Traditional Gender Roles and Backlash Against Female Attorneys Expressing Anger in Court

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Trial advocacy education often stresses the importance of attorneys expressing arguments with emotion to signal conviction. Yet, female attorneys must approach this advice with caution given potential backlash for expressing emotions traditionally considered masculine, like anger. Two experiments (Study 1, $N = 220$; Study 2, $N = 273$) demonstrated that people most likely to endorse traditional gender roles exhibited bias against female attorneys expressing anger in court. Participants were recruited nationally and randomly assigned to view an attorney delivering a closing statement in court who either (1) was a man or a woman, and (2) used a neutral or angry tone. They reported how hirable and effective they perceived the attorneys to be and completed measures of several individual difference factors that are established predictors of endorsement of traditional gender roles: ambivalent sexism, political conservatism, and age. Participants who were more likely to hold traditional gender values (i.e., more benevolently sexist, more politically conservative, and older) were more likely to favor attorneys who conformed to gender norms (i.e., male attorneys who expressed anger relative to no anger) and less likely to favor attorneys who violated gender norms (i.e., female attorneys who expressed anger relative to no anger). Thus, female attorneys are faced with the challenge of walking the line between exhibiting traditionally masculine behaviors that are valued by the legal system—but not so much so that they suffer backlash for violating gender norms.

I. TRADITIONAL GENDER ROLES AND BACKLASH AGAINST FEMALE ATTORNEYS EXPRESSING ANGER IN COURT

The law has traditionally been a male-dominated profession. Despite women making up half of matriculating law students, women make up only 36 percent of practicing attorneys and only 18 percent of equity partners (APA 2017). The male-dominated nature of the profession has given rise to a system that favors masculine traits, such as individualism, autonomy, and competition (McGinley 2012). Because the system champions these masculine

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traits, legal scholars have theorized that women's success in the field might be stunted by the contradictory expectations for how a good attorney should behave and how women should behave. Female attorneys might be penalized both for failing to exhibit masculine traits when acting feminine but also for violating gender stereotypes when exhibiting masculine traits. This "double bind" might put women in the legal profession at a disadvantage while attempting to advance their careers, as there is no way for women to meet both sets of contradictory expectations.

Despite the large body of theoretical legal literature about the disadvantages that female attorneys might face when developing their courtroom style, few scholars have empirically tested theories about backlash against female attorneys who violate gender roles. There is, however, empirical evidence that female attorneys face gender bias in their profession in general. For example, one study demonstrated that female attorneys received more positive performance reviews than men—yet women were less than half as likely to be mentioned as potential partner material than were men (Rhode 2017). Media coverage reveals more gendered forms of criticism and comments about appearance and family life when referring to female judicial nominees relative to their male counterparts (Wooley & Darling 2017). These studies, however, are largely correlational. Correlational studies provide important real-world data but cannot establish a causal role of gender in reactions to attorneys. The door is therefore left open a crack for people to argue that there are some naturally occurring differences in male and female attorneys' abilities or performance that drive the gender disparities observed in the legal profession. A rare experimental exception tested causality by manipulating whether people were randomly assigned to see a male or female attorney who either did or did not display aggression in court. The study demonstrated that aggressive male attorneys were the most successful, compared to passive male attorneys and both aggressive and nonaggressive female attorneys—demonstrating an advantage for aggressive attorneys, but not necessarily a backlash for aggressive female attorneys (Hahn & Clayton 1996).

We extended this limited experimental literature by testing whether people would react differently to attorneys who deliver their arguments with anger (Salerno et al. 2018), which is stereotypically considered to be an emotion expected from men, but not from women (e.g., Fabes & Martin, 1991; Salerno et al. 2019). Across three experiments, we found support for the idea that male attorneys were rewarded for "acting male," while female attorneys were penalized for the same behavior. More specifically, when male attorneys delivered their closing statements in an angry tone (compared to a neutral tone), they were rewarded in that participants viewed them more positively and, in turn, expressed greater willingness to hire them. In contrast, when female attorneys delivered the same closing statement with the same level of anger (compared to no anger), they were *penalized* in that participants viewed them more negatively and, in turn, expressed less willingness to hire them. Although this article established that attorney gender plays a causal role in how people react to a traditionally masculine behavior (i.e., expressing anger), it did not provide an explanation for *why* people react positively to angry male attorneys and negatively to angry female attorneys.

The goal of the current article is to revisit these data with a new analysis of individual difference factors that might predict who among our samples were more or less likely

to exhibit this gender bias. By identifying who is more likely to exhibit a bias against angry female attorneys, we can identify underlying psychological reasons for that bias so as to target more effective interventions. This can also provide guidance in identifying legal factfinders who might be more likely to react negatively to a female attorney violating gender norms by exhibiting traditionally masculine traits. Toward this aim, we conducted new analyses of data reported in Salerno et al. (2018) that take into account a set of individual difference measures (not analyzed in the previous paper) that we hypothesized would be predictors of who would be more likely to react negatively to violations of traditional gender roles (i.e., ambivalent sexism, political orientation, age). Thus, we build on the previous article by conducting new analyses utilizing novel individual measures that reveal an underlying psychological mechanism that illuminates the role of negative reactions to traditional gender role violations in explaining bias against female attorneys who express anger.

Next, we will review empirical evidence of a general gender bias against female attorneys, social psychological experiments demonstrating backlash against women who violate gender stereotypes, and previous research demonstrating a link between our individual difference predictors and the likelihood of endorsing traditional gender roles. Second, we will describe our experimental methodology. Finally, we will report the results of our experiments and discuss the implications for women in the legal profession.

A. *Gender Bias Against Female Attorneys*

Empirical research has demonstrated gender disparities at high levels of the legal system. Although half of all law school graduates and 45 percent of all associates are women, women are underrepresented in higher legal positions (ABA 2017). For example, women make up only 18 percent of equity partners in law firms, 25 percent of Fortune 500 General Counsel, and 27 percent of judges. Those women who become equity partners earn only 80 percent of the compensation earned by their male counterparts. Women make up only 31 percent of law school deans. Further, female law professors generally teach "softer" and "less prestigious" law school courses, such as immigration and property law, and courses traditionally considered to be more "feminine," such as women and the law and family law (Kornhauser 2004). In contrast, male law professors are more likely to teach "high-status" and "more prestigious" courses, such as evidence, constitutional law, and other bar courses.

One potential contributor (among many) to this gender disparity is the masculine nature of the legal system and the difficulties that female attorneys face as a result of the gender dynamics in the profession. Macerollo (2008) theorized that female attorneys are viewed as lacking leadership abilities and assertiveness. Other theorists suggest that female attorneys believe that they must be more aggressive and assertive than their male counterparts (Rhode & Kellerman 2006; McGinley 2012)—yet when women act this way, they are disliked and criticized for being aggressive (Macerollo 2008; Rhode & Kellerman 2006; Wooley & Darling 2017). Theorists argue that traditional gender stereotypes force women into "a double standard and a double bind" that results in female attorneys having to risk appearing both too feminine and not feminine enough (Rhode & Kellerman 2006). They argue that women face a tradeoff that men do not—they can be liked but not respected or respected but not liked. This tradeoff is particularly problematic for

women in settings that require people to be both respected *and* liked to succeed. Theorists have highlighted this problem for female trial attorneys specifically, given that they might be perceived as too weak when they exhibit feminine traits by being soft-spoken or compassionate, but perceived as too abrasive when they violate gender stereotypes by exhibiting valued masculine traits by being forceful or aggressive (Lee 2015).

