The Novel at the Bar

Joyce, Lewis, and Libel

Sean Latham (Contributor Webpage)

DOI:10.1093/acprof:oso/9780195379990.003.0005

Abstract and Keywords
This chapter explores the way James Joyce and Wyndham Lewis negotiated the legal consequences of their narrative experiments with libel and defamation in key romans à clef like *Ulysses* and *The Apes of God*. Both drew heavily on their own lives—as well as those of nearly everyone they knew—to launch a deliberate critique of the moral, aesthetic, and legal divide between fact and fiction. This forms, in fact, a fundamental aspect of their high modernist aesthetics. The interpenetration of world and text in their major works, however, also led both men into often grave legal trouble, putting their books in limbo and, in Lewis’s case, leading to a seemingly endless string of crippling lawsuits. Far from purely extraliterary events, these legal entanglements are instead an organizing component of the works themselves: the core element of a largely forgotten modernism structured around social, aesthetic, and legal contests between fiction and reality. Forged and circulated in this complex field of force, this chapter examines the ways these experimental texts not only exploit the ambiguities of libel law but are themselves inevitably constrained by its potent ability to adjudicate fact and thereby define the limits of fiction.

*Keywords:* modernism, roman à clef, libel law, law and literature, James Joyce, Wyndham Lewis, *Ulysses*, *Apes of God*, censorship, ethics
In a well-known 1922 photograph, James Joyce appears seated in Sylvia Beach’s Shakespeare and Company bookstore at 12 rue de l’Odéon on the bohemian Left Bank of the Seine. He is nattily dressed, sporting a bow tie, a neatly trimmed goatee, and slicked hair, all of which lends him a distinctly bourgeois air of elegance and sophistication. The black patch covering his left eye, however, warns us that something is amiss, as does the alarmingly large poster on the wall behind him: a reproduction of the April 1, 1922, Sporting Times, proclaiming “The Scandal of ‘Ulysses’” in towering black letters. In the foreground, Joyce and Beach appear to be studiously examining ledger books and order slips for the text, which is denounced in the paper behind them as the production of “a perverted lunatic who has made a specialty of the literature of the latrine.”¹ The poster plainly hovers there in this meticulously framed photograph as an advertisement, attempting to lure cultural tourists as well the Parisian avant-garde into the store where they could obtain a very expensive copy of the book that outraged American and British censors were destroying at their borders. In buying a copy of Ulysses, early readers also bought a little bit of this titillating scandal. The photograph of Joyce and Beach, in fact, has become iconic precisely because we have never really stopped proclaiming the scandal of Ulysses in the classroom, in literary scholarship, and in the popular press. This was true when Samuel Roth published not one but two pirated editions in the United States, and it remained true when the Collectors Publications edition appeared containing forty-three pages of advertisements for pornographic books and magazines.²
As a scandalous object, *Ulysses* has been regularly cast as the hero of a modern morality tale, tilting brilliantly at narrow-minded censors and anti-vice crusaders who dared suppress so bold a portrait of human sexuality. Joyce, Katherine Mullin argues, actually anticipated this role for himself, becoming a subtle “agent provocateur” who responded to Victorian prudery “through the creative appropriation of prevailing debates about art, morality, and sexuality.”

At the heart of this scandalous encounter, of course, lies the text’s blunt treatment of sex, ranging from Leopold Bloom’s masturbatory encounter with Gerty McDowell on Sandymount Strand in the “Nausicaa” episode, through the sadomasochistic fantasies in “Circe,” to Molly Bloom’s nighttime thoughts in “Penelope,” the section Joyce himself described as “probably more obscene than any preceding episode.”

Judge John Woolsey’s decision to lift the American ban on *Ulysses* in 1933 further emphasized the importance of sexuality in the book’s suppression. He struggled to determine whether *Ulysses* was an obscene text that, according to the legal definitions then in place, might “stir the sex impulses or lead to sexually impure and lustful thoughts.”

His famous conclusion that the “net effect” of the book “was only that of a somewhat tragic and powerful commentary on the inner lives of men and women” at once freed *Ulysses* from the grip of the government censor and transformed it into an icon of liberal humanism, free speech, and aesthetic integrity. The issues of censorship and outrage adjudicated in this case appeared to confirm the continuing autonomization of the aesthetic sphere around which the idea of a “high modernism” gradually coalesced. Joyce’s book became a scandal because it jumped this expanding gap between art and the law, temporarily exposing both the contradiction and the distance between these two kinds of judgment. Indeed, scandal in this case might best be defined as the precipitate of the encounter between law and literature that is produced by the unexpected conflict between these two otherwise independent spheres of thought and assessment.

When seen this way, then the “scandal of *Ulysses*” must be extended to include not only obscenity, but Joyce’s potentially illegal and deliberately libelous experiments with the roman à clef.
Like Joyce, Wyndham Lewis too cultivated this same generative conflict: a mode of experimentation that provides a new way of linking their agonistic modernism. Where Joyce embraced “silence, exile, and cunning,” however, Lewis declared himself the “Enemy,” using his vast and multifaceted talents to wage a more direct—and ultimately unsuccessful—assault on the institutional structures underwriting art’s claim to autonomy. Augustus John called his sometime friend and onetime protégé a “new Machiavelli” who treated art as if it were a battle in “an arena, where various insurrectionary forces struggled to outwit each other (p.91) in the game of artistic power politics.”

Libel became one of Lewis’s most powerful weapons, and he modeled his own early career, in part, on James McNeil Whistler, the gadfly artist who composed an autobiography entitled *The Gentle Art of Making Enemies* and signed his work with a barbed butterfly. Lewis too possessed a barb, but lacked the graces of a social butterfly. Instead, he made a regular habit of turning abruptly on even his closest friends—often by brutally folding them into his romans à clef. “Being in solitary schism, with no obligations at the moment towards party or individual colleague” he wrote in the first issue of his little magazine, *The Enemy*, “I can resume my opinion of the society I have just left, and its characteristics which might else remain without serious unpartisan criticism.”

Locked in a one-sided battle with literary London—from Bloomsbury to Fleet Street—he cultivated such hostility in order to expose what he believed to be the hypocrisy and petty snobbery of an aesthetic sphere that cloaked itself in the claims of radical autonomy only in order to preserve antiquated structures of social prestige.

Lewis drew deliberately on the roman à clef’s anarchic powers to savage the realist novel by extending fiction into the historical world. In a letter to Ford Madox Ford, he expressed open hostility toward “You fellows [who] try to efface yourselves; to make people think there isn’t any author and that they’re living in the affairs you … adumbrate, isn’t that your word? … What balls! What rot! … What’s the good of being an author if you don’t get any fun out of it; … Efface yourself! … Bilge!”

Modernist impersonality, for Lewis, was a sham, an archaic appendage of the genteel nineteenth century that both concealed the “arena” in which art was actually waged and demeaned the pleasures readers derived from texts that rendered unstable the distinction between fact and
fiction. He rebuts Ford’s narrow aestheticism and deliberately courts scandal by libelously developing his own art of extreme skepticism. He even taunts the very readers who activated and sustained such pleasures, as this passage from an abandoned introduction to *Blasting and Bombardiering* indicates: “I am about to gossip. I am going to be exceedingly ‘personal’ about certain persons. But this is not at all because I wish to be. It is because of *you* that I descend to these picturesque details. Quite at the start it is far better that I should lay the blame where it is due—namely at your door—for anything that is of too familiar a nature that may be uttered in these pages.”

Nowhere was such scandal-mongering more effectively or brutally executed than in Lewis’s massive 1930 novel *The Apes of God*. Intended as a critical response to Joyce’s *Ulysses*, it engages in many of the same narrative experiments in the roman à clef. Though this book narrowly managed to avoid a libel suit, it would be the last of Lewis’s major novels to do so. Throughout the following decade, the libel laws Joyce eventually managed to elude increasingly restricted Lewis’s own parallel experiments with the roman à clef, conspiring with the hegemonic aesthetic of modernist impersonality to marginalize his most daring experiments at the boundary between fact and fiction. By recalibrating the major works of Joyce and Lewis around their engagement with the roman à clef, this chapter recovers the assault both writers launched on the law of libel, setting the canny strategies of one against the increasingly frantic struggles of the other. Their strategic resistance, as we will see, defines the core component of an alternatively conceived node of modernist resistance to Victorian morality, the realist novel, and Eliotic impersonality. Yet it also delimits the legality of such writing while challenging our liberal narratives of modernism’s ever-expanding freedom.

**James Joyce**

“The Passage Complained of Is a Malicious and Deliberate Libel upon Me”
Our hagiographic studies of Joyce have focused too long and too narrowly on the comfortably liberal narrative of his victory over Victorian prudery and state censorship. This has led us to ignore or simply neglect the far more subtle mechanisms of repression structuring the aesthetic field. There remains, after all, one additional scandal that has been largely overlooked, yet which shapes *Ulysses* even more profoundly than either sexuality or intellectual property. It pervades the book from its opening to its closing pages and has troubled generations of critics who have developed somewhat torturous intellectual arguments to evade its most troubling implications. Hugh Kenner alludes to it when he describes Joyce’s decision to abandon the convention of the initialed dash when writing about real people and events, a practice that dates back to the very rise of the novel. “In the year 19—, in the city of D—,” Kenner writes, “that would have been the decorous way to go about it.” As he notes, the French printers who initially set *Ulysses* cared so little for this little English nicety that Joyce was able to indulge in “a very orgy ... of naming.” This use of real names and places, in fact, accounts for some of the peculiar pleasures of Joyce’s text, encouraging readers not only to track references to real people and places in the 1904 *Thom’s Directory* but to follow the fictional paths of Bloom and Stephen minute by minute and step by step as they make their way through Dublin. Joyce famously declared *Ulysses* so accurate that “if the city one day suddenly disappeared from the earth, it could be reconstructed (p.93) out of my book.” There is a danger, however, in such precision, for this particular orgy—like the one in Bella Cohen’s brothel—runs a very real legal risk of suppression, not for obscenity, but for libel. In *Finnegans Wake* Joyce alludes to this directly when his “Shem the Penman,” in writing “his usylessly unreadable Blue Book of Eccles ... scrabbled and scratched and scribbled and skrevened nameless shamelessness about everybody he ever met.” Just as Joyce deliberately provoked the encounter between law and literature when writing about both obscenity and copyright, so too did he engage the civil statutes of libel that sought to regulate the novel’s engagement with fact. Indeed, because Joyce published his work privately in Paris—far from the sanctions of the British libel courts—the legal risks and consequences of his writing remained largely invisible, emerging only when *Ulysses* was successfully sued for libel in 1955.
Joyce first became entangled in the webs of British defamation law when, in 1912, he returned to his native city in what would quickly prove a disastrous effort to force the publication of *Dubliners*. Six years earlier the book had already run afoul of censorious printers unwilling to take the risk of being singled out by the city’s Vigilance Society, and after repeated negotiations about possible revisions, Grant Richards had declined to publish it. Having secured a new contract from George Roberts of Maunsel and Company, Joyce found himself again confronted with a bewildering array of editorial objections, this time focused initially on the crude language of the characters in “Ivy Day in the Committee Room” who refer to Queen Victoria at one point as a “bloody old bitch.” After moderating this passage somewhat—just as he had done in similar negotiations about obscenity with Richards—Joyce confronted what seemed an even more quixotic demand: that in the same story he remove all references to King Edward VII. Roberts feared that such passages, which described the deceased monarch as “fond of his glass of grog and … a bit of a rake,” might provoke a charge of criminal libel since, as Joyce’s own solicitor advised him, the description “could be taken as offensive … to the late King.” This is certainly not the kind of legal difficulty we most often associate with Joyce’s work, and to a modern reader this passage’s threat has become essentially illegible. Nevertheless, libel continued to menace the negotiations with Maunsel as the firm’s solicitors grew ever more concerned about the absence of those decorous dashes Kenner describes. The genuine threat of a libel suit by the Crown in this case was likely quite small, and Joyce, in an effort to dispel Roberts’s concerns, actually wrote a letter to George V explaining his situation and asking that the monarch “inform me where in his view the passage (certain allusions made by a person of the story in the idiom of his social class) should be withheld from publication as offensive to the memory of his father.” Not surprisingly, the king’s secretary refused to offer an opinion in the case, leaving Joyce few options as a book that once ran afoul of obscenity laws now foundered on the threat of a libel charge.

