

# **MOBILIZING AGAINST BACKLASH:**

## **Analyzing Interest Group Reaction to *Roe v. Wade* through Direct Mail Solicitations**

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“Contentious Court Decisions as Lynchpins of Social Change” Panel*

by

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## Abstract<sup>1</sup>

This paper offers new theory and data to the ongoing debate over the effects of controversial Supreme Court decisions. Previous literature has examined multiple possible effects from Court decisions (direct, indirect, radiating, and centrifugal, among others), but not specifically backlash effects and the resulting interaction effects between the interest groups affected by the decision. The study presented here examines and tests two sets of interest group reactions following the Supreme Court's decision in *Roe v. Wade* (1973): reactions from both pro-choice and pro-life interest groups to the decision itself, and interaction effects between the groups as they reacted to their opposition's mobilization efforts. Overall, the qualitative and quantitative evidence strongly suggest that *Roe* in particular and the Supreme Court more generally have a major impact on the ways in which interest groups recruit money, members, and support.

## I. Introduction

Robert Jervis noted in the 1997-98 *Political Science Quarterly* that the distinction doctors draw between the “main” effects of medicines and the “side effects” is arbitrary: it is solely in the eyes of the beholder which effects are most important and which are “side” or “secondary” (Jervis 1997-8). Similarly, the papers on this panel will address the question of both “direct” and “side” effects of high court decisions on social movements. Political scientists have long debated the question of whether Supreme Court decisions create or reflect social change.<sup>2</sup> This panel puts a new twist on this long-debated question, by examining how high court decisions spur mobilization efforts on both sides, and how these mobilization efforts interact.

The strategic interaction of oppositional mobilization efforts after major court cases is a key underexplored element in the literature on judicial decisions and social change. Such an exploration requires a natural-science understanding of actions and reactions within a system, which Jervis describes as “inter-connected so that changes in some elements or their relations produce changes in other parts of the system... In a system, the chains of consequences extend over time and many areas; the effects of action are always multiple” (Ibid, 570). Studying only one element in a system is reductionist and inappropriate. As

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<sup>2</sup> See Rosenberg 1991; Klarman 2004; Kluger 1994; and McCann 1994, among others.

Newton reminds us, in physics every action has a reaction. Jervis urges political scientists to adopt a systems-view, seeking to explain phenomena holistically, by examining their interaction and multiple effects. By exploring the concept of backlash and strategic social movement mobilization efforts, this paper takes up that challenge.

In *The Hollow Hope*, Gerald Rosenberg looks in vain for evidence of social change produced by landmark Court decisions such as *Brown v. Board* and *Roe v. Wade*. By social change, he means “policy change with nationwide impact,” and he investigates both direct and indirect judicial effects through public opinion poll results and newspaper references to the case and issue in question (Rosenberg 1991, 3). His ultimate findings are that, although in highly specific circumstances a judicial strategy produces positive results, overall the courts have “virtually no direct effect” in producing progressive change such as ending racial discrimination, even after *Brown* (Ibid, 70).

This classic study, however, fails to take into account the existence and effects of strong backlash effects following controversial Court decisions. *Brown v. Board* ignited a firestorm of controversy in the South and across the nation, touching off years of political crises and showdowns as white Southern segregationists engaged in a campaign of “massive resistance” to the Court’s integration order. Likewise, opposition to *Roe v. Wade* escalated into a decade-long series of fire-bombings of abortion clinics throughout the country coupled with political mobilization of a still-growing coalition of anti-abortion political and religious groups actively seeking its reversal through both legal and extralegal means.

These backlash effects present an opportunity to both reexamine past literature on social movement response to judicial decisions, and to break new ground by investigating the interaction effects between social movement groups, in this case over the issue of abortion rights. Overall, this paper will address whether Rosenberg's vision was too limited in scope, and whether indirect (“side”) effects of the decisions can still have a significant role in producing change. Rosenberg’s theory overlooks two possible consequences of Supreme Court decisions, namely: (1) the mobilization of conservative socio-political movements in response to a far-reaching progressive ruling (such as the white segregationists’ “massive resistance” after *Brown* and the rise of the religious and political New Right in opposition to *Roe*); and (2) the liberal/progressive counter-mobilization that in both cases followed this initial conservative reaction. This paper therefore focuses on the impact of *Roe v. Wade* on

interest groups, on both the pro-choice and pro-life side<sup>3</sup>, to see whether there is evidence that Court decisions substantially impact social movement group goals, terminology, and strategies.

My argument is not with Rosenberg's data, but rather the theory behind it. I suggest that newspaper mentions and public opinion polls are not the right proxies for gauging "social change" (a moving target, indeed, and notoriously difficult to measure). Newspaper reporting, because it cannot possibly include all the information about every situation, is necessarily biased, and often distorts the significance of events. In a cross-national study, Myra Marx Ferree and William Gamson (1999) showed that newspapers failed to report accurately the ideas and concepts of both the pro-life and the pro-choice groups in the study.

Likewise, the results from public opinion polls change based on the wording of the question, current events, the day on which you poll, the order of questions, often the sex of the interviewer, and myriad other factors. Polling about abortion is especially tricky because of the complexity of the issue and the many shades of gray within the question. No state in the union allows completely unrestricted abortion at any point in the pregnancy; restrictions abound based on client age, reason for seeking abortion (especially rape or incest), parental consent, fetal age, and state funding.

Both before and after *Roe*, public opinion polls seemed to show the American public taking a stance in the middle – that is, favoring abortion but with restrictions. That the overall trend of the poll data that public opinion did not show great change after *Roe* is not evidence that *Roe* was not a significant social change. The reason for this is that it is not the overall centrist middle of the population that seeks and creates large-scale social change. Those in the middle tend to lack the sufficient motivation to actively contest laws or practices in such a way as to change them. It is the non-centrists, those with strong beliefs on either side, who are important to look at in investigating the kind of "social change" for which Rosenberg was "hoping" in *The Hollow Hope*. And indeed, these far-left and far-right believers must be quite strong in their belief and motivation to create social change in order to move the great inert middle.

