

What's Right With Women and Zimmun

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Introduction

IN RECENT YEARS, THERE HAS ARISEN CONSIDERABLE halakhically based controversy over women's participation in certain areas of Jewish life. These include women's prayer groups, women's advanced Torah study, and women's reading of the Torah. One area which involves little actual halakhic controversy in terms of permission to participate, is women's *zimmin* (the introductory invitation preceding Grace after Meals). Nevertheless, it is not widely practiced by women.¹ This summary article will attempt to elucidate some of the issues of *zimmin* and women. It will include an elaboration on those areas in which there is no controversy, such as the permissibility of women forming their own *zimmin*, as well as some discussion of the debated issues, such as women and men forming a joint *zimmin*. Some laws and concepts of *zimmin*, as they relate to women, will be discussed, then the relevant Talmudic sources will be cited. This will lead to a discussion of the medieval commentators' understanding of these sources, followed by the contemporary discussions and, finally, the contemporary halakhic view.

Zimmun

The first mishnah in the seventh chapter of *Brakhot* states: "Three who ate as one [together] are obligated" in *zimmin*." The definition of what this *zimmin* entails is presented in the third mishnah:

What is the formula for *zimmin*? If there are three, he [the leader] says: "Let us bless [for the food which we have eaten]." If there are three besides himself, he says: "Bless." If there are ten, he says: "Let us bless our God." . . . If there are a hundred, he says: "Let us bless the Lord our God." . . . If there are a thousand he says: "Let us bless the Lord our God, the God of Israel." . . . If there are ten thousand. . .

These introductory blessings said before the Grace are clearly an old formulation, for they do not contain the standard formula for a blessing, which developed in the middle of the Talmudic period. In addition, it is unusual for the text of a blessing to depend on the size of the crowd. Normative halakhah is not quite like this section of the mishnah. Rather, we only have two texts, one for three to nine people and the other for ten or more. The one for ten or more includes a mention of God's name.

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while the other does not. Despite these oddities of the *zimmun* formula, it is nonetheless treated as comprising real, legitimate blessings.³

In explaining these *mishnayot*, the Talmud brings numerous textual sources for the obligation of *zimmun*.⁴ Nonetheless, there is a debate among the commentators whether *zimmun* is of Biblical⁵ or rabbinic origin.⁶ There is even an opinion which suggests that a *zimmun* of three people is rabbinic, while a *zimmun* of ten is Biblical.⁷

The preferred format for *zimmun*, as stated by the *rishonim* (rabbinic scholars of the 11th-15th century), is that one person, the leader, invites everyone to participate in the Grace, and then he/she recites the entire Grace out loud. The others remain quiet and fulfill their obligation by listening to the leader and responding "amen."⁸ Because it is difficult to concentrate on the entire Grace while someone else says it, the custom has arisen for everyone to say the full Grace quietly by himself, while attempting to hear at least the first blessing recited aloud by the leader.⁹ The current practice, however, does not negate the essence of the *zimmun*, that one person fulfills the obligation of Grace for all the rest. Thus, in most situations where one cannot legally accomplish this objective for others in the group, that group may not form a *zimmun* together.¹⁰ At the very least, the one who cannot fulfill the obligation of the others cannot be the leader. This may have important ramifications for women participating in or leading *zimmun*, as men and women may have different levels of obligation in saying the Grace (although women certainly have an obligation to say Grace, as stated explicitly in mishnah *Brakhot* 3:3¹¹).

If *zimmun* is such a nice idea, a communal invitation to say Grace and praise God, then why should there ever be any hesitation? Let a group of any size or gender say *zimmun*! This question is even more pronounced when it is realized that, originally, the *zimmun* invitation was a single statement and response which, for fewer than ten people, did not contain any reference to God's name.¹² This issue is discussed by the commentators in the context of the Talmud's discussion (*Brakhot* 45a) of whether two men can say *zimmun*.¹³ Two possible reasons are suggested by the commentators why a *zimmun* of two might be problematic. First, although the *zimmun* formula for fewer than ten people is not a *davar she-b'kedusha* (a liturgy or "matter" of holiness), it may be considered *k'rin davar she-b'kedusha* — like such a ritual, which has certain minimal requirements,¹⁴ such as at least three individuals. Second, it may simply be a problem of appearance: it looks like one is adding to the prescribed blessing — two are obligated to start the Grace from the blessing *after* the *zimmun* invitation.¹⁵ In either case, *zimmun* is treated as a real blessing.¹⁶

Talmudic Sources

There are two significant Babylonian Talmudic sources that address women's participation in *zimmun* — the seventh chapter of *Brakhot*, ex-

panding on the *mishnayot* quoted above, and the very beginning of *Arukhin*.

