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INCEPTION: THE EXAM DREAM IS REAL

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I. INTRODUCTION

Morpheus: *Have you ever had a dream, Neo, that you were so sure was real? What if you were unable to wake from that dream? How would you know the difference between the dream world and the real world?*

Neo: *This can't be.*

Morpheus: *Be what? Be real? Welcome to the real world.*

--*THE MATRIX*, (Morpheus played by Laurence Fishburne; Neo played by Keanu Reeves).¹

Dreams are a material part of the human experience and thus the law school experience.

Dreams manifest our thoughts, fears, and passions often diametrically inconsistent with our

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¹ THE MATRIX (Warner Bros. 1999).

waking memories, but it is only from these memories that our dreams can even exist. Many of the dreams of law school students and graduates are not unusual to that experience; however, these dreams are naturally unique to the extent the dreams manifest in the law school context.

Dream 1. I had a dream about the tax exam. I was sitting in a class room, and I was barely dressed and feeling pretty naked. I was handwriting the test in a room filled with people all dressed in heavy coats. The test was the hardest test in the world, I felt like I didn't know any of the material, and you were sitting in the room watching everyone with a look of disappointment. During the test, every so often, the proctor would tell us all to go to the next room to continue the test and everyone would run through the halls looking for the next location even though there were no signs. At some point, someone asked you to clarify a question and you started to laugh. You said, "that's a mathematical term from calculus, everyone took calculus so you should know this stuff." I later turned my exam into you and you marked all of them wrong, wrote F, circled it, and handed it back. I started to cry and repeatedly asked you not to fail me. I had a family and a life and I worked so hard and I really tried. My failure was only exacerbated by the fact there were only 4 students, please don't leave me behind. You were thinking about what I had to say and before you answered, I woke up.

I was sweating, but really cold. My heart was racing and I felt a bit like crying. It was the middle of the night, so I just turned over and went back to sleep, but it was memorable enough to stick with me through the day.²

The exam dream is real. It is real, not because you will actually find yourself naked in a room taking an exam for which you could not possibly be prepared under surrealistic circumstances, but it is real because your sleeping brain conjured up the impossible circumstances from your actual memories. The exam dream is real because it embodies real emotions in the context of what you remember as real and stressful historical events. But what mysterious messages does the exam dream have for the law student? If we could interpret our dreams then we could discover the messages our subconscious is trying to communicate; if dreams are a reflection of our subconscious emotions then recognizing those emotions can help

² Email from Crystal Friend to author (April 25, 2013, 17:57 EST) (on file with author).

us understand our waking emotions. If dreams are the result of our resting mind reorganizing our recent memories then it is plausible that these emotions are subject to management because they are recent--being recent emotions they can also help us recognize our fears and stresses so we can provide relief from the same.

Just like all of our dreams, the exam dream takes many forms.³ The dream, though, is not a premonition of your future exam performance. Most dreams simply reflect our emotional state of mind during the hours and days prior to sleeping. As a result, it is from these dreams and this context that we can learn about ourselves and use these dreams to improve our lives, whether during law school exam seasons, practicing law after law school, or even while teaching law.⁴

Dream science evolved greatly since the premonitions recited in the Bible; but as little as science knows about dreams, it knows even less about dream interpretation. Sigmund Freud asserted that dreams were creatures of our subconscious wish fulfillment, but his psychoanalytical approach to dreams was more "speculative philosophy" rather than a physiological study of dreams.⁵ Modern dream science recognizes that dreaming is the result of measureable physical and chemical reactions to sleep; however, science also recognizes that dream content is immeasurable, random, and unpredictable.⁶ Some dream scientists believe dreams have no interpretive value, while others suppose dreams can hold meanings for us but

³ Discussed more fully at Section IV(A) *infra*.

⁴ While I seem to no longer have exam dreams I instead have the teaching counterpart to the exam dream where I discover I am late to teach a class for which I am unprepared. The dreams never end; they only evolve to match the imagery available.

⁵ J. ALLAN HOBSON, DREAMING: A VERY SHORT INTRODUCTION, 15, 102 (2002).

⁶ See discussion *infra* Section II(A), (D).

only on an individualized basis.⁷ At a minimum, dreams have an emotional effect on our waking consciousness even if the content of the dream is nonsensical.

If dreams contain any useful meanings, then such must be tied to the exaggerated emotions and instinctual reactions we have in and to these dreams. Accordingly, any interpretation of our dreams must be framed within the context of these exaggerations. Our dreams can only exist within the confines of our own memories; therefore, any meaning must be tied to our individualized perceptions of the events creating those memories. If dreams have absolutely no value to our waking lives then by examining the dreams of others, you will at least know that you are not alone in experiencing the surreal imaginations of your sleeping mind.

II. THE PHYSICAL AND UNCONSCIOUS CONNECTION TO OUR CONSCIOUS EMOTIONS

Morpheus: *Your appearance now is what we call "residual self-image." It is the mental projection of your digital self.*
Neo: *This, this isn't real?*
Morpheus: *What is "real"? How do you define "real"? If you're talking about what you can feel what you can smell, taste, and see, then real is simply electrical signals interpreted by your brain.*

--*THE MATRIX*, (Morpheus played by Laurence Fishburne; Neo played by Keanu Reeves).⁸

We all dream.⁹ While we have always sought to interpret dreams, true dream science is in relative infancy. Science discovered our chemical and electrical responses to sleep and can

⁷ See discussion *infra* Section III.

⁸ *THE MATRIX* (Warner Bros. 1999).

⁹ It is "rare" not to dream; those who assert they do not dream still reflect "identifiable dream patterns" while asleep. Judy Willis, *Recurring Final Exam Dream: You Forgot You Were Taking the Course*, September 7, 2009 <http://www.psychologytoday.com/blog/radical-teaching/200909/recurring-final-exam-dream> (last accessed

determine *when* we dream, but science cannot independently determine *why* and *what* we dream, except that dreams are comprised of our memories and emotions. In addition, science cannot interpret our dreams. Any dream interpretation may be less about past events and more about the emotions connected to those events; dream interpretation may be less exacting science, with hypothesis at one extreme and mysticism at the other.

The brain never sleeps.¹⁰ Even when our bodies go limp and our "consciousness abates entirely", our brains remain active.¹¹ When we sleep our brains are also performing higher mental functions including processing new memories and information.¹² In sleep, the brain acts like a program operating in the background when you walk away from your computer. The brain moves to this "background" mode by closing off sensors to the "outside" world and "shutting down" certain chemical outputs we use during our normal waking thought processes.¹³

A. Chemical Response

"Waking and dreaming are two states of consciousness, with differences that depend on chemistry."¹⁴ When we sleep our brains shift from one program to another.¹⁵ In the "awake" program our brains, usually on our command, can make our legs walk and our arms swing; however, the "dream" program disconnects that "awake" program in favor of another that either causes or results in our dreaming. Dreams, then, are the natural consequence of this alternative

December 2, 2014). An assertion that one does not dream is more likely an assertion that the individual cannot remember their dreams.

¹⁰ Hobson, *supra* note 5, at 36, 142.

¹¹ *Id.* at 142.

¹² *Id.*

¹³ *Id.*

¹⁴ *Id.* at 58.

¹⁵ See discussion *infra* this Section II(A).

programming, and are "clumsy narratives stitched together by the forebrain to make sense of the ... biochemical changes and erratic electric pulses" caused by this programming.¹⁶

When we are awake the brain's serotonin and noradrenaline systems fuel our "attention, memory, and reflective thought."¹⁷ When we sleep these systems decrease their output by half.¹⁸ Most dreams occur during "REM" sleep, but we also dream in other stages of sleep.¹⁹ When we enter REM sleep, the serotonin and noradrenaline systems substantially decrease, and may shut down completely, limiting our brain's ability to "direct its thoughts, engage in analytical problem-solving, and remember its activities."²⁰ While these systems are restricted or inhibited, others are enhanced.²¹ Recent research suggests that where certain areas of the brain were

¹⁶ Ryan Hurd, *Alan Hobson and the Neuroscience of Dreams*, <http://dreamstudies.org/2010/01/07/neuroscience-of-dreams/> (last accessed February 14, 2015).

¹⁷ Hobson, *supra* note 5, at 57.

¹⁸ *Id.*

¹⁹ "REM" is the acronym for "rapid eye movement" and defines the state of sleep where our eyes move, usually from left to right. Peter and Elizabeth Fenwick, *THE HIDDEN DOOR*, 9 (Berkley Books 1998). "REM sleep is the brain state most associated with dreaming." J.A. Hobson & K.J. Friston, *Waking and Dreaming Consciousness: Neurobiological and Functional Considerations*, 98 *PROGRESS IN NEUROBIOLOGY* 82, 85 (2012). Much, but not all, dreaming occurs during REM sleep; however, REM presents the "most ideal condition" for dreaming. Hobson, *supra* note 5, at 352. Some describe five sleep stages and some others combine stages three and four into a single stage three for a total of four sleep stages, with the first stage being the lightest, or sleep onset, and moving into deeper sleep until the last stage of REM sleep. Diana L. Walcutt, *Stages of Sleep*, <http://psychcentral.com/lib/stages-of-sleep/0002073> (last accessed December 4, 2014); Kendra Cherry, *The Stages of Sleep*, <http://psychology.about.com/od/statesofconsciousness/a/SleepStages.htm> (last accessed December 4, 2014). Dreams are most common on the first two stages of sleep (where "dreams tend to be fragmentary" and then where they "tend to be thought-like", respectively, and in REM sleep (where they "tend to be long, vivid, hallucinatory and bizarre.") Hobson & Friston, at 84 Fig. 1(a). Others simply describe three "sleep conditions" as sleep onset, non-REM (encompassing all of the otherwise middle stages) and REM. Hobson, *supra* note 5, at 12-13.