Therefore, to measure this concept of "social change" more accurately in this study, I look to the interest groups on both sides of the abortion issue (pro-choice and pro-life). It

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<sup>3</sup> As did Luker (1984), I use these terms to accord with how each side wishes to present itself, so as to avoid bias in naming the sides.

is the actions and activities of these groups, and the interactions between them, that in large part determine the course of the national debate over abortion. These groups set the terms of the debate, recruit politicians on both sides as champions and allies, stir up grassroots support in politicians' districts, influence newspaper accounts (both through outward group activity like marches, events, press releases, speeches, political ads, public service announcements and public quotes, as well as through more behind-the-scenes dealings with friends and allies within media outlets), propose and often author key legislation, and in general seek to build momentum for their side. The momentum-building exercises depend upon a steady source of income, which groups on both sides mostly raise through direct mail solicitations. Therefore, in this study I use the direct mail letters sent by both pro-choice and pro-life groups from the period 1980-1994 to test the significance of the Supreme Court generally, and of *Roe v. Wade* in particular.<sup>4</sup>

If an event (such as a Supreme Court decision) is so important to the course of an issue discussion that it fundamentally changes the way the interest group and movement leaders think, act, educate, and raise money around the issue, then it has importantly helped shape the future of that debate. It has been, in the language of historical institutionalism, a “critical juncture,” and future discussion and fights over the issue are “path-dependent” upon it. Whether or not the event itself was a result of previous activism by these movements, the event has an impact that is all its own. That is, a Supreme Court decision may indeed be endogenous to the work and activism that led up to it, but this does not mean it has no effects that are endogenous to it. Certain events alter forever the goals, assumptions, terminology, and fundraising strategies of interest groups on either side of an issue. The direct mail letters on both sides show the effects of such alteration clearly, even though there was not enough mail to test until years after *Roe* was handed down. Even decades after *Roe*, each side constantly and consistently references it. Based on my quantitative and qualitative studies of direct mail solicitations on both sides of the question, I argue that *Roe v. Wade* was such a critical juncture for the national debate over abortion.

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<sup>4</sup> The three other key cases that are mentioned with some frequency include *Webster v. Reproductive Services* 1989, *Planned Parenthood v. Casey* (1992), and *NOW v. Scheidler* (1994). These other three were frequently discussed with reference to *Roe*, as the first two involved the key question of whether the Court would overturn *Roe*, while the last was NOW's suit against Joseph Scheidler, founder of the group Operation Rescue, which used civil-and-criminal-disobedience tactics to block the entrances to abortion clinics and to close clinics down. For the reason that these other cases are fundamentally tied to the decision in *Roe* in a path-dependent connection, I measured both “references to a specific Supreme Court case” in the letters, as well as the name of the case.

The data from the letters, coupled with close textual analysis, reveal that both pro-choice and pro-life groups have used *Roe* to educate, galvanize, and raise money, awareness, and support from their group's members and potential members. Interest groups on both sides of the abortion issue constantly and consistently mention *Roe v. Wade*<sup>5</sup> throughout the period 1980 to 1994. Its power to raise money, support, and sympathy for both sides from members and potential members is undeniable and enduring. From 1980-1994, there is a direct and highly significant correlation between discussing abortion in a direct mail letter and mentioning a specific Supreme Court case (almost always *Roe*). *Roe* had a powerful and enduring effect on the way that the non-centrists, particularly the leaders on the debate's far right and left, conceptualize the issue, the discussion, and their own roles.

## **II. Literature Review**

Previous literature is rather a Seurat pointalist painting; outwardly it appears solid, but if you press your nose to the canvas you can see the individual dots surrounded by gaps of empty space. New social science research can relate to the body of literature in two ways – it can re-examine the substance of the existing particles, or it can fill in the gaps between them. This study attempts to do both.

The central puzzle arising directly from Rosenberg's work is his finding of the lack of social change subsequent to important, highly publicized Court decisions. If we assume that Rosenberg's findings correctly reflect a lack of social change, why don't we see the kind of impact for which Rosenberg "hoped"? Douglas McAdam (1982), in his work on political process, and Rosenberg himself suggest an explanation: high court decisions, they say, are *reflective* of rather than *productive* of social change. Looking to the black civil rights movement, McAdam writes, "Especially critical, I will argue, were several broad historical processes in the period from 1930 to 1954 that rendered the political establishment more vulnerable to black protest activity while also affording blacks the institutional strength to launch such a challenge." Later events, he says, like the decision in *Brown* and the bus boycott "merely served as dramatic (though hardly insignificant) capstones to these processes" (McAdam

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<sup>5</sup> Usually the case is cited directly as *Roe v. Wade* or simply *Roe*, although several letters also reference it obliquely as "the Supreme Court 1973 ruling" or other veiled references clearly meant to invoke *Roe*.

1982, 3). Echoing this “capstone” theory of judicial decisions, Rosenberg describes the Court’s judgment as part of the process – an endogenous variable, influenced by the movement, rather than a causal factor in the movement’s formation.

Such a view supports the hypothesis advanced in Piven and Cloward’s classic 1977 work on poor people’s movements. Drawing upon an elite model of power in American politics, Piven and Cloward conclude that every movement victory follows rather than precedes a shift in the political opportunity structure facing activists. “Protestors can only win, if they win at all, what historical circumstances have already made ready to be conceded... Both the limitations and opportunities for mass protest are shaped by social conditions” (Piven & Cloward 1977, 36). It is other factors, therefore, and other changes in the political landscape, that open the door for major judicial activist decisions like legalizing abortion or desegregating schools. The reasoning may appear tautological: protestors can only win what they can win. However, the fundamental concept is in line with the Rosenberg/McAdam perspective that courts can only bring about change that other shifts and much previous mobilizing work had made possible.