Joyce was understandably apoplectic and wrote an open letter to the press decrying “the present condition of authorship in England and Ireland” while citing specifically the passage Roberts wanted to change. As the letter notes, Grant Richards had not raised any objections to the description of
the king in 1906, and by publishing the extract in the paper, Joyce strategically hoped to allay any concerns about its legal status. *Sinn Féin*, in which the letter appeared, did print the passage, though the *Northern Whig*—a far less nationalist paper—declined to do so, no doubt because its editor too was concerned about his potential liability. Joyce likely did not realize that following the passage of the Newspaper Libel and Registration Act in 1881, periodicals had a far greater license to publish such material since they were merely reporting news rather than themselves making libelous claims. The situation for Richards, however, was far more delicate since libel law in both Great Britain and Ireland allowed for the possibility of both civil suits and even criminal prosecution for author, publisher, and printer alike. As Holt notes in *The Law of Libel*: “The offence of libel and slander is proportionately more criminal as it presumes to reach persons to whom special veneration is due. The diminution of their credit is a public mischief, and the state itself suffers in their becoming the objects of scorn; not only themselves are vilified and degraded, but the great affairs which they conduct are obstructed, and the justice they administer is thereby disparaged.”

It seems unlikely that by 1911 the Crown would undertake the prosecution of such a libel case, but Ellmann suggests rather vaguely that some kind of informal pressure may nevertheless have been brought to bear upon the firm by Lady Aberdeen, the Lord Lieutenant’s wife. In fact, at a stormy 1912 meeting in Dublin, Roberts demanded that all mentions of the king be deleted from the collection. Joyce immediately consulted a solicitor, George Lidwell, who obligingly wrote to Roberts, carefully reserving judgment on the question of obscenity, while effectively minimizing the threat of a libel prosecution brought by the Crown. “I have read ... ‘Ivy Day in the Committee Room,’” he writes, “and I think that beyond the questionable taste of the language (which is a matter entirely for the author) in referring to the memory of the last two reigning Sovereigns of these Realms, the vulgar expressions put into the mouths of the Characters in the dialogue are not likely to be taken very serious notice of by the Advisors of the Crown.” The letter proved to be of little use, in large part because Roberts was receiving his own legal advice from Maunsell’s London office, which proved even more wary than its Dublin agent.
At the same August 1912 meeting in which Roberts demanded changes in “Ivy Day,” he thus—on the advice of his London solicitors—made an even more far-reaching request, one so broad that it would eventually sink the entire project and again leave Joyce without a publisher for his stories. This time his concern lay not with the Crown but with the Dubliners whom Joyce dissects in his stories. No doubt well aware of the Artemus Jones case and its implications, he requested that all of the real public houses mentioned in “Counterparts” be given fictitious names, before expanding this demand to include the alteration or deletion of every real person and place of business mentioned by name in any of the stories. He sought, in short, to remove any trace of the roman à clef by limiting Joyce’s distinctive use of detail as well as the text’s “conditional fictionality.” Roberts was furthermore advised by the London office that Joyce himself should now back the publication by securing large sureties against a potential suit. Should this fail, the editor was then advised to sue the author for deliberately breaking his publishing contact by providing a text he knew to be libelous. Thomas Kettle, the solicitor to whom Joyce first (unsuccessfully) turned for help, had already advised him that the book might indeed be brought to court, and we have seen that even Lidwell qualified his opinion carefully and focused it narrowly only on “Ivy Day.”

On August 23, 1912, Joyce made a frantic attempt to save *Dubliners*, offering to drive Roberts to the various businesses mentioned in order to secure permission directly to use their names. Joyce was desperate, as what initially appeared to be a relatively minor quibble about the direct mention of King Edward VII expanded rapidly into a wide-reaching series of demands not only to suppress a key element of the text’s innovative style, but to indemnify the house upon its publication. Though negotiations with Roberts would continue for another week or so, it had become clear that Maunsel would not publish the book, and on September 11, the printer—according to Joyce’s now disputed claim—finally destroyed the sheets for fear that he too might be named in a libel suit.
Dubliners would, of course, appear nearly two years later without any such editorial objections. In 1912, however, the “nicely polished looking-glass” Joyce hoped to hold up to his native city finally proved too accurate in its fidelity, its intricate details rendering suddenly hazy the increasingly unstable bar between fact and fiction. Roberts and Maunsel, after all, were correct: by using real names and places of business, the stories did run the very real risk of incurring any number of potentially very damaging lawsuits. When Joyce forsweats the dash—describing directly “the ten o’clock slow train from Kingstown” in “A Painful Case” and naming real pubs like “O’Neill’s,” “Davy Byrne’s,” and “the Scotch House” in “Counterparts”—he potentially casts these businesses and their owners (p.96) into the kind of “hatred, ridicule, and contempt” that defines the tort of libel. In his incredulous letters to Nora, Joyce writes of his attempts to find some kind of compromise and he assures Roberts that though “a railroad co. is mentioned once,” it is immediately “exonerated from all blame by two witnesses, jury and coroner.” In the public houses, he further contends, “nothing happens. People drink.” Attempting to resolve the risk of libel, in other words, Joyce argues that the text is not defamatory, but is instead merely an accurate representation of the city of Dublin and some of its well-known institutions. Rather than feeling damaged, he desperately concludes, “the publicans would be glad of the advertisement.” Joyce, in effect, contends that he does not mean to libel anyone and adduces such intentions as proof against any finding of defamation.
As we have already seen, however, his intentions were entirely irrelevant in court, and though he may have believed, for example, that the railway company in “A Painful Case” had been exonerated by the overt description of events in the story, Maunsell’s solicitors were rightly concerned that the subtle play of irony and the shifting instability of the story might introduce a reasonable interpretation that the company had been negligent in its actions. Similarly, the publicans in “Counterparts” could contend that far from an advertisement, the story in fact harmed their ability to conduct business by falsely asserting that they allowed the profligate consumption of alcohol. I do not mean, of course, to introduce these readings as particularly convincing, but cautious writers and printers had long sought to avoid the risk and considerable cost of a trial by carefully excising the mention of real people and places either by introducing fictional names or resorting to the conventional Victorian dash.
The eventual publication of *Dubliners* in 1914 might seem to vindicate Joyce’s arguments, and it does suggest that in a world on the brink of war less attention was being paid to the publication of potentially libelous short stories. The absence of that secretive dash, in fact, has by now come to seem an integral part of a distinctly Joycean aesthetic in which fictional events are deeply and perhaps inextricably embedded in the historical realities of Edwardian Dublin. According to his brother Stanislaus, when Joyce began work on the novel that would eventually become *A Portrait of the Artist as a Young Man*, he initiated an even more aggressive assault on the constraints imposed by the restrictions of libel law: “Jim is beginning his novel, as he usually begins things, half in anger.... It is to be almost autobiographical, and naturally as it comes from Jim, satirical. He is putting a large number of his acquaintances into it, and those Jesuits he has known. I don’t think they will like themselves in it.”

*Portrait, Ulysses,* and *Finnegans Wake* all make use of this same technique, and generations of critics have devoted considerable effort to revealing—inadvertently perhaps—that Joyce indulged in an essentially unprecedented campaign of libel that nevertheless remains relatively illegible to those unfamiliar with turn-of-the-century Dublin. Herbert Gorman, in an early biography written under Joyce’s own careful guidance, notes the frustrating inability of many readers “to crack the hard nuts of certain paragraphs containing comments on actual personalities” and concludes that an intimate knowledge of Dublin “might heighten one’s enjoyment, for the scandalous aspects of [Ulysses] would then be more greatly emphasized.”

The extensive guides and annotations that now provide maps indicating the precise location of Davy Byrne’s and references to real figures only further reinforce the importance of this telling aesthetics of detail for the book.

Joyce used the roman à clef to invade not only the city’s outhouses and whorehouses, but its historical realities as well. In doing so, he forged a distinctly modernist aesthetic that sought to rupture realism’s autonomy by breaking down the tenuous legal distinction between novels and news. The risks he initially incurred have now largely dissipated. In American jurisprudence, the First Amendment’s broad protection of free speech has significantly constrained the reach of libel, and the civil laws in Britain state that the dead cannot be libeled. Unlike the potent sexuality, which still has the power to rankle...
and even shock some readers when they come across it, the dense web of names and the multifold acts of revenge pervading Joyce’s works have increasingly become mere scholarly arcana rather than the stuff of legal wrangling and public scandal. But the first time *Ulysses* actually entered a British or Irish court of law, the case involved neither Gerty and her thighs nor Molly and her masturbation. Instead, Reuben J. Dodd filed a suit for libel. In the “Hades” episode, Martin Cunningham tells a story about Dodd’s alleged attempt to commit suicide by jumping into the Liffey and his father’s miserly offer of a florin to the boatman who saved his son’s life. In 1954, the BBC broadcast a reading of *Ulysses* featuring this episode and Dodd promptly secured from the High Court of Dublin a summons on the broadcaster claiming damages for defamation. In his affidavit, Dodd spells out his complaint clearly, hewing to the legal requirement that the passage be shown to have intentionally aimed to harm his reputation and his business: “James Joyce, the author, whom I knew as a schoolmate, had a personal dislike for me because of what he alleged my father did to his father. And so, when he wrote his book ‘Ulysses,’ in or about the year 1904, he made some disparaging references, including moneylending transactions, to a Mr. Reuben J. Dodd…. The passage complained of is a malicious and deliberate libel upon me and its dissemination by the B.B.C. exposes me to personal humiliation and injury. The whole incident described was a malicious falsehood and, in particular, that I attempted to commit suicide.” Dodd essentially won his case by securing a substantive out-of-court settlement. The BBC’s decision to withdraw demonstrates that even more than thirty years after its initial publication Joyce’s text continued to generate not only scandal but a very real risk for publishers, printers, and broadcasters who might find themselves subject to any number of suits. After all, Dodd is but one of the hundreds of real people mentioned in the text, many of whom might also reasonably claim that Joyce deliberately sought to bring them into “hatred, contempt, and ridicule.” In using the roman à clef to reach from fiction into the world of fact, Joyce expands the scandal of his libelous writings to provoke a collision between a seemingly autonomous aesthetic sphere and the web of legal constraints structuring its development.

“The Disguise I Fear Is Thin”
Given his own abrupt introduction to defamation law, there can be little doubt that Joyce knew what he was doing when he began to fill *Ulysses* with a staggering array of very precise information about his native city. Unlike the stories in *Dubliners*, which mention only a few public houses and a railway company, *Ulysses* invokes a vast array of names ranging from individuals to businesses to commercial products. Just as he began *Portrait* “half in anger,” so too Joyce seems to make it explicit in the early pages of *Ulysses* that this is a libelous book out to settle some old scores. Atop the Martello tower, Buck Mulligan mocks the sullen and solipsistic Stephen Dedalus before suddenly declaring, “it’s not fair to tease you like that Kinch, is it?” In the ebb and flow of Stephen’s consciousness, this jovial apology is treated as an act of self-defense: “Parried again,” he thinks, realizing that Mulligan “fears the lancet of my art as I fear that of his. The cold steel pen.”