²⁰ Hobson, *supra* note 5, at 57, 142. Not everyone agrees that REM sleep results in a complete shutdown of these systems, but instead assert that "certain thought processes may be less pervasive in dreaming than in waking." *Dreaming and Waking: Similarities and Differences Revisited*, Tracey L. Kahan & Stephen P. LaBerge, 20 *CONSCIOUS AND COGNITION* 494, 505 (September 2011). "Individuals regularly report evaluating, planning, making decisions, and focusing their attention during dreaming; this recurrent pattern shows volitional activity is often present in dreaming." *Id.* at 505, 508. It may be that REM's purpose is to simply supply the cornea of the eye with oxygen during sleep: "Without REM ... our corneas would starve and suffocate..." Maury M. Breecher, *The Biology of Dreaming: A Controversy that Won't Go to Sleep*, <http://www.columbia.edu/cu/21stC/issue-3.4/breecher.html> (last accessed February 8, 2015).

²¹ Hobson, *supra* note 5, at 10.

previously thought to shut down completely, some of these areas actually remain active at low levels while others are "highly activated."²² Additionally, certain brain waves that present "at the very low level of parts of the brain stem" while awake are increased during REM sleep.²³ This area of the brain stem is responsible for "[generating] motor patterns" and creating the "sense of continuous motion" present during dreaming.²⁴ The brain continues to operate but markedly differently indicating that dreaming is "physiologically as well as psychologically" different from our waking consciousness.²⁵

The dream program affects not only our brain activity but also certain bodily functions. We usually cannot awaken while in REM sleep because the dream program intentionally shuts down our muscular system to ensure a "continuation of immobility."²⁶ Without this immobilization we would physically act out the movements our dreams create.²⁷

While we become immobile and our "attention, memory and reflective thought" substantially disconnect, brain activity continues; however, the brain activity focuses much of its attention on the emotion centers.²⁸ This change in focus is why our dreams feel "so perceptually intense, so instinctive and emotional, and so hyperassociative", and is also why we cannot

²² PENELOPE A. LEWIS, *THE SECRET WORLD OF SLEEP*, 86 (Palgrave Macmillan 2013).

²³ Hobson, *supra* note 5, at 54. "Brain imagining studies" reflect that REM sleep accompanies an activation of the "amygdala in the temporal lobe and the white matter of the base of the forebrain." *Id.* at 130.

²⁴ *Id.* at 54.

²⁵ *Id.* See also Hobson & Friston, *supra* note 19, at 85.

²⁶ Hobson, *supra* note 5, at 56. "You can breathe, and your heart is working, but [you can't] move." Walcutt, *supra* note 19. When we are in REM sleep we normally must transition to another state of sleep before we can awaken. Hobson, *supra* note 5, at 56.

²⁷ Hobson & Friston, *supra* note 19, at 84, Fig. 1(b). "This period of paralyzation is a built-in protective measure to keep you from harming yourself." Walcutt, *supra* note 19. By blocking "the mechanisms that normally suppressed movement during REM sleep" cats will act out their dreams including arching their backs, hissing and pouncing. DAVID K. RANDALL, *DREAMLAND*, 94 (W.W. Norton & Co. Inc. 2012).

²⁸ Hobson, *supra* note 5, at 80.

definitively determine we are dreaming when we actually are.²⁹ It is also why we lose track of "time, place, or person".³⁰ While dreaming we lose our "self-reflective awareness", "orientational stability", and "directed thought", suffer "poor memory both within and after the dream", and cannot "think critically or actively."³¹ Rules of logic and accuracy become irrelevant while we dream.³² Nonetheless, our dreams are "convincingly real" while we are in them, and sometimes feel just as real when we awaken.³³

B. Memory and emotion activation

Memory, especially memory related to a strong emotional response, is the touchstone of our dreams. We can only recreate dream imagery that already resides in our memory, regardless of whether we could recall such memory while awake.³⁴

Dreams consist of "episodic memory"--that is, a dream pulls pieces from different memories to form a new story.³⁵ These pieces may not accurately represent prior events.³⁶ The degradation of memory over time affects the accuracy of dream imagery, just as such

²⁹ *Id.* at 101.

³⁰ *Id.* at 5, 101.

³¹ *Id.*

³² *Id.* at 130.

³³ *Id.*

³⁴ "[We] only dream about things we could perceive, even if they could not exist in the context established [in] the dream." Hobson & Friston, *supra* note 19, at 95. "We need conscious experience in waking to represent it as such in our dreams, and we need language to give dream consciousness its narrative character and to make dream reporting possible." Hobson, *supra* note 5, at 124. People born blind dream; however, they do so without "visual imagery". *Id.* at 105. The dreaming brain cannot create visual imagery if the conscious brain never experienced visual imagery. *Id.* People born with sight who later lose their vision can no longer experience the waking "visual imagery", but do experience such imagery in their dreams. *Id.* Presumably, these dreamers not only recall imagery from their prior experiences but their dreams can also apply such imagery to the dreamer's more recent non-visual experiences.

³⁵ *Id.* at 22. "[Only] partial fragments of recent memories enter into dream construction and, along with other materials from remote memory, become part of scenarios created entirely from scratch as brain activation proceeds." *Id.* at 114.

³⁶ Dreams "treat the orientation of details in a relatively cavalier fashion in order to achieve efficiency." *Id.* at 119.

degradation affects our waking recall.³⁷ Our dreams do not enact the stored memories in full, but simply draw elements of these memories in directing an alternate reality. In an effort to make sense of the chaotic state of random memory generation the mind constructs a "hastily thrown together" and "bizarre [narrative]" that becomes a dream.³⁸ Many dreams originate in the "thinking part of the brain," and, instead of appearing to be a random collage of memories, can be "sensible, logical, and thematic."³⁹ Nonetheless, our dreams focus on the emotion attached to those events.⁴⁰

Dreams involve "intense emotion", usually "elation, anger, or anxiety."⁴¹ This is because our emotions and instincts are enhanced during sleep, especially during REM sleep.⁴² The brain associates these emotions to its own recorded "historical experiences", which experiences are necessarily brought forward in the dream to express these emotions.⁴³ Dreams can pull much of its imagery from the prior day's events as well as from history long past.⁴⁴

³⁷ Kahan & LaBerge, *supra* note 20, at 507.

³⁸ Hurd, *supra* note 16. Some describe dreams as "grand operas" that "exaggerate dramatically." Bill Graves, *As Oregon Students Prepare For Finals, Anxiety Dreams Surround Them*, THE OREGONIAN, May 31, 2011, http://www.oregonlive.com/education/index.ssf/2011/05/as_oregon_graduates_prepare_fo.html (last accessed December 3, 2014).

³⁹ Lewis, *supra* note 22, at 86.

⁴⁰ Hobson, *supra* note 5, at 119. Not only do dreams favor emotion over historical accuracy but also over historical completeness--dreams often forget facts, for instance, that a dream character is no longer living. *Id.* at 110.

⁴¹ *Id.* at 80, 110. Whether the dream is enjoyable or frightening depends on the whether the dream activates the positive or negative emotion centers of the brain. *Id.* at 80. "We dream about negative things ... simply because we spend a lot of time worrying." Randall, *supra* note 27, at 101. (quoting G. William Domhoff). Dreams represent the "worst-case scenarios" of our daily concerns. *Id.* at 102. (quoting G. William Domhoff). Dreams could be the brain "running with" our fears and anxieties "because there is nothing else competing for its attention in the middle of the night." *Id.* at 101. It logically follows, then, that the emotions upon which we dwell while awake are available fodder for our dreams when we sleep.

⁴² Hobson, *supra* note 5, at 130. See also discussion *infra* Sections II(C).

⁴³ Hobson, *supra* note 5, at 110. We see things in our dreams because active neurons in the "primary visual cortex create the illusion of seeing things" and we hear things in our dreams because active neurons in the "primary auditory area create the illusion of hearing things." Lewis, *supra* note 22, at 82. This focus on imagery and emotion exists regardless of gender--"it is a brain-based phenomenon that is experienced by both men and women." Hobson, *supra* note 5, at 135.

⁴⁴ Perhaps as much as 70% of dreams contain events from the prior day. Lewis, *supra* note 22, at 92.

If the "hallucinatory experience" of a dream is too dominated by "anxiety, fear [or] anger", then the negative emotions of the dream cause the dreamer to awaken.⁴⁵ Upon waking the dreamer not only remembers the original traumatic events, but also the dream which, itself, creates new memories from which future dreams can draw.⁴⁶ Theoretically, victims of traumatic events relive the trauma in their dreams just as they are "dominated by preoccupations" of these events while awake.⁴⁷ Holocaust survivors report that their dreams are invaded by their horrific experiences.⁴⁸ The same occurs with combat veterans struggling with posttraumatic stress disorder.⁴⁹ Because dreams are highly rooted in emotion, it should be expected that these traumatic events play a material role in dreams.⁵⁰

The law student dreams of testing because the law student is tested, and is likely anxious about that testing. To the contrary, cultures that do not focus on exams do not draw upon exam experiences in formulating their dreams.⁵¹ We dream of what we know and experience even though the dream is a conglomerate of unrelated memories, positive or negative, pleasant or frightening.

