

## Women and Kaddish

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AT FIRST GLANCE, ANY DISCUSSION OF THE APPROPRIATENESS

of women saying Kaddish, the traditional mourner's prayer, seems to be superfluous. On the one hand, those for whom egalitarianism is the major ethical principle see no possibility of excluding women from participating in this or any other synagogue experience. On the other, those committed to traditional *halakhic* norms tend to take for granted that women are excluded from any formal liturgical role.

This characterization of the *halakhic* position, however, is oversimplified. It is true, of course, that *halakha* rejects an egalitarian approach to religion, insisting that men and women have different (if overlapping) obligations and opportunities. Yet general observations cannot be applied indiscriminately to specific issues without an examination of the *halakhic* issues. Indeed, a conclusion excluding women from saying Kaddish hardly flows automatically from the sources.

Before examining those sources, however, it would be valuable briefly to take note of another issue, that of *birkhat hogemel* (the blessing that gives thanks for their deliverance) that people surviving a threatening illness or a dangerous situation must say publicly, in the presence of a *minyan* and two *talmidei hakhamim*. Hence the custom of reciting the *berakha* in the synagogue while the Torah is being read.

The issue here centers not on the *halakhic* debate over whether women can be counted in the requisite *minyan*,<sup>1</sup> but on whether or not they can say the *berakha*. As women cannot receive an *aliyah* during an Orthodox synagogue service, we have seen the rise of the custom of a husband receiving an *aliya* and reciting the *berakha* as his wife's representative following her recovery from childbirth.

Yet, as Rabbi Moshe Sternbach<sup>2</sup> (vice chairman of the "ultra-Orthodox" Eida Haredit) and former Israeli Chief Rabbi Ovadia Yosef<sup>3</sup> point out, it has been a long-standing custom in the most Orthodox synagogues in Jerusalem for a mother recovered from childbirth to recite *birkhat hogemel* either from the women's section of the synagogue when the Torah is read or at a specially convened public celebration at home. And of course, though it is practiced in Jerusalem, the custom is not restricted to this city.

It is instructive to note R. Yosef's quick dismissal of possible objections to her doing so:<sup>4</sup> The fact that she might still be *nidda* after childbirth is

irrelevant; *nidda* status is no impediment to entering the synagogue or reciting *berakhot*. There is nothing immodest in her public recitation, because it is the *halakha* which requires the *berakha* to be said in front of a *minyan*. There is no issue of *kol isha* (hearing a woman's voice in a sexually arousing situation) or general fear of sexual arousal caused by her presence, because the Shekhina Herself is attendant with the *minyan*, and there is no sexual arousal in the company of the Shekhina; indeed, "the evil inclination is not to be found for such a short matter . . . especially nowadays when women regularly go out to public places among men. . . ." (This, he notes, is the source used to allow men and women to sit together and sing *zemirot*.) Originally, women could be called to the Torah; the reason they are not called at this time is *kevod hatsibbur* (respect for the community), not fear of arousal or *kol isha*. Thus, he concludes, "everyone concedes (*lekkhol hadeiot*) that a woman may say *birkhat hogemel* in this manner."

The applicability of this logic to the question of a woman saying Kaddish is obvious. Yet, as we shall see, there has nevertheless been a reluctance on the part of many *halakhists* over the centuries to allow the matter.

The origin of Kaddish as a mourner's prayer is somewhat obscure.<sup>5</sup> It praises God without making mention of the dead and is unintelligible to those who do not understand Aramaic. Yet its contemporary impact on those who grieve is clear and obvious. The obligation to say Kaddish speaks even to those distanced from *halakhic* observance. Even bereaved Jews who do not identify with the theological premise that saying Kaddish brings benefits of one sort or another to the deceased feel a sense of duty to honor their dead with the recitation of this prayer.

Kaddish is a response to death. Instead of resigning oneself to a sense of meaninglessness that accompanies a confrontation with death, one turns to tradition and its call to action. "Through the Kaddish we hurl defiance at death and its feindish conspiracy against man," writes Rabbi Joseph B. Soloveitchik.