We read this, of course, just as Joyce himself is spearing Oliver Gogarty with that very pen, exacting the revenge Mulligan may have feared but nevertheless failed to escape. Proving the legal principle that libel does indeed have the ability to displace fact with fiction, the historical Gogarty struggled against this satiric portrait for the rest of his very distinguished life. Indeed, *Ulysses* haunted his very grave and though his glowing obituary described his fury about the fact that “posterity would remember him as Buck Mulligan,” it nevertheless carried an attention-grabbing subhead that reads: “Author and Wit was Prototype of Character in ‘Ulysses.’”

As Claire Culleton argues, the book’s “conditional fictionality” is more than just an innovative technique, it is also “the ultimate revenge, in that it condemns a real person to caricatured fabrication.”
Gogarty was by no means the only one to recognize his potentially libelous portrait; according to Ellmann, when the book first appeared “a tremor went through quite a few of [Joyce’s] countrymen, who feared the part he might have assigned to them.”  George Bernard Shaw wrote in the 1921 preface to *Immaturity* that “James Joyce in his *Ulysses* has described, with a fidelity so ruthless that the book is hardly bearable, the life that Dublin offers to its young men,” an opinion he simultaneously conveyed to Sylvia Beach when he called the book “hideously real.”  Although the sheets had been printed privately in France, Joyce nevertheless took care to employ some pseudonyms in order to deflect his most serious legal risks. Gogarty, therefore, appears as Mulligan; Joyce is partially figured as Stephen; the Englishman Trench is concealed behind the pseudonym Haines; and the villainous Michael Cusak becomes the anonymous Citizen. There are other such alterations, but these three seem specifically intended to help elude the potentially most damaging libel suits by at least partially obscuring both Joyce’s maliciousness and the historical antecedents of some of the work’s most treacherous characters. To bring a libel suit, after all, Trench or Gogarty would first have to admit that they recognized themselves in their supposedly fictional portraits in order to convince a court they had been defamed. This, in turn, would not only grant Joyce and his work a certain degree of publicity, but would simultaneously offer the opportunity for this famously aggrieved author to defend himself by trying to prove that the portraits in *Ulysses* were more or less accurate.
Despite the possible appeal of such publicity, however, Joyce remained concerned about the risks he had run. In a brief note appended to his 1967 essay, “James Joyce’s Sentimentality,” Clive Hart suggests that Joyce had “a still more cogent reason” for avoiding Dublin after 1922 than the romance of exile—namely, “the certainty of disastrous libel actions if he returned.”\(^{36}\) The decision to remain out of reach of the British courts afforded him an important bulwark, though it also appears that he did take some additional steps. A research note Richard Ellmann did not incorporate into his biography describes a conversation with A. J. Leventhal, who recalls that as late as 1921 Joyce, explicitly concerned about the threat of libel, asked if any Blooms still resided in Dublin. Leventhal assured him that they had departed, apparently convincing Joyce that he could use the name of the most clearly fictional character in \textit{Ulysses} without undue risk.\(^{37}\) If Bloom had some sort of clear historical antecedent, of course, or even if some tenuous connection could be drawn to a living person, then the grounds for a defamation suit would have been quite strong, particularly since the text delves so deeply into his sexual habits and private thoughts.

\textbf{(p.100)} These textual precautions only emphasize the importance of libel law to \textit{Ulysses} and the book’s critique of the legal constraints delimiting literary realism. In his own attempt to disrupt the intentional fallacy, William Empson argues that rather than developing techniques (such as David Hayman’s “Arranger”) for distancing the author from the text and thus affirming the supremacy of fiction, we should instead realize “that Joyce is always present in the book—rather oppressively so, like a judge in court.”\(^{38}\) Empson’s metaphor is more literal than he perhaps realizes, because \textit{Ulysses} puts its readers in the strangely juridical position of serving as those jurors who, according to the tort of libel, are alone empowered to determine whether or not a particular character has a historical antecedent and whether or not he or she has been defamed. This begins, as I have already suggested, when the novel itself begins atop the Martello tower, but it continues throughout the text in myriad ways. It emerges almost comically, for example, in the conundrum of the famous “man in the mackintosh,” an unnamed character who flits mysteriously in and out of the text. Scholars have struggled for decades to arrive at possible historical correlates for this character, a quest forever stymied by a stubborn anonymity.
that at once embodies and satirizes our search for the real facts behind this conditional fiction. Sebastian Knowles, in his study of gamesmanship in *Ulysses*, argues that the book “is built on the equals sign,” a figure that describes not only the parallel paths taken by Bloom and Stephen but our own attempt to locate equivalences for the characters themselves. Bloom himself thematizes our search for the history behind the fiction when, after masturbating on the beach, he strolls to the tide’s edge and uses a stick to write in the sand “I…. AM. A.” (U 13.1258, 1264). The sentence remains incomplete, and any number of serious studies have attempted to infer the conclusion of this elliptical phrase. Joyce, however, deliberately provokes here our inability to know who Bloom actually is—a mystery Joyce quite legalistically preserved as his conversation with Leventhal indicates. The extreme skepticism so distinctive of the roman à clef is dramatically compounded with the aesthetics of detail in the “Circe” episode, where names, identities, and descriptions shift so rapidly and so fantastically that identification becomes an endlessly mutating puzzle. As hypothetical members of the jury, we are left with a paralyzing doubt that might exonerate Joyce precisely because the boundary between fiction and fact cannot be fixed.
The scandal of libel, however, is more than just an implicit component of the book’s deeply interwoven symbolic structures, since it also constitutes an explicit part of the plot itself. It is there at the Martello tower and emerges later in the day when Bloom runs into Josie Breen who complains of her eccentric husband, Dennis: “He’s a caution to rattlesnakes. He’s in there now with his lawbooks finding (p.101) out the law of libel” (U 8.229–230). Bloom quickly learns that Dennis received an anonymous postcard reading “U.P.” or perhaps “U.p.: up” (8.257, 258). Like the man in the mackintosh, this card too has troubled any number of readers who not only have difficulty making sense of it, but who struggle to discover a meaning so defamatory as to occasion the suit Breen intends to file “for ten thousand pounds” in damages (8.263–4).

Richard Ellmann argues that the card implies some sort of erectile dysfunction, while others suggest that it is a reference to Dickens’s *Oliver Twist*, in which the letters U.P. are used to signal an old woman’s death. Alternatively, it may simply indicate that the somewhat dotty Breen is mentally ill, the two letters signifying that, like weak whisky, he is “under proof.” All of these readings seem more or less feasible, which means that any case for libel—even if the person who sent the card could be identified—would likely fail. The case, after all, would turn narrowly on the meaning of the card, and a jury would be asked to determine a particular interpretation that was clearly defamatory. The multiple possibilities, however, make it unlikely that a clear finding of fact could be determined. The roman à clef’s conditional relation to truth, in other words, which cannot be legally grounded in authorial intention, essentially serves as a potential defense against any charge of libel. Like much of the rest of *Ulysses*, this card can be multiply interpreted and contested, with definitive meaning held in permanent abeyance. The book’s potentially defamatory scandals, therefore, can be at least partially deflected by its difficulty, as the roman à clef’s anarchism serves simultaneously as a testament to its aesthetic power and a possible barrier to its prosecution.
Breen, in pursuing his unlikely suit, seeks out the services of John Henry Menton, a real Dublin solicitor with offices on Bachelor’s Walk. Like many characters in the text, Menton too appears amidst the fantasies and nightmares of “Circe,” where Bloom—accosted by the watch and asked for his name—first identifies himself as “Dr. Bloom, Leopold, dental surgeon” (15.721), the name of another real Dublin figure in 1904. In what amounts to a skillful act of deception, Bloom gives his name yet fails to properly identify himself. He then identifies his solicitors as “Messrs John Henry Menton, 27 Bachelor’s Walk” (15.730). This encounter with the guards, furthermore, is immediately preceded by an imagined conversation with Josie Breen, who expresses her mock horror at finding Bloom in Nighttown. Flirting with her, Bloom grows suddenly alarmed when she mentions his name: “Not so loud my name. Whatever do you think of me? Don’t give me away. Walls have ears” (15.398–399). Anxious about being caught in a potentially scandalous position, Bloom attempts to conceal his identity behind layers of confusion and misdirection, subtly evoking the hint of libel. Just as a jury must decide on a defamatory interpretation of a passage, so too must they agree that the plaintiff in the case (p.102) is actually the person described in the text. In suits involving nonfictional texts, this is rarely an issue, but it typically constitutes the core of any action involving a roman à clef. In a potentially libelous passage describing Bloom’s trip to a bordello, Joyce thus evokes the apparatus of defamation law, introducing once again the Breens and their solicitor, Menton, as Bloom employs pseudonyms and borrowed names to elude detection. Joyce already knew from Leventhal that Dr. Bloom no longer lived in Dublin in 1922, but for his readers this moment would have effectively summarized one of the text’s most pressing questions: Who is the historical antecedent of Leopold Bloom? Were he real, after all, he would be the most defamed character in the text and his identification would no doubt spark a major scandal. We now recognize him as one of the few characters in the book without a direct historical antecedent, but this moment of confusion and misdirection in “Circe” both obscures his identity and promises to reveal it. As a result, we are sent stumbling into a thicket of historical and fictional antecedents that exemplify the roman à clef’s anarchic power to activate the kind of skepticism barely suppressed by the realist novel.
Throughout *Ulysses*, Joyce deliberately and provocatively invokes this genre to probe the boundary between fact and fiction, thereby pitting legal and aesthetic modes of interpretation against one another in a scandalous yet creative conflict. The pleasure and frustration of this practice is nowhere more evident than in the “Scylla and Charybdis” episode, in which more real names are invoked than anywhere else in the text. As the scene opens in the National Library, we are immediately confronted with John Eglinton, the editor of *Dana* and a well-known man of letters. His name can be tracked through various guides, revealing the details of his quite real and very accomplished life; yet we also learn that he is not John Eglinton, that this is merely a pseudonym he used (his real name was William McGee). Furthermore, he is asking Stephen Dedalus—a pseudonym for James Joyce in 1904—about his plans to write a book comically entitled *The Sorrows of Satan*, the title of a wildly popular novel written by Marie Corelli—a pseudonym for Mary MacKay, who thought she was the reincarnation of William Shakespeare. As if this roster of displaced names is not confusing enough, the conversation is shared by Æ, the mystically initialed name taken by the writer and spiritualist George Russell. Finally, Dedalus, feeling the “elder’s gall” behind Eglinton’s question about his novel, merely smiles and then thinks of a fragment from a poem originally written by Oliver St. John Gogarty, which Buck Mulligan later recites when he appears. This most learned episode, in which scholarly sources are bandied about against the background of a vast cultural archive, thus begins amidst a welter of names and identities that disrupts any attempt to define the text’s fictional limits. By the end of the episode, this confusion is explicit as “MAGEEGLINJOHN” asks Stephen, “What’s in a name?” (9.901–2). What indeed? As the narrative suggests, even Eglinton’s own identity is a conditional fiction, and one could only wonder what a jury might do were it asked to consider this text in a libel suit. If Joyce defamed Eglinton, does that mean that he also defamed Magee? Does a pseudonym have the same right to a good name that a real person has? Noting their propensity to change names and to adopt distinct public personas, Stephen calls the writers gathered in the library “cypherjugglers” (9.411)—itself an entirely apt way to describe the roman à clef’s manipulation of details. Even more than the nightmare of “Circe,” this episode mixes fact with
fiction, preventing us from simply accepting the text as pure invention even as it insists on its historical veracity.