⁴⁵ HANS H. STRUPP, AN INTRODUCTION TO FREUD AND MODERN PSYCHOANALYSIS, 45 (Barron's Ed. Series, Inc. 1967); Hobson, *supra* note 5, at 80. When it is a dream that awakens us that dream is usually "dominated by anxiety, fear, and anger." *Id.*

⁴⁶ "The concern is that talking too much about a troubling dream may serve to reinforce it." Tara Parker-Pope, *Rewriting Your Nightmares*, October 31, 2008, http://well.blogs.nytimes.com/2008/10/31/rewriting-your-nightmares/?_r=1 (last accessed February 14, 2015). Supposedly, dreams do not create memories. *See infra* note 75. But, it appears that remembering a dream upon awaking creates a memory of the dream, and that memory would then be accessible in future dreams. Perhaps the memory of a remembered dream is the root of recurrent dreams.

⁴⁷ Hobson, *supra* note 5, at 85.

⁴⁸ *Id.*

⁴⁹ *Id.*

⁵⁰ *But see* discussion of "imagery rehearsal therapy" that might help reverse the unpleasant dream imagery *infra* Section V.

⁵¹ Argentina's students do not suffer from the same "test stress" that is present in the United States, and as a result, former Argentine students do not seem to suffer from any construction of the exam dream. Willis, *supra* note 9. (reporting from casual interviews and not a clinical study).

C. Memory Filing, Reorganization, and Preparation for the Next Day

While the true purpose of dreams seems elusive to modern science, it is clear that the brain does not dream simply to relive our memories.⁵² Dreaming has the physical benefits of cleansing our brain so that we can function the next day.⁵³ The "most popular current theory" is that dreams serve to reorganize the brain's memory database: Dreaming is necessary to relocate information from our short-term to long-term memory, delete "obsolete memories", "update memories", and consolidate "new experiences into our memory systems."⁵⁴ Dreams are the result of the brain's "attempt to find plausible explanations" for the emotion and imagery created by such reorganization.⁵⁵

Dreaming ensures our survival by allowing the restoration of the aminergic system of the brain.⁵⁶ This allows for the maintenance of our emotion and memory centers which is necessary for our waking intellectual and instinctual abilities.⁵⁷ Depriving a person of dreaming, and thus

⁵² Hobson, *supra* note 5, at 86.

⁵³ *Id.* at 78, 117. When we sleep the spaces between brain cells increase allowing the glymphatic system to clean the brain of toxins that accumulate in these spaces when we are awake. *Brain May Flush Out Toxins During Sleep*, October 17, 2013, <http://www.nih.gov/news/health/oct2013/ninds-17.htm> (last accessed December 1, 2014). Newborn babies experience a much larger amount of REM sleep which might also mean that dreaming is necessary for brain development as well as the lifetime "[reconstruction] of our brains and minds." Hobson, *supra* note 5, at 77. Even unborn babies experience REM sleep and presumably dream. Randall, *supra* note 27, at 95. It would appear that unborn and infant dreaming is different because "propositional or symbolic thought depends on language" which the unborn and infants lack. Hobson, *supra* note 5, at 66.

⁵⁴ *Id.* at 77. This memory reorganization theory is not new but more recent studies produced a "strong, clear line of evidence" in support. *Id.* at 108. Dreaming also facilitates the brain's ability to "[process] information ... and [learn] newly acquired skills." *Id.* at 142.

⁵⁵ "Dream content therefore is the brain's attempt to find plausible explanations for fictive visual searches triggered by oculomotor input (via rapid eye movements and PGO waves presumably) and by the pruning of synaptic connections that is part of the complexity reduction optimization process." Patrick McNamara, *A New Theory of Dreaming by Hobson and Friston*, PSYCHOLOGY TODAY, October 17, 2012, <http://www.psychologytoday.com/blog/dream-catcher/201210/new-theory-dreaming-hobson-and-friston> (last accessed January 19, 2015).

⁵⁶ Hobson, *supra* note 5, at 78, 108.

⁵⁷ It is the aminergic system that allows the brain to create memories and acquire information, but, on a basic survival level, is also responsible for alertness, "analytical intellect", and our natural and emotional instincts--"when to approach, when to mate, when to be afraid, and when to run for cover." *Id.* at 78. It seems then that the waking aminergic and the dreaming cholinergic systems have somewhat of a symbiotic relationship with respect to memory:

the opportunity to rest the aminergic system, results in irritation and restlessness.⁵⁸ But, concluding that dreams provide a physical and mental function necessary for survival does not necessarily mean that a dream's content contains any waking significance.

D. The Scientific Problem with Dream Interpretation

The scientific method is ill suited to dream interpretation because while science can determine that a brain is dreaming, it cannot create or re-create a dream, and it cannot predict the content or the emotional context of the dream.⁵⁹ Science depends upon predictability; it depends upon the ability to test theorems with predictable results.⁶⁰ Dreams are lawless; they follow no rules.⁶¹ With no rules, science is unable to predict results: "It is simply inadequate to conduct only retrospective analysis."⁶² But even as "retrospective analysis," modern dream interpretation science may contain very little "science".

Dreams must have memories to exist and dreaming allows the aminergic system to effectively create waking memories.

⁵⁸ "[When] a person is regularly awakened whenever he is dreaming ... and this process is continued for several nights, he becomes exceedingly irritable, frustrated, and restless. To deprive a person of the opportunity to dream, therefore, is to deprive him of an important avenue for the expression of instinctual impulses. Dreams are a necessity of psychic life." Strupp, *supra* note 45, at 46.

⁵⁹ "The scientific method was designed to protect us from these errors of projection. A scientific experiment is an exercise in the elucidation of cause and the best experiments unmask false causation as much as they demonstrate true causation.... [We] can predict that brain activation of a given chemical and regional type will always produce hallucinosis, hyperassociativity, hyperemotionality, false beliefs, and other cognitive errors" but, "[this] is as far as scientific prediction can now go...." Hobson, *supra* note 5, at 139.

⁶⁰ "Science" is "knowledge ... based on facts learned through experiments and observation; knowledge or a system of knowledge covering general truths or the operation of general laws especially as obtained and tested through the scientific method...." MERRIAM-WEBSTER, *Science*, <http://www.merriam-webster.com/dictionary/science> (last accessed February 16, 2015). The "scientific method" means "principles and procedures for the systematic pursuit of knowledge involving the recognition and formulation of a problem, the collection of data through observation and experiment, and the formulation and testing of hypotheses." MERRIAM-WEBSTER, *Scientific Method* <http://www.merriam-webster.com/dictionary/scientific%20method> (last accessed October 23, 2014).

⁶¹ Hobson, *supra* note 5, at 137.

⁶² *Id.* at 137.

It is impossible for science to determine how the brain manufactures the dream scenario.⁶³ While dreams are comprised of memories, science is unable to determine, or predict, exactly which memories become parts of dreams and how the brain chooses these memories.⁶⁴ Most of our memories and experiences never appear in our dreams.⁶⁵

It is, likewise, impossible for science to control dream imagery.⁶⁶ Science cannot see the dream images and emotions as produced, but instead must rely upon the dreamer's waking recollection.⁶⁷ The dreamer's "narration" of their "multimedia" dreams must rely on the dreamer's ability to convey the dream content when the dream itself includes a fantastical experience beyond language.⁶⁸ The dreamer might only remember or relate that portion of the dream that is easy to communicate while the most important aspect of the dream may appear as

⁶³ "Here we are on thin ice because we don't really know how the dream scenarios are composed, any more than we know how ideas are generated in waking." *Id.* at 130.

⁶⁴ *Id.* at 138.

⁶⁵ *Id.* "[A] scientific dream theory has to explain why a whole class of emotionally salient experiences cannot be a dream stimulus." *Id.*

⁶⁶ Martin Dresler, et al., *Dreamed Movement Elicits Activation in the Sensorimotor Cortex*, 21 CURRENT BIOLOGY 1833 (November 8, 2011). Tracey L. Kahan, *Possible Worlds, Possible Selves: Dreaming and the Liberation of Consciousness*, ON DREAMS AND DREAMING, 109, 122 (Penguin Books Ltd. 2011).

⁶⁷ Kahan & LaBerge, *supra* note 20, at 497. Although some research indicates that content, such as "dreamed hand movements" during lucid dreaming can be identified through neuroimaging. Dresler, *supra* note 66, at 1833. In the study, a "highly experienced lucid dreamer" was twice able to dream of clinching his left fist ten times and then his right fist ten times separated by "sets of left-right-left-right eye movements", alternating the fist-clinching as long as he could. *Id.* at 1836. Then using "combined electroencephalography (EEG)-fMRI or combined EEG-MIRS conditions" the authors were able to see activity in the related brain region (as predetermined by waking tests). *Id.* at 1833. Lucid dreaming is defined and briefly discussed at Section V, *infra*. Researchers in Kyoto, Japan developed a process using an fMRI whereby they associated particular brain activity with a picture from the Web to create a prediction of what the subject dreamed with about 60% success. Joseph Strombert, *Scientists Figure Out What You See While You're Dreaming*, SMITHSONIAN.COM, April 4, 2013, <http://www.smithsonianmag.com/science-nature/scientists-figure-out-what-you-see-while-youre-dreaming-15553304/?no-ist> (last accessed February 16, 2015); Jason Mick, *Japanese Dream Machine Can Visualize Your Dreams with 50 Percent Accuracy*, DAILYTECH, April 7, 2013, <http://www.dailytech.com/Japanese+Dream+Machine+Can+Visualize+Your+Dreams+With+50+Percent+Accuracy/article30291.htm> (last accessed February 16, 2015); Adi Robertson, *Scientists Turn Dreams into Eerie Short Films with an MRI Scan*, THE VERGE, April 4, 2013 <http://www.theverge.com/2013/4/4/4184728/scientists-decode-dreams-with-mri-scan> (last accessed February 16, 2015). But even a series of still photographs cannot mimic the surreal and fluid nature of a dream.

⁶⁸ Hobson, *supra* note 5, at 130. Kahan & LaBerge, *supra* note 20, at 497. Kahan, *supra* note 66, at 109, 114.