A second puzzle emerges from this explanation, however. If movements can only gain through judicial decisions what historical circumstances have made ready to be conceded, then why would there be such strong resistance to a decision? The existence of strong opposition reactions to both *Brown v. Board* and *Roe v. Wade* calls into question this explanation. If historical circumstances had already made possible the concession of abortion rights and racial integration in schools, we certainly would not expect this kind of resistance, which Faludi, Lipset, and Raab term “backlash” (Faludi 1991, 231).

Throughout her work, Faludi uses specific historical examples of conservative and religious backlash reactions to feminist gains. Some instances are highly individualized, such as the “Montreal Massacre,” where Marc Lepine, an unemployed twenty-five year old engineer, gunned down fourteen women in a University of Montreal engineering classroom because, he said, they were feminists (Faludi 1991, 67). Other backlashes are model examples of political and social mobilization, where institutions (especially churches or social movement groups) play a key role in encouraging a collective action (such as voting pro-choice officials out of office, or protesting at abortion clinics. I will focus on the latter phenomenon, and particularly the ways in which instigators, activists, and group leaders on

both sides utilize specific Supreme Court decisions (most clearly *Roe v. Wade*) to incite and build mobilization efforts.<sup>6</sup>

Within the literature on mobilization and social movements, three models predominate, what McAdam terms “classical,” “resource mobilization,” and “political process” (his own). The critical importance of “opportunity structures” facing potential participators is under-explored in both the classical approach and the early resource mobilization models, such as Zald and McCarthy (1977). In a field essay on participation literature in *Political Research Quarterly*, Jan Leighly writes, “Even if one is motivated to attend a meeting or sign a petition, unless a meeting is scheduled or a petition is available to sign, the act of participation is precluded” (Leighly 1995, 187).

In their development and reframing of the resource mobilization models, Rosenstone and Hansen (1993) improve the model by stressing the necessity of leaders/organizers, to mobilize resources and opportunities as well as people. Their focus on the actions of social movement group leaders to create opportunities for others to participate is a crucial component of my theory of interest group’s use of direct mail solicitations. The direct mail letters on both sides of the abortion debate show that the group leaders actively use the political opportunity structure available to them in order to both raise money for their group and to mobilize support amongst their members and potential members. The resource mobilization model posits resources and opportunities as the central factors influencing social movement participation and more broadly social movement response to external events, including governmental actions, such as high court decisions.

The theme of this paper’s research, investigation of interest group response to *Roe v. Wade* and its subsequent conservative backlash, necessitates an understanding of the role of leaders/organizers within social movements and groups. McAdam’s “political process” model also offers a useful framework for such an understanding, in that it anticipates that social movement groups will adopt, shift, and modify their strategies in response to events, other groups and to counter-movements, such as a backlash. One major part of the process

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<sup>6</sup> Again, as with doctors’ arbitrary decisions about “main” vs. “side” effects of medicines, the use of the term “backlash” to describe the conservative reaction to feminism is arbitrary; from the conservative perspective, of course, it is the feminist movement that is the backlash. Indeed, the direct mail qualitative findings presented below suggest that there is never just one backlash, that a major event incites a kind of backlash dialectic, with each side responding to the other and sometimes using the other’s reaction to gain further momentum.



of movement development is how the groups within the movement interact, and especially how they interact with opponents. When McAdam speaks of the large impact of “external groups on the development of the movement,” he primarily refers to funders and donors, but his insights can help us understand groups’ dealing with opponents and backlash, as well (McAdam 1982, 23). Opponents and their strategies, especially if they are powerful and/or effective, will necessarily affect social movement group strategies and responses. McAdam says as much explicitly when he writes that, over time, the internal and external factors shaping social movements have to contend with one additional factor: “the shifting social-control response of other groups to the movement” (McAdam 1982, 2).

This study then must address two separate sets of effects: those of interest groups from both sides to the original Supreme Court decision (*Roe v. Wade*), and then the interest group responses to each others’ responses. Looking first to the question of direct response to a major Supreme Court case, the literature is rather sparse. Several important works have examined interest group strategy leading up to a Supreme Court decision<sup>7</sup>, but few seem to have documented interest group response to and utilization of the outcome of a major case. Both Luker and Faludi examine the impacts of *Roe*, but only on the level of individual activists and their responses, especially psychological. Luker notes:

For many of the anti-abortion people we interviewed, the 1973 Supreme Court decision came, as one of them put it, ‘like a bolt out of the blue.’ It seemed to them that the Court had suddenly and irrationally decided to undermine something basic in American life, and they were shocked and horrified. As one of them said: ‘I thought the American public would stand up and scream bloody murder, and they didn’t. Even the Catholic bishops in this country didn’t scream bloody murder, which is what abortion is (Luker 1984, 126).

In the midst of a revolution in sexual mores and gender roles, the legalizing of abortion seemed the last straw for conservatives at the same time as feminists saw it as an inevitable liberation step.

Court decisions like *Roe* and *Brown* have a strong legitimizing effect on the “winning” group, in that they authorize a claim or action which before was only questionably legal/permissible. And since, every action has a reaction, this legitimizing effect for one side has an upsetting de-legitimizing effect on the “losing” group, an impact that plays strongly into both the “bolt out of the blue” and the “feeling cheated” sentiments described by Luker and Faludi. This kind of shocking reversal of established policy rarely happens in legislative

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<sup>7</sup> See, e.g., Vose (1959) on African-American policy advancements, O’Connor (1980) on women’s rights groups, and Epstein (1985) and Galanter (1974) on groups and repeat litigation strategies.

policymaking, where the necessary compromises and give-and-take of the political process soften the blow. Such a blow factors heavily into the backlash reaction.