When the mourner recites "Glorified and sanctified be the great name . . ." he declares more or less the following: No matter how powerful death is, notwithstanding the ugly end of man, however terrifying the grave is, however nonsensical and absurd everything appears, no matter how black one's despair is and how nauseating an affair life itself is, we declare and profess publicly and solemnly that we are not giving up, that we are not surrendering, that we will carry on the work of our ancestors as if nothing had happened, that we will not be satisfied with less than the full realization of the ultimate goal of the establishment of God's kingdom. . . .<sup>6</sup>

Not only is the mourner willing to make such declarations about himself, but he calls out to the congregation to join him. It is the elicitation of the communal response "*Amen. Yehe shemey rabba* . . ." which is traditionally seen as the main merit of saying Kaddish. Originally, writes Rabbi Naftali Zvi Roth,<sup>7</sup> the mourner brought relief to the deceased by reciting "*Barekhu*" in his capacity as *hazzan* and thereby eliciting the congregation's praise of God in response.

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But not everybody has the ability to act as *hazzan* (or get one of the few *aliyyot* available on a Shabbat); minors would thus not be able to exercise their responsibility towards their deceased parents. Therefore, he maintains, the early authorities enacted the saying of Kaddish after the recitation of Psalms, which is outside of the formal prayer service, to provide an opportunity for those who could not act as *hazzan*.

This logic, of course, is easily extended to women. The argument is all the more compelling when we realize that the elicitation of “*yehi shemei rabba*” in response to mourner’s Kaddish is a form of *kiddush haShem* (the public sanctification of God’s name), and not only are women fully obligated in that mitzvah, but, according to some authorities, because of that obligation they may count in the *minyan* required for such a public sanctification.

Indeed, even those opposing a daughter saying Kaddish concede this. In the late seventeenth century, R. Yair Bakhrakh (*Havvot Ya’ir*)<sup>8</sup> dealt with a case of a man in Amsterdam who died leaving only daughters and asked that a special *minyan* be set up to enable them to say Kaddish. The scholars and lay officials did not prevent them from doing so. R. Bakhrakh conceded that “there is no proof to contradict the matter,” agreeing that the daughter’s Kaddish brings *nahat ruah* (repose) to the deceased, that women participate in the mitzvah of *kiddush haShem*, and that Kaddish could be said because a *minyan* of men was present. But in the final analysis he would not allow her to say Kaddish, for he feared that such an innovation might weaken allegiance to existing Jewish customs.

It is important to be aware of the conscious effort being made here to separate the social responsibility of the *posek* (*halakhic* decisor) from his allegiance to the logic of the *halakha*. There is no attempt made to suggest that the *halakha* dictates forbidding the woman to say Kaddish. On the contrary, R. Bakhrakh rules that despite the apparent permissibility of her doing so, he must forbid it because he fears the negative impact that a permissive ruling might have on the fabric of his community. Such a decision, of course, is by definition applicable to a specific community at a specific time.

Thus, for example, it comes as no surprise that when we open the standard edition of the Mishneh Berura we find that *Ba’er Heitev* comes to a different conclusion. He writes:

In *Responsa Keneset Yehezkel*, the author wrote that it is specifically the son’s son [who can say Kaddish] but the son of the [deceased’s] daughter may not say Kaddish. And certainly the daughter has no Kaddish in the synagogue. But if they wish to form a separate *minyan* for her, they are permitted to do so. See there at the end of the section on Yore Deah.<sup>9</sup>

*Ba’er Heitev*’s ruling allowing the daughter to say Kaddish in a private *minyan* is clearly in opposition to that of the *Havvot Yair*, who also dealt with establishing a private *minyan* for the daughter. While this in and of itself is not surprising—*poskim* often come to different conclusions—it is significant to note

that the *Keneset Yehezkel* responsum to which he makes reference cites the *Havvot Yair* and comes to the conclusion that “If they want to form a separate *minyan* they may do so for the son of the [deceased’s] daughter or for anyone who wishes to say Kaddish for the benefit of the deceased. But not for any female whatsoever.”

*Ba’er Heitev* apparently read the *Keneset Yehezkel* to say that while the law might have allowed her to say Kaddish at home, she should not exercise this option because of the reservation suggested by *Havvot Yair*. *Ba’er Heitev* felt bound by the *halakha* and not the policy advice. In a similar vein, *Shaarei Teshuvah* writes: “See *Shevut Yaakov*, part two, number 23. [It should read, 93.] If he had only a daughter, she may say Kaddish [but] only in her house.”<sup>10</sup> *Tel Aviv Chief Rabbi Hayim David Halevi*<sup>11</sup> comments that this is no lone opinion, but rather a reflection of a then current widespread practice.