The theory that women face gender bias in the courtroom is supported by correlational survey research and anecdotal evidence. For example, a Defense Research Institute (2004) survey found that 70.4 percent of female attorneys reported experiencing gender bias in the courtroom. In a survey by the Texas State Bar (2004), nine out of 10 female attorneys reported being subjected to gender discrimination in the courtroom. There are reports of female attorneys being mistaken for a secretary, being called terms like "honey" and "sweetheart" by judges and male opposing counsel, and being critiqued for their voices being shrill (Lee 2015). Additionally, female attorneys are more likely to report being referred to by their first name than male attorneys (Brown 2018; MacCorquodale & Jensen 1993). Law students implicitly associate men with judges and women with paralegals (Levinson & Young 2010). In a survey by the jury consulting firm Decision Quest, participants expressed a preference for male trial attorneys because female attorneys are "less respected by the average person in society" (Pynchon 2012). Additionally, surveys and examinations of court transcripts indicate that female attorneys are more likely to be reprimanded for raising their voice than are male attorneys (Bogoch 1999; Defense Research Institute 2004). Judge respondents explained that women who raise their voices are seen as shrill but men who raise their voices are seen as appropriately aggressive (Defense Research Institute 2004).

This descriptive and correlational research suggests that female attorneys are disadvantaged when they adopt the traditionally masculine traits necessary to succeed in the legal profession, but there is little experimental research on this topic to establish the causal role that gender plays in how people react to male versus female attorneys displaying traditionally masculine traits in court. However, basic social psychological theory and experiments outside of the legal realm support the hypothesis that women might be penalized for violating traditional gender roles in their legal careers.

B. The Social Psychology of Traditional Gender Role Violations

Social psychology research suggests that women are penalized for violating traditional gender roles. For example, women who retain their surnames are perceived as less committed to their marriage than women who take their husband's surname (Robnett et al. 2016). Similarly, people are more likely to sabotage a woman who does well in a quiz game on football than a woman who does well in a quiz game on child development (Rudman & Fairchild 2004).

In professional settings, social psychology research suggests that women who violate gender stereotypes are treated negatively. For example, women are punished for deviating from traditional gender roles in hiring decisions. Rudman and Glick (2001) examined willingness to hire people who exhibited stereotypically feminine communal traits (i.e., those who are perceived as kind, thoughtful, and sensitive to other's feelings) and

stereotypically masculine agentic traits (i.e., those who are perceived as aggressive, assertive, and demanding) for masculine and feminine jobs. Although the communal/agentic traits did not impact hiring decisions, participants did hire women less than men—but only when the job required someone who was both kind and competent. This supports the idea that women will be at a particular disadvantage when a successful career is contingent on demonstrating both traditionally feminine (i.e., being kind) and traditionally masculine (i.e., competence) traits. This theory is also supported by research demonstrating that agentic women are viewed as more socially deficient than agentic men (Rudman 1998) and that social skills predict hiring decisions only for agentic women; for all other applicants, competence was more predictive of hiring decisions (Phelan et al. 2008). Women are also penalized for violating gender roles after they are hired. Women with masculine personalities experience more sexual harassment than women with more feminine personalities (Berdahl 2007). Additionally, women leaders are rated more negatively than male leaders, possibly because women are typically seen as better suited to subordinate roles (Rudman & Kalianski 2000).

The penalty for violating gender expectations can also arise when tensions are high and women start expressing their opinions with emotion in the workplace. Although women are generally stereotyped as being more emotional than men, anger, specifically, is considered to be a masculine emotion that is expected from men, but not from women (e.g., Fabes & Martin 1991; Salerno et al. 2019). As a result, women are punished for expressing gender-incongruent emotions, such as anger, in professional settings whereas men are rewarded. For example, when expressing anger (vs. no anger) in professional settings, men are perceived as more confident, competent, and of higher status, but women are perceived as less confident, less competent, and of lower status—regardless of whether they are a trainee or CEO (Brescoll & Uhlmann 2008; Tiedens 2001). Female leaders were perceived more negatively when they expressed anger in the workplace, while male leaders were not (Lewis 2000). Further, compared to anger expressed by men, anger expressed by women is seen as detrimental to both personal relationships and organizational relationships (Gibson et al. 2009).

Rare research on expressing anger specifically in legal contexts indicates that men are rewarded for anger expression while women are punished. Male jurors are more persuasive and influential when expressing anger (compared to no anger) but female jurors are less persuasive and less influential when expressing anger (Salerno & Peter-Hagene 2015; Salerno et al. 2019). Some have theorized that the courtroom might be a rare context in which women are able to express anger because (1) it is considered appropriate and even expected for attorneys to express their arguments with emotion, (2) they have credentials bestowed upon them by an external source (i.e., the Bar Association), and (3) their emotion expression is in service of obtaining justice for another person (i.e., is a demonstration of stereotypically feminine communal traits) (Kupfer-Schneider et al. 2010). Yet, a set of experiments that showed participants videos of attorneys delivering closing statements again demonstrated the gender bias against angry female attorneys (Salerno et al. 2018). More specifically, participants drew positive inferences about angry (vs. not angry) male attorneys to justify being more likely to hire them. In contrast, participants drew negative inferences about angry (vs. not angry) female attorneys to justify

being less likely to hire them. These patterns were found despite the fact that all male and female attorneys were delivering the same closing statement with the same level of anger. The current article identifies a psychological explanation for *why* people draw negative inferences about angry female attorneys that was not addressed in the previous article. More specifically, we investigate individual differences that might identify who is more likely to endorse traditional gender roles and therefore be more likely to exhibit gender bias against female attorneys who express anger.

C. Individual Differences: Predictors of Endorsing Traditional Gender Values

Based on the research suggesting that female attorneys might be penalized for violating traditional gender roles, we looked at specific attributes, or individual difference markers, that suggest who is more likely to hold these traditional gender values and therefore be more likely to show a bias against angry women. Specifically, we investigated three individual difference markers: ambivalent sexist attitudes, political leanings, and age. Of note, in the original paper, we report moderation analyses testing whether the bias against angry women was equally apparent among male and female participants. In one experiment, participants' gender made no difference: men and women were similarly likely to exhibit the gender bias against anger expression by female attorneys. In another experiment, however, women were actually *more* likely to exhibit bias against angry women than were men. That is, we found that participant gender was not a consistent predictor of the bias against angry women. This is consistent with previous research demonstrating that both men and women can hold sexist attitudes (e.g., Glick & Fiske 1996). In the current article, we focused on additional factors that might be related to endorsing traditional gender roles.