"a trivial detail or may be completely forgotten".⁶⁹ The dreamer might report only imagery in the dream that is easily recalled but may also "embellish or elaborate" aspects of the dream.⁷⁰ Even if the dreamer could accurately and completely relate every emotion and every piece of imagery of a dream, a huge obstacle in interpreting a dream is that the dreamer necessarily does so within the parameters of the dreamer's own conscious mind, while the dream is clearly a product of the unconscious: "[Finding] order in the real world may not be the same as finding order in the virtual world."⁷¹

Dreams are clearly the product of a chemical response that occurs when we sleep. Dreams serve the functions of permitting our brains to reorder and reorganize thoughts and memories as well as regenerating the systems responsible for analytical and intuitive thought. Understanding the dynamics of dream content is likely forever beyond scientific reach. Even if dream content could be adequately tested and measured, even if science could influence and predict the memories that dreams elicit, and even if dreamers could completely recount every detail of their dreams, science would still have the insurmountable task of examining a particular person's dreams within the context and meanings of that person's lifetime experiences and emotions without the examiner's bias from her own experiences and emotions. But, dream interpretation is not completely beyond reach. While exact scientific interpretation remains highly unlikely, science uncovered that dreams are less about immeasurable content and

⁶⁹ Strupp, *supra* note 45, at 42.

⁷⁰ Kahan & LaBerge, *supra* note 20, at 497.

⁷¹ Hobson & Friston, *supra* note 19, at 95. (citing S. Llewellyn, *If Waking And Dreaming Consciousness Became De-Differentiated, Would Schizophrenia Result?*, 20 CONSCIOUSNESS AND COGNITION 1059-1083 (2011)). But, "if dreams arise from the same cognitive structures that create the waking world for us, then the dream will have within it at some level this waking logic." Fenwick, *supra* note 19, at 104.

imagery, and more about identifiable emotion.⁷² Any interpretation, then, must focus on those emotions elicited by such content and imagery.

III. DREAMING AND INTERPRETATION

Charlie: *Consider all the deep dark secrets that people hide away in their minds. Now, those secrets are bound to come out in their dreams.*

--*DREAMSCAPE*, (Charlie Prince, played by George Wendt, to Alex Gardner, played by Dennis Quaid).⁷³

Dreaming might only be the casual result of the cholinergic system maintaining the emotional and memory systems of the brain with no other functional purpose.⁷⁴ Perhaps a dream is simply comprised of pieces of memory that the brain finds necessary to relocate, delete, or restore without any intent or purpose other than promoting the brain's waking efficiency. If true, dreaming is nothing more than a movie of someone cleaning their office by dusting the shelves, rearranging pictures, and throwing away old paperwork--the result is an efficient office, but with no other real benefit. The argument follows that if dreams are so important to our everyday lives then how do so many functioning people who cannot remember their dreams survive?⁷⁵ In addition, why is it that we can only recall the dream we had immediately before waking, and

⁷² See discussion *supra* Section II(B).

⁷³ *DREAMSCAPE* (Zupnik-Curtis Enterprises 1984).

⁷⁴ "Dreams are just 'an accidental by-product of our ability to think and have an autobiographical memory.'" Randall, *supra* note 27, at 101. (quoting G. William Domhoff). "It has recently been suggested by the philosopher Owen Flanagan that dreaming is an epiphenomenon (a casual occurrence or functionally insignificant phenomenon), i.e. it has no function as such. Taking this position is rather extreme, but scientifically tenable, because there is no evidence that the content of dreams has a significant influence on waking behaviour." Hobson, *supra* note 5, at 77.

⁷⁵ *Id.* Dreams may be hard to remember because they are not "encoded in short-term memory" but are instead "carried away by the tide" of the changing chemical process of waking up. Hurd, *supra* note 16. "If you don't wake up during the dream, the memory is gone. We're on a self-erasing tape when we're asleep." Karen Springen, *10 Things You Didn't Know About Dreams*, <http://www.goodhousekeeping.com/health/wellness/interesting-facts-dreams> (last accessed February 14, 2015) (quoting Mark Mahowald). This "dream amnesia" is the result of the chemical changes in the hippocampus--"the same physiological disconnect which makes us construct bizarre combinations and sequences of events when we dream [keeping] us from remembering them later on when we are awake." Lewis, *supra* note 22, at 97.

what importance is lost in the dreams occurring before the dream we do remember?⁷⁶ The issue for those of us who recall our dreams is whether these dreams are nothing more than the unconscious byproduct of the brain's chemical changes in sleep, or whether these dreams hold unconscious secrets to our emotional well being.

Ancient history reports dreams in the context of divine warnings or prophetic messages: Sometimes these dreams took the form of God speaking to the dreamer, and other times these dreams were symbolic.⁷⁷ Dreams were also used to "diagnose illness" and "predict the future."⁷⁸ The exam dream is none of these.

In recent history, dream interpretation focused on symbolism, which continues in non-scientific circles today. These "symbolists" assert that individual objects in a dream possess a static meaning applicable to all dreams and dreamers. There are innumerable books, dictionaries, websites, and "apps" defining these symbols.⁷⁹ Carl Jung, addressing the

⁷⁶ If dreams had a purpose and were "so important" then "why don't we remember more of them?" G. William Domhoff, *The "Purpose" of Dreams*, <http://www2.ucsc.edu/dreams/Articles/purpose.html> (last accessed December 3, 2014) [hereinafter Domhoff, *Purpose of Dreams*]. The "best dream recallers only remember a few percent of their dreams." G. William Domhoff, *The Case Against the Problem-Solving Theory of Dreaming*, August 2004, http://www2.ucsc.edu/dreams/Library/domhoff_2004b.html (last accessed February 15, 2015) [hereinafter Domhoff, *Case Against*].

⁷⁷ In King Abimelech's dream God spoke and warned Abimelech to not sleep with Abraham's wife, Sarah. GENESIS 20:3-6 KJV. Joseph interpreted the imprisoned butler's and baker's dreams (the butler was to be restored his position while the baker was to be executed) before eventually interpreting Pharaoh's dream (seven years of plenty followed by seven years of famine). GENESIS 40:8-41:30.

⁷⁸ Rebecca Turner, *Why Do We Dream? Modern Theories of Dreaming*, <http://www.world-of-lucid-dreaming.com/why-do-we-dream.html> (last accessed December 3, 2014).

⁷⁹ "[Dreams] cannot be understood by reference to the popular 'dream books' in which objects have invariant meanings." Strupp, *supra* note 45, at 45. Most of these resources "peddle nonsense, mostly along the lines of new age 'spiritualities' and ideologies". Patrick McNamara, *The Folly of Dream Interpretation*, July 29, 2013, <http://www.psychologytoday.com/blog/dream-catcher/201307/the-folly-dream-interpretation> (last accessed December 1, 2014). I do not believe we can dismiss such resources *carte blanche*; however, we need to view the proposed interpretations in the context of the emotional link dreams attach to the imagery. See generally discussions *supra* Section II(B) and (C) and *infra* this Section III and Section IV. To the extent the interpretations are rooted in

symbolism concept, proffered that the interpretation of symbols are more flexible than proposed: The symbol could have "seven thousand meanings" each personal to an individual dreamer.⁸⁰ The objects presented in our dreams cannot be confined to a single definition because individuals may have different experiences with any particular object.⁸¹ For instance, a snake cannot possess the same meaning or elicit the same emotion between two people if one is deathly afraid of snakes and the other would happily play with the snake.

Today, dream science focuses on the emotions connected to the imagery in the dream.⁸² Thus dream interpretation is less about the imagery that occurs in the dream and more about the emotion connected to that imagery.⁸³

If we can learn from our dreams, and there is no empirical evidence that we can, then dreams might be useful in identifying particular emotions that are predominant in our consciousness.⁸⁴ To be effective we must be willing to examine these emotions "[meaningfully]

emotion, then it might be worth the dreamer's attempt to discover whether and how--but not definitively decide that--the emotion applies to their waking lives.

⁸⁰ Fenwick, *supra* note 19, at 67-68. But Jung also believed that there were certain "universal symbols" that, perhaps having no personal meaning to the dreamer, belonged to a "collective conscious"--symbols that had static meanings interpretable "by using historical and mythological analogies." *Id.* at 68-69.

⁸¹ "A person, object, or event occurring in a dream never has a single meaning; rather the meaning represents a convergence of a wide variety of thoughts, feelings, memories, etc., many of which are highly personal to the dreamer." Strupp, *supra* note 45, at 41. "A dream can be adequately interpreted only by recourse to the associations of the dreamer to the various dream elements. In other words, in order to understand a dream, it is usually necessary to know great deal about the dreamer, his current life and life problems, events of the previous days which provided the stimulus for the dream, and the memories which are recalled in free association. Even then there will be dreams which defy understanding. While every dream is potentially interpretable, this is not always true in actuality." Strupp, *supra* note 45, at 45. "The truth is that you are the only person who can really appreciate and interpret your dreams. Other people can comment or suggest interpretations, ask questions about aspects of the dream that puzzle or interest them. But because they don't know you and every aspect of your life as well as you know it yourself, they cannot have your insights, or hope to understand every nuance of your dreams, or make the associations that you might make...." Fenwick, *supra* note 19, at 74.

⁸² Randall, *supra* note 27, at 104-105.

⁸³ Hobson, *supra* note 5, at 110. "...Freud was correct in his basic assumption that dreams are (in part) driven by instinctive force (emotions) and that these emotions are loosely connected to mental content." *Id.* at 133.