Amid this misdirection, “Scylla and Charybdis” features Stephen’s long-awaited theory of Shakespeare’s plays, itself a dazzling yet defamatory attempt to deduce historical fact from otherwise apparently fictional works. Mingling textual and documentary evidence, Stephen extracts all manner of libelous gossip from the plays, prompting Æ to depart and dismiss such talk as “prying into the family life of a great man,” for information that is “interesting only to the parish clerk” (9.181, 184). In an episode already mired in a complex assortment of names and pseudonyms, however, we cannot depart with the snobbish poet and are left instead with what appears to be something like Hamlet’s instructions to the players—that is, an encoded and ambiguously satirical set of instructions from the author himself about how we might go about reading *Ulysses* as a roman à clef.\(^44\) Just as Stephen instructs his listeners in how to draw fact from fiction, so too we as readers (and perhaps even jurors) are asked to listen to these instructions and apply them not to Shakespeare’s plays, but to *Ulysses* itself.\(^45\)

---

\(^{44}\) See below for discussion of Stephen’s theory.

\(^{45}\) This reading of the episode, while certainly not without precedent, is not without its critics. See, for example, MacCabe’s *The New Epic Tradition in English Literature* (1977), which argues against the notion of *Ulysses* as a roman à clef. However, I believe that the episode as a whole—and particularly the instructions for reading Shakespeare—can be read as a parodic commentary on the very idea of reading fiction.”
Stephen crucially contends that the Bard played the ghost in *Hamlet*, talking to an incarnation of his own dead son, Hamnet, about the infidelity of Anne Hathaway. Rocked by tragedy, however, he can do more than speak to this other version of himself in an act of painful revelation. “His beaver is up,” Stephen notes of the ghost, suggesting that when Shakespeare walked on the stage, his own face was visible to the audience as he related this tale of murder and adultery, making fiction “consubstantial” with fact just as the ghost itself is “the son consubstantial with the father” (9.481). The conditional qualities of this fiction drives Stephen’s theory just as it drives our own attempts to read *Ulysses*, mired as we are in the text’s deliberate and provocative refusal to abide by the laws of libel and defamation. Even this reading, however, becomes ironic, as Stephen ends his performance by telling Eglinton that while he does not believe his theory, he is nevertheless willing to sell it for a guinea. This mocking conclusion again suggests the way we too might read *Ulysses*: neither as fact nor fiction but as an elaborate edifice of gossip and defamation—a distinctly modernist experiment in rejuvenating the roman à clef. “You are a delusion” Eglinton finally tells Stephen (9.1064). This constitutes the core of Joyce’s assault on the legal limits of fiction: Stephen is indeed a delusion, a fantasy like the ghost of Hamlet’s father that both appears to speak the truth and yet critically refuses to validate that knowledge.
“Scylla and Charybdis” concludes with Buck Mulligan revealing his own satirical rendition of the proceedings in the library, a “national immorality in three orgasms,” which mocks all this theorizing as mere intellectual onanism. He reads it to Stephen, telling him that “the disguise, I fear, is thin” (9.1178), thus rehearsing in his own little drama the same kind of lightly veiled and deeply libelous attacks Stephen finds in Shakespeare, and that we too can tentatively find in Ulysses. The disguise is indeed thin, since we do know that this is both Buck Mulligan’s play and Oliver Gogarty’s, just as this is both Stephen’s Dublin and Joyce’s own. Rather than concealing its engagement with historical reality as Victorian novelists typically did by decorously avoiding the names of real people, Joyce uses the roman à clef to destabilize the autonomy of art and the increasingly fraught legal institutions designed to maintain a critical distance between fiction and fact. This deliberate and potent confusion constitutes one of the most remarkable and original aspects of Joyce’s writing, though it has been largely obscured by the text’s epic legal entanglements with obscenity laws and, over the course of time, the gradual diminution of its ability to bring living people into “hatred, ridicule, and contempt.” It nevertheless constituted a vital aspect of the book’s scandal. Joyce recorded “nameless shamelessness about everybody he ever met” and in so doing at once courted libel suits and crucially revealed the fragility of the legal assumptions about the novel on which they would have depended.
As he learned from his attorney when trying to bring *Dubliners* into print, even his own intention could not constitute a defense, nor could it legally guarantee the meaning of any particular passage. In *Ulysses*, therefore, Joyce created a work that is blatantly libelous yet seeks to elude that charge in its misdirected names, its aesthetic difficulty, and its deconstructive ironies. As the Dodd trial later revealed, this defense proved insufficient and justified Joyce’s own decision to remain in exile, safe from the sanctions of British and Irish courts. In a 1909 meeting, after their friendship had collapsed, Gogarty told Joyce, “I don’t care a damn what you say of me so long as it is literature.” Joyce took him at his word, and in the process attempted to undermine the concept of literature as it had taken shape in the eighteenth century, exposing the limits of its imagined autonomy while simultaneously challenging the law’s ability to delimit the nature and structure of art. Long after (p.105) Woolsey’s decision and the novel’s ascension in the canon, this remains one of the scandals of *Ulysses* we have yet fully to confront.

Wyndham Lewis

“Remove from Satire Its Moralism”
Despite the fact that his work deals everywhere in libel, Joyce himself entered a courtroom as part of a defamation action only once—after he sued an English consular agent named Henry Carr in a Swiss court. The dispute arose from a feud between the two men regarding a semi-professional performance in wartime Zurich of Oscar Wilde’s *The Importance of Being Earnest*. Joyce had served as the production’s business agent, and when he showed up to collect a disputed debt, Carr threatened him with violence and called him a swindler. The legal proceedings were protracted and the British embassy sought deliberately to hinder them, so that by the time of the trial Joyce was forced to withdraw his claim and pay court costs of 120 francs. Though frustrating, this was little more than a minor inconvenience and Joyce—according to form—exacted his revenge by giving the name “Private Carr” to the solider who assaults Stephen Dedalus in “Circe.” Like the author of *Ulysses*, Wyndham Lewis too often waged rather than merely wrote fiction, brandishing his pen in a campaign of cultural critique and petty revenge. But, where Joyce largely managed to evade the limits of libel law, Lewis found his own similar experiments stymied and suppressed by the paradoxical British laws governing defamation in the wake of the Artemus Jones case. Between 1913 and 1938, Lewis was directly involved in at least six direct or threatened actions for libel, almost all of which were lost when nervous editors agreed to settlements. Two books, *The Doom of Youth* and *Filibusters in Barbary*, were withdrawn from publication, while the type for a third—*The Roaring Queen*—was broken up at the proof stage. In drawing so explicitly on the conventions of the roman à clef, Lewis too lodged his work at the scandalous boundary between fact and fiction, where a deliberately formulated skepticism collided with the legal constraints governing the novel. Unlike Joyce’s work, which gained a certain degree of freedom through its author’s self-imposed exile, Lewis’s troubled career more clearly exemplifies the ways in which the law constrained other kinds of experiments with the roman à clef by seeking to regulate its uncanny social life.
Lewis’s onetime publisher, Rupert Grayson, who was himself brutally satirized in *Snooty Baronet*, remembered Lewis wielding the same “cold steel pen” (p.106) Stephen describes atop the Martello Tower and with equally hostile intentions: “He employed his usual weapon, a pen sharpened to a dagger point with which he etched my likeness …, cutting lines jagged and deeper than scars and poisoned with acidic brilliance.”

Unlike Joyce, who leavened *Ulysses* with humanism and sentimentality, Lewis sought to “remove from Satire its moralism” by deploying the roman à clef as a cruel and alienating counter-form to the novel.

This radical critique, which spans most of Lewis’s major works, reaches its climax in the *Apes of God*, only to be increasingly diminished by a series of defamation suits of the sort Joyce generally managed to avoid (until after his death). Lewis’s career, therefore, offers a compelling example of the ways in which the laws of libel shaped early twentieth century literature by constraining a particularly caustic mode of narrative experimentation with the roman à clef that finally revealed the precise limits of modernism’s imagined autonomy.
Lewis infamously thrived on the carefully constructed image of himself as “The Enemy,” a cunning provocateur who, as his biographer Jeffrey Meyers notes, “protected his privacy at the same time that he courted publicity, for he moved about in a furtive manner, as if in constant expectation of arrest, yet wore conspicuous and flamboyant hats and capes that instantly drew attention to himself.” Such contradictions form the very core of the aesthetic flaunted by Lewis, who sought to inhabit the world of art and letters in order to reveal its fatuous claims to autonomy. Indeed, one of his earliest and perhaps best known works of fiction, the 1918 Tarr, used the formula of the Bildungsroman to turn a coldly dispassionate eye upon himself even as it mocked the genre’s bourgeois solipsism. Like Joyce’s Portrait and D. H. Lawrence’s Sons and Lovers, it focuses on the rising consciousness of an aesthetically sensitive artist. Yet the dynamic subjectivity of characters like Stephen Dedalus and Paul Morrell, as Paul Peppis argues, becomes in Lewis’s work “a repetitive, torturous vortex of conflicting forces” so that the central characters can only “strive to adopt an identity they wish were authentic in hopes that by performing that pseudo-self it might somehow become real.” In Tarr, there is neither authenticity nor epiphany, only an endless and chaotic jumble of social and psychic forces that coalesce as publicly staged identities. Just as Lewis guarded his own private life with paranoid intensity yet ostentatiously staged that privacy, so too the characters in this early work find themselves always already implicated in the very structures they seek to escape. Rather than providing some glimmer of authenticity or redemption, the world of art becomes little more than another capital marketplace where identity is ceaselessly commodified and even the most private moments are weighed in the public scales of profit and loss.