1. Ambivalent Sexism

One factor that might predict a negative reaction—either explicit or implicit—to female attorneys violating gender norms by expressing anger is explicit endorsement of sexist attitudes. We assessed participants' explicit endorsement of sexist attitudes with a measure of ambivalent sexism, which assesses two different types of sexist beliefs: hostile sexism (i.e., antipathy toward women) and benevolent sexism (i.e., subjectively favorable but patronizing ideas about women) (Glick & Fiske 1996). Ambivalent sexism is related to, but somewhat different from, endorsement of traditional sexist values in that it assesses *descriptive* beliefs about how women *do* act (e.g., "women exaggerate problems they have at work"), while traditional sexist values are *prescriptive* beliefs about how men and women *should* act and their role in society (e.g., "women should not work outside the home"). Despite this relatively subtle difference, we predicted that endorsement of ambivalent sexist attitudes would be a likely predictor of the degree to which participants react negatively to a female attorney violating traditional gender roles. Further, utilizing ambivalent sexism measures enabled us to conduct an exploratory test of the role of two different types of sexist attitudes in negative reactions to angry female attorneys.

Hostile sexism is the more traditional version of sexism. When people refer to sexist attitudes, they are often referring to overt and hostile sexist attitudes that are based in antipathy toward women. For example, believing that when women lose to men in a fair competition, they blame it on being discriminated against. In contrast, benevolent sexist attitudes are a more "modern" form of sexism that do not rely on overt and negative sexism, but instead are disguised by attitudes that, on the surface, appear to be more positive. For example, suggesting that behind every good man is a good woman, or that women need to be put on a pedestal and protected. Benevolent sexist attitudes are typically seen as more pro-social because they are generally framed as positive statements, but they continue to encourage gender stereotyping and traditional gender roles. Despite seeming less insidious on the surface, both hostile *and* benevolent sexism contribute to gender inequality in society (Glick & Fiske 2001). For example, both hostile and benevolent sexism positively predict a tendency to exaggerate gender differences in a host of traits (Zell et al. 2016). Both hostile and benevolent sexism predict complementary prescriptive gender norms: hostile sexism predicts negative reactions to women who violate gender roles by being the primary breadwinner in her household, and benevolent sexism predicts more positive reactions to women being in the caregiver role in her household (Gaunt 2013).

Although hostile sexism would predict negative reactions to women in general, benevolent sexism might be particularly predictive of bias against angry female attorneys because a key component of benevolent sexism is that it specifically includes viewing women stereotypically and in restricted roles (Glick & Fiske 1996). Benevolent sexism justifies and even promotes gender discrimination (Glick & Fiske 2001) because it implicitly suggests that women lack competence (Dardeene et al. 2007; but see Good & Rudman 2010; Masser & Abrams 2004). Benevolent sexism might exacerbate biases against women who violate emotion stereotypes, in particular, given that benevolent sexism serves to justify the status quo by characterizing women as "complementary" but equal to men (Jost & Kay 2005). Further, the degree to which someone endorses traditional gender roles and stereotypes might also predict the degree to which participants *reward male anger* in court. In other words, those who exhibit relatively greater levels of benevolent sexism might be predicted to have both negative reactions to attorneys who violate gender roles (i.e., angry female attorneys relative to calm female attorneys), and also positive reactions to attorneys who conform to gender roles (i.e., angry male attorneys relative to calm male attorneys). In contrast, hostile sexism might predict overall bias for men versus women overall regardless of the degree to which they exhibit or violate gender norms.

2. Political Conservatism

Research suggests that political ideology is correlated with support for traditional gender roles. Political liberals identify as more feminist than do political conservatives (Bayer 1975; Pincus 1978). Political conservativism has been found to be negatively associated with support for both feminist values and women's political issues (Rosenthal 1995). More generally, research has shown that political conservatives (compared to political liberals) are less in favor of sexual equality and more in favor of traditional gender roles

(Corbett 1988; Mason & Lu 1988). Finally, political conservatives are more likely to live in a household with traditional gender roles than are political centrists and political liberals (Paterno & Martínez 2006). This support for traditional gender roles might lead a political conservative to view angry female attorneys negatively and an angry male attorney more positively. In other words, those who exhibit relatively greater levels of political conservatism might be predicted to have positive reactions to attorneys who conform to gender roles (i.e., angry male attorneys) and negative reactions to attorneys who violate gender roles (i.e., angry female attorneys).

3. Age

Like political orientation, age is positively correlated with support for traditional gender roles. Older people are more likely than younger people to support traditional gender roles (Akotia & Anum 2012; Barclay 1995; Mason & Lu 1988). Age has been negatively correlated with support for feminist values and women's political issues (Rosenthal 1995). Men over the age of 45 are more likely to believe that gender equality currently exists than are men under 45, and men over the age of 35 live in homes with more traditional gender roles than men under the age of 35 (Paterno & Martínez 2006). Additionally, older people tend to support and identify with more sexist attitudes than younger people and are more resistant to change in their sexist attitudes (Phillips 1979). This extends to attitudes toward women in professional positions of power: older adults are less likely to vote for a female president than are younger adults (Spitze & Huber 1980). Thus, relatively older adults might be more likely to exhibit positive reactions to attorneys who conform to gender roles (i.e., angry male attorneys) and negative reactions to attorneys who violate gender roles (i.e., angry female attorneys), relative to younger adults.

D. *Study Overview and Hypotheses*

We conducted new analyses on data examining reactions to attorney anger expression reported in Salerno et al. (2018). In two experiments, participants viewed a video of a closing statement.[1] The closing statement was delivered by either a male or a female trial attorney in a calm or angry tone. Participants completed measures of perceptions of how effective the attorney was, and several individual difference factors that might predict greater bias against angry female attorneys (i.e., ambivalent sexism scale, political orientation, age). The analyses reported here are not reported in the previous article.

1. Hypotheses

First, we predicted a three-way interaction between attorney anger, attorney gender, and participants' ambivalent sexism, such that the gender bias favoring angry men and

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[1]We conducted these analyses on Studies 2 and 3 reported in the original manuscript. We were unable to analyze Study 1 from the original manuscript because that study did not include any individual difference measures.

penalizing angry women would be stronger among participants who are relatively higher in benevolent and/or hostile sexism.

Second, based on research indicating that political conservatism positively correlates with support of and adherence to traditional gender roles, we predicted a three-way interaction between attorney anger, attorney gender, and participants' political conservatism, such that the gender bias favoring angry men and penalizing angry women would be stronger among participants who are relatively higher in political conservatism.

Finally, based on research indicating that age positively correlates with support for traditional gender roles, we predicted a three-way interaction between attorney anger, attorney gender, and participant age such that the gender bias favoring angry men and penalizing angry women would be stronger among participants who are relatively older.

In other words, we are predicting that the results from analyzing these three different individual difference predictors will converge on the general prediction that people who are more likely to endorse traditional gender roles will be more likely to exhibit positive reactions to attorneys who conform to gender roles (i.e., angry male attorneys relative to calm male attorneys) and negative reactions to attorneys who violate gender roles (i.e., angry female attorneys relative to calm female attorneys), compared to those who are relatively less likely to endorse traditional gender roles.