⁸⁴ *Id.* "We are *not* saying the dream content is unimportant, uninformative, or even uninterpretable. Indeed, we believe that dreaming *is* all three of these things, but it is already crystal clear that many aspects of dreaming previously thought to be meaningful, privileged, and interpretable psychologically are the simple reflection of the

to the construction of a historically honest view of ourselves."⁸⁵ Each dreamer must examine his own dreams with respect to events that occurred in his life and the emotions that attached to those events.⁸⁶ But while some dreams may hold meaning, others might not.⁸⁷ Recognizing these cautions, the content of the dream might be "nakedly open to understanding without complex interpretation", even if we cannot ever really know that our interpretation is accurate.⁸⁸

IV. INTERPRETING THE EXAM DREAM

Bellamy: *Slay your demons when you're awake, and they won't get you when you're asleep.*

--*THE 100*, (Bellamy Blake, played by Bob Morley, to Charlotte, played by Izabela Vidovic after waking Charlotte from a nightmare).⁸⁹

Law school students dream the same dreams as any other person; however, law school students have a unique aspect affecting their dreams: The stressful law school experience and imagery.⁹⁰ This stress climaxes during the exam season, which is the period of time during which the specific dreams presented herein occurred. While, recognizably, interpretation is specific to the dreamer and the dreamer's own life experiences and memories, there are some

sleep-related changes in brain state...." *Id.* at 1. Then some assert that dreams are more than simply a bi-product of sleep and that "we wouldn't have dreams unless it served some biological advantage." Graves, *supra* note 38. Some assert that dreams are "a warning, something that can help guide us to better behavior and more success in our waking life." *Id.* But others assert "dreams probably have no purpose!" Domhoff, *Purpose of Dreams*, *supra* note 76. "There are innumerable theories of dream function. All of them are highly speculative and difficult to refute in a definitive way, and they therefore linger despite a lack of evidence for any of them." Domhoff, *Case Against*, *supra* note 76.

⁸⁵ Hobson, *supra* note 5, at 134.

⁸⁶ Strupp, *supra* note 45, at 45.

⁸⁷ Fenwick, *supra* note 19, at 76. Some dreams might be the "equivalent of 'doodling'". *Id.* Although, sometimes our "doodles" can actually be the inspiration for something more.

⁸⁸ Hobson, *supra* note 5, at *Intro.* "The fact that these associations are meaningful to me and that they possess compelling emotional salience confers no validity on them, either as dream instigators or accurate explanations of why I dream this dream, or that this is what this dream *really* means!" *Id.* at 137.

⁸⁹ *THE 100*, Season 1: Ep. 3 Earth Kills (Bonanza Productions 2014).

⁹⁰ That is not to say that the dreams of law students somehow are of a "higher order" but that they are different from the unique dreams of a medical student, and vice versa, simply because of the nature of the subject matter studied.

themes we all experience as members of the same society: The "so-called universal dreams."⁹¹

The exam dream is one such dream; however, as "universal" as such dream may be, precise interpretation may not always be as universal.⁹²

A. The Exam Dream

Dream 1. I had a dream about the tax exam.... The test was the hardest test in the world, I felt like I didn't know any of the material, and you were sitting in the room watching everyone with a look of disappointment.... I later turned my exam into you and you marked all of them wrong, wrote F, circled it, and handed it back. I started to cry and repeatedly asked you not to fail me. I had a family and a life and I worked so hard and I really tried. My failure was only exacerbated by the fact there were only 4 students, please don't leave me behind. You were thinking about what I had to say and before you answered, I woke up.

I was sweating, but really cold. My heart was racing and I felt a bit like crying. It was the middle of the night, so I just turned over and went back to sleep, but it was memorable enough to stick with me through the day.⁹³

Law school exams can be some of the "most stressful experiences in life, so it is hardly surprising that exams appear in our dreams."⁹⁴ In a society where educational success focuses highly on exam results it is common for individuals to experience the exam dream.⁹⁵ Up to half of an exam society will experience the actual exam dream, and about half of all students will

⁹¹ McNamara, *supra* note 79. It seems reasonable to presume that these common themes could have consistent meanings among multiple dreamers as long as the emotion attached to the imagery is similar to that experienced by society as a whole. Any interpretations given without citation are based on my best guess as if the imagery and emotion in the dream were my own. Accordingly, my interpretations, if even accurate for myself, may not be accurate as applied to the actual or another dreamer.

⁹² There is no present scientific data to support one interpretation over another. McNamara, *supra* note 79. But, since "there are no definitive research conclusions" there is no way to refute any conclusion. Willis, *supra* note 9.

⁹³ Friend, *supra* note 2.

⁹⁴ Janice Paskey, *Exam Nightmares*, <http://news-archive.mcgill.ca/f95/4.htm> (last accessed February 14, 2015). (quoting David Fontana; original quote refers only to exams generally, and not specifically law school exams). "[Cyclists] dream about cycling, teachers dream about teaching, and bankers dream about money." Lewis, *supra* note 22, at 92. Law students and attorneys dream about law school.

⁹⁵ The exam dream may be "common to the past two to three generations in the United States and other countries with educational systems that emphasize high stakes formal written tests that determine your future academic opportunities." Willis, *supra* note 9.

experience "exam anxiety" in some form throughout their lifetimes.⁹⁶ Exam anxiety translates into other areas of our life where we are "anxious about performance and performance evaluation," or are otherwise afraid of failing.⁹⁷ The anxiety can also appear when our lives are busy and we feel we don't have enough time to "meet deadlines or fulfill obligations."⁹⁸ What better way to express anxiousness about performance than to dream about an exam in which the dreamer feels unprepared or in which the dreamer fears failure.⁹⁹

Dream 1 is a fascinating example because the dreamer expresses the emotional content of the exam dream as well as several dream characteristics most of us have experienced.¹⁰⁰ The dream is highly emotional as evidenced by her sweating (even though the ambient temperature was cold), heart racing, and urge to cry upon waking. This particular dream occurred during a law school exam season when the dreamer would soon face an exam in her tax course. As a result, this dream has similarities to the ordinary exam dream because of the pending exam, and, likely, because of the amount of time the dreamer spent studying for this exam before the dream.¹⁰¹

As for this particular dream, the dreamer was already studying for, and thus concerned about, the upcoming exam. In her dream she was anxious about her performance on the exam,

⁹⁶ *Exam Nightmares? You're Not Alone*, <http://www.stuff.co.nz/life-style/well-good/7847883/Exam-nightmares-You-re-not-alone> (last accessed February 14, 2015). Paskey, *supra* note 94. Which means that the law student will likely continue to have exam dreams for many years after completing law school.

⁹⁷ Hobson, *supra* note 5, at 110; Graves, *supra* note 38; Fenwick, *supra* note 19, at 83; *Exam Nightmares? You're Not Alone*, *supra* note 96.

⁹⁸ Fenwick, *supra* note 19, at 83.

⁹⁹ Hobson, *supra* note 5, at 110.

¹⁰⁰ See discussion of other dream imagery *infra* Section IV(B).

¹⁰¹ See discussion of course content imagery *infra* Section IV(B)(2).

much like most law students' "obsessive thinking" about material during exam season.¹⁰² With such rigorous exam preparation it is not difficult to propose that the exam imagery is a projection of her anxiousness in real life regarding the same exam.¹⁰³

Dream 1 is, and exam dreams can be, characterized by an expression of a perceived knowledge deficiency. In the dream, the dreamer expresses that she "didn't know any of the material", she "should know this stuff", and she answered all the questions incorrectly receiving an "F", even though she "worked so hard and [] really tried." Knowledge deficiency in the dream does not necessarily mean that the dreamer is unprepared for the real exam, but only that the dreamer is concerned about whether she prepared enough. The dream is not a premonition that she will fail but only an expression of anxiety about failing.

The exam dream can be, but usually is not about a pending exam.¹⁰⁴ Long after we leave formal education and regular written examinations, we continue to have the exam dream.¹⁰⁵ Without a pending exam, the exam dream cannot be a prediction of our failure of such nonexistent exam, as real as the dream might seem when we awaken. The exam dream is about the emotions surrounding performance stress. Dream 1 occurs shortly before, and happens to involve the subject matter of, a pending exam: The dream both pulled emotions attached to prior exam imagery similar to the emotions the dreamer experienced during her waking consciousness, and pulled tax subject matter imagery because she recently immersed herself in that subject

¹⁰² Hobson, *supra* note 5, at 8. (referring to exam dreams in general and not specifically to law school exams.)

¹⁰³ "... [We] can easily understand [this kind of dream] in terms of brain activation that reflects, in sleep, the dreamer's previous experience ... and concerns about the future (anxiety about an exam). In [this case], the residual brain activation of sleep onset and early night sleep is enough to reproduce faithfully a very small part of waking experience." *Id.* at 9. (referencing a different but similar exam dream experience.) The exam dream commonly presents imagery of a subject that the dreamer found difficult. Willis, *supra* note 9.

¹⁰⁴ DREAM INTERPRETATION, *Test Exam Dreams*, <http://dream-interpretation.us/test-dreams.html> (last accessed February 14, 2015).

¹⁰⁵ Graves, *supra* note 38. One law school graduate reported having the exam dream more than forty years after leaving law school. *Id.*

matter for purposes of the real tax exam. Not surprisingly, a dream can contain imagery of material a law student is trying to learn, especially when her days are consumed with the level of studying law school requires.