That *Roe* was a major shock to the pro-life forces is evident from their rapid mobilization following the 1973 decision. Cabrillo, Meuli, and Csida (1993) report that although there was some mobilization of pro-life forces and groups before 1973, it was nothing like the explosion of mobilization that followed *Roe*. In the seven years directly following *Roe v. Wade*, pro-life leaders founded at least 11 major groups to oppose abortion, including: National Committee for a Human Life Amendment, Pro-Family Forum, the U.S. Coalition for Life, the National Right to Life PAC, the Eagle Forum, the U.S. Catholic Bishop's "Pastoral Plan," Life Amendment PAC, the National Pro-Life PAC, the Concerned Women for America, Pro-Life Action League, and the American Life Lobby (Cabrillo, Meuli, & Csida 1993, 64-97). Such a "mobilization of losers" effect should be noted as an important indirect effect of Supreme Court decisions in Rosenberg's theory.

More recent scholarship on interest groups' relation to the Supreme Court suggests that such indirect effects are indeed powerful. McCann's (1994) "structuralist" model of social movement judicial strategies considers not only the "direct" effects of judicial decisions, but also "centrifugal" and "radiating" effects and "secondary tactical uses of official legal action in social struggle." He explains,

Such indirect effects can matter for building a movement, generating public support for new rights claims, and providing leverage to supplement other political tactics... Indeed, given the copious evidence demonstrating that judicial victories often produce uneven or negligible impacts on targeted social practices, such indirect effects and uses of litigation may be the most important for all political struggles by most social movements (McCann 1994, 10).

Later, he applies this concept more directly to the risks and costs of a backlash, which is much more likely in judicial than legislative strategies. Because each court decision creates unambiguous winners and losers, judicial victories come at "high costs," including both the requirement of investment of scarce resources and the generation of "counter-mobilization by opponents" (McCann 1994, 334).

In other words, litigation can be a very costly strategy for social movement groups, even if they win. In fact, one question arising from the previous literature is whether, in some cases, and purely from the perspective of the interest groups (not the plaintiffs!), it might be *better to lose*. Several of the direct mail letters from NOW note to potential contributors that donations dropped off sharply when Bill Clinton won the presidency in

1992, while others on the pro-life side said the same of Reagan's election. As professional fundraisers know and as Barbara Craig and David O'Brien wrote in their study of abortion and American politics, "unless there is a sense of crisis, it is difficult to wring donations out of any but the most committed" (Craig & O'Brien 1993, 62).

It is a truism of political activism that it is easier to fight *against* something than rally support for it. The data presented below for the direct mail letters show how ardently both sides subscribe to this belief: each constantly references their opposition, either a specific opposition member or group, or the opposition more generally (such as "the radical right" from the pro-choice side, or "the abortionists" from the pro-life mail). Craig and O'Brien (1993) use the example of the Supreme Court's decision in *Webster v. Reproductive Health Services* in 1989 to illustrate this phenomenon:

The Court did not use *Webster* to overturn *Roe*, but it did draw back from its past limits on state regulation of the procedure, and the majority sent strong signals that it might be receptive to overturning *Roe* in the near future. But the loss provided a dramatic disturbance of the sort that could reinvigorate the pro-choice forces. "There is no question," said Congresswoman Barbara Boxer, "the Supreme Court awakened a sleeping giant." Even abortion opponents recognized, as Paige Cunningham, a lawyer for Americans United for Life, commented, that "the pro-choice movement is fresh so they're operating with a much greater energy reserve. They've really rallied in light of *Webster*" (Craig and O'Brien 1993, 67).

For the pro-choice side, at that point it appears it was more effective for the social movement as a whole to lose the judgment in *Webster*. As Craig and O'Brien write, both donations to and membership in the large national pro-choice organizations had fallen, resulting in less power for these groups. They write: "Money and numbers: the stuff of pressure politics... More critical than organization was the need to awaken their constituency to the threat to *Roe*" (Craig & O'Brien 1993, 62).

The literature on mobilization of losers is not yet developed enough to fully answer these questions, but this study suggests that interest groups do indeed use both Supreme Court decisions as well as reactions by the opposing side (the "backlashes") as mobilizing factors. In this sense, both groups could be viewed as "mobilizing against backlash."

This review of the previous literature thus sets the stage for the presentation of the data from the direct mail solicitations. Using the theory and understanding of social movement strategies and interaction effects developed here, I will present the findings of both statistical and textual analysis of the letters sent by interest groups on both sides of the abortion debate.

### III. Methodology

The case of abortion cases and mobilization is an excellent example of Jervis' concept of an interconnected system, where every action has multiple and lasting effects, and the true interplay between variables is quite complex. To narrow the scope of this complicated series of interaction effects, I have specified a limited set of variables and testable methods to measure their effects.

I hypothesize that social movement groups utilize Supreme Court decisions as catalysts for raising money and intensifying emotions. To test this proposition, I have collected a new data set consisting of information about 14 years of direct mail solicitations from groups on both sides of the abortion debate. The data ranges from 1980-1994. Unfortunately, direct mail does not exist for 1973, as it did not become a political tool until the late 1970s. The data is also difficult to obtain, as some groups are protective, while others do not keep complete records of old solicitations. The most complete section of the database are the records from direct mail letters from NOW, the National Organization for Women, from 1980-1994, which contains every letter sent by NOW for which NOW has records. As part-time staff at NOW, I did not have the usual trouble of incomplete access to records or suspicion/protectiveness interfering with the data collection. For the pro-life groups, I was able to obtain sample letters (though not a comprehensive collection) from this same time period from three separate groups: American Life Lobby (ALL), the Ad Hoc Committee in Defense of Life (AHCDDL) and the Concerned Women for America (CWA). I plan to continue this research and further expand the direct mail sample database, collecting further data for both sides. Because of the incomplete nature of the datasets for these pro-life groups, I am able to offer descriptive statistics, but can give regression analysis only for the NOW dataset at present.