II. STUDY 1 METHOD

A. Participants and Procedure

As reported in the original manuscript, we recruited 300 adults online from Amazon's Mechanical Turk (M-Turk), which is an online panel commonly used to recruit participants into psychological studies. M-Turk provides samples that are more demographically diverse than other traditional samples (e.g., college students or online community member samples), and is considered to be a legitimate source of quality data (e.g., Buhrmester et al. 2011; Irvine et al. 2018; Paolacci et al. 2010). Six participants (2 percent) were excluded for failing the gender manipulation check. We also excluded participants who spent less than five minutes on the task ($n = 74$, 25.2 percent). The remaining 220 participants were 37 percent women and 73 percent white, 8 percent African American, 9 percent Hispanic, 7 percent Asian, and 3 percent other, with a mean age of 36 ($SD = 11$).

Participants were instructed that they would be watching a video of an attorney giving a closing argument in a case. They were reminded to make sure that their sound was turned up so that they could hear it clearly. Participants watched a video of a prosecutor delivering a segment of an actual closing argument from a murder case. They were randomly assigned to watch a video in which the attorney was either male or female and delivered the same script in either a calm or angry tone. Thus, the experiment comprised a 2 (attorney gender) × 2 (attorney anger: calm, angry) between-subjects design. After watching the video, participants reported the likelihood that they would hire the attorney. Participants completed manipulation checks, the benevolent and hostile sexism scales, reported their gender, age, and ethnicity, and a were administered a political conservatism measure, in that order. Participants were compensated $1 for their participation. All procedures were

approved by Arizona State University's Institutional Review Board and all datasets are available at the Open Science Framework (osf.io/mpf64).

B. Materials

We utilized a real closing statement that had been delivered by an attorney in an actual murder case as a script for our actors. The case was chosen because the crime was disturbing enough that jurors might reasonably expect a prosecutor to express anger about the crime. This was done purposely to provide the strongest possibility for a female attorney to be perceived as justified in expressing anger because the context might render her anger expression appropriate. The closing statement described how a single mother was stabbed several times in the head and throat in her home while her one-year-old son witnessed the crime and was later found covered in his mother's blood. To produce the videos, we hired two professors who both have law degrees and previous courtroom experience. We filmed them delivering the closing statements while standing at a podium in a mock courtroom. Both actors delivered the closing statement in a calm tone. Next, they delivered the exact same closing statement in an angry tone. We ensured that they were expressing anger in a similar manner and to a similar degree in several ways. First, we provided cue cards of the script, which included indicators of when the attorneys should increase their volume, give emphasis, or slam on the podium to convey anger. Second, the actors observed each other deliver several practice runs, and we discussed ways in which they could both modify their performance to be more similar to each other.

C. Measures

1. Likelihood of Hiring the Lawyer

Participants were asked how likely they would be to hire the lawyer, if they needed one, on a seven-point scale from *not at all likely* to *extremely likely*, similar to previous research (e.g., Brown & Campbell 1977; Hodgson & Pryor 1984).

2. Manipulation Checks

Participants reported the attorney's gender. We also assessed the degree to which participants perceived the attorneys as angry to ensure our anger manipulation was equally successful for both the male and female attorney. Participants indicated the extent to which they agreed that the attorney in the video was angry on a seven-point scale from *strongly agree* to *strongly disagree*. Scores were reverse scored such that higher numbers meant that they perceived the attorney as more angry.

3. Ambivalent Sexism Scales

Next, participants completed three items from the hostile sexism scale that reflect traditional discriminatory attitudes toward women and three items from the benevolent sexism scale reflecting more modern forms of sexist attitudes toward women that are subjectively

benevolent but reinforce traditional gender roles (Glick & Fiske 2001). Participants reported their agreement on five-point scales ranging from *strongly disagree* to *strongly agree* with the following statements indicating (1) benevolent sexism: "No matter how accomplished he is, a man is not truly complete as a person unless he has the love of a woman"; "Every man ought to have a woman whom he adores"; and "Men are complete without women" (reverse scored), $\alpha = 0.82$; and (2) hostile sexism: "Women exaggerate problems they have at work"; "Once a woman gets a man to commit to her, she usually tries to put him on a tight leash"; and "When women lose to men in a fair competition, they typically complain about being discriminated against," $\alpha = 0.87$. The experimental manipulations did not affect participants' responses on the hostile sexism items, Fs 2.70, all ps 0.102, or benevolent sexism items, Fs 1.68, ps 0.197.

4. Demographic Variables

Finally, they reported demographics and responded to the question "When it comes to politics, how liberal or conservative are you?" on a seven-point scale ranging from *extremely liberal* (1) to *extremely conservative* (7). Participants' reported political conservatism was not affected by the manipulations, all Fs < 1.22, all ps > 0.270.

III. STUDY 1 RESULTS

Descriptive statistics and correlations are reported in Table 1.

A. Perceived Anger Manipulation Check

As reported in the original manuscript (Salerno et al. 2018), the manipulation was successful: angry attorneys were perceived as significantly more angry ($M = 3.26$, $SD = 1.17$) than were calm attorneys ($M = 1.85$, $SD = 1.06$), $F(1, 216) = 102.26$, $p < 0.0001$, $d = 1.25$, 95% $CI = [1.11, 1.71]$. There was not a significant main effect of gender, $F(1, 216) = 1.99$, $p = 0.159$, $d = 0.20$, 95% $CI = [-0.08, 0.58]$, or a significant interaction, $F(1, 216) = 0.63$, $p = 0.427$, $\eta_p^2 < 0.003$. The effect of the anger manipulation can be specifically attributed to perceiving the attorney as more angry, rather than more generally emotional, because our manipulations did not have an effect on participants' perceptions of the attorneys' level of sadness or fear, Fs 2.43, ps 0.120.

B. Ambivalent Sexism

We tested whether the bias against female anger is stronger among participants with relatively more explicit sexist attitudes. We conducted two linear regressions with dummy codes representing attorney gender (0 = male, 1 = female) and attorney anger (0 = calm, 1 = angry), a continuous measure of sexism, and all interactions predicting hirability. The first regression included benevolent sexism as the continuous moderator and the second regression included hostile sexism as the continuous moderator.

Table 1:   Descriptive Statistics and Bivariate Correlations (Studies 1 and 2)

	Study 1					Study 2			
	M (SD)	(1)	(2)	(3)	(4)	M (SD)	(3)	(4)	(5)
Benevolent sexism (1)	2.47 (1.07)					—			
Hostile sexism (2)	2.19 (1.06)	0.21**				—			
Political conservatism (3)	3.40 (1.75)	0.33**	0.40**			3.47 (1.75)			
Age (4)	36.41 (11.04)	–0.09	–0.09	0.15*		38.56 (11.68)	0.16**		
Likelihood of hiring attorney (5)	5.12 (1.76)	–0.05	–0.17**	–0.09	0.06	—	—	—	
Attorney effectiveness (6)	—	—	—	—	5.14 (1.59)	0.02	0.07	0.95

1. Benevolent Sexism

The predicted three-way interaction between attorney gender, attorney anger, and partici-
pants' benevolent sexism was significant, *b = –0.92, SE = 0.46, t = –2.00, p = 0.046, 95%
CI = [–1.82, –0.015]* (Figure 1).