The exam dream can contain many other characteristics. In Dream 1 the dreamer intends to take the exam but finds that she is unprepared. Similar exam anxiety exists when you dream you receive an unexpected exam for which you are unprepared:

Dream 2. *I [dreamed] I was in some little lecture room and I was handed my debtor-creditor exam. I was like "It's not May 3rd, why are we taking this now?" And they replied "Yes, it is." Then I realized it was. I was unprepared and scared....*¹⁰⁶

Dream 3. *...I dreamed that there was a secret final that everyone else in the class knew about except for me. I failed because I missed this final. I tried to show [redacted] that it was not on the final exam schedule that I had received and she said she would have to talk to [redacted] but that is very rare and weird. I went the whole summer without hearing anything and I woke up without a resolution.... I checked my final exam schedule as soon as I woke up and the dream actually compelled me to print the exam schedule so I knew for sure when my exams were. It was awful....*¹⁰⁷

Similar to the surprise exam is the dream where you realize that you have an exam in a course you never attended, or in which you did not realize you were enrolled.¹⁰⁸

Dream 4. *[I dreamed I] ... didn't sit for a class all semester then [I realized I] have to take the final. It felt really real because the class I missed was actually one I registered for the next semester!*¹⁰⁹

Dream 5. *...It's exam time, and come to find out, [I] hadn't attended a single lecture of two or three courses [I] didn't even know [I] had, and now the final was two days away and [I was] utterly hosed and unable to graduate.*¹¹⁰

¹⁰⁶ Email from Melanie M. Ghaw to author (April 26, 2013, 9:27 EST) (on file with author).

¹⁰⁷ Email from Katherine Kennedy to author (April 25, 2013, 16:15 EST) (on file with author).

¹⁰⁸ Interestingly, the failure to attend the class in dreams is usually always unintentional. Willis, *supra* note 9. Perhaps this allows the brain to experience the exam anxiety without also dealing with the responsibility for not attending or being prepared.

¹⁰⁹ Email from Katherine Kennedy to author (January 9, 2013, 12:25 EST) (on file with author).

¹¹⁰ Email from Jacob Lauser to author (December 18, 2012, 15:07 EST) (on file with author).

The exam dream can also manifest itself by imagery of being prevented from taking the exam, or while taking the exam being unable to complete it.

Dream 6. *I [dreamed] I slept through my final....*¹¹¹

Dream 7. *I [woke] up late ... and only have a couple hours to complete the exam....*¹¹²

Dream 8. *...I [passed] out during a big final.*¹¹³

Dream 9. *I show up to the final and [the proctor will not let me] take it.*¹¹⁴

Sometimes the imagery manifests itself with some mechanical reason causing us to be unable to write the exam.

Dream 10. *I [was] taking an exam, but the pen wouldn't write. [I was] frustrated.*¹¹⁵

These types of dreams can also present imagery of pencil lead repeatedly breaking.¹¹⁶ You might find the exam is written in a foreign language you do not know.¹¹⁷ You might not be able to find the room, or an empty seat to take the exam.¹¹⁸ The exam dream might also contain emotions related to the fear that you will disappoint a spouse or parent because of your failure.¹¹⁹

Similar to the exam dream, but somewhat unique to those disciplines that require lengthy writing assignments, is the paper dream. These dreams are characterized by the same anxiety,

¹¹¹ Email from Katherine Kennedy to author (December 2, 2012, 8:48 EST) (on file with author).

¹¹² Email from [name withheld by request] to author (December 18, 2012, 15:38 EST) (on file with author). This student actually had this dream about the pending bar exam during his last semester of law school, even though he had never taken a bar exam; however, a bar exam is the natural culmination of three years of law school exams and a preoccupation with the bar exam would not be unusual during a law student's final semester's exams.

¹¹³ Email from Katherine Kennedy to author (December 2, 2012, 8:48 EST) (on file with author).

¹¹⁴ Emails from Katherine Kennedy to author (December 2, 2012, 8:48 EST; February 2, 2015, 17:25 CST) (on file with author).

¹¹⁵ Email from Travis Owen to author (January 9, 2013, 18:37 EST) (on file with author).

¹¹⁶ Graves, *supra* note 38.

¹¹⁷ *Id.*

¹¹⁸ DREAM INTERPRETATION, *Test Exam Dreams*, *supra* note 104.

¹¹⁹ Graves, *supra* note 38. You might also cause the professor to express "a look of disappointment." *See* Friend, *supra* note 2.

fear of failure, and frustration, but the imagery pulls memories from writing briefs, motions, or law review style articles: The dreamer might be late turning in the paper, may only be able to write the same argument over and over, or the dreamer's professor might not find or refuses to acknowledge that the dreamer timely submitted the paper.¹²⁰

Both the exam dream and the paper dream can be very stressful and can instill panic in the law student upon awakening. These emotions are completely understandable during the exam season when the law student frantically consumes notes, outlines, and study aids, specifically because the law student fears they will fail the exam. The stressful exam season provides high anxiety and intense emotions available for use in the law student's dreams. While reflective of the law student's emotions, the exam dream is not a reflection of any present or pending reality.

B. The Exam Season Dreams

The law student will no doubt agree that when a single final exam must measure an entire semester of effort learning the subject of a particular course, as well as the rest of the courses filling the semester, the exam season is filled with high stress. While our dreams might use the exam imagery to express this stress, our memories contain many other examples of anxiety associated imagery from which dreams can draw. A feeling of insecurity or inadequacy can be expressed in our dreams by nakedness. Feeling lost or behind can be expressed by heading toward a destination that the dreamer can never reach.

1. Non-exam related imagery.

¹²⁰ Email from Kirk Rose to author (December 3, 2012, 20:02 EST) (on file with author).

Dream 1. *I was sitting in a class room, and I was barely dressed and feeling pretty naked. I was handwriting the test in a room filled with people all dressed in heavy coats....*¹²¹

In Dream 1 the dreamer was "barely dressed" in a room of people wearing "heavy coats". It is less important that the dreamer was nearly naked, and more important that she felt naked. It is not uncommon to be naked, nearly naked, dressed in pajamas, or fully clothed in the exam dream.¹²² The dreamer who is underclothed can experience a variety of emotions consistent with how most people might feel if suddenly discovered to be substantially underdressed: Embarrassed, ashamed, insecure, and perhaps substantially more than a little uncomfortable. These feelings are magnified by the presence in Dream 1 of the rest of the exam takers wearing "heavy coats". If the dream occurred during the winter exams the dreamer might excuse the coats as simply part of the cold weather season; however, since this exam dream occurred during the spring exams--as did the actual exam which is the subject of the dream--the "heavy coats" might be a way of overemphasizing the emotions suffered by the dreamer's nakedness. Curiously in naked dreams, no one else in the room ever seems to recognize that the dreamer has no clothes; perhaps, the other dream characters' emotional neutrality is designed to exemplify that the dreamer owns the experienced emotions, irrespective of the others' non-reaction to the circumstance.

Dream 1. *During the test, every so often, the proctor would tell us all to go to the next room to continue the test and everyone would run through the halls looking for the next location even though there were no signs....*¹²³

Dream 11. *[Near the end of finals] I'm swimming in endless, calm water and I see where I am going but I just can't get there.*¹²⁴

¹²¹ Friend, *supra* note 2.

¹²² Willis, *supra* note 9.

¹²³ Friend, *supra* note 2.

¹²⁴ Email from Katherine Kennedy to author (December 2, 2012, 8:48 EST) (on file with author).

In most dreams where the dreamer is moving toward a destination they cannot find, the dreamer never reaches that destination, just as occurs in Dream 11. In these types of dreams the dreamer is usually experiencing emotions of frustration and concern about not being able to reach that destination. In Dream 1 the dreamer apparently reaches each destination she tries to find, because the dream ends with the professor grading the finished exam; however, the dreamer never discusses finding the room, sitting at a new desk, reopening and answering the exam, and the other actions that would occur if you actually changed rooms multiple times during an exam. This is attributable to the dream's seamless ability to jump from imagery to imagery without the boundaries of reality.¹²⁵ What is important in the dream is the emotion attached to the imagery that actually exists in the dream, not the imagery that does not appear or the emotion that might attach to such missing imagery. Accordingly, the dream content that is missing--the dreamer actually finding the room--is irrelevant; what is important is the dreamer's frustrating and desperate search to do so. Looking for the next exam room in Dream 1, and perhaps seeing but not being able to reach the water's edge in Dream 11, may be reflective of emotions of frustration, confusion, feeling lost, or feeling that the dreamer cannot reach her goal, a goal of which the dreamer "worked so hard" and "really tried" to reach.

Another common theme that raises feelings of frustration are those dreams where no matter what you try nothing seems to work. Many times this theme appears in the form of the locker dream, but also can appear using other mechanical devices.

¹²⁵ See discussion *supra* Section II(A).

Dream 12. *I had a dream I couldn't open my locker. There was a motion due that was inside my locker. I was on the verge of tears until I looked up, and noticed my locker was locker number 1 and that I could still be number 1 even if I didn't turn in my motion. In real life my [law school] locker was #1.*¹²⁶

The locker dream probably only appears with those dreamers who used lockers in school, and then only likely with those of us who became frustrated and irritated when the lock would not unlock, or would not timely do so. The frustration and anxiety in these dreams intensify when our attempts to open the locker, turn the deadbolt, or turn on the light repeatedly fails, just as these emotions increase when the same occurs in real life.

Curiously--and somewhat humorously--Dream 12 ends with the dreamer resolving that even though he cannot turn in his brief, he "could still be number 1." The dream seems to reflect an emotional switch from anxiety to a sense of surrender, but also of comfort in success. The law student is acutely aware that you cannot be "number 1" without taking your exams or turning in your written assignments; however, because dreams are not bound by any rules of consistency this conflict in emotion is irrelevant.¹²⁷ The end of Dream 12 might simply reflect a resolution that "it will be okay" or might even be an expression of confidence. Perhaps, if the dreamer's locker was number 123, the emotional result would be much different.

Similar emotions can be expressed in the dream where you are being chased. The dreamer usually cannot escape until they awaken.

