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THE LAW OF F·R·I·E·N·D·S

Ezra Rosser*

Introduction

A serious law professor would not write an article about the TV show *Friends*, but having just written a book and an article, I'm on a "break." Besides, I'm not that serious a law professor.¹ And *Friends* is as good a topic as any.² For those of us of a certain age—too young to have watched *M.A.S.H.* when it came out and old enough to remember watching broadcast TV and not just through a streaming service on a device—*Friends* was *and is* a big deal.³ It both captured a particular moment in history and helped make that moment.

Looking back can be a fraught exercise, filled with both judgment and nostalgia. Some of the plot lines and jokes in *Friends* have not aged well. From our perspective today, it is too homophobic (but in complicated ways), too white (not in a complicated way at all), and overly reliant on stereotyped characters.⁴ On the other hand, many of the jokes are timeless and the characters, with time, acquired a depth that seems to defy the limits of the sit-com format. Smug superiority and quirkiness propelled *Seinfeld* (and later shows like *Colbert* and *Schitt's Creek*) forward, but *Friends* relied on a different formula, one that took relationships incredibly seriously.

Conveyed through humor and infused throughout the show's endless parade of "joke, joke, joke, joke,"⁵ *Friends* put forth a complicated vision of social interaction. Complete with an intricate system of rewards and punishments, the *Friends* universe can be seen as a moral tale that touches on nearly every aspect of both law and human relations. Just as Robert Ellickson's *Order without Law* famously described how cattle farmers and their neighbors relied principally on informal norms rather than legal rules to resolve disputes,⁶ the law of *Friends* is similarly informal, but no less significant in the lives of characters.

This article takes *Friends* (semi-)seriously. It tries to build a "law of *Friends*" out of the jokes and relationship dynamics as they develop over the show's ten seasons and 236 episodes. What sort

* Professor of Law, American University Washington College of Law. Thanks to Bilen Kassie, Jeremy Paul, David Snyder, and Ebony Toussaint for feedback on prior drafts. Ayana Anderson, Felicia Cienfuegos, Nick Cross, and Oliver Jury provided excellent research assistance even though Nick strongly encouraged me not to write about *Friends* because he considers it hopelessly offensive. By way of disclaimer, I did not have TV at home growing up but I have done my part since college to make up for that fact.

¹ See Ezra Rosser, *On Becoming "Professor": A Semi-Serious Look in the Mirror*, 36 FLA. ST. U. L. REV. 215 (2009).

² Courts have taken judicial notice of *Friends* as well. See *U.S. v. Emor*, 785 F.3d 671, 672 (2015).

³ Even Rachel's hair was a big deal: "a good hair day for Rachel on a Thursday night meant big business over the weekend" for hair salons. Jay Serafino, *The One Where Jennifer Aniston's 'Rachel' Haircut on Friends Became a Phenomenon*, MENTAL FLOSS (Sep. 19, 2019), <https://www.mentalfloss.com/article/598225/jennifer-aniston-the-rachel-haircut-friends-history>.

⁴ See Lauren Michele Jackson, *When Black People Appear on Seinfeld*, N.Y. MAG. (Aug. 3, 2020), <https://www.vulture.com/2020/08/seinfeld-rewatch-close-read.html> (noting that, given the minimal inclusion of African Americans in *Friends*, "the demographics of the show might as well round-up to white"); Emile Bartow, *40 Moments From 'Friends' That Haven't Aged Well*, WOMEN ADVANCE (Nov. 19, 2020), <https://admin.womenadvance.com/stories/40-moments-friends-havent-aged-well/> (highlighting the ways the characters are all stereotypes: "Joey is a womanizer, Monica is baby-crazy, Rachel just wants a man, and Ross is emotionally weak.").

⁵ *Friends: The One with the Video Tape* (NBC television broadcast Oct. 8, 2001).