Such a critique of authenticity is by no means entirely unique to Lewis, and even Joyce’s Portrait is now typically read as an ironic critique of the Bildungsroman it once seemed to exemplify. The “new secondhand clothes” Stephen’s mother lays out for him at the end of the book symbolize the recycled and thus inauthentic nature of his own romantic pursuit of exile in bohemian Paris. Unlike Joyce, however, who generally managed to remain always on the edges of the bohemian world—even when he finally moved to its Parisian heart in 1920—Lewis was throughout his career deeply embedded in the vicious and competitive world of
coterie modernism that he otherwise endlessly savaged in his works. His first encounter with libel law, in fact, found him on the offensive in 1913 after he broke with Roger Fry’s Omega Workshop. Though the details of this particular scandal remain somewhat murky, Lewis believed that Fry had stolen a commission from him to design a “Futurist room” for the Ideal Home Exhibition sponsored by the Daily Mail. Lewis responded by first securing the services of a solicitor from the offices of Fry, Vandercom, and Co. and then publishing a circular to the friends and clients of the Omega Workshop. The letter was plainly meant to provoke Fry into naming Lewis in a defamation suit, asserting first that he had taken the commission “by a shabby trick” and that he had furthermore deliberately misled the organizer of an exhibition about the availability of another artist’s work. It then concludes by condemning the Omega Workshop as a crass, bourgeois attempt to appropriate the energy of a radical art movement: “This enterprise seemed to promise, in the opportunities afforded it by support from the most intellectual quarters, emancipation from the middleman-shark. But a new form of fish in the troubled waters of Art has been revealed in the meantime, the Pecksniff shark, a timid but voracious journalistic monster, unscrupulous, smooth-tongued and, owing chiefly to its weakness, mischievous.” Lewis condemns Fry and his cohort for their alleged obsession with commercial gain and their ability to manipulate the press in order to puff themselves at the expense of others. As Bloomsbury immediately realized, however, Lewis too was playing “Pecksniff shark,” hoping to provoke a defamation suit that would serve primarily to advertise his own work and reputation. Vanessa Bell wrote to Fry explicitly to warn him that Lewis may have been setting just such a snare, and that what he “would really like would be an action for libel.” No response to Lewis’s broadside would, in fact, be published and, despite continued provocations, the legal gambit reached its conclusion when his solicitors sent a bill along with a note regretting that the circular had “failed to arise Roger Fry.”
Following this break with Bloomsbury, Lewis formed his own alternative coterie of artists and writers, first creating the Rebel Art Center, then organizing the Vorticist movement and editing the two remarkable volumes of *Blast*. Such projects, however, were short-lived, not only eclipsed by the First World War but driven into obscurity by Lewis’s own hostility toward the very kind of organizations he sought to create. The larger trajectory of his career, in fact, consistently reiterates the paradox of the private man in the gaudy costume, for though he embedded himself deeply in bohemian life, he nevertheless ceaselessly critiqued its institutionalization. After cursing “snobbery” and the “fear of ridicule” in the first issue of *Blast*, for example, he then embraces the savagery of a modern art movement inextricably entangled in the mechanisms of mass-mediation and celebrity that were themselves rapidly expanding their reach during the first decades of the twentieth century.\(^5^8\) “This enormous, jangling, journalistic, fairy desert of modern life,” he writes, serves the modern artist “as Nature did more technically primitive man.”\(^5^9\) Rather than a refuge from the commercial world, he contends bohemia is merely one of its many commercial outgrowths, its organization and institutions fully penetrated by advertisement, competition, and self-promotion. In order fully to critique the “journalistic” world of modernity, in effect, Lewis refuses to exempt himself from critique, becoming the very sort of “Pecksniff-shark” that he once condemned. This is what he means when he writes of a satire without morals: an assault upon the very institutions that have made his own work possible, one so insistent and pervasive that it condemns both reader and writer alike. Unwilling to claim any sort of moral high-ground, Lewis instead becomes the Enemy—even to himself.
This self-critical impulse pervades his work, but finds its most powerful expression in the massive 1930 roman à clef, *Apes of God*. The title refers to the vast number of “New Bohemians”: the “gossip-mad, vulgar, pseudo-artist, good-timers” who, the text claims, are “more damaging for the very reason that they are identified in the mind of the public with art and intelligence.”\(^{60}\) In a series of brutal sketches, the narrative traces the journey of an idiotic young man, Dan Boleyn, through this treacherous world of “restlessness, insecurity and defamation” in which art is never more than a veiled attempt to secure fame or exact revenge on one’s enemies. The text itself is extraordinarily long and densely packed, its loosely organized chapters brutally targeting almost the entire panorama of modern aesthetic production. Boleyn himself conjures the generic codes of the *Bildungsroman*, and he spends a good deal of the narrative treasuring his supposed genius while suffering a bewildering array of humiliations. Bloomsbury, psychoanalysis, sexology, homosexuality, Proust, and literary coteries are all savagely attacked, and the book concludes with Dan’s pointless death in the 1926 General Strike.
The most remarkable aspect of *Apes of God*, however, is its dogged manipulation of the roman à clef’s anarchism. Writing in *The New Review*, Ezra Pound (p.109) lightly dismissed this aspect of the work, suggesting that “in eighty years no one will care a kuss whether Mr X, Y or Z of the book was ‘taken from’ Mssrs Puffin, Guffin or Mungo.” As Pound so often did, he attempts here to remake this book into something he finds more suitable, even at the cost of doing great damage to the underlying text. Thus, the review huffily separates *Apes from God* from the taint of the roman à clef in an attempt to counter the more popular perception of the book, summarized by an anonymous reviewer for the *Evening News*: “Just what it is all about I cannot say, for I have not the key. Mr. Lewis hates widely and well. I assume that there are many portraits in this book, but they are portraits, for the most part, of those whom I do not know…. I should have preferred ... less mysteriousness in the matter of identification.” The more snobbish reviewer for *Everyman* is equally explicit, calling the book nothing more than a portrait collection of “the people you read about day by day in the popular Press.” Despite Pound’s defensive lament, *Apes of God* remains most strikingly vibrant now for the same reason it did in 1930: it draws on the structural ambiguity of the roman à clef to undermine the legal and aesthetic compromise underwriting the realist novel.
Rather than a set of broadly drawn stereotypes, *Apes of Gods* manipulates the finest descriptive details to single out real individuals, attacking them personally while simultaneously using them to allegorize the hypocrisy underwriting the entire aesthetic field of production. Of a piece with the circular letter mailed in 1913, the book was carefully designed to provoke a libel suit. Though Lewis did not retain a firm of solicitors in advance of its publication, he still managed the text’s circulation very carefully. Two short extracts were published in Eliot’s *New Criterion*, but they focused narrowly on parts of the book that did not contain any portraiture. In 1924, Lewis offered Eliot a third extract from the climatic chapter entitled “Lord Osmund’s Lenten Party,” which harshly describes the Sitwell family’s obsessive pursuit of celebrity as well as their “professional wistful juvenility” (393). When Eliot received some portion of this in the *New Criterion* offices, however, he asked Lewis to delete one explicit—if relatively innocent—reference to Bloomsbury, while also suggesting that the fictional names “Lord Osmund” and “Stillwell” should be more radically altered in order to avoid legal action. Even though these changes were quickly made, Eliot continued to equivocate, and by 1925 Lewis began to lose patience, withholding another piece he had already submitted while warning that “should any of these fragments find their way into other hands before they appear in book-form, I shall regard it as treachery rather than a harmless trick, or as the inadvertence of a harassed man.”