Dream 13. *Ghosts were chasing me and I couldn't run away fast enough.... [I felt] very scared and helpless.... I couldn't go back to sleep.*¹²⁸

Dream 14. *I was being chased through a house by either a pig or a boar.*¹²⁹

¹²⁶ Emails from McKay B. Whitney to author (December 18, 2012, 15:02 EST; December 18, 2012, 15:33 EST) (on file with author).

¹²⁷ See discussion *supra* in Section II(A).

¹²⁸ Email from Melanie M. Ghaw to author (December 20, 2012, 14:45 EST) (on file with author).

¹²⁹ Email from [name withheld by request] to author (December 17, 2012, 9:53 EST) (on file with author).

In these dreams we fear what chases us, are anxious about escaping, and are frustrated that we cannot seem to escape. Sometimes these dreams are accompanied by our trying to make our legs move faster when they feel heavy and only move in slow motion. Other times we cannot move at all. Perhaps this feeling is tied not only to the emotions our dreams elicit, but also to the paralyzed state in which REM sleep takes us--that is, perhaps our brain is trying to get us to move, but is frustrated by the temporary paralysis sleep causes.¹³⁰

Although Dream 13 and Dream 14 provide the chaser we often do not have a good grasp of what is really chasing us, only that we need to escape. Running from something set on causing us harm reflects our instinctive "flight" emotion. We flee to escape that of which we are afraid. In the context of the law school exam season, the chase dream could reflect a fear of an impending exam, frustration with how studying is proceeding, or simply the "horror" exam the dreamer took the day before.¹³¹

Our scariest dreams often include animals, bugs, spiders, snakes, or other creatures. If you are afraid of spiders then you should expect that fear might appear as spider imagery in your dreams.

Dream 15. ... *A giant tick was on my hand (bigger than myself...) and it was sucking my blood. I was so scared, but I couldn't move my hand. [My hand] was stuck from fear and I just couldn't move it. [I was] anxious ... panicky and disgusted.*¹³²

Dream 16. *Crickets [were] all over me, in my hair, clothes, and I couldn't get rid of them. They were stuck to me. [I was] scared and panicky [and] a little "freaked out".*¹³³

¹³⁰ During REM sleep the brain suppresses the ability to move. See discussion *supra* at Section II(A).

¹³¹ Or, if you "watched a horror movie just before you went to bed," the chase dream might only be a reflection of the emotion associated with that activity. DREAMDICTIONARY.org, *Chase Dreams*, <http://www.dreamdictionary.org/common/chase-dreams/> (last accessed February 8, 2015).

¹³² Email from Melanie M. Ghaw to author (December 20, 2012, 14:45 EST) (on file with author).

Dream 17. *Spiders are bouncing around my apartment. HUGE balloon like spiders, so scary.*¹³⁴

Dream guides are filled with symbolist interpretations of spiders, crickets, ticks, and monsters; however, the emotion attached to such dreams are usually singular and the same: Fear. The law school exam season is fraught with the fear of failure and the fear of disappointing ourselves and others. It should be expected that the exam season would foster dream imagery that expresses that fear. But the size of the spiders and the tick as well as the entanglement of the crickets in the dreamer's hair may also instill an emotion of being overwhelmed--you can squash a little spider, but it is much more difficult, and perhaps perceivably impossible, to eradicate hundreds of bouncing balloon spiders. You can overcome a fear of snakes, but the fear emotion remains and would only present itself in the form of another "boogeyman" to taunt the dreamer. It is not the spider, but the fear that the dreamer must overcome. Consciously dealing with the fear of the law school exam is dealing with the fear of dream's spider imagery.

Dream 18. *I [was] falling, uncontrollably.*¹³⁵

Many of us experience the falling dream shortly after falling asleep. In this dream we feel helpless because there is nothing we can do to stop falling out of control. We usually do not hit the ground; instead we jerk awake before we hit the ground.¹³⁶

A law student does not need to experience the exam dream for the subconscious to conjure emotions of fear, insecurity, anxiousness, frustration, and helplessness. Our brains have

¹³³ *Id.*

¹³⁴ Email from Katherine Kennedy to author (December 2, 2012, 8:48 EST) (on file with author).

¹³⁵ Email from Travis Owen to author (January 9, 2013, 18:37 EST) (on file with author).

¹³⁶ Jerking awake from the falling sensation is referred to as a "myoclonic jerk" and it usually occurs during the early stages of sleep. Cherry, *supra* note 19. See brief reference *infra* in Section V.

a wealth of imagery to which such emotions attach. Conquering a fear of spiders might be consciously healthy but the brain will only resort to other imagery to express the emotions present during the exam season.

2. Course content imagery.

Dream 1. *I had a dream about the tax exam.... The test was the hardest test in the world, I felt like I didn't know any of the material.... At some point, someone asked you to clarify a question and you started to laugh. You said, "that's a mathematical term from calculus, everyone took calculus so you should know this stuff."*¹³⁷

In some dreams the subject matter of a pending exam appears as imagery because it is content with which the dreamer is presently immersed. While dream interpretation focuses on the emotion attached to the imagery, the content itself is irrelevant; however, it is nonetheless fascinating and likely reflective of such immersion.

In Dream 1 the dreamer experiences the horror of the tax exam for which she is preparing and fears. It is the dreamer's fear that is relevant. The fact that the dreamer was preparing for the tax exam in real life merely gave the dream recent imagery with which to attach the fear. The presence of this imagery does not necessarily mean that the dreamer actually feared the tax exam, although she might have; the dreamer might fear law school exams in general, or fear something else occurring in her life completely unrelated to law school.

Dream 19. *Some random girl walked up to me and told me she was pregnant with my child to which I said that's great but I have to go and take a test right now....(I woke up from that dream in a cold sweat).*¹³⁸

Dream 20. *My ex... contacted me and said she lied [and had actually been] pregnant. She says the baby girl is a year and half.... I meet the child and decide I want to be a*

¹³⁷ Friend, *supra* note 2.

¹³⁸ Email from Ryan M. Stratton to author (January 9, 2013, 13:40 EST) (on file with author).

*part of her life.... [My ex] says she has sole custody and it is the last time I will ever see the baby again....*¹³⁹

These two dreams occurred prior to a Family Law exam.¹⁴⁰ In Dream 19 the dreamer was shaken by the revelation that "some random girl" was pregnant with his child; the dreamer was on his way to an exam when he is confronted with the unexpected and improbable news from someone he does not know. The dream is not evidence that the dreamer thinks that taking his exam is more important than his "dream child", but the surprise child is simply the imagery the dream used to express the feeling of unpreparedness.

In Dream 20 the dreamer had a prior relationship with the woman who withheld the existence of his child. The dreamer accepts and embraces the "surprise" child, but then is faced with losing the child nonetheless. This dream might initially instill a sense of panic, followed by acceptance, and then anxiety. The dreamer could simultaneously experience all of these emotions during an exam season, having finished some but facing more exams.

Some assert that pregnancy dreams are signs of "a new life situation" or a problem that is "gestating".¹⁴¹ Clearly, taking end of the semester exams could be seen as moving from one life situation to another, and preparing for a difficult exam might seem like a "developing" problem; however, pregnancy imagery and such definitions are likely disconnected from these dreamers' exam season emotions.¹⁴² Further, these dreams are not premonitions that these two dreamers have children, either with a woman they know or one they never met. Similar to the tax exam of Dream 1, these two dreamers were preparing for their Family Law exam in which paternity is a

¹³⁹ Email from Brenton Bohannon to author (December 4, 2012, 16:30 EST) (on file with author).

¹⁴⁰ Email from Ryan M. Stratton to author (January 9, 2013, 16:37 EST) (on file with author); email from Brenton Bohannon to author (December 4, 2012, 16:37 EST) (on file with author).

¹⁴¹ DREAMBIBLE, *Pregnant*, <http://www.dreambible.com/dreamdictionary/p4.html> (last accessed January 22, 2015).

¹⁴² That is, unless the dreamers themselves--both males in this case--held a strong emotional connection between pregnancy and the supposed definition, which seems unlikely.

material issue; the brain simply used recent Family Law imagery designed to express fear strong enough to leave the dreamers in a "cold sweat".

Not surprisingly, an immersion in the course content can become imagery after the exam just as it can prior to the exam.

*Dream 21. After exams I kept having the same dream where I am explaining how a check works (drawer/drawee/payee/warranties etc....) It was my last exam before the break....*¹⁴³

In Dream 21 the dreamer, after completing the exam season, rehashes material he learned for his last exam. Such dreams may occur after the exam season because a law student, after exhaustive cramming for exams, is suddenly thrust into a materially decreased level of intellectual input, during a time when the law student simply seeks to relax. Notably, the dream lacks the exam stress, and instead focused on the subject matter solutions, perhaps, consistent with cessation of the exam season.

Course material that appears in a dream is not a predictor of what actually will appear on an exam.

*Dream 22. [The Payment Systems professor] passed by where I was standing with a group of students and said that the test would have 3 things on it: the "checklist of requirements" and two other things that I didn't catch and I had to ask a fellow student what they were. [I was] irritated at not catching what was on the exam....*¹⁴⁴

While the Dream 22 dreamer felt confident that the "checklist" topic would appear on the exam, the dreamer was irritated at not hearing what other topics would. This "premonition" is only possible because in the dreamer's mind the "checklist" was such an obvious topic that it had to

¹⁴³ Email from Ryan M. Stratton to author (January 9, 2013, 13:40 EST) (on file with author).

¹⁴⁴ Email from [name withheld by request] to author (December 17, 2012, 9:53 EST) (on file with author).

appear. Through the dreamer's exam preparation she likely could not conclude what else to expect on the exam, which led to the dream imagery of not hearing the topics the professor confessed--the brain did not know and so the dream could not speculate.