⁶ ROBERT C. ELICKSON, *ORDER WITHOUT LAW* (1991).

of behavior is seen as wrong? When someone does something wrong, how should they be punished and under what conditions are they forgiven? What is the role of formal law? What are the show's moral lessons and what behavioral norms does it uplift as well as reject? The hope is that readers of this article will join me in taking *Friends*, and the place of *Friends* in our society, somewhat seriously, will help build out the legal theory of *Friends*, and will also approach this piece with levity that “*Friends*”-scholarship invites. To those who do not want to join in this undertaking or question whether a tenured professor should spend time on such a topic, I can only say “vafanopi!”⁷

Methodology

This study of *Friends* was conducted over more than two decades. I started watching it in college, but my study became more intense when I first became a law professor. Netflix DVDs by mail allowed me to watch the entire series over a short period of time. I continued my study by watching endless reruns. After my wife and I had kids, such time indulgences were not available (and besides, my preferences post-baby seemed to gravitate towards needless violence for reasons I hesitate to explore). A year ago, I tasked two research assistants with watching every episode and coding every episode of *Friends* to try to piece together how the characters resolved disputes. From a statistical perspective, it was largely a failed experiment. There were too many moving parts. A column on race was largely empty save that in season 3, Ross is shown reading Studs Terkel's *Race: How Blacks & Whites Think & Feel About the American Obsession*.⁸ But the fact that two law students were paid by their law school to watch *Friends* part of their 3L year has to be recorded as at least a partial success. In the end, everything that follows is academic b.s., but readers who have insights into the show or think that something important is missing are encouraged to email me at crosser@wcl.american.edu. Collaborative feedback helped Andy Weir write and revise *The Martian* and I am confident that law students and even law professors can help improve this paper, so I want to thank them in advance for their feedback. Now to the law of *Friends*.

Punishment

Although taking a comedic form, punishment is a recurring theme in *Friends*. Punishment serves as a vehicle to correct a character who has done wrong and also a way of informally restoring balance to the group. Thus when Ross gets angry at Rachel for taking too long to get dressed for an event and she then decides she isn't going, the solution is for Ross to “drink the fat.”⁹ Although Ross at first rejects the proposed solution as immature, he ultimately is prepared to suffer the punishment.¹⁰ Similarly, when Chandler kisses Joey's girlfriend Kathy behind his back, Chandler's physical punishment is to be confined in a cardboard box.¹¹ Even more traditional forms of violence-based conflict resolution, such as when a fight between Monica and Rachel over guest star Jean Van Damme escalates from head flicks to wrestling, serve as a way of bringing the group back together.¹²

⁷*Friends: The One with Chandler in the Box* (NBC television broadcast Nov. 20, 1997). See also URBAN DICTIONARY, <https://www.urbandictionary.com/define.php?term=vafanopi&fa%20Napoli> (last visited March 10, 2021) (explaining what “vafanopi,” or more accurately, “Va fa Napoli!” means).

⁸ *Friends: The One Where Monica and Richard Are Just Friends* (NBC television broadcast Jan. 30, 1997).

⁹ *Friends: The One Where No One's Ready* (NBC television broadcast Sept. 26, 1996).

¹⁰ *Id.*

¹¹ *Friends: The One Where Chandler Crosses the Line* (NBC television broadcast Nov. 13, 1997).

¹² *Friends: The One After the Superbowl, Part 2* (NBC television broadcast Jan. 28, 1996).

Throughout *Friends*, physical humor plays a distant second role relative to shunning and disapprobation when it comes to punishment. But the things you can be punished for are almost infinite. Not thinking a sketchy movie is going to be Joey's big break, punishable.¹³ Being a bad friend in another person's dream, punishable.¹⁴ And of course, having sex with a random person during a break in a relationship, punishable.¹⁵ Indeed, Ross's betrayal of Rachel while they were on a break is the transgression that won't go away.¹⁶ Making an appearance even in the last episode, the question of whether Ross did something wrong provides a background beat for the entire show. The audience does not need to be told what "a break" refers to; when Rachel flies to London in the hopes of breaking up Ross's marriage to Emily, the guy sitting next her, played by Hugh Laurie—most famous for playing Dr. House on the TV show *House*—only has to say "it seems to be perfectly clear, that you were on a break" for the audience to be in on the joke.¹⁷

Of course, sometimes punishment can go too far or is not leveled at the right person. The law of *Friends* is resilient enough to respond (eventually) to such mistakes. Thus, although Joey initially takes the blame ("I'm Joey, I'm disgusting") for a series of offenses—leaving underwear in Monica and Rachel's apartment, having a naked picture of Monica, and setting up a video camera to record sex acts—that are not his fault, Monica eventually concocts a story to save Joey and accept the judgment of the group.¹⁸ Similarly, in perhaps the show's best example of punishment going too far (in that it threatened to break the group apart), when Emily insists that Ross stay away from Rachel as a pre-condition for trying to make the marriage work, at first Ross agrees.¹⁹ Emily had her reasons—Ross mistakenly said "Rachel" not "Emily" on their wedding day—but her insistence on Ross completely altering his life, and especially on not being around Rachel, eventually leads to Ross's second divorce.²⁰ In keeping with its sit-com nature, often the punishment was not warranted and the offense is relatively easily forgiven. The characters in such circumstances, such as when Monica opened all the wedding presents by herself and Chandler kissed another bride to fake photos of their wedding, ultimately "call it even."²¹ Certainly by the next episode most transgressions—except the "break" hookup—are forgiven and forgotten.