For the NOW direct mail data, the set of variables includes: **year**, **type of letter** ("appeals" go to pre-existing members, "prospects" go to potential new members), **NOW entity** sending the letter (can be from the Political Action Committee [PAC], the Foundation, or NOW, Inc., the general body), and the **point of the letter** (abortion, NOW as an institution, economic issues, one of the branches of government, or other issues), in addition to **number of mentions** in the letter of **key words or phrases**, including: mention

of a **specific court case**, mention of the **Supreme Court generally**, mention of **Congress**, mention of the **President or Executive Branch**, mention of a **specific member of an opposition group**, mention of a **specific opposition group** (without a member's name), or **mention of the opposition generally** (a.k.a. "Far Right," "Radical Right," "right wing"). (For sample codesheet, see Appendix.)

I use this data to test my hypothesis that groups will use Supreme Court decisions as catalysts for raising money, support, and awareness by testing the relationships between several of these variables, including: year and the various "mention" variables, type or size of letter and all of the "mention" variables, NOW entity and all the "mention" variables, point of letter and all the "mention" variables, and the relationships between which branches of government are mentioned in reference to which kinds of issues. My hypothesis predicts that the Supreme Court will be much more likely to be mentioned in letters concerning abortion than, say, economic or other issues.

My sub-hypotheses are twofold: first, the number of mentions of both Supreme Court cases and the opposition will increase around the years of the later two major Court cases (1989 and 1992). Second, the number of mentions of cases and the opposition will vary according to the type of letter sent and the NOW entity sending it. Specifically, I hypothesize that "appeal" letters, which are sent to people who are already members of NOW, will contain more mentions of cases than "prospect" letters, which are sent to potential new members, and that general NOW, Inc. letters as well as NOW Foundation letters will contain more court and opposition references than will letters from the PAC.

#### ***IV. Data & Analysis***

Even decades after the *Roe* decision, both sides have continued to invoke its name to raise money and mobilize action and support from group members and sympathizers. A recent (March 2005) direct mail letter sent by NOW to all its members stated in its first page: "We have watched in fascination and horror as George W. Bush has taken step after step to undermine Roe. Now he has an unprecedented opportunity to destroy it once and for all by appointing anti-women, anti-choice Justices to the Supreme Court." It continued: "The Justices of the United States Supreme Court have the power to support or undermine

everything that we and those who came before us have fought for” (page 2, underlining in original).

On the pro-life side, leaders invoke *Roe* with just as much emphasis. A key national pro-life leader, Joseph Scheidler, wrote an instruction manual for closing abortion clinics, in which he stated: “The American people, with some local exceptions, were never allowed to vote on abortion. Abortion-on-demand was handed to Americans by a Supreme Court *fiat*, through a very serious misinterpretation of the Constitution...” (Scheidler 1985, 339). He continued, citing *Roe* directly:

The power of the individual in defying a bad law is never exercised more strikingly than when a person goes to an abortion clinic, confronts someone who is going in to deny another human being his guaranteed right to life, talks her out of having an abortion, and preserves the life of her child. That is something each of us can do. In saving a life, we perpetuate decency, morality, righteousness, and the spirit of the Constitution... It is an on-the-spot reversal of *Roe v. Wade, Doe v. Bolton* abortion decisions at the doorstep of the abortion clinic. This should be done all over the country (Ibid).

Beverly LaHaye, President and Founder of the Concerned Women for America (CWA), a conservative counterpart to the National Organization for Women (NOW), wrote in a direct mail letter in 1989 that her group was gearing up for “THE BIGGEST ABORTION BATTLE IN HISTORY!” (capitalized in original). She explained: “We are preparing to confront head-on the PRO-DEATH forces who are determined to stop the Supreme Court from overturning the infamous *Roe v. Wade* decision of 1973.” This particular letter mentions *Roe* by name a total of 14 times in 5 pages, or nearly three times per page. Lest this appear an extreme example, the data section below reveals just how common such vehemence is from both the pro-choice and pro-life sides, with reference to *Roe* in particular and the Supreme Court more generally.

My sample of NOW direct mail contains data for all letters sent from 1980 to 1994 for which NOW has records (n = 241]). These letters fall into four general types: appeals (sent only to members), prospect letters (sent to potential new members), renewals (sent to members whose renewals have or are about to become lapsed), and PAC letters (by law, sent only to existing members to raise money for the NOW-PAC). The first two types are the most prevalent: 38.7% of the letters in the sample were appeals, and 31.7% were prospects. Renewal letters constituted 25.2%, and PAC letters only 3.9% (also missing type values for 0.4%). There are also three possible NOW entities from which the letters could originate: NOW, Inc. (the main body), NOW-PAC, or the NOW Foundation. Foundation letters, which are by tax law nonpartisan and for educational and legal (defense and other litigation)

purposes only, are rare in the sample, constituting only 3.5% of the total. PAC letters were also rare, making up only 4.8%. The vast majority of letters in the sample (91.7%) were sent from NOW, Inc. The bulk of the sample is therefore appeals, renewals, and prospect letters from the main body of NOW, which provides exactly the type of data we wish to examine about NOW’s response to both the Supreme Court cases and the conservative opposition.