Course content dreams exist because a law student's immersion in the course material provides the brain with material to which the brain can attach emotion. The law student should not allow such a dream to affect the law student's confidence in her exam preparation for that or any other exam. Likewise, where such dreams express confidence, the law student should recognize that such confidence does not necessarily mean that the law student is adequately prepared.

3. Exam preparation imagery.

Law school exams measure the culmination of the material the law student learns during the semester and that in which the law student should be immersed immediately prior to the exam. While the exam itself may only last a few hours, the exam preparation could involve several to any number of days immediately before the exam. Because the emotion of the exam season is not limited to the exam it should be expected that the exam preparation could also create exam imagery.

Dream 23. *In the dream I was helping everyone around me and not doing my own studying.... [When I awoke I was] stressed about studying and taking on too many projects rather than focusing on my own studies.*¹⁴⁵

Dream 24. *All my classmates and I were living in one house and our professor locked us in the house so that we would study.... [I was] annoyed and worried ... [and upon awakening I was] anxious to get to the test and worried I hadn't studied enough.*¹⁴⁶

¹⁴⁵ Email from Catherine Houlihan to author (January 14, 2013, 14:26 EST) (on file with author).

¹⁴⁶ *Id.*

Preparing for law school exams are as stressful as taking the exams. The fear of failure is present in, and motivates, exam preparation. In addition to these emotions, the Dream 23 dreamer also stressed about devoting time to other time consuming projects. In law school, a student can become involved with class projects, papers, as well as other extracurricular activities that monopolize a law student's time. This type of dream does not necessarily reflect that the law student is not devoting enough time to studying, but only that the student feels she is not adequately preparing or feels that other activities are preventing her from studying.

Dream 24 is similar because the law student felt like she had not given the exam an adequate amount of preparation; however, the dream pulls imagery of a professor, presumably an authoritative figure, to force the student to study by giving the student no other option but being locked in a room, or in this case a house.¹⁴⁷ It may appear that the dreamer's annoyance attaches to the authoritative figure demanding that the student, and giving the dreamer no other option but to, study; however, there is no real authoritative figure but that which the dream created. The dreamer isn't actually annoyed at the professor in her dreams, but is annoyed at the part of herself that is telling her she needs to prepare more. Like Dream 23, the Dream 24 dreamer awoke

¹⁴⁷ The symbolist approach to dream interpretation would place significance on the act of studying in the dream, the existence of the house, being locked in the house, the authoritative nature of the professor, the act of helping others, and the presence of other people. *See generally* websites such as www.dreammoods.com and books such as ROSEMARY ELLEN GUILY, *THE ENCYCLOPEDIA OF DREAMS* (1993). "To dream that you are studying signifies that your intellect and knowledge will catapult you into a path of success and wealth. Alternatively, studying indicates that you need to study more or increase your self-knowledge." DREAM MOODS, *Studying*, <http://dreammoods.com/cgi-bin/dreamdictionarysearch.pl?method=exact&header=dreamsymbol&search=study> (last accessed October 30, 2015). Then it seems from a symbolist approach, if you are not soon successful and wealthy you probably should have interpreted the dream in the alternative--that you should have studied more. More than likely, studying in a house with other people around, or helping other people study, are simply dream imagery the brain used because those acts are common to the dreamer and law student in general. The emotions associated with being locked in the house and panicked about not being adequately prepared likely bear the true significance of the dream.

concerned that she did not devote enough time to her exam preparation. It is also instructive that these two dreams originate from the same dreamer, and each dream occurred on different nights immediately prior to different exams.¹⁴⁸ As much as the law student prepares for an exam, there likely are few times in which a law student truly believes she cannot possibly prepare any more or better. These dreams exemplify that emotion.

Dreams are not proof that the law student did not adequately prepare for exams; dreams are only evidence that the law student questions whether she did. Even if the law student devotes every waking hour to studying, such dreams could still occur. If the law student suffers from a feeling of unpreparedness during her waking life, such feeling feeds the dream's ability to recreate the emotion. At some level, the only solution is to prepare adequately and be comfortable with that level of preparation--the quality of preparation will affect success on the exam, but being emotionally comfortable with that preparation might relieve some of the stress of the exam, and, perhaps, the dream's anxiety imagery.

V. MANIPULATING THE EXAM DREAM EMOTIONS

Spoon Boy: *Do not try and bend the spoon. That's impossible. Instead, only try to realize the truth.*

Neo: *What truth?*

Spoon Boy: *There is no spoon.*

Neo: *There is no spoon?*

Spoon Boy: *Then you'll see that it is not the spoon that bends. It is only yourself.*

--*THE MATRIX*, (Neo played by Keanu Reeves; Spoon Boy played by Rowan Witt).¹⁴⁹

¹⁴⁸ Email from Catherine Houlihan to author (January 14, 2013, 14:26 EST) (on file with author).

¹⁴⁹ *THE MATRIX* (Warner Bros. 1999).

The exam dream can add more stress to an already stressful exam season. Waking in a cold sweat after a particularly traumatic dream the morning of a difficult exam can destroy a law student's confidence in their preparation; however, poor performance in an exam dream does not need to be self-fulfilling.

Students who have the exam dream may actually experience better exam performance.¹⁵⁰ A recent study found that such dreams "predicted proportionally higher scores" on the pending exam, even though the dreamer experienced negative emotions and failure in the dream.¹⁵¹ Perhaps the dream reflects a "stronger desire and motivation to succeed".¹⁵² Or, the success might be attributable to intense studying that is motivated by the fear of failure, both of which drive the law student to excel, but also provides the requisite emotion to which the exam dream imagery can attach--the more the law student studies, the more such imagery exists.

If the exam dream has value it cannot only be in identifying the emotion the dream expresses; however, by recognizing the exam dream emotion, the law student can slay those emotions when the student awakens. Allowing the exam dream to consume the law student creates more exam anxiety and can perpetuate the recurrence of the same or similar emotional dreams. Learning to deal with those emotions while awake could allow the law student to calm their dreams. More importantly, recognizing and dealing with these waking anxieties could free up the law student to make more effective use of time and energy in preparing for the real exams.

¹⁵⁰ Michell Carr, *What's Behind Your Recurring Dreams*, DREAM FACTORY, November 13, 2014, <https://www.psychologytoday.com/blog/dream-factory/201411/whats-behind-your-recurring-dreams> (last accessed February 8, 2015). See also Paskey, *supra* note 94.

¹⁵¹ Carr, *supra* note 50.

¹⁵² *Id.*

Although the law student does not usually believe they have time to do anything other than study during the exam season, there can be no doubt that taking time to exercise or relax has a benefit of not only relieving exam stress but also of giving the brain a rest so that it can learn more efficiently.¹⁵³ There is even some evidence that the presence of pleasant fragrances during sleep can generate more comfortable dreams.¹⁵⁴ But, dealing with exam anxiety requires more than the adrenaline release exercise provides or the calming nature of pleasant fragrances. Overcoming these fears requires a change in mental attitude resulting from adequate exam preparation.

It may also be possible to change the tenor of our dreams by using "imagery rehearsal therapy".¹⁵⁵ Using this technique the law student might be able to change the exam imagery while awake so that in the dream the exam imagery is less disturbing and is a more pleasant reflection of success.¹⁵⁶ The process requires that the dreamer spend at least ten minutes before going to sleep focusing on and creating the dream story they want.¹⁵⁷ Perhaps the law student can use this technique to write a dream in which the law student timely finds the exam room, receives an exam containing subject matter with which the law student is acutely proficient, and which the law student can timely and thoroughly complete with no breaking pencils or pens.¹⁵⁸ Naturally, changing the content of the dream imagery will not create exam success, which will

¹⁵³ *Exam Nightmares? You're Not Alone*, *supra* note 96. There are numerous on-line resources that provide ways to relieve stress. Try many and choose the ones that you enjoy and are the most effective.

¹⁵⁴ Lewis, *supra* note 22, at 90. Likewise, foul smells can also help generate negative dreams. *Id.*

¹⁵⁵ Parker-Pope, *supra* note 46.

¹⁵⁶ *Id.*

¹⁵⁷ Randall, *supra* note 27, at 101.

¹⁵⁸ This technique must be regularly practiced and may not be immediately and completely effective; however, it is helpful to incorporate into the next dream story you create, any subtle, positive changes that appear in your dreams.

still require actual subject matter proficiency; however, changing the imagery might relieve some of the stress of an already stressful exam season.

VI. CONCLUSION

Howser: *Hey. Maybe we'll meet in our dreams. [Chuckles and shrugs.]
You never know.*

--*TOTAL RECALL*, (Howser played by Arnold Schwarzenegger).¹⁵⁹

Our brain neurologically and chemically functions differently when we sleep than when we are awake. These physiological distinctions may not purposely create dreams, but dreams are clearly a product of this unconscious environment. Dream interpretation is possible and valuable if law students will closely examine the emotions attached to the actual dream imagery they experience. Recognizing that these emotions exist in dreams because they are likely predominant in consciousness, law students can attempt to minimize or eliminate the emotional stresses of law school and its exams before the anxiety affects the students' ability to learn.

The exam dream is real; however, the dream is not a premonition that you will be lost searching for, late to, naked in, or fail your final exams. Dreams are real because they are comprised of our thoughts, memories, and emotions. The exam dream is not real because you will fail, but it is real because you fear you will fail. Conquer the fear and you can conquer the dream.

¹⁵⁹ *TOTAL RECALL* (Carolco Pictures 1990) (quoting the in-movie video recording of Howser explaining to Douglas Quaid that Quaid was just a memory implant in Howser's brain and that it was time to remove the manufactured Quaid memories so Howser could return).