964 and 1965 for the *George Washington Law Review* article — confirm against the journal's own citation.

Citations

Chicago Notes-Bibliography style, primary and institutional sources.

1. Pauli Murray Center for History and Social Justice, "Who Is Pauli Murray?," accessed September 13, 2026, <https://www.paulimurraycenter.com/who-is-pauli>.
2. Pauli Murray Center for History and Social Justice, "Our Historic Site," accessed September 13, 2026, <https://www.paulimurraycenter.com/our-historic-site>.
3. National Museum of African American History and Culture, "Jane Crow & the Story of Pauli Murray," Smithsonian Institution, accessed September 13, 2026, <https://nmaahc.si.edu/explore/stories/jane-crow-story-pauli-murray>.
4. University of North Carolina Libraries, "1938–39: Murray's Application to UNC," Pauli Murray and UNC (exhibit), accessed September 13, 2026, <https://exhibits.lib.unc.edu/exhibits/show/pauli-murray-unc/1939-application>.
5. Berkeley Law, University of California, "An Enduring Legacy," accessed September 13, 2026, <https://www.law.berkeley.edu/spotlight/an-enduring-legacy/>.
6. National Park Service, "Pauli Murray Family Home," U.S. Department of the Interior, accessed September 13, 2026, <https://home.nps.gov/articles/000/pauli-murray-center-for-history-and-social-justice.htm>.
7. Pauli Murray, *Proud Shoes: The Story of an American Family* (New York: Harper & Brothers, 1956).

Prepared by the Two Americas research process. Verify all figures against primary sources before publication if stronger originals become available.