The seventh chapter of *Brakhot* is devoted principally to a discussion of the laws of *zimmun* and Grace. The first mishnah, which defines who may and may not participate in a *zimmun*, states:

Three who ate as one [together] are obligated in *zimmun* . . . women, [non-Jewish] slaves, and minors "may not have *zimmun* said over them" [*ayn mezamnin aleyhem*].

This ambiguously formulated mishnah does not give us much detail about a woman's status within the framework of *zimmun*, but it does indicate that women, slaves and minors are in a different category than are free adult males, a category characterized as *ayn mezamnin aleyhem*.

The ensuing discussion in the Talmud forces one to reconsider use of this mishnah in actually determining halakhah. With respect to a minor, the Talmud is explicit: On *Ber.* 47b and 48a, the Talmud, using our mishnah as a springboard, discusses the participation of a minor in *zimmun* and concludes: ". . . and the law is not like any of these sayings [including the mishnah¹⁷]. Rather, as Rav Nahman says, a minor who knows to Whom we say Grace, may participate in a *zimmun*."¹⁸

In light of this explicit rejection of the mishnah with respect to a minor, it is important to carefully analyze what the Talmud has to say with regard to a woman. On *Ber.* 45b, the Talmud records another tannaitic source, a *braita*, which states:

Women form a *zimmun* amongst themselves, slaves form a *zimmun* amongst themselves, but women, slaves and minors, even if they want to form a *zimmun*, may not.

In discussing this *braita*, the Talmud indicates that it seems odd that women or slaves should be able to make their own *zimmun*. After all, for many other "countings," women and slaves do not count even amongst themselves. Furthermore, the mishnah explicitly placed them in a separate category from free adult males with respect to *zimmun*. In response to this, the Talmud tells us that what is important here is that there should be at least three independent, intelligent beings capable of praising God, in which case three women certainly qualify (*ika de'ot*). If so, continues the Talmud, what about the end of the *braita* where it states that women and slaves may not join together? The response is that such a union may lead to immorality¹⁹ and is therefore outlawed.²⁰

The second significant Talmudic source is a short piece on the top of 3a in *Arukhin*. The Talmud is discussing a series of laws found in a *braita*, all of which begin with the phrase: "All are obligated in . . ." In each case the Talmud is trying to understand what additional class is included due to the word "all." In this list is included: "All are obligated in *zimmun*" and "All can be included in *zimmun*." The Talmud discusses these two statements in the following way:

"All are obligated in *zimmun*." [All] comes to include what? To include women and slaves, as we learned [in the same *braita* quoted in *Brakhot*]: women form a *zimmun* amongst themselves, and slaves form a *zimmun* amongst themselves. "All can be included in *zimmun*." [All] comes to include what? To include a minor who knows to Whom we bless.

This discussion supports a woman's obligation in *zimmun*, possibly on the same level as men.

It seems clear that minors are not obligated in *zimmun* (just as they are not yet obligated in other *mizvot*). It is equally clear that even though they have no obligation, they may be included in the quorum (*minyán*) needed for *zimmun*. Needless to say, this has obvious implications with respect to the issue of joint quorums where all members may not be obligated at the same level, e.g., a joint *zimmun* of men and women.

Due to the ambiguity of the Talmudic sources and to the discussion of the sources that has ensued since then, it is imperative to next analyze the writings of the *rishonim* (scholars from the 11th to the 15th century) and *ahronim* (scholars since that time) to arrive at any conclusions. The issues will be broadly divided into the topics of joint *zimmuns* and separate women's *zimmuns*, and will be addressed in that order.

Joint Zimmun

The source in *Arukhin* seems to most authorities clearly to reject free men and women joining to form a *zimmun*, i.e., two women and one man. Since the Talmud quotes two separate statements, "All are obligated in *zimmun*" and "All are included in *zimmun*," it is evident that the two issues are not synonymous, which is to say, one needn't be obligated to be included, and one might be obligated, yet not included. Thus, being included in one category might not guarantee inclusion in the other category. The assumption is then made that, as opposed to a "minor who knows to Whom we bless," women and slaves are not included in the second category, that of inclusion in a *zimmun*, and, as such, two women and a man may not form a *zimmun*.