Lewis had good reason to be worried, particularly if he were indeed hoping to provoke a defamation suit. One of the basic principles of British law is that an act must first be committed before it can be enjoined. Thus, Lewis could not be named in a suit until and unless he actually published the work. As we have already seen in chapter 3, however, publication itself is defined simply as writing a defamatory statement and sharing it with a third party. Thus, were a manuscript copy of the section into find its way into the Sitwells’ hands before it had been published, they would be free to sue Lewis for libel before the text had even gone to print, effectively short-circuiting any attempt to profit from the chapter’s publication. In the end, Eliot declined to publish the piece, though Osbert Sitwell did get wind of the larger project, warning Lewis in a 1929 letter not to “get onto a frail biographical track in your new book, as it would be extremely tiresome to make us either self-conscious or quarrelsome.”
Lewis, of course, was perfectly aware of the risks he ran in writing this kind of text, and by 1930 the consequences of the Artemus Jones case had rippled throughout the publishing industry. Merely changing a few names in the final text—Finnian Shaw for Sitwell, for example, or Matthew Plunkett for Lytton Strachey—afforded him little legal protection, particularly when the veneer of fiction was so lightly applied. A plaintiff would have little difficulty in filing a colloquium demonstrating that many readers would draw quick and clear connections between the Sitwells and the Finnian Shaws. Both families consisted of two brothers and a sister, a caretaker, and a cranky old father, all of whom shared an ancient manor house and hosted magnificent parties frequently described in the pages of gossip columns. Many of the other portraits, furthermore, are equally pointed. The Strachey character, for example, is a tall yet awkward gay man, the “fairy giant of a Bloomsbury pantomime” (81), who is fascinated by psychoanalysis and carries on an awkward romantic relationship with a diminutive woman, herself a dead ringer for Dora Carrington.
Perhaps the most striking aspect of the book is its methodical—even manic—delineation of external detail, so that the characters assume the kind of concrete nastiness evident in some of Lewis’s most striking paintings. “No book has ever been written,” he proudly wrote, “that has paid more attention to the outside of people. In it their shells or pelts, and the language of their bodily movements, comes first, not last.” Hugh Kenner calls this “puppet-fiction,” and a number of critics emphasize what a radical departure it was from the stream of consciousness and interior monologues Joyce and Woolf both had so skillfully developed. Particularly when read against Lewis’s condemnation in *Blasting and Bombardiering* of “time consciousness,” these portraits depend on a comedy that arises from “the observations of a thing behaving like a person.” That is, by refusing to provide any kind of narrative access to individual consciousness, Lewis engages in a philosophical assault on the world, his objective aesthetic deliberately reducing what Vincent Sherry calls “the pretense of human superiority” to a mere “animal’s humorous impersonation of free and thinking humanity.” This widely accepted description of Lewis’s aesthetic, however, obscures the fact that such objectivity inevitably produces texts shot through with the roman à clef’s distinctive aesthetic of detail. The focus on the external body, after all, makes it easy for select readers to identify the real people moving through an apparent work of fiction, particularly since their features and habits are described with such telling detail. Lewis’s objective aesthetic, therefore, draws its critical energy not just from a philosophical resistance to Joycean stream of consciousness, but from a much more scandalous deployment of the roman à clef as well.
Apes of God relishes its own unstable and potentially disruptive social life. It begins with a framing narrative focused on an aged gossip columnist and reaches its climax at the Finnian Shaw costume ball where the participants arrive in fancy dress as characters from fiction, “human cryptograms ... vegetative, secretive—grown from spores, without true seed, stamen-and-pistilless” (355). The text, in other words, thematizes its own identity as a roman à clef, generating characters who are themselves lightly disguised as literary figures while indulging “gluttonously [in] gossip” and “stale personal allusion” (354). Lady Fredigonde Follett, the “Gossip-Star” who opens the book, wonders, as Stephen Dedalus does in the National Library, “What’s in a name?” (15, italics in original). This is the very question that drives the roman à clef and, as the Artemus Jones case made clear, it is also a crucial element in determining the nature and extent of a libel. As Follett realizes, however, names are particularly slippery things: “Bolts from the blue they flop down on men and women from nowhere, in their cradles, on each anonymous noodle—all of us worse luck have to be a Something! Seeing how at random names fall upon the heads to be accommodated with tags, descriptive whatnots—the shower of Violets, the downpour of Jacks, Joans, Peters, Toms—what reference can there be?” (15). Positioned as an introduction to the text, this passage asks readers to consider precisely the question of names. Although it does not offer an explicit key, it suggests that the names Lewis uses are indeed somewhat haphazardly assigned and thus invites readers to look tentatively beyond them to the brutal descriptions that offer a much more precise reference to an individual’s personality and identity than terms like “Jack” or “Violet” could. And yet, in a passage that could easily have been drawn from a treatise on libel, Follett also recognizes that “we survive by words ... things perish” (15, italics in original). Defamation law rests upon precisely this assumption—that printed words, in particular, have the power to do a unique and lasting kind of damage. Lewis thus frames Apes of God as a (p.112) gossip-driven roman à clef that exploits the random and unstable nature of names in order to relate unpleasant truths about the real people he describes.
Such ambivalence is, of course, essential to the genre’s infectious ability to reinject a destabilizing skepticism into the news/novel divide. This opening narrative, in fact, only heightens the reader’s appetite for scandal by assuring him or her that real damage has been done. Mark Perrino argues that Lewis modulates such ambiguities quite carefully in order to afford himself some degree of protection: “With his external method Lewis portrayed people so objectively, literally as physical objects, that the images were painfully embarrassing, yet he included enough fantasy to allow him to claim that the characters did not derive from particular individuals.” There is unquestionably a degree of satiric excess in the book, and it may indeed afford Lewis some small degree of plausible deniability; but it is consistently shadowed by the text’s dogged insistence that it is indeed a roman à clef—that its fictions are actually facts. Indeed, in the gossip-driven world Dan explores, people are endlessly concerned not only about their own reputations but about how they might appear to others. Guiding Dan through this maze of performativity, deception, and deceit is Horace Zagreus, a darkly satiric Virgil who provides insights into the petty habits of the bohemian Apes. He sets Dan a variety of odd assignments, arranging for him to move through the parties, salons, and studios of London while requiring the dim-witted young man to write up his often bizarre experiences—ranging from posing nude for a lesbian painter to observing another artist’s collection of whips.
Each chapter unfolds in roughly the same fashion as Dan goes on one of these visits and uncomprehendingly observes the hypocrisy of a fully institutionalized bohemian subculture. Even the roman à clef, it emerges in a chapter entitled “Chez Lionel Kein, Esq.,” is an essential part of this deeply corrupted art world, precisely because it was used so regularly even by otherwise ardent defenders of art’s impersonality and autonomy. Lewis modeled Lionel Kein, around whom this chapter congeals, on Sidney Shiff, Proust’s English translator and a well-known man of letters. After listening to Kein and his wife praise À la recherche du temps perdu as the greatest of literary works, Zagreus anticipates Edmund Wilson by noting that Proust wrote a roman à clef rather than a novel. Furthermore, he emphasizes that those who insist on the work’s supreme aesthetic value obscure its darker satiric ends. “How is it that no one ever sees himself in the public mirror—in official Fiction?” he asks. “People feel themselves under the special protection of the author when they read a satire on their circle…. It is always the other fellows (never them) that their accredited romancer is depicting, for their sport” (255). Cutting through what he imagines to be vacuous rhetoric about literary aesthetics, Zagreus (p.113) contends that these “new bohemians” miss the point of work by Proust and others. Believing themselves safely ensconced in the author’s coterie, they see only the brutal portraits of others and fail to acknowledge the indictments leveled against themselves.
Throughout the chapter Zagreus spells out the consequences of this conditional mode of writing and reading, which he contends is becoming ever more damaging and widespread. Modernist impersonality, in particular, degenerates into mere strategic misdirection, becoming "a wonderful patent behind which the individual can indulge in a riot of personal egotism" (260). Far from a marginal or archaic genre, he contends, the roman à clef has become the very essence of a new mode of writing that disrupts the novel’s complacent autonomy: "Fiction, as we call it, is indeed no misnomer, since it is generally an untruthful picture. In its high-brow forms it is in fact the private news-sheet, the big ‘Gossip’-book—the expansion of a Society newspaper-paragraph—of the Reigning Order. And the Reigning Order is the people with the pelf and the circle of those they patronize, and today it is the High Bohemia of the Ritzes and Rivieras. And the ‘great novels’ of this time are dramatised social news-sheets of that particular Social World" (262, emphasis in original). Within a celebrity-obsessed culture, Zagreus contends, the divide between news and novels collapses as readers come to believe they can unlock most any text to reveal the real people populating the gossipy social columns of the burgeoning popular press. Furthermore, the infectious consequences of this confusion radiate into reality itself, so that people begin to confuse themselves with characters in books. Bohemia is thus filled with empty and mechanical beings in search of an author to write them fully into being: “they have all been written about in their own or their friend’s books—upon that you may rely. But what of Fiction? It is a Fiction as dependent upon reality—such a poor reality and so unreal—that they are neither flesh nor fowl—they are fictional mongrel facts” (293, emphasis in original). Like Joyce’s term “cypherjugglers,” this aptly describes the revived roman à clef, and for Zagreus it becomes the definitive genre of a rapidly decaying modernity in which reality has collapsed into the celebrity apparatus of the popular media. Indeed, before he is finally thrown out of the Kein’s flat, he concludes that the couple constitutes perhaps the poorest class of modern bohemians, “the people who have never been able to become fiction,” precisely because no one has ever bothered (until now) to write about them (294, emphasis in original).
The ironies of this particularly pointed critique of modernist aesthetic production abound, since Lewis himself deploys the roman à clef in order to critique its disastrous predominance. Gossip, innuendo, and celebrity scandal drive *Apes of God* just as powerfully as they do the works Zagreus condemns, introducing (p.114) into the text a bewildering hypocrisy that seems to undermine some of its most eloquent moments. Critics like Perrino who seek to redeem Lewis for a more Eliotic modernism misunderstand this aspect of the book when they contend that Lewis attempts to “obscure the most effective aspect of the novel (especially to his contemporary audience), the insulting portrayal of actual people [and] that these protests constitute a *covert* denial of the novel’s personal dimension, a denial that ironically attests to some measure of guilt.”71 There is nothing ironic about Lewis’s sense of guilt; he self-consciously condemns himself, his text, and his readers in *Apes of God*. This satire without morality, as he describes it, does not allow for the creation of a position of superiority or impersonality outside of the text. Instead, like the idiotic Dan, we too are led through the warrens of London’s new bohemia and invited—even required—to indulge our desires to read reality into the book as if it were a “private news-sheet,” ferreting out the lightly disguised figures behind its fictional façade.
Zagreus himself initially appears to be Lewis’s alter-ego, his manifestos and proclamations echoing closely many of the author’s own positions on the maniacal cult of youth, the naked pursuit of publicity, and the dissolution of bohemia. This character’s homosexuality, however, as well as his predilection for devious pranks more closely associates him with Horace de Vere Cole, a marginal member of the Bloomsbury coterie who participated in the 1910 Dreadnought Hoax by disguising himself as an African dignitary to sneak aboard a British warship. Furthermore, Zagreus himself articulates very few original ideas over the course of the narrative and instead opens and closes many of the chapters by “broadcasting” the theories of a shadowy and mysterious figure named Pierpoint. Indeed, Zagreus increasingly seems to be simply an older version of the hopelessly misguided Dan: having himself once received Pierpoint’s “Encyclical” describing the apery of the new bohemians, he now passes it on to younger, sexually attractive men in order to serve as their guide and mentor. By the midpoint of the Finnian Shaws’ party, the other characters (as well as the reader) grow tired of these secondhand lectures: “Ratner realized that Horace was preparing to ‘broadcast’ or to try out a new Pierpoint Record, and that he might begin at any moment now. He resigned himself to listen to the ubiquitous loud-speaker, with the hated voice of Pierpoint starring” (449). The guide who brings us into the world of the “apes,” in other words, is himself revealed to be nothing more than a kind of empty, mechanical puppet who recites someone else’s words. Even this mysterious off-stage voice, however, is deeply submerged in the same culture of gossip and celebrity it otherwise condemns, creating its own coterie that transforms Pierpoint into a media star. His incisive critiques are, therefore, less ironic than they are self-condemning, and the whole mass of *Apes of God* engages in this reflexive mode of satire that does not allow for a moral position outside of itself. Within the pervasive institutions of celebrity culture, the novel’s autonomy inevitably gives way, in Lewis’s book, to the roman à clef’s “conditional fictionality.” Without a position to occupy outside of this system, author, reader, and characters alike all become the very apes the text condemns, left to wander this narrative warren in which fact and fiction are irremediably entangled.
Lewis’s risky narrative experiment deliberately challenges the idealized autonomy of the aesthetic sphere, revealing a hypocritical pursuit of fame and fortune at the heart of modernism by itself mordantly seeking such rewards. Like *Ulysses*, *Apes of God* is a wildly libelous book. Eliot was aware of this, and finally declined to publish the extract satirizing the Sitwells. Lewis’s editor at Chatto and Windus also grew alarmed at the risk the firm would run in producing the book and wrote to ask for extensive revisions to conceal or even remove any association between the seemingly fictional characters and real individuals. Lewis’s response is strikingly disingenuous, drawing on what has become the well-worn claim that he is merely describing broad types rather than actual people:

As to your believing that you detect a likeness in some of the personages to people in real life, in that you are mistaken. I have here and there used things, it is true, that might suggest some connection. But the cases you choose [Lionel and Isabel Kein] are not ones I could, I am afraid, remove from my picture. If the bodies I describe fit in the morning suits of real people and they thrust themselves in and lay claim to them, however much the clothes fitted I should not countenance the wearing of such mis-fits by any of my characters, to all of whom I supply suits from *my own* store.72

As we have seen, the Kein chapter openly invites readers to see it as a libelous roman à clef, subject to the same infectious instability pervading the entire literary field. Indeed, even as he disavows any intentional attempt to mix fiction and fact, Lewis still snidely allows that any number of people might deliberately misrecognize themselves in the text, seeking out an author able finally to write them into stardom. Legally, of course, Lewis’s stated intentions carry no weight, but he may be trying to invoke another defense against libel—namely that groups cannot be defamed and individuals who feel themselves libeled must prove that they alone suffered harm. Thus, authors are free to write about artists or bohemians in general, provided they do not single out a particular individual by name or description. For Lewis, who sees all humans as devoid of individuality, such a defense may have made a certain kind of philosophical and even critical sense, but, given the (p.116) narrow description of the Keins and their friends, such reasoning could not gain any sort of legal traction.
Not surprisingly, Chatto and Windus voided their contract after Lewis failed to make the invasive changes they requested. Furthermore, word of the book had already begun to circulate throughout London, and Osbert Sitwell’s letter warning Lewis off was likely accompanied by similar admonitions issued to other interested publishers. The book had the potential to generate a great deal of scandal-driven publicity, but the legal risks proved insurmountable. In the end, Lewis followed the same strategy Joyce had, using a private imprint—the Arthur Press—to publish a limited edition of 750 copies complete with illustrations and priced at a fabulously expensive three pounds. Initially, no legal action was taken, despite the fact that a number of reviewers clearly identified it as a roman à clef, with Naomi Richardson in *Time and Tide* noting that those singled out include “the Sitwell family—also probably a good many other of his [Lewis’s] contemporaries whom I am not gossip-column-ape enough to recognize.”

Seizing on the decision by Ellis Roberts of *The New Statesman* to reject a positive review written by Roy Campbell, Lewis cobbled together a pamphlet entitled *Satire and Fiction*, which all but dared the figures he had named to sue him for libel. This broadsheet contains a copy of Roberts’s rejection letter, a piece by Lewis in defense of satire, and a short but provocative essay by Campbell. The latter section begins by claiming that “an electrical atmosphere pervaded all of London” after the publication of *Apes of God*, and that Lewis himself had been viciously libeled in “anonymous letters of the most violent sort.” A number of those satirized in the book had indeed mailed Lewis a postcard reading “GREETINGS TO TARZAN FROM A GATHERING OF THE APES” and signed the names assigned to them in the book. Richard Wyndham, one of Lewis’s ardent supporters, who was nevertheless drawn as a particularly ridiculous ape, used the personal columns of *The Times* to offer some of Lewis’s most important paintings—including *Kermesse* and *Plan for War*—for sale at ridiculously low prices.
In *Satire and Fiction*, Campbell treats these private acts of revenge derisively, noting that though the perpetrators see themselves in Lewis’s apes, they nevertheless lack the courage to reply openly: “What is interesting to observe is the *manner* in which the satirized of to-day behave, in contrast to that of their classical counterparts. At least it can be said that today they are far more *anonymous!* It is in that respect chiefly that they differ. In nothing have they the courage to appear *openly* and *publicly.*”  

76 By first noting that these figures yearn for celebrity and then taunting them for their anonymity, the pamphlet throws down a gauntlet, daring the objects of Lewis’s satire to abandon their anonymity and sue him for libel.  

77 As (p.117) the reviews of the book clearly indicated, any number of real people recognized themselves as Apes; Campbell’s essay relishes relating the story of Edith Sitwell glimpsing “Mr. Lewis’s advancing sombrero in a Bayswater street” and suffering a “seizure” before her friends could revive her with an “old-fashioned remedy of Arquebuscade Water.”  