We probed the three-way interaction by assessing the simple two-way attorney gen-
der × attorney anger interaction at different levels of benevolent sexism. At relatively
lower levels (–1*SD*) of benevolent sexism, the simple interaction was not significant, *b = –
0.31, SE = 0.69, t = –0.45, p = 0.652, 95% CI* [–1.68, 1.06]. More specifically, participants
with lower levels of benevolent sexism were unaffected by anger (vs. no anger) expression
for both the male attorney, *b = 0.04, SE = 0.46, t = 0.08, p = 0.934, 95% CI* [–0.87, 0.95],
and the female attorney, *b = –0.27, SE = 0.52, t = –0.53, p = 0.599, 95% CI* [–1.30, 0.75].

In contrast, the simple interaction was significant at moderate levels of benevolent sex-
ism, *b = –1.30, SE = 0.48, t = –2.70, p = 0.007, 95% CI* [–2.25, –0.35]. Simple slopes analyses
revealed that participants with moderate levels of benevolent sexism were significantly less
likely to hire an angry female attorney relative to a calm female attorney, *b = –0.76, SE = 0.36,
t = –2.10, p = 0.037, 95% CI* = [–1.48, –0.05], but were unaffected by anger expression from a
male attorney, *b = 0.54, SE = 0.31, t = –1.70, p = 0.090, 95% CI* [–0.08, 1.16].

The simple two-way interaction was also significant at relatively higher levels (+1*SD*) of
benevolent sexism, *b = –2.29, SE = 0.68, t = –3.35, p = 0.001, 95% CI* [–3.63, –0.94]. Simple
slopes analyses revealed that participants with relatively higher benevolent sexism were signif-
icantly less likely to hire an angry (vs. calm) female attorney, *b = –1.25, SE = 0.49, t = –2.55,
p = 0.011, 95% CI* = [–2.22, –0.28], and were also significantly *more* likely to hire an angry
(vs. calm) male attorney, *b = 1.03, SE = 0.47, t = 2.18, p = 0.030, 95% CI* [0.10, 1.97].

2. Hostile Sexism

A similar regression with hostile sexism as the moderator replacing the benevolent
sexism scores revealed that the three-way interaction between attorney gender, attor-
ney anger, and hostile sexism was not significant, *b = –0.44, SE = 0.45, t = –0.96,*

Figure 1:   Predicted likelihood of hiring as a function of attorney anger, attorney gender, and participant levels of benevolent sexism (Study 1).
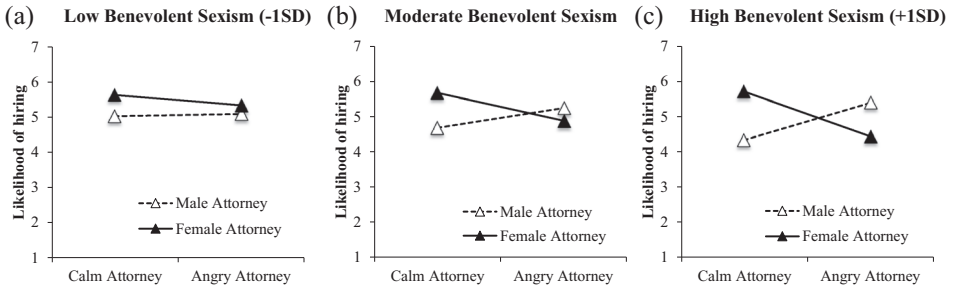
p = 0.336, 95% CI = [−1.33, 0.46]. Hostile sexism was a marginal predictor of hiring overall, b = −0.41, SE = 0.21, t = −1.95, p = 0.052, and no other effects were significant, all ps > 0.336.


C. Political Conservatism

We found a very similar pattern for political conservatism. The predicted three-way interaction between attorney gender, attorney anger, and participants' political conservatism was significant, b = −0.69, SE = 0.28, t = −2.48, p = 0.014, 95% CI = [−1.23, −0.14] (Figure 2). We probed the three-way interaction by assessing the simple two-way attorney gender × attorney anger interaction at different levels of political conservatism. At relatively lower levels (−1SD = 1.65) of political conservatism (i.e., high levels of liberalism, given 1.65 falls between 1 = *extremely liberal* and 2 = *liberal*), the simple interaction was not significant, b = −0.03, SE = 0.68, t = −0.04, p = 0.971, 95% CI [−1.37, 1.32]. More specifically, participants with lower levels of political conservatism were unaffected by anger (vs. no anger) expression for both the male attorney, b = −0.01, SE = 0.43, t = −0.01, p = 0.990, 95% CI [−0.85, 0.84], and the female attorney, b = −0.03, SE = 0.52, t = −0.06, p = 0.955, 95% CI [−1.08, 1.02].

In contrast, the simple interaction was significant at moderate levels of political conservatism (i.e., M = 3.40), b = −1.22, SE = 0.47, t = −2.58, p = 0.010, 95% CI [−2.16, −0.29]. Simple slopes analyses revealed that participants with moderate levels of political conservatism were marginally more likely to hire an angry male attorney relative to a calm male attorney, b = 0.57, SE = 0.31, t = 1.82, p = 0.070, 95% CI = [−0.05, 1.19], but were marginally less likely hire an angry female attorney relative to a calm female attorney, b = −0.64, SE = 0.35, t = −1.83, p = 0.070, 95% CI [−1.35, 0.047].

The simple two-way interaction was also significant at relatively higher levels (+1SD = 5.15) of political conservatism, b = −2.42, SE = 0.67, t = −3.60, p = 0.0004, 95% CI [−3.75, −1.10]. Simple slopes analyses revealed that participants with relatively higher political conservatism were significantly more likely to hire an angry (vs. calm) male

Figure 2:   Predicted likelihood of hiring as a function of attorney anger, attorney gender, and participant levels of political conservatism (Study 1).
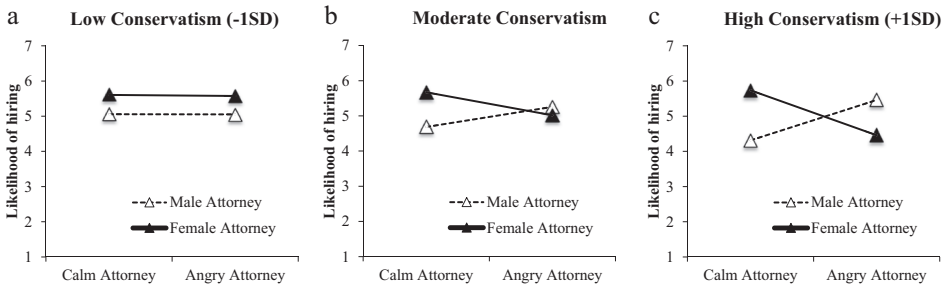
attorney, $b = 1.15$, $SE = 0.46$, $t = 2.49$, $p = 0.013$, 95% $CI = [0.24, 2.05]$, and were also significantly *less* likely to hire an angry (vs. calm) female attorney, $b = -1.28$, $SE = 0.49$, $t = -2.60$, $p = 0.010$, 95% CI $[-2.24, -0.31]$.