Even if this approach, of prohibiting joint *zimmun*, is followed, as it is by the vast majority of authorities, it still leaves the problem that there is no Talmudic reason given for the ban on such a *zimmun*. Rashi²¹ posits that it is based on their different status in the Grace, but not in the *zimmun per se*. In the Grace, circumcision is mentioned, in which women do not personally participate, and inheritance of the land is mentioned, in which slaves do not participate. Thus, since the men have an aspect in the Grace that is not applicable to women or slaves, men cannot join with them in the *zimmun*. The *Shulhan Arukh*, O.H. 199:6 states as halakhah that a mixed *zimmun* is prohibited, but provides no reason. The *Mishnah Brurah*, rather than quoting Rashi's reason, provides two new rationales. First, he states that women are not obligated in *zimmun* as men²² are, and, additionally, a unit which owes its halakhic status to a union of men and women

is not proper (*ayn havuratan na'eh*),²³ even if it consists of a husband, wife and children. The *Raivad* gives yet another possible reason, that women are not *b'nei k'viut* — possibly meaning that, together with men, women cannot establish a permanence.²⁴

An opposite, equally logical, approach to the passage in *Arukhin* could be taken, in which the reasoning of the second statement of the *Gemara* would be: "All can be included in *zimmun*;" Whom does this "All" come to include? Certainly not women and slaves, because that is obvious; women and slaves are mentioned above as obligated, so they are surely included. Rather, you might have thought that since minors have no obligation they cannot count towards the three or ten, therefore the "All" comes to include a minor as being eligible to be included. And since we have a *braita* that explicitly includes minors, who are not obligated, certainly women, who are obligated, may be included in the *zimmun*.

There is a minority dissenting opinion in this issue, which, while not presenting this exact logic, reaches similar conclusions. The *Tur* (O.H. 199) quotes Rav Yehudah Hacohen as stating that a *zimmun* of women and men is permitted.²⁵ The *Sha'ar ha'Ziyun* (199:3) quotes an anonymous scholar who used to form a *zimmun* together with his daughter and son-in-law; and the *Mordekhai*²⁶ states that R. Simḥah of Speyer (13th century) used to include women in the *zimmun* of three and ten. This opinion, however, is rejected by the vast majority of authorities, including all later codifiers (*aḥronim*), i.e. scholars since the 16th century.²⁷

This discussion has focused primarily on a joint *zimmun* of three. The issue of forming a joint *zimmun* of ten (which may have different halakhic parameters than other groups of ten, i.e., *minyān*²⁸) is also discussed in the sources. In the general case of counting men and women together for a *zimmun* of ten, as well as in the specific case of nine men and at least one woman, there is a minority opinion²⁹ that would permit a *zimmun* with God's name. The vast majority of authorities (primarily *aḥronim*), however, do not agree.³⁰

Women's Zimmun of Three

Up to this point the contested issue of whether women may join with men to form a *zimmun* has been discussed. In the next topic, that of a separate women's *zimmun*, the question is not whether women *may* form a *zimmun*, but rather, whether they *must*. That is, is the separate women's *zimmun* an *obligation* or an *opportunity*. In addition, this will lead to the question of whether women acquire an obligation when in the presence of a men's *zimmun*.

In formulating an opinion on a separate women's *zimmun*, the commentators were faced with three apparently divergent sources. The *braita* in *Brakhot* seems to indicate a permission: If women choose to, they may form their own *zimmun*. The Talmud in *Arukhin* appears to indicate an

obligation: women, like men, are obligated in forming a *zimmun* when presented with the opportunity.³¹ And last, the prevailing custom contemporary with each of the commentators, which is sometimes viewed as a "source," was that women did not generally form a *zimmun*.

Three basic approaches were taken in order to harmonize the sources. *Tosafot*³² puts greater emphasis on the prevalent custom than on the Talmudic sources. Based on that, *Tosafot* easily interprets the Talmud in *Brakhot* to be saying that *zimmun* for women is only optional,³³ "and our women have opted not to do it." With a little effort, *Tosafot* then interprets the Talmud in *Arukhin* to also be speaking of an optional obligation rather than a true obligation.