The State

Though informal punishment abounds in *Friends*, the characters have an antagonistic relationship with formal law enforcement. "The Law" is presented as scary and something to avoid. Not that the characters are above breaking the law. Phoebe robbed people, including Ross, when she was young: "A pipe was my weapon of choice and preteen comic book nerds were my meat."²² Chandler and Rachel, two of the more straight arrow of the *Friends*' characters, steal cheesecake

¹³ *Friends: The One with Joey's Big Break* (NBC television broadcast May 13, 1999).

¹⁴ *Id.*

¹⁵ *Friends: The One Where Ross and Rachel Take a Break* (NBC television broadcast Feb. 13, 1997).

¹⁶ It is beyond the scope of this article to answer the question of whether they were actually on a break or not. I am also not going to attempt to define what a "break" in a relationship means. To borrow from social media's relationship categories, "it's complicated."

¹⁷ *Friends: The One with Ross's Wedding, Part 2* (NBC television broadcast May 7, 1998).

¹⁸ *Friends: The One with Ross's Sandwich* (NBC television broadcast Dec. 10, 1998).

¹⁹ *Friends: The One Where Phoebe Hates PBS* (NBC television broadcast Oct. 15, 1998).

²⁰ *Friends: The One with Ross's Wedding, Part 2* (NBC television broadcast May 7, 1998).

²¹ *Friends: The One with the Red Sweater* (NBC television broadcast Oct. 4, 2001).

²² *Friends: The One with the Mugging* (NBC television broadcast Feb. 13, 2003).

from outside a neighbor's door.²³ Ross keeps an illegal exotic monkey.²⁴ Rachel discriminates against an older job applicant and then sleeps with her subordinate, Tag.²⁵ Rachel commits insurance fraud by pretending to be Monica.²⁶ But "law" is normally quite menacing, whether it takes the form of someone from animal control trying to catch Ross's monkey,²⁷ a police officer reclaiming his badge from Phoebe and later interrogating her,²⁸ or child protective services holding Ross's baby after Joey and Chandler leave Ben on a bus.²⁹ Rather than the law being about protection and service, the law lurks. Even private enforcement, such as Ross's colleagues discovering that he is sleeping with a student³⁰ or Monica being caught wrongly accepting steaks as gifts from a supplier,³¹ takes a dangerous form in the show.

Of course, the biggest legal danger to the characters and to the show is a very New York one—the risk that they will be discovered as wrongly benefiting from the city's rent control regulations. Though the smaller apartment across the hall—occupied by Joey and Chandler, later Chandler and Eddie, later Rachel and Monica, later Joey and Janine, later Joey and Rachel, later just Joey, and lastly Joey, Rachel, and Emma—is a major secondary set location, most action in the show takes place in either the coffeehouse, Central Perk, or in Monica's apartment. Or more precisely, the rent-controlled apartment, complete with outdoor terrace and ample indoor space, that Monica got from her grandmother Nana and that is lived in by most of the rest of the cast at one point or another.³² The group's hold on this apartment is significant enough that rent control is brought up in the series' very last scene.³³ Even though when the show starts, Monica is a waitress and struggling cook and Rachel has no job, rent-control provides the characters a comfortable space to hang out and to grow.³⁴ The group faces the loss of the apartment when the building superintendent, Treegar, threatens to turn in Monica and Rachel for violating the rent control laws until Joey agrees to teach him how to ballroom dance.³⁵ Though rarely mentioned in most episodes, housing enforcement silently looms in the background as either a matter calling for viewers to suspend disbelief or as an explanation for the disjunction between the quality of their lives and their incomes in one of the most expensive cities in the United States.³⁶

²³ *Friends: The One with the All the Cheesecakes* (NBC television broadcast Jan. 4, 2001).

²⁴ *Friends: The One with the Monkey* (NBC television broadcast Dec. 15, 1994).

²⁵ *Friends: The One Where Chandler Doesn't Like Dogs* (NBC television broadcast Nov. 23, 2000).