At first glance, a ruling allowing a woman to say Kaddish at home and not in synagogue seems self-contradictory. A *minyan* of men is required in either case, and any objections based on *kol isha* or the fact that women may not form the *minyan* required for the saying of Kaddish would apply to the private *minyan* as well. But the logic becomes clear when we realize that *Keneset Yehezkel* was addressing a synagogue protocol different from our own. His responsum dealt with a question of who has precedence to say Kaddish in the synagogue. In most modern shuls, all mourners say Kaddish together. The original custom, however, was for only one mourner to say Kaddish at any time; when two people both claimed the right, the question arose as to who had first claim. *Keneset Yehezkel* apparently maintains that inasmuch as women have no obligation to participate in the synagogue activities, she cannot displace a man in the synagogue who presses his claim to say Kaddish. *Ba’er Heitev* sees no reason to extend this to a private *minyan* where no one else has a claim to say Kaddish.

If the reason for requiring a special *minyan* for the daughter is that she has no right to say Kaddish in the synagogue and cannot displace a man who has a right to say Kaddish, it would follow that in synagogues such as ours where all mourners say Kaddish together or where no male mourner is present, a woman could say Kaddish. Indeed, this seems to have been the position of Lithuanian *poskim* of the last century.

Almost a quarter of a century ago, when the issue came up in a chapter of *Yavneh*, the National Religious Jewish Students Association, I asked one of the *Yavneh* student leaders who was then learning with the *Rav*, *Rabbi Joseph B. Soloveitchik*, to put the question to him. *Rabbi Ezra Bick* (now at *Yeshivat Har Etzion*) wrote back:

I spoke to the *Rav* about the question you asked concerning a girl saying Kaddish. He told me that he remembered being in Vilna at the “*Gaon’s Kloiz*”—which wasn’t one of your modern Orthodox shuls—and a woman came into the back (there was no *ezrat nashim* [ladies section]) and said Kaddish after *ma’ariv*. I asked him whether it would make a difference if someone was saying Kaddish along with her or not, and he replied that he could see no objections in either

case—it's perfectly all right.<sup>12</sup> Coincidentally, checking around, I came across a number of people who remember such incidents from Europe, including my father (in my grandfather's *minyān*—he was the *rav* in the town).

Indeed, many people remember such occurrences. For example, Rabbi Pinchos Zelig Prag, *gabbai* of the Mir Minyan (the famous Brooklyn *shul* the core of whose members are former students of the Mirrer Yeshiva who came to America after the Second World War by way of Shanghai), told me that one of the congregants, Rabbi Moshe Maaruch, who was born and raised in Vilna and who studied at the Mirrer Yeshiva recalled that when his cousin died leaving an adult daughter and no sons, Rabbi Hayyim Ozer Grozinsky had allowed her to say Kaddish daily in the synagogue; another recalled that the Hafetz Hayyim had similarly ruled.

Prof. Yaffa Eliach<sup>13</sup> relates similar occurrences in her study of Eisheshok. Tzipora Hutner Kravitz, wife of Rabbi Yosef Kravitz, recalled to Dr. Eliach that in 1935, when she was 14 years old, her brothers were out of town when her father, Rabbi Naftali Menahem Hutner, the *dayan* of the town, died. She said Kaddish at the graveside and continued to say Kaddish in both the town's New Bet Midrash and *Shtibel* until her brother returned. She recalled that at the same time Gittel Gordon, then 18 years old, said Kaddish in the *Shtibel*. Another townsman recalled that when the girls said Kaddish, they wore a *beret* and stood in the men's section in the first row to the right of the *amud*.<sup>14</sup>

Rabbi Yosef Eliyahu Henkin also recalled that in his youth young women said Kaddish.<sup>15</sup> He also allowed women to say Kaddish in *shul*, provided they remained in the women's section.<sup>16</sup> He noted that in past times, when only one person said Kaddish, that person would stand in the front of the *shul*, something inappropriate for a woman. Now, though, when everyone says Kaddish together from their respective places, the woman can say Kaddish.