A second approach, adopted by the *Beit Yosef*³⁴ in the name of the *Smag*,³⁵ tries to give equal weight to the two Talmudic sources. They interpret the reference to an obligation in *Arukhin* to be referring to an occasion when an obligation exists within the group. That is, if women are eating with three or more men, then the women acquire the same obligation in *zimmun*. Thus, a woman would not be permitted to break off and say Grace on her own, independent of the *zimmun*. If, however, three or more women are eating with fewer than three men, then we turn to the *braita* in *Brakhot* which tells us, according to this interpretation, that they are permitted, but not obligated, to form a *zimmun*.

The third approach puts the greatest weight on the *Arukhin* source. The *Rosh* (R. Asher ben Yehiel, circa 1250-1327),³⁶ after noting the other options and expressing surprise at the custom that women do not usually form a *zimmun*, says that he sees no way to interpret the sources except to say that women do have an actual obligation to form a *zimmun* when three eat together.³⁷ After all, he says, why should they not be on equal footing with men in this obligation, as there is no reason to exclude them? The *Rokeah* (R. Eleazar ben Judah of Worms, circa 1165-1235), one of the earliest codifiers, also states that women are obligated in *zimmun*.³⁸ This is the approach accepted by the Vilna Gaon,³⁹ who says that there is an absolute obligation for women to form a *zimmun* when three or more eat together.

In the first two approaches, three women eating together not in the presence of three men are not under an obligation to form a *zimmun*, as men would be. The obvious question is the one which the *Rosh* raised, and that is: Why not? Why should they not be under the same obligation?

A variety of possible answers have been offered, each with its own ramifications.⁴⁰ The *Bah*⁴¹ postulates that it relates back to the essence of *zimmun*, of the leader's recitation of Grace fulfilling the obligation for others. Since, he states, from the time of the Talmud through contemporary codifiers,⁴² there has been a doubt about whether women have the same level of obligation as men in Grace, it would not be plausible to count them in the same *zimmun* as men, and this was extended to not obligate them in *zimmun* at all.⁴³

The *Hafez Hayyim* postulates two other reasons. In the *Mishnah Brurah*⁴⁴ he says that the rabbis did not wish to impose on women the obligation of *zimmun* when they are by themselves, because women were usually not experts in *zimmun*. The rabbis were trying to be lenient and not impose an obligation that women would have trouble fulfilling due to their lack of knowledge. In the *Sha'ar ha'Ziyun*,⁴⁵ he suggests that the exemption is tied in with an ancillary requirement of *zimmun*. It is preferable that all *zimmun* be said over a glass of wine,⁴⁶ and for women to use wine in a ritual is not proper.⁴⁷ The rabbis therefore did not impose the *zimmun* obligation on women when they are by themselves, and would *a priori* be the ones leading and using the wine.⁴⁸

Women's Zimmun of Ten

The discussion until this point has focused on the formation of a quorum of three women to say the basic *zimmun* formula. There is an additional level of *zimmun* which adds God's name to the basic formula. When the Talmud discusses *zimmun*, it seems that it is always referring back to *Brakhot* 7:3, which contains the entire *zimmun* "package," for three, ten, etc., individuals. This includes the rule that when ten or more men form a *zimmun* they add God's name to the *zimmun* formula. It might seem that whenever women's *zimmun* is discussed, the entire *zimmun* "package" is also included, and that a women's *zimmun* should follow all the same laws as the men's; if ten women form a *zimmun*, God's name should be added. Indeed, among the early authorities (*rishonim*, from the 11th to the 15th century), there is an opinion which permits women to include God's name in a *zimmun* of ten. Such an opinion is cited by the *Meiri*, *Sefer Me'orot* and *Shiltei ha-Gibborim*,⁴⁹ and is held by *Rabbenu Tam*.

All of the later codifiers (*ahronim*) reject this opinion and rule that a women's *zimmun*, no matter the size, says *zimmun* without God's name.⁵⁰ Maimonides seems to be the first to have raised this issue, and it is his opinion, which is given without any source or reason, that is accepted by the later codifiers.⁵¹ Various reasons are advanced for this ruling, including the possibility that, with ten people, Grace with *zimmun* becomes a *davar shebikedusha* (acts or declarations of sanctification of the Holy One); women cannot form a "congregation;" or, women are not obligated (but only have the option) in *zimmun* and therefore cannot extend it to include God's name.⁵²

Practical Situations

Below will be presented various combinations of men and women (slaves will be left out of the picture) that can exist, and the halakhah as determined by the later codifiers (*ahronim*) in each scenario. For the most part it will be seen that it is the second approach discussed above, that *zimmun* is optional for women alone and mandatory if with a *zimmun* of men,

that has been accepted. A minority of codifiers accept the third approach, obligating women in *zimmun* in both cases, while the opinion of *Tosafot* is almost never accepted, although it is sometimes taken into consideration.