²⁶ *Friends: The One with Two Parts, Part 2* (NBC television broadcast Feb. 23, 1995).

²⁷ *Friends: The One Where the Monkey Gets Away* (NBC television broadcast Mar. 9, 1995).

²⁸ *Friends: The One with the Cop* (NBC television broadcast Feb. 25, 1999).

²⁹ *Friends: The One with the Baby on the Bus* (NBC television broadcast Nov. 2, 1995).

³⁰ *Friends: The One Where Ross Dates a Student* (NBC television broadcast Mar. 9, 2000).

³¹ *Friends: The One with Five Steaks and An Eggplant* (NBC television broadcast Oct. 19, 1995).

³² See Tom Huddleston, 'Friends' Premiered 24 Years Ago Today: Here's How Much That Crazy NYC Apartment Would be Worth Now, CNBC (Sep. 22, 2018 9:30), <https://www.cnn.com/2018/09/21/friends-debut-anniversary-how-much-is-monica-apartment-worth-now.html> (estimating the fictional apartment's size as between 1,125 and 1,500 square feet). See also Michael Shulman, *the Revealing Reasons That People Visit the "Friends" Building*, THE NEW YORKER (July 10, 2019), <https://www.newyorker.com/culture/culture-desk/the-revealing-reasons-that-people-visit-the-friends-building>.

³³ Shelly Cobb & Hannah Hamad, *Friends "The Last One"*, in TELEVISION FINALES: FROM HOWDY DOODY TO GIRLS (Douglas L. Howard & David Bianculli eds., 2018): 123-28, at 126.

³⁴ Andrew Berman, *Friends' in NYC: How Plausible Were the Greenwich Village Apartments Depicted in the Hit '90s Series?*, 6SQFT (Sep. 12, 2019), <https://www.6sqft.com/friends-in-nyc-how-plausible-were-the-greenwich-village-apartments-depicted-in-the-hit-90-series/> See also Hana R. Alberts, *What Would These Picture-Perfect TV Homes Actually Cost*, N.Y. POST (May 6, 2016), <https://nypost.com/2016/05/06/what-would-these-picture-perfect-tv-homes-actually-cost/> (estimating that the characters would have had to pay more than \$4,000 per month if they were living there in 2016).

³⁵ *Friends: The One with the Ballroom Dancing* (NBC television broadcast Oct. 16, 1997).

³⁶ By the end of the series, the characters are making significantly more money but still enjoying the advantages of rent control. For quick coverage of rent control in New York City highlighting the ways in which some non-poor tenants

Relationships

The most important law of *Friends* is that friends come first. Not friends as a generic category but the six friends—Monica, Ross, Phoebe, Chandler, Rachel and Joey—whose intertwining relationships anchor the show.³⁷ The person who is potentially the love of your life briefly travels into town from Minsk, you cannot break a dinner date you have with a member of the core friend group.³⁸ You are in love with someone for the first time in your life, you have to first clear it with their ex and your friend. You want to go on a romantic weekend vacation but your friend wants you to stay for a baby’s birthday party, you have to stay for the birthday party.³⁹ Although the reason group focus is important in each instance is usually explained or justified in some manner, the basic point remains, the highest moral obligation runs to the group. A character who deviates from this orientation is subject to sanction not only by the friend who was wronged but by the collective friend group.

As the name of the show suggests, the characters are part of what some now call a “chosen family.”⁴⁰ In the very first episode, Monica introduces her date, “Paul the Wine Guy” to the group, telling Paul “this is everybody.”⁴¹ Even though some pairings within the group are particularly strong—Ross and Rachel as a couple, Monica and Ross as siblings, Monica and Chandler as a couple, Chandler and Joey as roommates, Joey and Phoebe as the odd ones out, Joey and Rachel as a couple, Monica and Phoebe as polar opposites—the pairings provide the plot but not the foundation. The foundation is the collective group. After Monica and Chandler hook up, they can’t tell anyone because they are nervous that letting their friends know will hurt their relationship.⁴² When Rachel and Joey’s relationship fails, it is not because they don’t love each other, it is because they are too good of friends.⁴³ The core friendships are tight and resilient, provided you do not step too far out of line. Joey is allowed to sexually harass the female characters without real pushback, Monica is allowed to be overly controlling,⁴⁴ and Phoebe’s weirdness is tolerated and often simply ignored. Eccentricities and moral failings are okay, judgment is reserved for prioritizing people who are not part of the group.