Rabbi Soloveitchik also insisted on the woman staying in the women's section. When at the time I had asked Rabbi Gerald J. Bliedstein (then a faculty advisor to Yavneh and now at Ben Gurion University) about the issue, he wrote to me:

The Kaddish matter is as follows. I was asked about the question last year, and looking into it, could find no reason beyond "general policy" for forbidding it. I spoke to Aharon Lichtenstein [then Rosh Kollel at Yeshiva University and now Rosh Yeshivat Har Etzion], who had the same reaction and said he would ask the Rav [Rabbi Joseph B. Soloveitchik, his father-in-law], which he did when I was on the other end of the phone. [Rav Lichtenstein] put the question to him, and then was directed to ask me whether the girl was stationed in the *ezrat nashim*. I, of course, answered in the affirmative, and the Rav then said that of course she could say Kaddish.

While European rabbis apparently did not insist on this, I suspect that the insistence by the American *poskim* that women stay in the *ezrat nashim* stemmed in no small part from their opposition to the mixed seating that was gaining hold in many American synagogues.

It is interesting to look at some of the contemporary arguments that have been used to justify restricting Kaddish to males. The late Israeli Chief Rabbi Ben-Zion Uziel<sup>17</sup> argues that the tradition of women not saying Kaddish is veiled in the secrets of the Kaddish itself, so "we should not initiate a new custom of daughters saying Kaddish." Nevertheless agreeing that "we should try to find a rationale," he offers the following argument:

The son is the continuation of the father's physical form; by his actions and speech, and by taking his place in the community, he brings credit to his father in world of the souls. . . .

The son does this, he continues, by saying Kaddish and performing mitzvot publicly in the presence of the community (*tsibur*), which according to *halakha* must consist of ten adult males.

And this can be accomplished only by the sons who qualify to establish the Jewish *aida*, and not by the daughters, who therefore cannot say Kaddish in the *tsibur*.

The novel argument, which finds no echo in previous discussions, is less than overwhelming. Daughters saying Kaddish is not a new custom, having centuries of precedent—albeit not universally accepted—behind it. According to many *halakhists*,<sup>18</sup> women can join with men to form a *minyān* when they have the same obligation in the mitzvah—and men and women are obligated in *kiddush haShem*. Even when they cannot form a *tsibur*, women are still part of one in which they are present. In reviewing—and dismissing—the arguments to the contrary, Rabbi Hayyim Hirschenson concludes that "there is simply no sustainable view that women are not called a *kahal* and *aida*."<sup>19</sup> If daughters are not part of the *aida*, neither are their mothers. Yet the son, whose Kaddish is to be part of his taking his father's place in the *aida*, says Kaddish for his mother. Clearly the argument is at best forced.

Rabbi Hayim David Halevi<sup>20</sup> concedes the *halakhtic* legitimacy of daughters saying Kaddish, noting that there is nothing strange or incomprehensible about the practice. But he limits his own permission to a private service in the home attended by only a small group of family members. A daughter cannot say Kaddish in the synagogue, because "there are all sorts of people there" and her action might result in sexual arousal, if only slight. Even the graveside is inappropriate, as the presence of a large number of people makes her saying Kaddish immodest. A home service attended by the large number of people who pay a *shiva* visit is no different from a synagogue service, and "a mitzvah cannot be achieved by way of a sin." All of these concerns seem to be dismissed by Rabbi Ovadia Yosef's remarks concerning saying *birchat hagomel* in synagogue which we quoted above.

A very different negative approach is taken by Rabbi Shlomo Wahrman, author of *She'erit Yosef*. He cites R. Henkin's position but cannot reconcile himself to it.

I fear that if we allow daughters to say Kaddish as allowed by R. Henkin, then those of our contemporaries who are out to cause confusion—their aim being to create a new Torah and, God forbid, change our traditions, always looking for a high peg on which to hang their nonsense—will rely on this to count a woman in a *minyan*, saying that the most stringent have already allowed it.<sup>21</sup>

He then quotes a number of authorities who agree with him that the daughters should not be allowed to say Kaddish.

We have here an honest, unabashed public policy decision. There is no attempt to ignore or argue against the objective *halakhic* permissibility of a woman saying Kaddish. Nonetheless, in this posek's opinion there is more at stake than personal sensitivity or reasoned *halakhic* analysis. Upholding the integrity of the *halakhic* system requires certain strategies; forbidding a daughter to say Kaddish is but one of them.

