



MEMORIAL TRIBUTE

In Memory of Phil Harter

Bill Pedersen, Jeffrey Lubbers & Andrew Popper 653

ARTICLES

Major Questions in Lower Courts

Natasha Brunstein 661

Cost-Benefit Analysis in Polarized Times

Jonathan S. Gould 695

Rethinking the Good Cause Exception to Notice-
and-Comment Rulemaking in Light of Interim
Final Rules

Mark Seidenfeld 787

COMMENTS

The Push to Grow the Capacity of Inspectors General:
What Should Be Next for the Inspector General
Community

Madison Gestiehr 847

Fear and Loathing in the American Workplace:
Paving the Bog of Logomachy

Sam Salinger 879