I also coded for the number of pages in each letter, and for the size of the paper used, since both these factors could impact the content of the letter. Shorter letters provide less space, and can include discussion of fewer events, issues, and people. By the same reasoning, a 2-page letter sent on half-size sheets will be able to mention these same elements less than a 2-page letter on legal paper. Most of the letters (90.8%) contained between 2 and 4 pages – 4 pages was especially popular, making up a full 49.1% of the sample. Only 4.3% had less than 2 pages, and only 3.9% had more than 4. In terms of size, a full 91.7% were on standard-sized paper, with only .9% on smaller sheets and 7% on legal-sized paper. This suggests that we can compare across letters without worrying unduly about paper size, but that we should take seriously the element of number of pages in each letter when running regressions or examining correlations.

Turning now to the content of the letters, I coded for 27 possible topics, ranging from abortion to economic issues (such as pay equity) to health care to Rush Limbaugh. For the purposes of this study, I created five dummy variables to test my hypotheses about abortion and Supreme Court and opposition mentions. If abortion was a significant point (meaning it was discussed more than once in the letter), the letter received a 1. All other letters received a 0. I repeated this process to code for the following major topics: Congress, the President or a Presidential election race, the Supreme Court or a Supreme Court nomination, and Economic Issues (to test whether the letters mention different branches of government more in reference to certain issues, like abortion versus economic issues such as pay equity). Table 1 presents the basic descriptive statistics for these five variables:

***Table 1: Points of Letter***

	Mean	Std. Deviation
<b>Abortion</b>	0.598	0.491
<b>Supreme Court</b>	0.071	0.257
<b>Congress</b>	0.158	0.365
<b>President/Exec Branch</b>	0.087	0.283

<b>Economic Issues</b>	0.419	0.494
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*n* = 241

As the table shows, abortion was by far the most oft-discussed issue; fully 60% of the direct mail letters made significant reference to abortion as a reason to send money to NOW. Economic issues were the second-most popular, showing up as a major point in 42% of the letters. Of the three national branches of government, Congress was the most popular, with 16% of the letters making it a topic of discussion or a reason to donate. Both the Presidential and Judicial branches were each only mentioned about half as much, showing up in 9% and 7% of the letters respectively as significant points.

After looking at the large points in the letters, I then coded for specific mentions of the opposition, whether individual opposition members, specific opposition groups, or the opposition more generally (i.e. “the far right,” “conservative extremists,” “anti-abortion terrorists,” etc). I also coded for mentions of the three branches of national government, as follows: Congress (either “Congress,” “the House,” “the Senate,” or any specific congressional committee), the President and executive branch (including reference to the “White House” or any specific governmental agency under presidential jurisdiction, such as the FBI or Justice Department), or the Supreme Court. For the Court, I coded for two categories of mentions: a specific Supreme Court case (such as mention of *Roe v. Wade* or just *Roe*), or mention of the “Supreme Court,” the “Court,” or any specific Justice name, without reference to a particular case.

The results are striking:

***Table 2: Mentions in Letter***

	<b>N</b>	<b>Minimum</b>	<b>Maximum</b>	<b>Mean</b>	<b>Std. Deviation</b>
<b>Mentions of Opponents</b>	241	0	36	5.353	5.954
<b>Mentions of Supreme Court</b>	240	0	23	2.354	3.634
<b>Mentions of Congress</b>	238	0	33	5.441	5.540
<b>Mentions of President/Exec Branch</b>	240	0	20	3.863	4.237

*n* = 241

The Supreme Court was by far the branch least likely to be mentioned. The letters were most likely to mention Congress (mean = 5.44 mentions per letter), followed by the President/Executive Branch (mean = 3.86 mentions per letter). The mean of Supreme Court mentions per letter was only 2.35. Additionally, crosstabulations revealed a high



degree of correlation between whether a letter focused on abortion as a significant point and whether the letter mentioned the Supreme Court:

***Table 3: Correlations Between Issue & Mentions***

		<b><u>Abortion as Point of Letter</u></b>	<b><u>Mentions of Opponents</u></b>	<b><u>Mentions of Supreme Court</u></b>	<b><u>Mentions of Congress</u></b>	<b><u>Mentions of President/ Executive Branch</u></b>
<b><u>Abortion as Point of Letter</u></b>	Pearson Corr.	1.000	0.272**	0.467**	-0.202**	0.180**
	Sig. (2-tail)		0.000	0.000	0.002	0.005
	N	241	241	240	238	240
<b><u>Mentions of Opponents</u></b>	Correlation	0.272**	1.000	0.311**	-0.047	0.066
	Sig.	0.000		0.000	0.474	0.305
	N	241	241	240	238	240
<b><u>Mentions of Supreme Court</u></b>	Correlation	0.467**	0.311**	1.000	-0.100	0.082
	Sig.	0.000	0.000		0.123	0.206
	N	240	240	240	238	240
<b><u>Mentions of Congress</u></b>	Correlation	-0.202**	-0.047	-0.100	1.000	0.364**
	Sig.	0.002	0.474	0.123		0.000
	N	238	238	238	238	238
<b><u>Mentions of President/ Executive Branch</u></b>	Correlation	0.180**	0.066	0.082	0.364**	1.000
	Sig.	0.005	0.305	0.206	0.000	
	N	240	240	240	238	240

\*\* Correlation is significant at the 0.01 level (2-tailed).

Letters that focused on abortion as a major point (fully 60% of the NOW samples in the database) were significantly more likely to reference the Supreme Court, either by directly

mentioning a specific case (mostly *Roe*) or by a non-case-specific mention of the importance of the Court. These letters were also significantly more likely to mention the pro-life opposition and to mention the President or Executive branch, but interestingly were significantly less likely to mention Congress (all correlations significant at the 0.01 level). The Pearson correlation coefficients and significance-levels are given in Table 3 above.