A similar approach is taken by Israeli Chief Rabbi Yisrael Meir Lau:

As a practical matter, it seems that we cannot rely on Rabbi Henkin's permissive ruling. Especially in our times we must be sensitive to the opinion of the *Havvoth Yair*. . . . Reformers might follow and draw the conclusion that women may act as *hazan*. . . . Therefore we cannot allow women to say Kaddish in any way.<sup>22</sup>

One must appreciate the openness of this presentation even though the same argument can be used against any lenient ruling in just about every area of contemporary life. But one might just as well argue that the strategy is wrong, that forbidding what is permitted only encourages others to permit what is forbidden. Thus Rabbi Aaron Soloveitchik writes:

Nowadays, when there are Jews fighting for equality for men and women in matters such as *ahiyot*, if Orthodox rabbis prevent women from saying Kaddish when there is a possibility for allowing it, it will strengthen the influence of Reform and Conservative rabbis. It is therefore forbidden to prevent daughters from saying Kaddish.<sup>23</sup>

Another approach is simply to ignore the *halakhic* permissibility of women saying Kaddish. Consider, for example, Rabbi Aaron Felder's *Yesodei Semahot*, a popular summary in English of the laws of mourning. Describing the graveside service, the author writes that following Tsidduk Hadin, "the male mourner should recite the burial Kaddish."<sup>24</sup> Later, he indicates that during *avelut* it is the son who says Kaddish.<sup>25</sup> Significantly, the source of the first ruling is given as Shulhan Arukh Yoreh Deah 376:4, where the word "male" does not appear. Five sources are given for the second—including Kol Bo Al Avelut—and the note ends (in Hebrew), "The daughter should not say Kaddish." In general, R. Felder presents positions unequivocally in the English section but mentions alternate views in the Hebrew notes; here, though, despite the fact that the graveside is a private rather than synagogue service, the reader has no indication that some authorities allow the daughter to say Kaddish.

Kol Bo Al Avelut is an encyclopedic collection of all responsa on death-related issues. The author knows of no source or custom that allows women to say Kaddish in the synagogue; still, it is "*pushut* (simply obvious)" he writes, that she may not. He is, however, willing to consider the question of her saying Kaddish in a private *minyan*. He mentions Ba'er Heitev's quoting Keneset Yehezkel's opinion that the daughter may not say Kaddish in shul, but omits the former's ruling that she may do so at a private *minyan*. The author quotes the permissive ruling of Shevet Yaakov but dismisses it as a lone opinion. "If she wants," he concludes, "let her go to the women's section in the synagogue and answer 'Amen' when Kaddish is said [by the men]."<sup>26</sup> Unfortunately, if she goes to weekday services at many—if not most—Orthodox synagogues, she will find that the bet midrash ("chapel") used has no *ezrat nashim*.

One cannot deny an author the right to side with those authorities who forbid a daughter to say Kaddish. But he must be prepared to include in his presentation those sources with which he does not agree. The *halakhic* legitimacy of women saying Kaddish is unassailable even if not universally accepted. Thus, even if a rabbi feels that it is in society's best interest not to allow an orphaned daughter to say Kaddish, he should make it clear that he knows that other *poskim* hold otherwise. That is the approach responsible *poskim* regularly follow in all other areas of *halakhah* when answering personal questions. In a healthy *halakhic* community, people generally feel bound by their personal *halakhic* authority.

While many will pass up the opportunity to exercise an option which all agree is not obligatory, finding solace in a more passive role, a woman who regularly attends *shul* will feel resentment when she learns later that a most meaningful, legitimate option was withheld from her. The rabbi, in his role as counselor, has an obligation to bring all legitimate options to the attention of the mourner.

## NOTES

1. Aryeh A. Frier, "Women and *Minyan*," *Tradition* 23 (Summer 1988): 4, p. 64. Also see Rochelle L. Miller, "Birchat Hagomel: Cultural Context and Halakhic Practice," *JUDAISM* 43 (Summer 1994), no. 3, pp. 270-78, and "Communications: 'Birchat Hagomel,'" *JUDAISM* 44 (Winter 1995), no. 1, pp. 115-117.

2. Rabbi Moshe Sternbach, *Responso Teshuvot veHanagot* [Jerusalem, 5746 [1986]], number 195, p. 72.

3. Rabbi Ovadia Yosef, *Responso Yehave Da-et* [Jerusalem, 5741 [1981]], vol. 4, responsum 15, pp. 75-78.

4. *Ibid.*, p. 78.