Outsiders reflect a threat to the core friend group and are treated as such. Whenever a new character, usually an outside romantic interest, is introduced, the drama usually involves the ways members of the group rejecting their possible inclusion. Up until Mike marries Phoebe in the last season of the show, in a sub-plot that is more decorative than anything,⁴⁵ no outsider really breaks into the group. Paolo leads the women to swoon but Ross almost immediately calls him a “crap-

benefit, see Adam Davidson, *The Perverse Effects of Rent Regulation*, N.Y. TIMES MAG. (July 23, 2013), <https://www.nytimes.com/2013/07/28/magazine/the-perverse-effects-of-rent-regulation.html>.

³⁷ One study of viewers’ emotions after the last episode aired found that “[o]f the six *Friends* characters, more participants (31%) chose Rachel as their favorite character. She was followed by Chandler (20%), Joey (20%), Phoebe (14%), and finally Ross (7%) and Monica (5%).” Keren Eyal & Jonathan Cohen, *When Good Friends Say Goodbye: A Parasocial Breakup Study*, 50 J. BROAD. & ELEC. MEDIA 502, 512 (2006).

³⁸ *Friends: The One with All the Cheesecakes* (NBC television broadcast Jan. 4, 2001).

³⁹ *Friends: The One with the Cake* (NBC television broadcast Oct. 23, 2003).

⁴⁰ See also Cobb & Hamad, *supra* note 35, at 123 (describing the group as “an “urban family” of precariously employed twentysomethings, each differently resisting or delaying the necessary step to full adult status—the formation of the nuclear family”).

⁴¹ *Friends: The One Where Monica Gets a Roommate* (NBC television broadcast Sept. 22, 1994).

⁴² *Friends: The One with Ross’s Wedding, Part 2* (NBC television broadcast May 7, 1998).

⁴³ *Friends: The One with Ross’s Tan* (NBC television broadcast Oct. 9, 2003).

⁴⁴ *Friends: The One with the Joke* (NBC television broadcast Jan. 13, 2000).

⁴⁵ *Friends: The One with Phoebe’s Wedding* (NBC television broadcast Feb. 12, 2004).

weasel,”⁴⁶ Janene’s dislike of Joey’s friends ends with her physically fighting Monica,⁴⁷ and Parker’s upbeat take on life leads everyone, eventually including Phoebe, to turn on him.⁴⁸ Showing the self-awareness of *Friends*, reacting to Roger, a shrink who was then dating Phoebe, Rachel first declares on behalf of the group, “we hate that guy,” and later Roger notes of such dislike, that “actually it is quite typical group behavior when you have this kind of dysfunctional group dynamic.”⁴⁹ You know, this kind of co-dependent, emotionally stunted, sitting in your stupid coffee house with your stupid big cups, which I’m sorry, might as well have nipples on them, and you are all like “oh define me, define me, love me, I need love.”⁵⁰ Almost immediately afterward Phoebe tells everyone, “I hate that guy,” which both explains why she dumped Roger and signals that she has rejoined the group.⁵¹ *Friends* pulled back the curtain briefly but quickly slammed it shut in the name of group unity.

Indeed, the strength of the internal relationships is shown in part through the ways such deep friendships contrast with the shallowness and heartache of more traditional family relationships. Chandler’s copes with his father, Charles Bing, being a gay drag queen with the stage name “Helena Handbasket,” through a mix of homophobia, anger, and grudging acceptance. But they are not close and Chandler comes across as fairly scarred from his childhood. With a mother who killed herself, an absent father, and a confusing assortment of odd relatives, including an indifferently cruel twin sister, Phoebe is even more estranged from a traditional family. Though Phoebe’s character gained depth through it, it is worth recalling that Phoebe ends up acting as surrogate birth mother for her brother’s triplets. With both Phoebe and Chandler’s families, suicide and gayness end up being punchlines between friends. Joey and Rachel’s parents play much more limited roles, but they too are part of the same melody. Joey’s father cheats on his mother and when Joey confronts his parents about it, they are upset at Joey for making a big deal about it. The separation of Rachel’s parents ruins Rachel’s birthday but serves as background to one of the show’s best jokes, when Rachel’s mom complains, “you work and you work and you work at a marriage but all he cares about is his stupid boat,” and, in juxtaposition, her dad complains, “you work and you work and you work on a boat.”⁵² But they never make the leap from warning shots about marriage to major characters. Monica and Ross’s parents provide a convenient but somewhat complicated foil next to the other parents. Jack and Judy Geller live in a nice house, have a stable marriage, and largely serve as checks on the main characters—Judy’s Jacques Cousteau monologue is one of the best moments in the series⁵³—but coming out of a Mayberry childhood cannot save Monica from justifiable frustration that her parents prefer Ross.