D. Age

The predicted three-way interaction with age was not significant, $b = 0.02$, $SE = 0.04$, $t = 0.54$, $p = 0.592$, 95% $CI = [-0.06, 0.11]$. Age was not a significant predictor, $b = 0.01$, $SE = 0.02$, $t = 0.46$, $p = 0.649$, 95% $CI = [-0.03, 0.05]$, nor were any interactions with age significant, all ps > 0.209.

IV. Study 2

Study 2 was a replication study with one major modification. Rather than using videos of only two attorneys (one male, one female), we videotaped additional female and additional male attorneys delivering the same closing statement as the actors in Study 1 so that our findings are not a result of something idiosyncratic about the first two actors. Further, we expanded our outcome variable from a single item about hiring to a more comprehensive scale about perceptions of attorney effectiveness.

V. Study 2 Method

Participants were 302 adults recruited online from Amazon's Mechanical Turk (M-Turk). Nine participants (3 percent) were excluded for failing the gender manipulation check and an additional 20 participants (6.8 percent) were excluded for spending less than five minutes on the task. The remaining 273 participants were 51 percent women and 81 percent white, 10 percent African American, 7 percent Hispanic, 5 percent Asian, and

1 percent other, with a mean age of 39 years ($SD = 12$). Study 2 again comprised a 2 (attorney gender) × 2 (attorney anger: calm, angry) between-subjects design. Participants were randomly assigned to one of the four conditions and within each condition randomly saw one of three actors consistent with that condition. That is, participants were randomly assigned to see one of 12 versions of the attorney video. Participants completed the same procedure as Study 1, with additional measures described below, and were compensated $1 for their participation.

A. Materials and Measures

We recruited two additional female attorneys and two additional male attorneys, who all had trial experience, to deliver a calm and an angry version of the same closing statement from Study 1. The six attorneys (i.e., the original two actors and the four new actors) ranged in age from 28 to 56 ($M_{female} = 45$, $M_{male} = 41$) and all identified as white, except for one male attorney who identified as Hispanic. Their years of experience being an attorney ranged from three to 31 ($M_{female} = 20$, $M_{male} = 14$), and their years of trial experience ranged from two to 16 ($M_{female} = 10$, $M_{male} = 6$). In the no-anger control condition, the male and female attorneys were rated to be equally professional, $t(148) = 1.41$, $p = 0.162$, $d = 0.23$, 95% CI [–0.08, 0.50]. The four new attorneys watched videos of the first two attorneys who acted in Study 1, on which they modeled their performances. They read off a teleprompter that included indicators of when they should increase their volume, give emphasis, or slam on the podium to convey anger.

Participants completed a new outcome measure of perceived effectiveness described below, manipulation checks, demographics, and the political conservatism measure from Study 1. Participants' reported political conservatism was not affected by the manipulations, all Fs < 1.47, all ps > 0.226. Ambivalent sexism was not measured in this study.

1. Effectiveness Scale

For our main dependent measure, we asked participants to respond to the following items on seven-point scales: (1) "How good was the lawyer at their job? In other words, how ineffective or effective was the lawyer in arguing the case?" from *extremely ineffective* to *extremely effective*, (2) "How likely would you be to hire this person if you needed a lawyer?" from *extremely unlikely* to *extremely likely*, (3) "If you were the head of the prosecutor's office, how likely would you be to promote this person?" from *extremely unlikely* to *extremely likely*, and (4) "If you or a family member was a victim of violence, how comfortable would you be with this person being the prosecutor who represented your case?" from *extremely uncomfortable* to *extremely comfortable*. These items formed a reliable effectiveness scale ($\alpha = 0.95$).[2]

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[2]The pattern of results in Study 2 was the same regardless of whether we analyzed the perceived effectiveness scale or the single hiring item from Study 1 as the outcome measure.

Figure 3:   Predicted perceptions of attorney effectiveness as a function of attorney gender and participants' political conservatism (Study 2).
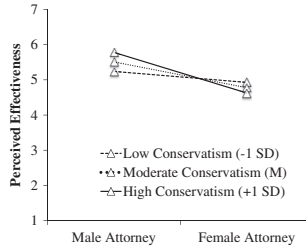
VI. Study 2 Results

Descriptive statistics and correlations are reported in Table 1.

A. Perceived Anger Manipulation Check

As reported in the original manuscript (Salerno et al. 2018), the manipulation was again successful: angry attorneys were perceived as significantly more angry ($M = 3.32$, $SD = 1.16$) than were calm attorneys ($M = 1.52$, $SD = 0.80$), $F(1, 269) = 215.40$, $p < 0.0001$, $d = 1.78$, 95% $CI = [1.57, 2.04]$. There was not a significant main effect of gender, $F(1, 269) = 2.64$, $p = 0.105$, $d = 0.16$, 95% $CI = [-0.10, 0.54]$, or a significant interaction, $F(1, 269) = 2.25$, $p = 0.135$, $\eta_p^2 < 0.008$. Thus, participants again perceived the angry attorneys as more angry than the nonangry attorneys—the effect size was again large and did not differ in strength for the male versus female attorneys.

B. Political Conservatism

The predicted three-way interaction between attorney gender, attorney anger, and participants' political conservatism was not significant, $b = -0.05$, $SE = 0.21$, $t = -0.23$, $p = 0.814$, 95% CI = $[-0.46, 0.36]$. We dropped the anger variable to see whether political conservatism predicted a general gender bias regardless of anger expression and confirmed that there was a two-way interaction between attorney gender and participants' political conservatism, $b = -0.24$, $SE = 0.10$, $t = -2.31$, $p = 0.021$, 95% $CI = [-0.44, -0.03]$ (Figure 3). Simple slopes analyses revealed that, at relatively lower levels ($-1SD$) of political conservatism (i.e., political liberals), the attorneys' gender did not have an effect on participants' perceptions of their effectiveness, $b = -0.31$, $SE = 0.26$, $t = -1.21$, $p = 0.226$, 95% CI $[-0.82, 0.19]$. In contrast, participants perceived the female attorneys to be significantly less effective than the male attorneys at both moderate levels of political conservatism, $b = -0.73$, $SE = 0.18$, $t = -4.03$, $p = 0.0001$, 95% $CI = [-1.09, -0.37]$, and at relatively higher levels of political conservatism ($+1SD$), $b = -1.15$, $SE = 0.26$, $t = -4.48$, $p < 0.00001$, 95% CI $[-1.66, -0.65]$.