A) Ten or more men with any number of women — The existence of a *zimmun* of men obligates all eating there, men and women, in *zimmun*. Thus, the women also have an obligation to participate in *zimmun*.⁵³ Since the halakhah is that the women cannot form their own *zimmun* of ten to include God's name, the present *zimmun* (with the men) is on a higher level of requirement than any *zimmun* the women could form independently. The women would therefore be *required* to participate in the *zimmun* of the ten men.⁵⁴

B) Between three and ten men and any number of women — As in the above case, the women have an obligation to participate in *zimmun*.⁵⁵ However, unlike the previous case, in this instance, if there are three or more women, their *zimmun* is on par with the men's, who also will not include God's name. Hence, the women can break off and form their own *zimmun*.⁵⁶ The requirement is simply that all present at that meal participate in a *zimmun*.

C) Three or more women and fewer than three men — This is the essence of the debate regarding the interpretation of the primary sources. There is NO opinion that says that women *cannot* form their own *zimmun*. Rather, the *Shulhan Arukh* is of the opinion that three women *may optionally* form a *zimmun*, but are not required to,⁵⁷ and hence no mandatory *zimmun* exists in this situation. The Vilna Gaon, and a number of other significant authorities, rule that in this case the women have an *obligation* to form a *zimmun*. If these women do say Grace with *zimmun*, it is proper and appropriate for the men present to answer, even though they do not have an obligation in *zimmun* in this instance.⁵⁸

D) Fewer than three men and fewer than three women — No *zimmun* may be formed, even optionally.⁵⁹ This is true even if they are all members of the same family, such as father, mother and their children.⁶⁰

Two interesting cases which we have not found discussed, and which would both apply only to Sephardim because of their custom of including a minor in *zimmun*:

E) Two women, fewer than three men and a girl between the ages of six and twelve — Would the halakhah be the same as two men and a minor, in that an optional *zimmun* exists? It would seem to us that there is no reason why not.

F) Two men, three or more women and a boy between six and thirteen — There are two optional *zimmuns* here for Sephardim (Ashkenazim have only the women's, and this is case D). Do they have equal weight, since both may be defined as "optional"? Is one preferable to the other? Could or should they split?

Conclusion

Women have been included in the framework of *zimmun* from the Talmudic period. There are areas of dispute, but there are certain essentials which are universally agreed upon by the codifiers. Amongst those points are that: (1) If women participate in a meal where there is an obligation in *zimmun* for the men, the women fall under the same obligation to participate in a *zimmun*. (2) Women are permitted to form a *zimmun* on their own (at least when eating alone). Many authorities encourage that, while some think there is an obligation on women for *zimmun*.⁶¹ These points are critical in women fulfilling certain obligations that they have, and in widening avenues of communal Jewish self-expression that are openly endorsed by the halakhic authorities. We know of educational institutions and homes in the United States and Israel which encourage these practices. It is a goal of this paper to further knowledge of this topic, thus furthering the goal of Jewish education and practice. It is worth concluding with the words of the *Ben Ish Hai*:⁶² "It is proper for all people to instruct the women in the household to form a *zimmun* amongst themselves when they eat in a group of three."

NOTES

1. For additional references on this subject, see all or part of the following: David Aurbach, *Halikhot Baytah* (Hebrew) (Jerusalem: Aleph Bet, 1983), especially chap. 12; R. Matis Blum, *Torah Loda'as, Ha'azinu* 1992 (Hebrew); Elyakim G. Ellenson, *Between Woman and Her Creator* (Hebrew) (Jerusalem: World Zionist Organization, 1984), p. 77-82; David M. Feldman, "Woman's Role and Jewish Law," *Conservative Judaism and Jewish Law*, Seymour Siegel, ed. (N.Y.: Rabbinical Assembly, 1993), p. 302; Aryeh A. Frimer, "Women and Minyan," *Tradition* 23:4 (Summer 1988), especially pp. 59-62; Rav Yizhak Ya'acov Fuchs; *Halichos Bas Yisrael: A Woman's Guide to Jewish Observance* (Oak Park, Mich.: Targum Press, 1987), pp. 65-67; Joel B. Wolowelsky, "The Eating Fellowship: An Exploration," *Tradition* 16:3 (Spring 1977); Joel B. Wolowelsky, "Women's Participation in Sheva Berakhot," *Modern Judaism* 12 (1992): 157-165; Eliezer Berkovits, *Jewish Women in Time and Torah* (Ktav Publishing House, 1990), especially pp. 83-92.