78 Legal action, however, would require a plaintiff to file a colloquium, providing a judge and jury very precise information about how and why he or she might be identified with one of the book’s brutally satiric portraits. Furthermore, at trial Lewis himself would be given a very public forum in which to vent his spleen, and even if he should be found guilty, the plaintiff would likely secure little in the way of damages and Lewis’s reputation as the “Enemy” would be all the more highly burnished.
In the end, no one took up Lewis’s implicit challenge and the book remained something of an oddity—a “cubist telephone book”—in which the boundary between fact and fiction had been powerfully breached despite the injunctions of British defamation law. More than any other author aside from Joyce, Lewis manipulated the conventions of the roman à clef to launch an assault on the institutions of the modern novel by provocatively testing the very limits of its presumed autonomy. By making himself an object of his own “satire without morals,” furthermore, Lewis mined the realist novel’s foundations by extending the roman à clef’s reach into the public sphere. A deliberately defamatory book, Apes of God sought to destabilize the troubling nexus between art, morality, and the law in order to disrupt the institutions that had long underwritten the novel as a form. It ultimately failed to produce the kind of legal action that would have proved its own argument about the cultural sphere, yet it also marked the limits of Lewis’s probing experiments with the roman à clef. As he sought to extend his formal innovations with the genre throughout the next decade, he encountered increasing legal resistance that finally foreclosed this mode of experimentation by setting profoundly disabling limits on the modernist roman à clef.

“Vexatious Laws Abound”
After completing work on *Ulysses* in 1922, Joyce’s interest in the roman à clef’s possibilities increasingly gave way to an obsessive fascination with language. For most of the rest of his life he labored to construct the astonishing densities of *Finnegans Wake*, a text that effectively abandons normative codes of plot, genre, and character (though it does not shy away from its own distinctive style of portraiture). Lewis, however, continued throughout the 1930s to pursue the implications of *Apes of God*, pushing even harder to extend the roman à clef’s critical potential as a counter-form to the novel. Tyrus Miller, in *Late Modernism*, links Lewis to a larger group of writers in this same period who rejected the Joycean ecstasy of language and instead presented “unlovely allegories of a world’s end” in which “subject and object, figure and ground, character and setting are only weakly counterposed or even partly intermingled.”

For Lewis, as we have seen, this results in texts without a grounding morality—often vicious yet always conditional fictions that fold together the novel and the autobiography in a coldly measured, self-consuming satire. Miller calls this new kind of work a “generalized mimetism,” and it is characterized by “role-playing, contagious imitation, ‘rhythmic’ forms of association, anthropomorphic ‘animation’ of the object-world, [and] ritualized behavior.” Lewis and other later modernists, in other words, saw the infection of fiction with fact as part of what they imagined to be the larger disaster of modernity itself.
This aesthetic mimetism Miller usefully identifies carries considerable legal risks, since by deliberately blurring the boundary between fiction and history, it threatens to violate one of the central legal structures on which the news/novel divide rested. Throughout the 1930s, in fact, Lewis increasingly ran afoul of both the formal and informal mechanisms of libel law; by the time he published *Blasting and Bombardiering* in 1937, he had become uncomfortably aware of the limits imposed upon his compositional strategies. “You quite realize,” he advises his readers in the text’s introduction, “that there are limits to the truthfulness in which I may indulge I hope? Vexatious laws abound.” He refers here explicitly to the laws of libel, which bedevil his desire to create an anarchic alternative to the novel. In an earlier version of the same document, he is equally explicit about the legal absurdities that led him to deploy the roman à clef’s conditional facts and fictions: “That is the danger with me—I have to guard against my tendency never to do things by halves. For then I might after all not find myself lying cosily side by side with Mr. Priestly or Miss Baum upon the railway bookstall, but squatting cheek by jowl with some embezzler in one of His Majesty’s jails.” While Lewis perhaps overestimates the jeopardy in which he might place himself (since a criminal libel charge would be almost impossible to secure in most cases), he nevertheless acknowledges that defamation law sharply delimits his innovative critique of the novel.
The final version of the book’s preface actually provides a kind of recipe for the roman à clef, contending that almost everyone of some notoriety already acts as if they had become characters in a novel: “Every ‘great man’ to-day knows that he is living potentially a life of fiction. Sooner or later he will find himself the centre of a romance, and afford some person incapable of true invention the opportunity of stealing the laurels of the fictionist.”

To someone unfamiliar with Lewis’s work, of course, this may look like the sniping of a literary purist disgusted by a lack of artistic originality. Almost all of his own major texts, however, are romans à clef, attempts to reveal the ways in which “great men” have always already become emplotted and thus fictionalized machines. As we have come to expect, Lewis thus indicts himself along with the rest of the literary world, but he also acknowledges that his experiment with genre has become hopelessly frustrated by those “vexatious laws.” Blasting and Bombardiering, perhaps one of his now most widely read books, thus marks the end of his most innovative work, as he abandons the ambiguity and complexity so carefully cultivated in Apes of God and instead produces a conventional memoir hewing judiciously to the distinction between fact and fiction.
Lewis’s caution in *Blasting and Bombardiering* is the hard-learned lesson gained from a series of bitter encounters with the law that began shortly after the publication of a somewhat similar book in 1932 entitled *The Doom of Youth*. Once again taking up the mantle of “the Enemy,” he launches an assault in this text upon what he believes to be an infatuation with youth pervading modern culture—an obsession that effectively infantilizes art by creating the “Age-snob” who cares for nothing other than a certain naïve vivacity.\(^8\) In many ways, this argument simply reiterates themes from *Apes of God*, in which Zagreus celebrates Dan’s “genius,” despite the fact that he is little more than an idiotic, albeit attractive, young man. Without the ambiguous protection afforded by the roman à clef, however, Lewis’s satire became essentially indistinguishable from defamation, and two libel actions followed. Both emerged from a single chapter, “Winn and Waugh,” which critiques “*Youngergenerationconsciousness*,” treating Alec Waugh’s popular memoir, *Loom of Youth*, as a particularly egregious case of this malady. The editors at Chatto and Windus had already considered the legal risks posed by Lewis’s book, warning that he may have gone too far in his description of Michael Arlen: “We speak with no precise knowledge of the working of the law of libel, but we are inclined to think that the effect of calling him ‘this dismal asiatic caricature of a *rastaquouère*’ and ‘this tawdry gentleman who has filched the christian name of an archangel’ would be to send him hot-foot to his solicitor.... [T]here is no point in putting one’s head in the noose.”\(^8\) This is the same kind of gamble Lewis had freely made in *Apes of God*—indeed the essential pleasure of both texts resides in watching him take such enormous risks by exploiting the generic conventions of the very artists and writers he attacks. In *Doom of Youth*, however, ambiguity gives way to journalistic critique, and Lewis moderated the passage on Arlen in order to protect himself.

Shortly after the book appeared, however, Chatto received a letter from Godfrey Winn’s solicitors warning that they intended to seek legal redress for a passage describing their client as a “salaried revolutionary agent” exploiting his youth to cover a lack of talent while shamelessly arousing “the envy and hatred of everybody for everybody else” (105).\(^8\) Lewis promptly shot back a letter on June 26 telling the attorneys that Winn “regarded it as his mission to ‘stop me’
from writing books of the type of Apes of God.\" \textsuperscript{89} Despite such combativeness, however, the editors at Chatto had already agreed that the passage was indeed libelous and proposed a series of alterations to be pasted into the remaining copies of the book and included in any subsequent editions. By then, however, Alec Waugh had threatened a second libel suit based on a series of passages that seemed to identify him as a homosexual. The grounds for such a claim were somewhat thin, emerging from Lewis’s assertion that in \enquote{the strange case of Mr. Waugh ... all the feminine, maternal attributes were thwarted\} and that \enquote{the homosexual is, of course, an imitation-woman.\} \textsuperscript{(112, 206)} Like Winn, Waugh demanded through his solicitors that the book be suppressed: \enquote{We are instructed to call upon you unconditionally and immediately to withdraw the book from circulation ... and to publish a full and unqualified apology to Mr Waugh in terms approved by us in The New Statesman and Nation, The Observer, The Sunday Times, and The Times Literary Supplement.\textsuperscript{90}} An outraged Lewis could not believe that of all the potentially damaging passages in the book, Waugh had settled on one that likely did not even contain a direct or even indirect imputation of homosexuality. Even were a libel trial to proceed, therefore, it would turn not on Lewis’s indictment of the novelist’s writing or careerism, but on the much narrower charge that he had sex with men. Waugh may have cannily been attempting to avoid just this kind of trial. His request for an immediate injunction on further sales of the text was defeated when a judge ruled that the allegation of homosexuality could not be pursued because the words did not apply to the plaintiff. Despite this initial victory, however, Chatto and Windus, as well as booksellers throughout London, remained concerned about other pending charges and the matter was not finally settled until 1933 when both plaintiffs agreed to withdraw. During the course of the proceedings, however, Lewis lost the support of his publisher and generated substantial legal costs that could not be recovered. \textit{Doom of Youth} was finally pulped in 1934, having ignominiously sold only a few hundred copies.
This book, which in many ways simply advanced the same kind of satirical critiques launched in *Apes of God*, was a personal and financial disaster for Lewis. Without even the limited protection afforded by the roman à clef, Lewis found himself effectively without a defense. Winn and Waugh even managed to bring Lewis’s relationship with Chatto and Windus to an end over this matter. Though he managed to find another publisher—Grayson and Grayson—this arrangement too was destroyed by another libel suit. This time the case involved his 1932 travel book, *Filibusters in Barbary*, which details a trip taken to North Africa. Unlike *Doom of Youth*, the text carefully avoids naming a British agent whom Lewis found particularly distasteful, but it nevertheless provides a damning description of him as a “queer middle-aged middle-class Bulldog Drummond of an ex-temporary Major” who bribes corrupt French officials and engages “in every lawless activity under their noses on the grounds that [he is a] Briton.” By withholding the man’s name, the book occupies a kind of middle-ground between the direct claims of nonfiction and the coy allusiveness of the roman à clef. There is no clear or obvious key to be distributed, nor does the man indicted have the kind of celebrity status that might make it easy to recognize him as many readers did the characters in *Apes of God*. 
Lewis and his publishers, however, received a solicitor’s letter in 1933 informing them that Major Thomas McFie claimed to have recognized his portrait: “It is manifest from a most careful perusal of this book that it is permeated with libelous matter of a most serious character concerning our Client, and we shall be glad to hear from you not later than next Wednesday morning what proposition you have put forward to compensate our client on a liberal basis before proceedings are instituted.” As we have seen, Lewis often courted such suits, hoping to bring his targets fully into the open and force them to defend themselves under oath against his claims. This constituted, in fact, a vital part of his critique of celebrity culture and the institutionalization of bohemia in *Apes of God*. McFie, however, did not belong to this world, and once again Lewis published these statements as part of a clearly nonfictional work. His target in *Filibusters in Barbary* would likely be unembarrassed by a trial, and the matter did, in fact, move promptly into court in early 1934 where a portion of the colloquium was read into the record: “In the Book there are descriptions which are capable of being understood to refer to Mr MacFie, and which were so understood, and they are in fact grossly defamatory of him and hold him up to the greatest ridicule. It accuses him of defying the French Authorities and activities such as engaging in contraband traffic and smuggling arms and such like.” Grayson and Grayson could mount little in the way of an effective defense and immediately agreed to pay £250 in damages and withdraw the book from circulation.
Lewis’s initially successful attempts to develop the roman à clef’s critical and aesthetic potential had, only three years after the publication of *Apes of God*, become increasingly frustrated by the courts. One book had been officially withdrawn from publication and another pulped after the threat of additional legal action kept it too out of circulation. In the process, Lewis destroyed his relationship with two London publishers who had taken considerable risks on his behalf (p.122) and even covered his mounting legal costs. His sense of frustration and betrayal is evident in the book he began after finishing *Apes of God*. Also structured as a roman à clef, *The Roaring Quean; Foul Play’s a Jewel* caustically indicts the systems of patronage and celebrity he felt drove the production of British literary culture. As was the case with *Apes of God*, many of Lewis’s targets were lightly disguised, but his focus on physical detail made it easy to recognize portraits of Arnold Bennett, Virginia Woolf, Nancy Cunard, and Victor Gollancz.95 Once again, Lewis used the genre’s “conditional fictionality” and its infectiousness to expose the ways in which seemingly autonomous works of art actually functioned as profitable nodes within systems of mass-mediated celebrity and social capital. The generic conventions he employed in the text, however, afforded him little legal protection as the boundary between news and novels once again imposed itself through the mechanism of libel.
The first version of The Roaring Quean was submitted to Chatto and Windus in 1930 and rejected almost immediately. “The piece seems too risky for Chatto to do,” his editor wrote. “Too many heads are cracked, and the result would be that the wounded would take it out of us.” A private edition proved too expensive, and Lewis did not have the money to mount a legal defense, nor could he locate a private sponsor as he had for the Apes of God. As a result, the manuscript languished until Cape agreed to publish it in 1935. As had been the case with Joyce’s Dubliners, the text was set into proof and then shown to the company’s legal advisors for an opinion—a decision likely motivated by Lewis’s other legal difficulties, including Waugh’s then unresolved suit over Doom of Youth. “I am exceedingly sorry,” Lewis’s new editor soon wrote, “that the final conclusion come to by our solicitor is that he must advise us not to publish the book.”