Figure 4:   Predicted perceptions of attorney effectiveness as a function of attorney anger, attorney gender, and participant age (Study 2).
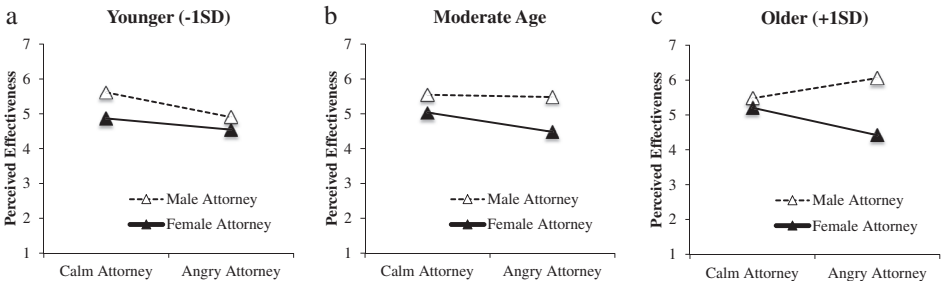
In other words, in contrast to Study 1 that demonstrated political conservatism was related to a bias against female attorneys who express anger specifically, Study 2 demonstrated that political conservatism was related to a bias against all female attorneys, not just those who expressed anger.

C. Age

The predicted three-way interaction between attorney gender, attorney anger, and participants' age was significant, $b = -0.07$, $SE = 0.03$, $t = -2.43$, $p = 0.016$, 95% $CI = [-0.14, -0.01]$. We probed the three-way interaction by assessing the simple two-way attorney gender × attorney anger interaction at different ages (Figure 4). At relatively younger ages $(-1SD = 26.33$ years), the attorney gender × attorney anger interaction was not significant, $b = 0.39$, $SE = 0.51$, $t = 0.76$, $p = 0.450$, 95% CI [-0.62, 1.39]. The simple interaction was also not significant at moderate ages ($M = 37.96$ years), $b = -0.49$, $SE = 0.36$, $t = -1.36$, $p = 0.173$, 95% CI [-1.20, 0.22].

In contrast, the simple two-way interaction was significant at relatively older ages $(+1SD = 49.60$ years), $b = -1.37$, $SE = 0.51$, $t = -2.68$, $p = 0.008$, 95% CI [-2.38, -0.36]. Simple slopes analyses revealed that participants at relatively older ages were significantly less likely to hire an angry (vs. calm) female attorney, $b = 0.79$, $SE = 0.34$, $t = -2.30$, $p = 0.022$, 95% $CI = [-1.47, 0.11]$, but were unaffected when male attorneys expressed anger, $b = 0.58$, $SE = 0.38$, $t = 1.53$, $p = 0.127$, 95% CI [-0.17, 1.33].

VII. Discussion

Across two experiments we found that a variety of individual difference measures that were theorized to predict participants' endorsement of traditional gender roles determined the level of bias against angry female attorneys. Further, these predictors also determined the degree to which men were rewarded for expressing anger. Overall, the

pattern of results suggested that angry (vs. calm) female attorneys were penalized more and angry (vs. calm) male attorneys were rewarded more as individual difference predictors of endorsing traditional gender roles increased.

A. *Ambivalent Sexism*

Study 1 demonstrated that the gender bias in reactions to anger expressed in court was exacerbated as participants' level of benevolent sexism increased. That is, the more people explicitly endorsed women in traditional gender roles, the more likely they were to both react positively to attorneys who acted in accordance with those gender roles (i.e., angry male attorneys) and react negatively to attorneys who violated them (i.e., angry female attorneys). Of note, this bias appeared to be driven by benevolent sexism, which is characterized as thinking about women stereotypically and within restricted gender roles, rather than traditional hostile sexism. This finding lends support to Jost and Kay's (2005) theory that benevolent sexism (in addition to or in place of hostile sexism) can contribute to system justification, as well as previous research demonstrating that benevolent sexism predicts gender inequality (Glick & Fiske 2001; Jost & Kay 2005).

The fact that hostile sexism did not determine the degree of bias against angry female attorneys might, at first blush, seem counterintuitive—Why wouldn't people with more hostile sexist attitudes be biased against angry female attorneys? One potential explanation is that it might be because benevolent sexism is capturing a type of sexism that is more specifically and directly relevant to a bias against women who violate gender stereotypes by expressing anger, given that it assesses thinking about women stereotypically and within restrictive gender roles; whereas hostile sexism captures more general negative attitudes toward women overall and would not be specific to women who violate gender roles. Yet, we did not find that hostile sexism predicted a bias against all women. Therefore, we acknowledge a second possibility, which is both theoretical and methodological. In contemporary society, it is becoming less and less socially acceptable to express explicit prejudice—even if people still harbor that prejudice either explicitly or implicitly (e.g., Crandall & Eshleman 2003; Devine et al. 2002). Because benevolent sexism is, on the surface, framed more positively, people might be more willing to endorse those items when they agree with them relative to the more traditional and blatantly negative hostile sexism items. In fact, benevolent sexism is perceived more favorably than is hostile sexism (Bohner et al. 2010; Chisango & Javangwe 2012; Kilianski & Rudman 1998) and is sometimes classified as chivalry rather than sexism (Viki et al. 2003). At least one study has demonstrated that hostile sexism is more likely to manifest in private, relative to public, contexts but found the opposite pattern for benevolent sexism (Chisango et al. 2015). Thus, people might be less willing to answer the hostile sexism items honestly when they agree with them, thereby making it a less meaningful measure relative to the more modern form of benevolent sexism that allows for people to convince themselves or others that they are not sexist while continuing to endorse traditional gender roles. Therefore, we find support for the theory that explicit endorsement of benevolent sexism is related to bias against angry female attorneys, but are agnostic as to the role of traditional hostile sexism given the difficulties associated with measuring these attitudes explicitly.

B. Political Conservatism

Studies 1 and 2 demonstrated that higher levels of political conservatism were related to biases against female attorneys—in Study 1 it was associated with a bias against angry women specifically (and rewarding angry men), but in Study 2 it was associated with a bias against women in general, regardless of whether they expressed anger. The relationship between gender bias and participants' political conservatism is consistent with research that demonstrates that political conservatism is correlated with endorsement of more traditional gender roles and less feminist values (e.g., Corbett 1988; Mason & Lu 1988; Rosenthal 1995; Paterno & Martínez 2006). One potential explanation for why politically conservative participants showed a bias against female attorneys in general in Study 2, rather than only against angry women as they did in Study 1, is that women in a traditionally male-dominated profession might, in and of itself, represent a violation of traditional gender roles (albeit a less extreme one than when the female attorney also expresses anger). That is, just seeing a woman as an attorney might be enough to trigger a bias in political conservatives. This might have been brought about by something idiosyncratic about the actors who were added in Study 2. For example, one of the female attorneys in Study 2 was considerably younger than the female attorney in Study 1. It might be the case that conservatives had a particularly negative reaction to a young and female attorney that led to the decreased in perceived effectiveness, regardless of whether she expressed anger.

It is also possible, however, that this difference is due to methodological differences between the two studies (e.g., something about the additional actors in Study 2). We were able to rule out one such potential methodological explanation, which is the different outcome measures used in Study 1 (willingness to hire the attorney) versus Study 2 (a more broad effectiveness measure that included, but was not limited to, willingness to hire the attorney). Our pattern of findings in Study 2 were the same regardless of whether we limited the outcome to the hiring item or used the perceived effectiveness scale.