2. When the term "obligated in *zimmun*" is used in this paper it implies that the individuals who have that obligation may no longer say Grace on their own and must participate in the communal *zimmun* (mishnah *Brakhot* 7:4, O.H. 193:1).

3. See "Birkath Ha-zimmun and Havurah Meals" by Yosef Heinemann in *JSS (Journal of Jewish Studies)* 13 (1962): 23-29.

4. E.g., Deut. 8:10, Deut. 32:3, Psalms 34:4; See *Brakhot* 48b.

5. Raivad on the *Ma'or* at the end of *Brakhot*; *Tur* O.H. 188; *Levush* 199; *P'nei Yehoshua*, chap. 7.

6. Rav Natrunai Gaon (*Siddur Rav Amram Gaon* 141a); *Mahzor Vitry* (p. 23); *Meiri* (*Brakhot* 45a); *Ritva* (*Brakhot* 5:10); *Shulhan Arukh Harav* (199:9); *Sha'ar ha'Ziyun* (199:19).

7. *Kiryat Sefer*, *Brakhot* 5. See also *Maharsha* on *Agadot*, *Brakhot* 48b.

8. *Bi'ur HaGra* 195:5; *Bah* 193 based on *Brakhot* 45b; Maimonides, *Brakhot* 5:3; *Rosh* 7:27.

9. *Ta*: 183:6; *Mishnah Brurah* 183:28; *Shulhan Arukh Harav* 183.

10. *Magen Avraham* 193:8; *Mishnah Brurah* 193:24; *Sha'ar ha'Ziyun* 193:22.

11. See however note 42 for sources that discuss the level of women's obligation.
12. See *Siddur Rav Amram Gaon*, p. 45 in the Goldschmidt edition, and *Sefer Ha'Manhig, Hilkhot Se'udah*, p. 218 in the Rafael edition. Our current text of *zimmun* contains God's name even in the *zimmun* of three. See Magen Avraham's introduction to O.H. 192.
13. Based on a *braita* cited on *Brakhot* 45b, the normative halakhah is decided (Maimonides, *Brakhot* 5:15; *Shulhan Arukh*, O.H., 193:1) that two may not form a *zimmun*. There are some who say that they may (e.g., the *Rokeah*, *siman* 329 — p. 228 in the *Ozar HaPoshim* edition).
14. *Shitah M'kubetzet*, *Brakhot* 45b.
15. *Pnei Yehoshua*, *Brakhot* 45a.
16. See source in note 3.
17. See, however, *Teshuvot U'psakim* of R. Abraham ben David (Raivad) (Kafah ed.), number 12, who accepts the mishnah at face value and interprets the *genara* to mean that a minor may be counted in the ten, while for a *zimmun* of three a minor is explicitly excluded by the mishnah. R. Yona (*Brakhot* 45b) also does not see the mishnah as being rejected. Rather, he says that the mishnah is referring to minors without knowledge and the *genara* to minors with knowledge.
18. This is codified in the halakhah (The *Shulhan Arukh*, O.H. 199:10). *Ramah* (O.H. 199:10) and *Hayei Adam* (48:20), while not disputing the actual halakhah, say that our custom is not to include a minor. *Meiri*, *Brakhot* ch. 7 and *Prisha* O.H. 199 quote an opinion that minors may even form a *zimmun* entirely on their own. The *Kaf ha'Hayyim* (199:18) rejects this opinion. See R. Ovadia Yosef, *Yehaveh Da'at* 413.
19. Because of this reason, even more than three women may not join with more than three slaves to form a *zimmun*, although each group independently could form a *zimmun*. *Mishnah Brurah* 199:14.
20. It seems to these authors that the reason of immorality stated here applies only to women and slaves, but from this source no proof can be brought to prohibit women and free men joining together. This seems to be the understanding of the *Shulhan Arukh*, O.H. 199:6, *Mishnah Brurah* s.k. 12 and 14; *Drisha* O.H. 199; *Meiri*, *Brakhot* ch. 7, "some say". Others do reach such a conclusion; for example, see *Maharam* of Rothenburg quoted in *Bah* O.H. 199; *Shita Mekubetzet*, *Arukhin* 3a; *Arukh haShulhan* 199:2; third opinion in *Meiri*, *Arukhin* 3a; *RaN* on *Megillah* 19b.
21. *Arukhin* 3a.
22. See note 25.
23. See also *Hazon Ish* O.H. 30:8. We see the reason of "not proper" to be different from that of immorality (*prezut*) of note 19. Some may interpret them as one and the same. *Shuts Mishpat Uziel* (*Hoshen Mishpat* 6) brings a proof from here that the rabbis did not object to a mixed meal *per se*, but only to a legal union formed for the sake of a *mitzvah*. Frimer, *Op. cit.*, p. 65, cites authorities who say that such a union could lead to "immodesty."
24. Raivad, see n. 17.
25. *Bah*, O.H. 199 quotes an opinion that R. Yehuda Hacohen would only count women towards the ten and not the three. Others might view this as an even greater novelty. See note 17 where a similar ruling is brought in the name of the Raivad with regard to a minor. As the Raivad proposes this based on the mishnah in *Brakhot*, which discusses women and minors, it would seem that the Raivad would not count women in the *zimmun* of three, although he might count them towards ten.
26. *Mordekhai* to *Brakhot* 45b.
27. See *Prisha* (199) in the name of the *Agur*, *Ta*: 199:2; *Arukh haShulhan*, O.H. 199:2; *Shulhan Arukh*, O.H. 199:6. See also Joel B. Wolowelsky, "The Eating Fellowship," *Op. cit.*, for a discussion of the reasons why a woman may or may not be included within a *zimmun* with men, and his suggestion that perhaps this should be more flexible nowadays.
28. See, for example, the *Bah* O.H. 199, who explains that R. Simḥah permitted women in a joint *zimmun* of ten because it is not a *davar she-bikedusha*, from which, according to the *Bah*, women are normally excluded. We see that the *zimmun* of ten may be different than