As he and Campbell had done in Satire and Fiction, Lewis tried to plead for the fictional and satirical qualities of the text, arguing that it dealt primarily in mechanical stereotypes rather than actual individuals, and that although he attacked “the Bloomsbury principle” there was “no caricature of any individual Bloomsbury.” Seeking the cover he believed the roman à clef afforded, Lewis further pressed his point by noting that such a charge was merely indicative of the very gossip-ridden publishing world he sought to critique: “In any satire there is almost always the possibility—indeed almost the probability that someone or other (either with a grudge against the author, or with a keen business sense and desire to turn an honest penny) will come forward and claim financial compensation for an alleged libel.”

The defense Lewis tries to mount here, as we have seen, would have had no standing in the course of a defamation trial. After all, the very fact that someone may come forward implicitly acknowledges that the legal interpretation of the text lies with the reader and not the author—no matter what his professed or documented intentions might be. Lewis appears to misunderstand this crucial element of libel law, and his own experiment with the roman à clef founders on this interpretive failure.
By using the roman à clef to extend fiction into the public sphere, Joyce and Lewis alike sought to contest the legal, moral, and aesthetic foundations on which the realist novel had rested since the eighteenth century. They all too successfully reactivated the genre’s latent powers, and in the process found themselves entangled in legal structures designed to hold skepticism about fiction’s simulation of reality in check. This constitutes, in fact, a key element of modernism’s assault on nineteenth-century realism, albeit one that does not comport well with our liberal humanist narrative of the period’s artistic and social revolutions. This part of modernism’s rise and consolidation, after all, cannot be recuperated into the kind of heroic liberation and truth-telling associated with the obscenity trials of *Ulysses* and *Lady Chatterley’s Lover*. Joyce, after all, largely abandoned his experiments with the roman à clef after 1922, likely well aware that suits such as the one eventually brought by Dodd would inevitably limit his work by imposing on it severe legal and financial risks. For Lewis, the consequences of his own experiments in a “satire without morals” were even more dire, essentially bringing his potentially most creative period to an end amidst a welter of lawsuits and crippling judgments. By rereading the works of both these writers through the lens of defamation, we reveal a far more complex relationship between law and literature, uncovering not a steady march to truth but an array of both overt and subtle mechanisms for negotiating fiction’s limits. The roman à clef reveals the operation of this field of force that both produced and constrained modernism’s experimental attempts to challenge the terms of its own autonomization.

Notes:


(2) James Joyce, *Ulysses* (California: Collectors Publication Edition, n.d.). This is a pirated edition, printed sometime in the late 1960s, which advertises an array of pornographic novels and magazines, often with delightfully lurid illustrations.


(8) . Meyers, 29.


(13) . Cited in Richard Ellmann, James Joyce (Oxford: Oxford University Press, 1982), 310. The various manuscript copies of the story contain several different versions of this passage, which was continually rewritten in an effort to secure publication. For a full record see Michael Groden et al., eds., The James Joyce Archive (New York: Garland, 1977–79), 4:181–269. The final version of the text of Joyce’s Dubliners (New York: Viking, 1967) simply refers to the queen as Edward VII’s “old mother” (132).

(14) . Joyce, Dubliners, 132.

(15) . Ellmann, 314. As we saw in the previous chapter, a civil suit could not be brought since it is not possible to libel the dead. In this case, however, it seems likely that the concern is with libellis famosus—the more serious criminal charge of libeling the head of state.

(16) . Ellmann, 315.


(19) Ellmann, 328.


(21) Roberts demands that Joyce take out two sureties against the possibilities of a libel suit, each providing a thousand pounds of insurance for the publisher. The outraged Joyce wrote to Nora, “No one admires me as much as that” (*Selected Letters*, 202).

(22) *Collected Letters of James Joyce*, 1:64.

(23) In the published text of *Dubliners* as well as in the manuscript and typescript drafts preserved in the *James Joyce Archive*, the name of the railway company in “A Painful Case” is never directly used. Since Joyce mentions this specific objection in a letter, however, it is reasonable to assume that some version of the story did name the company specifically. Just as he excised the description of Queen Victoria as a “bloody old bitch,” literally pasting a new version into his notebook, so Joyce may also have deleted this specific reference to the railroad company in an effort to shore up his defense against a libel charge. See *Collected Letters of James Joyce*, 2:312.

(24) Ellmann, 331.

(25) Ibid.

(26) The decorous dash whose absence Kenner notes, is actually everywhere evident in the text since Joyce originally sought to use it (as he would in *A Portrait* and *Ulysses*) in place of quotation marks to identify direct discourse.


(29) *Ulysses* was suppressed in Great Britain not at trial but through the actions of the Home Office. For a detailed description of these proceedings, see Carmelo Medina Casado, “Sifting Through Censorship: The British Home Office *Ulysses* Files (1922–1936),” *James Joyce Quarterly* 37 (2000): 479–508.


(34) Ellmann, 530.

(35) Ibid., 507.


(37) Typescript page titled “Ulysses” from the Richard Ellmann Collection, McFarlin Library Special Collections, University of Tulsa, series I, folder 89.


(40). As is so often the case in *Ulysses*, the card itself presents a difficult textual crux. Even its potentially libelous content is unclear, since when Bloom initially reads it he sees only the two letters, yet when Josie Breen recites its contents she says “u.p: up” (8.258). She may simply be running the letters together, or the card itself may contain the colon and word “up” as well as the letters. The card later resurfaces in “Circe” (8.485) when Alf Bergan recites it, but since this is an essentially hallucinatory event, it does not resolve this curious aporia, which leaves us not only unsure of the card’s meaning, but of its contents as well.


(42). Like many fictional characters, Bloom’s origin can be vaguely traced to a number of potential sources all reworked imaginatively by Joyce in a synthetic act of creation that is actually quite unusual in all the works that appear after *Dubliners*. Among these sources were the Triestine novelist Ettore Schmitz (who published his own autobiographical works under the penname Italo Svevo) and the Dubliner Alfred Hunter, who helped rescue Joyce after a night of drinking and who may have been the initial inspiration for *Ulysses*. For more on Schmitz see John McCourt, *The Years of Bloom: James Joyce in Trieste, 1904–1920* (Dublin: Lilliput, 2001); for Hunter see Ellmann, 162.

(43). Joyce used the pseudonym “Stephen Daedelus” to sign his the first version of “The Sisters” in 1904, thus only further compounding the interplay of real and fictional names that complicate this episode.

(44). Ellmann, 364, argues that “according to friends” Joyce took this theory of Shakespeare’s plays more seriously than Stephen does, further emphasizing the perhaps obvious fact “that *Ulysses* divulges more than an impersonal and detached picture of Dublin life.”

(45). Mark Shechner, *Joyce in Nighttown: A Psychoanalytic Inquiry into Ulysses* (Berkeley: University of California Press, 1974), 27, contends that “Shakespeare, then, is only the pretext of ‘Scylla’; James Joyce is the text.”


Cited in Meyers, 219.


Meyers, 108.

This book has a particularly complicated history, having been written in 1915 and initially published in *The Egoist* (immediately following Joyce’s *A Portrait of the Artist as a Young Man* as the magazine’s “Serial Story”) before appearing as a book in 1918. A decade later, Lewis then substantially revised the initial text, eliminating some of its stylistic experiments to render it more recognizable as a novel. Therefore, no standard edition of this work does (or indeed could) exist.

Gregory Castle in *Reading the Modernist Bildungsroman* (Gainesville: University Press of Florida, 2006) argues that texts like *Portrait* actually fail as *Bildungsromane* since their characters do not “achieve inner culture or harmonious socialization.” They nevertheless do exploit “the formative and transformative power of failure in powerful new ways” to create alternative concepts of subjectivity and its articulation within a decentered modernity.


Ibid., 49–50.


“Manifesto,” *Blast* 1 (1914), 15.
(59) Ibid., 33.


(62) *Satire and Fiction*, 35.

(63) Ibid., 34.

(64) Lewis, *Letters*, 149.

(65) Cited in Meyers, 170.


(71) Ibid., 73.

(72) Lewis, *Letters*, 149.


(74) Lewis, *Satire and Fiction*, 33

(75) Ibid., 7.
Perrino identifies a “legalistic denial of libel that envelops Satire and Fiction,” when the text, in fact, dares its targets to enter into a court and thereby identify themselves.


Meyers, 158.

One year after the publication of the Arthur Press edition, Grayson and Nash produced the first trade edition of the text, their concerns about a potential libel suit now allayed by the lack of legal action. Though this new edition could itself have been the subject of a suit, the existence of the earlier edition would suggest that little harm had been done and that any damage award would be minimal.


Ibid., 63, 42–43.


Lewis, “Preliminary Aside to the Reader,” 185.


O’Keeffe, 315.

In Ezra Pound’s copy of this book, held by the Harry Ransom Humanities Research Center, this passage is clearly marked in pencil. Although it’s not clear when this was done, it does suggest that the case had some notoriety.

Cited in Meyers, 215.

Cited in O’Keeffe, 317.
(91) Charles Prentice, an editor at Chatto, was furious when he learned that Lewis had been signing contracts with other publishers while his own firm was in the midst of mounting an expensive libel defense. Chatto eventually sued Lewis for breach of contract and won the return of a £100 advance paid out following the publication of Snooty Baronet. For a description of this incident, see Meyers, 216–17.

(92) Wyndham Lewis, Filibusters in Barbary: Record of a Visit to the Sous (London: Grayson and Grayson, 1932), 151, 156.

(93) Cited in O’Keeffe, 337.

(94) O’Keeffe, 339.

(95) The Bennett character, Samuel Shodbutt, is actually referred to on one page of the manuscript by the initials “SB” rather than “SS.” See Walter Allen, “Introduction,” The Roaring Queen (London: Secker and Warburg, 1973), 7.

(96) O’Keeffe, 292.

(97) Ibid., 363.


(99) Ibid.