C. Age

Finally, we found mixed support for our hypothesis that participants' age might be a predictor of a bias against angry female attorneys. In Study 1, age was unrelated to gender biases, but in Study 2 the bias against angry women was evident only among relatively older adults. The relationship between gender bias and age found in Study 2 is consistent with research that demonstrates that older adults are more likely to endorse traditional gender roles than are younger adults (Akotia & Anum 2012; Paterno & Martínez 2006; Phillips 1979; Rosenthal 1995; Spitze & Huber 1980). One potential explanation for why age played a stronger role in Study 2 is that the Study 2 sample was significantly older ($M = 37.87$) than that of Study 1 ($M = 35.42$), $F(1, 601) = 7.19$, $p = 0.008$, and also had somewhat more variability (Study 1: $SD = 10.72$, range = 49 [19 to 68]; Study 2: $SD = 11.63$, range = 52 [20 to 72]). Having a wider age range that extended to older adults would provide a better test of the age moderation hypothesis than the more restricted age range recruited in Study 1. It is also possible that these differing results were due to

methodological differences noted above. We again ruled out the possibility that the differing results were due to the different outcome measures: We again found that our pattern of age findings in Study 2 was the same regardless of whether we limited the outcome to the hiring item or used the perceived effectiveness scale.

D. Implications

Given that all three individual difference variables are associated with endorsement of traditional gender roles (and are either unrelated or have relatively weak correlations with each other), this suggests that the gender bias against angry female attorneys that we demonstrated is likely to be due, in part, to the fact that angry women are being penalized for violating traditional gender roles by expressing anger, while angry men are being rewarded for conforming to traditional gender roles by expressing anger. This finding is striking given the fact that the attorneys were all delivering the exact same arguments and displaying similar levels of anger.

These findings have several implications for women in the legal system. Law students are often taught that expressing their closing statements with emotion is an effective courtroom strategy because it humanizes the attorneys and demonstrates convictions about their chase (e.g., Caldwell et al. 2002; Foster 2010; Golberg & McCormack 2016; Lubet 2004) and that anger, specifically, is "a great way to close a case" (Foster 2010:10). This means that women are put in the difficult position of either (1) being seen as having a lack of conviction about their cases or weak in court if they do not express anger, or (2) being penalized for violating gender roles if they do express anger. It is important for legal education to address this potential backlash for women and help women develop courtroom strategies that demonstrate the courtroom behaviors that are part of being a good attorney that are considered traditionally masculine without the backlash for violating gender roles. The fact that female attorneys are penalized for exhibiting traits and behaviors that are traditionally considered masculine, such as expressing anger or being aggressive in court, might prevent women from advancing in their careers and contribute to the gender disparity we see at high levels of the legal profession.

Identifying individual difference factors that predict bias against women—and angry women specifically—not only helps identify the underlying psychological mechanism for this bias, but also has practical implications. Our findings suggest that female attorneys should be particularly wary of using anger (or other traditionally masculine behaviors) in court when they know the judge or jurors are politically conservative or older. Measures of political conservatism and benevolent sexism could be included in voir dire for these purposes. One the other hand, although avoiding anger expression in court might be good for individual female attorneys in the short term, if women suppress anger expression this is likely to reinforce the very gender norms that underlie this bias and might make the situation worse in the long term. Our results suggest that women can feel more comfortable using anger in court if they are dealing with a judge or jury that is relatively liberal and young given that our results showed that people with low benevolent sexism and political conservatism, and who were relatively younger in age, were not influenced by the attorneys' gender and/or anger expression. This also

highlights the need to diversify judges and juries to avoid predominantly older and conservative juries or judiciaries.

E. Limitations and Future Directions

Our study has some limitations that could be addressed in future research. To establish the tight control over our variables necessary to make causal arguments about the impact of attorney gender and anger, our stimuli were somewhat artificial. The participants saw only a brief closing argument from one side, whereas if they were real jurors or judges they would have had much more information on which to base their opinions. We tried to establish realism, however, by making sure our actors were attorneys with trial experience and by using a real closing statement from a real case. Our individual difference measures were measured after our manipulations, which raises concerns about how our manipulations might have affected how the participants responded to those measures. We would argue, however, that this should not be a major concern given that we conducted statistical tests to determine that the manipulations did not have an effect on participants' reports of sexism or political conservatism.

We hope that some of the limitations of our experiments inspire very important future research questions. Although our article establishes a gender bias, it is not clear whether these findings would generalize to other types of emotions, attorneys, or cases. For example, perhaps it is possible that gender-*congruent* emotions (e.g., fear, sympathy) might be more acceptable from female attorneys. Although there is mixed evidence that sometimes female jurors are penalized for expressing fear (Salerno et al. 2019) and sometimes are not (Salerno & Peter-Hagene 2015), there is no evidence thus far that they are *more* effective when doing so. Given that individuals who hold benevolent sexist beliefs were exhibiting the most bias, this case might have brought out the bias in them more so than another case that did not include a female victim. That is, this case might have activated their benevolent sexist belief that it should be a man protecting the female victim. Thus, it would be fruitful to investigate whether female attorneys' anger is more acceptable in other types of cases. Further, there is some evidence in the realm of jurors arguing about a case that African Americans might also face backlash for anger expression in court because it conforms to the "angry black man/woman" stereotype (Salerno et al. 2019). Finally, this research highlights the need to investigate whether the bias against female attorneys expressing anger in court generalizes across all manners of delivery. A very important step for future research is to determine whether there are some women who are able to express anger without backlash, or if there are ways to express it that mitigate its harmful effects on how they are perceived. Finally, future research should include other individual differences that might predict negative reactions to violations of gender norms in court, such as participants' race or education level.

F. Conclusion

Previous research in social psychology has demonstrated that women often experience backlash for violating gender roles by expressing anger in settings that stress rationality,

such as office settings, juries, or job interviews. If there is any setting in which it would be acceptable for women to express anger it would be the adversarial setting of a courtroom. Not only are attorneys taught to exhibit conviction by expressing their arguments with indignation and anger, but in this setting the female attorneys are expressing anger in service of obtaining justice for the victim of a truly heinous murder (Kupfer-Schneider et al. 2010). Yet, we find that even in this setting where it is not only appropriate but even encouraged to express emotion, we still see men being perceived as more effective and hirable when they express anger, and women being perceived as less effective and hirable. These studies went beyond previous demonstrations by identifying an explanation for the backlash that women experience based on the role of traditional gender norms. People who were more likely to endorse traditional gender roles—that is, older, more conservative, and more benevolently sexist participants—rewarded attorneys who conformed to gender norms (angry male attorneys) and penalized attorneys who violated gender norms (angry female attorneys). Identifying this psychological mechanism has much broader implications surrounding legal education, including the need for finding a way to help educate female attorneys on courtroom strategies that will help them demonstrate the valued behaviors and traits that were traditionally considered masculine, while avoiding backlash for violating gender stereotypes.

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