the usual quorum of ten (*minyan*). That it may not be different is suggested by its inclusion with nine other *minyan* rituals in *Meg.* 4:3.

29. R. Simhah, quoted in the *Mordekhai* to *Brakhot* 158 and 173; one opinion in the *Meiri*, *Brakhot* 48a; *Bah* to O.H. 199 explaining the opinion of R. Yehudah Hacoheh in the *Tur*; *Bah* to *Tur* O.H. 689; Rabbi Aaron Halevi to *Berakhot* 45; *Ran* to *Megillah*, Ch. 2; *Rosh* and Rabbenu Tam as cited by *Shiltei ha-Gibborim* to Alfasi at beginning of *Brakhot*, ch. 7.

30. *Meiri*, see n. 29; *Shulhan Arukh Harav* 199:7.

31. See note 34.

32. *Brakhot* 45b. This also seems to be Rashi's and *Tur*'s (O.H. 199) opinion. *Tosafot* admits that women forming a *zimmun* was not totally unheard of. He cites the daughters of Rabbenu Avraham (a student of Rabbenu Tam) who, on their father's advice, used to form a *zimmun*.

33. The idea of an optional *zimmun* is not unique to women forming a *zimmun*, and occurs in other *zimmun* situations. For example, if people did not technically eat "together," such as at separate tables or separate rooms, they are not required to form a *zimmun* but may do so (*Shiltei Gibborim* to *Mordekhai*, *Brakhot* 7:5; *Drisha* 193:2; *Bi'ur Halakhah* 193:2, s.v. *adif (fay)*). Additionally, some *rishonim* say that two men may form an optional *zimmun* (the *Rokeah*, see note 13).

34. O.H. 199.

35. *Mizvat Asay* 27. See also *Hayai Adam* 48:20.

36. *Brakhot* 7:4. This is also the opinion of the *Talmidai Rabbenu Yona*.

37. The real problem, as we see it, with the first two approaches, is that they separate the two sources. The problem with that, is that the Talmud in *Arukhin* quotes the *braita* from *Brakhot* in support of its position that all, including women, are obligated in *zimmun*. It thus seems clear that, at least in the eyes of the Talmud, the two sources are saying the same thing and are both supporting the notion that women are obligated in *zimmun*. That is essentially what the *Rosh* and the *Gra* (*Vilna Gaon*) say.

38. *Rokeah*, number 333, p. 230 in *Osar Hapostkim* edition.