Outside of friendships, the second most important relationship category in *Friends* involves dating and romance. Joey plays the stereotypical male lover, bedding a long line of women but women who, for the most part, are not introduced to the audience; a part that is essentially a precursor to Charlie in the later sitcom *Two and a Half Men*. The only real rule for who Joey dates appears to be attractiveness. The other characters have more complex romantic storylines. With Rachel as the former wealthy cheerleader, there is the danger she will get pigeonholed into a New York-equivalent of a valley girl stereotype. Indeed, in one episode she woos Joshua by wearing her cheerleader outfit, remarking at the end, “works every time.”⁵⁴ But Rachel also has a child out of

⁴⁶ *Friends: The One with the Blackout* (NBC television broadcast Nov. 3, 1994).

⁴⁷ *Friends: The One with the Apothecary Table* (NBC television broadcast Jan. 6, 2000).

⁴⁸ *Friends: The One in Massapequa* (NBC television broadcast Mar. 28, 2002).

⁴⁹ *Friends: The One with the Boobies* (NBC television broadcast Jan. 18, 1995).

⁵⁰ *Id.*

⁵¹ *Id.*

⁵² *Friends: The One with Two Parties* (NBC television broadcast May 2, 1996).

⁵³ *Friends: The One Where Rosita Dies* (NBC television broadcast Feb. 1, 2001).

⁵⁴ *Friends: The One with the Fake Party* (NBC television broadcast Mar. 19, 1998).

wedlock and struggles to find love. Although Ross to some degree plays the nerd, he dates a long series of women. The fact that his first wife left him for another woman is fodder for jokes across all the seasons, as one op-ed explains, “the lesbian stereotype was a seemingly bottomless well drawn from time and time again.”⁵⁵ Much more can, has, and should be said about how *Friends* dealt with LGBTQ issues. One retrospective asks “Is *Friends* homophobic?” and then answered immediately, “In short, yes.”⁵⁶ But compared to the ways *Friends* cautioned about male closeness and insisted on policing such intimacy, the show was relatively accepting of the relationship between Ross’s ex-wife, Carol, and her partner, Susan. The most traditional partnership comes in the form of Monica and Chandler. Beginning with a drunken hookup in London, they become the most stable pair in the show, an idealized form of love that is brought into relief by the reappearance at crucial moments of Chandler’s ex, Janice, a squeaky voiced character who eventually also sleeps with Ross before dumping him because he is too whiney (“Oh my god!”).⁵⁷ The hardest person to figure out is Phoebe, a character who lives in her own world and touches on the lives of everyone else without being central to any other character. Phoebe’s dating life is equally confused until the final season when, against all odds, she decides she wants the white-picket fence life.

It is worth noting that, in general, *Friends* challenged all sorts of television norms about coupling. When it came to stable, stereotypical relationships, *Friends* was not *The Cosby Show*, it wasn’t even *Rosanne* or *Married with Children*. For example, according to *Friends*, age is just a number: Ross dates a very young college student, Rachel a younger man, and Monica a man, Richard, who is the same age as her parents as well as a kid still in high school. Whether a partner is in another relationship or not is also not necessarily a barrier. Even when Ross and Rachel are going strong, they have lists of people (Isabella Rossellini guest stars in the episode) they can freely have sex with outside of the relationship. When Rachel hooks up with Barry, her ex fiancé whom she abandoned at the altar, he is engaged to Mindy, a bridesmaid at Rachel’s wedding. Chandler sleeps with a woman, Aurora, even though she had a husband and another boyfriend at the same time. *Friends* is remarkably open to a diversity of romantic couplings, except perhaps gay men. Male-male affection (“bracelet buddies”) happens but the characters react to it with denial or judgment. Ross and Joey take naps together until the rest of the group find out, Chandler and Joey hug fairly often but are self-conscious about it or really any acknowledgment of affection and love. That said, over the course of the show, Joey kisses Chandler and Ross kisses Joey. Indeed, it is almost harder in *Friends* to identify characters who don’t kiss each other than those who do. Monica and Rachel kiss to get back their apartment, Rachel and Phoebe kiss, Joey and Phoebe kiss a couple of times, Chandler kisses Monica (he also pees on her, but that is a different story), Rachel, and Phoebe in the same episode, Joey and Monica kiss, Rachel and Joey kiss, Joey kisses Rachel’s mom, Ross kisses Chandler’s mom, Chandler kisses one of Joey’s sisters, and, of course, Rachel and Ross kiss. The incestuousness of the core friend group takes on tones of actual incest when the the audience is told, though not shown, that siblings Ross and Monica shared a romantic kiss in high school as a result of a case of mistaken identity. Internal coupling not only drove ratings but also affirmed the idea that the core group really did include “everybody.”