Table 3 also shows significant positive correlations between whether a letter mentions the Supreme Court and whether it mentions the opposition (which makes sense in the context of the above findings about abortion letters being more likely to mention both the Supreme Court and the opposition). It also reveals that there is a strong correlation between letters mentioning Congress and the President/Executive Branch, suggesting that NOW tends to mention the Supreme Court and pro-life opposition together in one type of letter, and Congress and the President together in a different set of letters more focused on legislation than judicial lawmaking.

To further test the results, the results of a regression are displayed below in Table 4, testing the relationship between mention of the Supreme Court in general in a letter and four possible points of the letter: abortion, economic issues, Congress, and the President/Executive Branch. The regression results are quite clear: the only coefficient that is positive as well as substantively and statistically significant is the variable “abortion,” meaning that abortion was a major point of the letter (significant at the 0.000 level). For letters that made economic issues or the other two branches of government a focal point, the coefficients are negative and only significant at the 0.05 level for economic issues. These results suggest that mentions of the Supreme Court are not randomly dispersed within the population of NOW direct mail letters: they are inserted with specific reference to the abortion issue, and avoided in the case of economic issues or reference to Congress and the President or Executive Branch.

***Table 4: Regression of Supreme Court Mentions vs. Points of Letter***

<b>Points of Letter</b>	<b>Unstandardized Coefficients</b>		<b>Sig.</b>
	<b>B</b>	<b>Std. Error</b>	
<b>(Constant)</b>	1.125	0.387	0.004
<b>Abortion</b>	3.253	0.418	0.000
<b>Congress</b>	-0.403	0.560	0.473
<b>President/Executive Branch</b>	-1.286	0.733	0.081

<b>Economic Issues</b>	-1.266	0.422	0.003
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*n* = 241

*F* = 21.364 (*sig* = 0.000)

*R-squared* = 0.267

Results for a second regression are displayed below in Table 5, this time testing for mention of a specific Supreme Court case against various possible explanatory variables, including date of letter, letter type, entity sending the letter, size of letter in pages, size of paper (standard, half-size, or legal), abortion as a focal point, and economic issues as a focal point. As the table reveals, the first two variables have no significant effects – both date and type of letter appear to be unrelated to mention of a specific Supreme Court case, contrary to one of my sub-hypotheses. However, the NOW entity sending the letter is significantly related to whether the letter mentions a specific Supreme Court case, with NOW, Inc. letters being more likely than either PAC or Foundation letters to mention a specific case, mostly in line with another original sub-hypothesis.<sup>8</sup> Additionally, the number of pages in the letter significantly impacts the likelihood of the letter mentioning a specific Supreme Court case, as expected, with longer letters being more likely and shorter letters less likely to do so (although page size does not appear to have a significant impact).

***Table 5: Regression of Specific Supreme Court Case Mention vs. Letter Characteristics***

<b>Points of Letter</b>	<b>Unstandardized Coefficients</b>		<b>Sig.</b>
	<b>B</b>	<b>Std. Error</b>	
<b>(Constant)</b>	-92.597	96.438	0.338
<b>Date of Letter</b>	0.046	0.049	0.342
<b>Type of Letter</b>	0.277	0.231	0.232
<b>Entity Sending Letter</b>	-1.092	0.416	0.009
<b>Pages in Letter</b>	0.739	0.192	0.000
<b>Size of Paper</b>	0.476	0.628	0.449
<b>Abortion as Main Point</b>	2.346	0.393	0.000
<b>Economic Issues as Main Point</b>	-1.713	0.388	0.000

*n* = 241

*F* = 13.279 (*sig* = 0.000)

*R-squared* = 0.288

<sup>8</sup> The very small number of Foundation letters in the sample make impossible a good test of the sub-hypothesis concerning entity. The Foundation letters often mentioned a specific Supreme Court case (specifically *NOW v. Scheidler*), but the results are not significant due to the small-n problem here.

The real story told in Table 5, however, is about the point of the letter – those that focus on abortion are much more likely to mention a specific Supreme Court case (significant at the 0.000 level), while those that focus on economic issues like pay equity are significantly less likely to mention a specific Supreme Court case (also significant at the 0.000 level).

The data make clear a point that clarifies NOW reaction to *Roe v. Wade*: when it comes to abortion, the NOW leadership and members mobilize mainly around the Supreme Court and the pro-life opposition. Likewise, the Supreme Court is mainly mentioned with reference to abortion rather than economic issues, Presidential actions, or legislative reforms. *Roe v. Wade* clearly continues to shape the ways in which pro-choice activists mobilize to protect abortion rights and raise money for their groups.

Turning now to the pro-life side, we must ask if these same general trends apply. Do pro-life groups also depend heavily on references to the pro-choice opposition and to the Supreme Court (and specifically *Roe v. Wade*) in their mobilization efforts? The qualitative and quantitative data suggests that they do. In fact, the initial results of my sample suggest that if anything, the pro-life letters are more vehement in their reference to *Roe* and the Supreme Court than are the pro-choice letters.

For the first group in my sample, the Ad Hoc Committee in Defense of Life (AHCDL), the sample includes 15 direct mail letters mailed between April of 1992 and November of 1994. Of these, 10 (or 67%) mention *Roe v. Wade* specifically at least once, and often more times than one (one letter mentioned *Roe* by name four times). As in the pro-choice letters, the pro-life letters make frequent reference to the political opposition and depict a raging battle between the two camps. One letter from AHCDL from 1992 stated: “The pro-aborts have greatly expanded their propaganda assaults... [Please sign and send in your copy of the enclosed letter, and] one version will go to the ‘good guys’ and another to the ‘baddies’ – again, it’s trench warfare stuff” (page 2). Another, written by the same group and signed by the same man (James McFadden, President), tells the reader about McFadden’s personal conversion to the pro-life activist cause following *Roe*:

Back in 1973, when the Supreme Court first handed down its infamous *Roe v. Wade* decision, I asked myself that question [what one person could do]. In New York, where I live, abortion was already legalized, but I didn’t want to get ‘involved’ – I didn’t think I could do anything myself, and anyway the churches would surely ‘handle’ things, wouldn’t they? That’s why Roe was such a shock: I realized I could no longer avoid the issue – it had to come to me, and I couldn’t duck the fight (April 13, 1992, underlining in original).