39. *Be'urai HaGra*, O.H. 199:7.

40. *Ohr Same'ah* (*Brakhot* 5:3); see generally, Frimer, *Op. cit.*, p. 65.

41. *Bah*, *Tur*, O.H. 199.

42. *Brakhot* 20b; *Shulhan Arukh* O.H. 186:1; *Encyclopedia Talmudit* 2:248.

43. This is the very argument that *Rosh* explicitly rejected. *P'nei Yehoshua* (*Brakhot* 45b) uses similar reasoning and explains that women were not given the same obligation in *zimmun* to avoid the possibility that women would come to fulfill the obligation on behalf of the men, which would be problematic.

44. 199:16.

45. 199:6.

46. *Ramah*, 183:1.

47. This seems a little difficult in light of the halakhah that when the host leads the *zimmun* he is supposed to give his wife to drink from the cup of wine (*Shulhan Arukh* O.H. 183:4; *Mishnah Brurah* 183:19). However, the *Kaf ha'Hayyim* (199:19) quotes an opinion that women would actually use a glass of wine when they form a *zimmun*.

48. Either of the *Hafez Hayyim*'s explanations is consistent with women being obligated in *zimmun* in the presence of three men. It is assumed that men would be expert in leading the Grace, and that the men would use the glass of wine. Hence, there is no longer a reason to exempt the women from the existing *zimmun*, and they too become obligated.

49. *Meiri*, *Brakhot* 47a; *Me'orot*, *Brakhot* 45b; *Shiltei ha-Gibborim*, *Brakhot* 7:2. This debate does not necessarily fall along the same lines as that over whether women have an obligation. For example, the *Rosh* and the *Gra* both hold that women have an obligation in *zimmun*. Yet the *Rosh*, as quoted by the *Shiltei ha-Gibborim*, says women can use God's name, while the *Gra* (O.H. 199:6) says that they cannot.

50. *Shulhan Arukh*, O.H. 199:6.

51. Maimonides, *Berakhot* 5:7.

52. See Frimer for details.

53. *Shulhan Arukh*, O.H. 199:7. This is according to the second approach, that of the *Beit Yosef* (author of the *Shulhan Arukh*), to the sources, that women are obligated when eating with a *zimmun* of men.

54. *Shulhan Arukh Harav*, 199:6.

55. R. Ya'akov Emden in his *Siddur* (p. 119) agrees with the *Beit Yosef* that women eating alone have an option to form a *zimmun*, but are obligated to join a *zimmun* if they ate with a *zimmun* of men. He then advises that one should make women aware of this obligation so that they will know to participate in the *zimmun*.

56. *Shulhan Arukh Harav* 199:6; *Mishnah Brurah* 199:18; *Kaf ha'Hayyim* 199:23. There is a dissenting opinion that says they should not break off, but the *Sha'ar ha-Ziyun* 199:9 says that the first opinion is the logical one.

In any example of case A, and of case B when there are fewer than three women, when the women participate in the men's *zimmun*, they are required to listen to the men's *zimmun* and may not be leaders, according to *Bi'ur Halakhah* 199, s.v. *V'yoš'ot*, and *Kaf ha'Hayyim* 199:24. The latter gives as the reason that it is unclear whether women are obligated in Grace Biblically or rabbinically (see note 42). *Meiri, Brakhot* ch. 7 cites an authority who says that the women may even lead.

57. The *Arukh haShulhan* 199:2 agrees that there is an optional *zimmun* (and uses this to explain why women can never use God's name in a women's *zimmun*), but says that the custom is not to make one, and "we have never heard of women who form a *zimmun* on their own." Clearly there are other codifiers who do not find the implementation of this option as surprising.

58. Aurbach, *Op. cit.*, p. 94, in the name of his uncle, R. Shlomo Zalman Aurbach, one of the leading contemporary authorities in halakhah.

59. O.H. 199:6. Frimer, *Op. cit.*, p. 65, discusses the reasons given for this, including "immodesty."

60. *Mishnah Brurah, Shulhan Arukh* O.H. 199:12.

61. The primary exceptions that we found are *Tosafot (Brakhot 45b)*, *Arukh haShulhan* (199) and *Bi'ur Halakhah* (199), who all state that it was not current practice for women to form their own *zimmun*. But none of them dispute the essential halakhah and none discourage women's *zimmun*.

62. *Shanah Rishonah, Korah*, 13.