⁵⁵ Lacey Vorrasi-Banis, *The One Where Friends helped Keep Me in the Closet*, ENT. WKLY. (Sept. 20, 2019 10:30 AM), <https://ew.com/tv/2019/09/20/friends-helped-keep-me-in-the-closet/>.

⁵⁶ Kelsey Miller, *Friends is 25 Years Old. It’s Still Extremely Popular— and Polarizing*, VOX (Sept. 20, 2019 (11:20 AM), <https://www.vox.com/culture/2019/9/20/20875107/friends-25th-anniversary-polarizing-legacy-homophobia> Notably, however, the same article notes that *Friends* featured a wedding between Carol and Susan before such weddings were even legal and that it was officiated by “Candace Gingrich, the LGBTQ rights activist and sibling of Newt Gingrich.”

⁵⁷ *Friends: The One with Chandler’s Work Laugh* (NBC television broadcast Jan. 21, 1999).

Indeed, one of the most problematic parts of *Friends* is that a show set in New York City decidedly did *not* include everybody. Indeed, the only two non-white characters of any significance are Julie, an Asian woman whom Ross dates, and Charlie, an African-American woman whom Joey and then Ross date. Within the show's whiteness there is some diversity. Joey is Italian; Ross and Monica are Jewish, though both get married without signs that their weddings are Jewish; and (this was news to me before I started writing this article); Rachel may be Jewish as well. Overall, though, the cast is monolithically white—including more minor characters such as Gunther, Janice, as well as their respective co-workers (with the exception of the African-American man who hires Chandler to work at an ad agency)—something that is especially glaring considering that the show is supposed to take place in New York City. The absence of minority characters in a mass marketed sitcom is not unique to *Friends*; *How I Met Your Mother* took off right where *Friends* left off—an all-white cast somehow also avoiding minorities in New York. Sure there are differences, *How I Met Your Mother* is about five friends not six and the coffeeshop is replaced by a bar, but the formula is transparently that of *Friends*.⁵⁸ But that doesn't make it okay. Even *The Office*, a show about an office in Scranton, Pennsylvania, and *The Walking Dead*, a show about a zombie apocalypse, have more diversity.

The final significant relationship category in *Friends* is employment. In the very first *Friends* episode, Monica explains employment to Rachel, “Yeah, we all have jobs. See, that’s how we buy stuff.”⁵⁹ And over the course of the show, employment is, arguably, one of the areas where the characters grow the most and in unexpected ways. Rachel goes from not understanding work to being a powerful fashion executive. But her story is not merely a TV-version of things working out; Rachel consistently shows that work matters to her, separating from Ross in part because of his inability to understand how much it matters to her. Even Chandler, who works in “statistical analysis and data reconfiguration” and routinely jokes about how meaningless his work is (and his friends seem to agree: Monica and Rachel lose their apartment to Chandler and Joey because they do not know what Chandler’s job is), ultimately leaves a well-paid job so he can do something he cares about.⁶⁰ Similar career growth can be seen in the employment trajectory of both Ross (whose shenanigans as a professor are cringe-worthy but whose struggle to get others to care about his work probably resonates with readers of this article) and Monica. In contrast, very little development is seen in the careers of Joey and Phoebe. But here, too, there is arguably a lesson on the relative (in)significance of work. *The Office* put employment front-and-center in a way that *Friends* never did, but many of the same feelings of frustration, joy, and indifference come across even in the relationships the *Friends* characters have with work. True, jobs let the characters buy stuff (and some characters more than others, as was explored in perhaps the only class conscious episode in *Friends*, when Phoebe, Rachel, and Joey refuse to split a restaurant check evenly⁶¹). But work can also be more than that and is for most of the characters.