5. Rabbi Nafali Zvi Roth, "Azkara vechaitara vekaddish yetom," *Talpiyot*, 7:2-4, Tishrei 5721 [1961], pp. 369-81.

6. Rabbi Joseph B. Soloveitchik, "A Eulogy for the Talner Rebbe," in Joseph Epstein, ed., *Shivrei Havanot: A Conspectus of Public Lectures of Rabbi Joseph B. Soloveitchik* (New York: Hamevaser, 1974), p. 20.

7. Roth, p. 375.
8. Rabbi Yair Bakhrakh, *Responsa Haavot Ya'ir*, number 222.
9. Rabbi Yehuda Ashkenazi, *Ba'er Hataer*, commentary to Orah Hayyim, section 132. n. 5, p. 27 in vol. 2 of standard Mishnah Berurah.
10. Rabbi Hayyim Mordecai Margoliyot, *Shaarei Teshuva*, n.5 in Mishnah Berurah ad loc.
11. Rabbi Hayim David Halevi, *Asah Lekha Rav* [Tel Aviv, 5743 [1983]], vol. 5, no. 33, pp. 230-36.
12. There is nothing surprising about allowing the female mourner to say Kaddish by herself. The private *minyanim* which many *poskim* allowed to be set up for a female mourner were by definition services where she said Kaddish by herself. Any objections concerning *kol isha, taniul* [modesty], etc. would apply equally to the private or synagogue *minyan* (as they would to her saying *hirkhat hagomel*). She could not say Kaddish in the synagogue because of the protocol then in effect in which the male mourners had a claim to the Kaddish.
13. I am grateful to Dr. Eliach for sharing this material from her forthcoming book, *The Shiva*, soon to be published by Little Brown. Dr. Eliach's photo collection of the townspeople of Eisheshok is part of the permanent exhibition at the National Holocaust Museum in Washington, DC.
14. This practice found its way to America. Writing about an Orthodox synagogue in New Bedford, Massachusetts, in the early twentieth century, Herman Elliot Snyder ("The American Synagogue World of Yesterday, 1901-1925," *American Jewish Archives* 42:4 (Spring/ Summer 1990), p. 72) notes: "Despite this strict separation of the men and women, a young girl, perhaps sixteen years old, would enter the men's section to recite the Kaddish for a parent. No one ever made protest or even a comment."
15. Rabbi Yosef Eliyahu Henkin, *Sefar Teshuvot Ibra*, vol. 2 (New York: Ezrat Torah, 1989), "Amirat Kaddish al yedei haBat," no. 4 (2), p. 6.
16. *Ibid.*, no. 4 (1), pp. 3-5. (This is a reprint of his article by the same name that appeared in *Hapardei*, 38:6, pp. 5-6.) Rabbi Henkin's student and grandson, Rabbi Yehuda Herzl Henkin, published an extensive discussion and explanation of that decision in his "Amirat kaddish al yedei isha vetsuruf laminyan me ezrat nashim," *Hadarom*, no. 54, Sivan 5745 [1985], pp. 34-48, reprinted in his *Responsa Benei Banim*, vol. 2, 1992, no. 6, pp. 23-30.
17. Rabbi Ben Zion Uriel, *Responsa Mishpatei Uziel*, Tanina vol. 1, no. 13, pp. 37-38.
18. Frimer, "Women and *Minyan*."
19. Rabbi Hayim Hirschenson, *Malki baKodesh* (Hoboken, NJ, 5681 [1921]), vol. 2, p. 201.
20. Halevi, *Asah Lekha Rav*.
21. Rabbi Shlomo Halevi Wahrman, *She'erit Yosef*, Vol. 11 (New York: Balsham, 1981), p. 299f.
22. Rabbi Yisrael Meir Lau, *Yahel Yisrael* (Jerusalem, 5752 [1992]), vol. 2, no. 90, p. 479.
23. Rabbi Aaron Soloveichik, *Od Yisrael Yosef Beni Hai* (Yeshivas Brisk, 1993), no. 32, p. 100.
24. Rabbi Aaron Felder, *Yesodei Semahot*, part I (New York: Balsham, 1974), section 4.1, p. 50, emphasis added.
25. *Ibid.*, p. 123, n. 1.
26. Rabbi Yekutiel Grenwald, *Kol Bo Al Avelut*, Vol. 1 (New York: Feldheim, 1965), p. 375.