From 2005-2013, the U.S. Supreme Court under Chief Justice Roberts decided ten cases involving Indian tribes, and the Indians lost nine of them. These decisions have been described as extending the Rehnquist Court’s discomfort with the arguably exceptional nature of tribal rights under federal Indian law, and its attendant preference for states’ rights, mainstream values, and formal equality among individuals. Yet, emergent norms in domestic and international law alike promote a different paradigm, one of indigenous “self-determination” in relationship with governments and others. In this spirit, Professor Carpenter describes the ways in which tribes are engaging the decisions of the Court towards the promotion of human rights and cultural revitalization.