The Significance *and* Insignificance of *Friends*

Friends is an incomplete and partial window through which to understand life in 1990s America. The characters are a little too funny and a little too pretty for a full account of life, even white, heteronormative life, of the period. Many of the jokes and story lines are problematic—

⁵⁸ Emily VanDeWerff, *Friends Was a Great Show—That Just Happened to Ruin TV*, VOX (Sept. 19, 2019 7:09 PM), <https://www.vox.com/2014/9/29/6857745/friends-ruined-tv-25th-anniversary>.

⁵⁹ *Friends: The One Where Monica Gets a Roommate* (NBC television broadcast Sept. 22, 1994).

⁶⁰ Megan Garber, *On Chandler Bing’s Job*, THE ATLANTIC (Sept. 12, 2019), <https://www.theatlantic.com/entertainment/archive/2019/09/friends-25-prescience-chandler-bing-job/597829/>

⁶¹ *Friends: The One with Five Steaks and an Eggplant* (NBC television broadcast Oct. 19, 1995).

homophobia abounds but so does fat shaming, controlling jealousy, and many forms of misogyny.⁶² But the show has not fully lost its allure; “even today, we, the audience, are very far from bidding farewell to *Friends*.”⁶³ Netflix paid \$118 million to stream the show in 2014.⁶⁴ Cable TV has kept it one of the most successful shows of all time, with Warner Brothers reportedly making \$1 billion annually from syndication.⁶⁵ And while some *Friends* references are not part of the vernacular of younger people who may not know what a TV Guide is, much less who Chandler Bing, Ken Adams, or Regina Phalange are, some parts of the show seem to have a longer shelf life (“How you doing?”). The interactions between the characters in *Friends* demonstrate what Robert Ellickson highlighted about the relationships between ranchers in Shasta County, “that large segments of social life are located and shaped beyond the reach of law.”⁶⁶ There is a law of *Friends* even if it appears haphazard and involves informal punishment, fluid social relations, and a lot of kissing.

So here is hoping this early contribution to the legal literature on *Friends* creates space for additional work. It has been suggested that a follow-up article, “The Jurisprudence of *Friends*,” could explore how “the show was really a thinly-veiled rejection of classical liberalism—an embrace of Communitarianism in a rudderless era beset by the AIDS epidemic and the sudden collapse of the Cold War paradigm. Gen X, adrift, had to find their people to find their way.”⁶⁷ That strikes me as a promising sequel, but so does a property law analysis of *The Big Bang Theory* that unpacks the contours of Sheldon’s ownership interest in his “spot” on the couch.⁶⁸ Legal scholarship can be dry but if there is space for a whole literature on baseball’s infield fly rule,⁶⁹ there has to be space to debate things that really matter in life, such as whether George Clooney, Anna Faris, or Brad Pitt was the show’s best guest star.

⁶² See Ellie Woodward, *21 Times “Friends” Was Actually Really Problematic*, BUZZFEED (Mar. 16, 2018), <https://www.buzzfeed.com/elliewoodward/times-friends-was-actually-really-problematic>; Ilana Kaplan, *Friends: 10 Times the Classic Sitcom Was Problematic*, INDEPENDENT (Jan. 22, 2018), <https://www.independent.co.uk/arts-entertainment/films/friends-netflix-sitcom-problem-sexism-men-joey-phoebe-chandler-ross-rachel-a8168976.html>.

⁶³ Cobb & Hamad, *supra* note at 35, at 127.

⁶⁴ Adam Sternbergh, *Is Friends Still the Most Popular Show on TV?*, VULTURE (Sept. 17, 2019), <https://www.vulture.com/2016/03/20-somethings-streaming-friends-c-v-r.html>.

⁶⁵ Jessica Napoli, *How Much Money the ‘Friends’ Cast Has Made*, FOX BUSINESS (June 9, 2020), <https://www.foxbusiness.com/media/friends-cast-salary>.

⁶⁶ ELLICKSON, *supra* note 8, at 4.

⁶⁷ Email from Elizabeth Beske to author, Mar. 12, 2021 (on file with author).

⁶⁸ For an introduction to Sheldon’s “spot,” see La G., *The Big Bang Theory: 10 Things to Know about Sheldon’s Spot*, ScreenRant, Dec. 24, 2019, <https://screenrant.com/the-big-bang-theory-secrets-facts-details-about-sheldons-spot/>.

⁶⁹ See, e.g., *The Common Law Origins of the Infield Fly Rule*, 123 U. PENN. L. REV. 1474 (1975).