Other letters in this set from AHCDL refer to *Roe* as “an exercise in raw judicial power, beyond the dreams of the most ardent pro-abortionist” (from an October 16, 1992 letter) and the impetus for the formation of the AHCDL Foundation: “This Foundation went into action shortly after the U.S. Supreme Court legalized abortion on demand nationwide via its infamous *Roe v. Wade* decision in 1973” (from a September 1993 letter).

This kind of rhetoric also pervaded the letters from another pro-life group in the sample, the American Life Lobby, often with even more inflammatory language, including, from two separate 1981 letters: “Remember, since the 1973 Supreme Court decision legalized abortion, 1,500,000 preborn babies have been killed each year” and “The Supreme Court started the battle in 1973 when it okayed abortion on demand. Since then, every anti-abortion effort in the states has been cut short by that 1973 Supreme Court decision. Six Justices on the Supreme Court opened the floodgates that have led to the slaughter of over 10,000,000 innocent defenseless children in the last 8 years. What enormous power over life and death!” This last letter asks the reader to send letters and money to prevent the confirmation of Sandra Day O’Connor as a new Justice on the Court, stating directly that it is the Court that controls abortion rights: “Can we sit still while another friend of this death toll fills the next vacancy on that Court? I cannot. And I pray to God you cannot either. I need your help. Our unborn children need your help.”

Of the total of 34 letters from ALL in the sample, 21 mentioned *Roe* either by name or by oblique reference such as “the 1973 Supreme Court decision,” a total of 61.8%. The letters also made frequent reference to the feminist groups, often directly and by name, such as: “Remember, our foes from Planned Parenthood, the National Abortion Rights Action League and the National Organization for Women are well-financed and they get a lot of media coverage” (letter from early 1980s, exact date unknown), and, from a 1982 letter: “What’s worse is that every minute we waste, the so-called pro-choice groups like Planned Parenthood continue to kill God’s pre-born children. And while Planned Parenthood kills babies in their abortion clinics, you’ve got the National Abortion Rights Action League (NARAL) and the National Organization for Women (NOW) spreading the anti-life godless message that abortion is a personal freedom of choice.”

Likewise, the letters from the Concerned Women for America (CWA) that address abortion (since CWA, like NOW, is a multi-issue group) frequently refer to NOW and other

pro-choice groups, as well as to unnamed opposition like “the abortionists” (from a 1985 letter). The interaction effects between the pro-choice and pro-life camps are evident in the CWA letters. A 1983 letter reads in part: “Dear Concerned Friends, The battle lines are drawn! N.O.W., under the leadership of their new president, is out to ‘get’ the right-wing religious conservatives! (According to their own publicity!) This frightens me – and I hope it frightens you too! Not because they are out to ‘get’ us, but because if we don’t do something about their battle plan and soon – we will be too late!” (page 1, February 14, 1983 letter, underlining in original). In several letters, CWA even reprints parts of NOW direct mail letters to show the NOW strategy and convince the CWA members and potential members to become outraged, active, and to send in their checks. One letter from 1985 takes the appearance of a mock-telegram and in all capital letters tells the CWA members that if they do not send money, CWA will have to cut back staff and activities in Washington, stating: “N.O.W. WOULD HAVE A FIELD DAY IF THIS WERE TO HAPPEN” (page 1).

Even in 1989, sixteen years after *Roe v. Wade*, the CWA letters continue to put it front and center in their appeals. The start of a May 1989 letter reads:

Dear Supporter of Life and the Family,  
Yes, it’s true. CWA is preparing for... THE BIGGEST ABORTION BATTLE IN HISTORY. We are preparing to confront head-on the PRO-DEATH forces who are determined to stop the Supreme Court from overturning the infamous *Roe v. Wade* decision of 1973. We will be countering the desperate efforts of extreme leftist organizations like NOW, the ACLU, Norman Lear’s PAW, Planned Parenthood, and other well-funded groups that are determined to keep abortion on demand as a woman’s ‘choice’. And I’m calling for every member and friend of CWA to join me in redirecting his or her efforts – prayerfully and financially – to ensure that PRO-LIFE wins this battle once and for all. We must not be caught napping in the pews like we were back in 1973 when Supreme Court Justice Harry Blackmun wrote the notorious *Roe v. Wade* decision (which ultimately became the death sentence for more than twenty million innocent babies over the past sixteen years).

## V. Conclusion

The theory and results of this study offer an enlarged understanding of the impact of Supreme Court decisions. Like a major action by the President or Executive Branch, or like an important bill from Congress, a Supreme Court decision draws a political line in the sand around which interests groups organize. Any major governmental action creates room for either new actors to enter or the old actors to move in new and different ways. In this paper, I have suggested that *Roe v. Wade* had both effects; it catalyzed the formation of new

interest groups as well as forcing the existing groups on both sides to respond to it in new ways. As such, it was a shift in the political opportunity structure for both pro-life and pro-choice groups that I argue constituted a critical juncture in the history of abortion mobilization.

The quantitative and qualitative data presented here reveal that there are important connections between Supreme Court decisions on abortion and the ways in which certain interest groups (NOW on the pro-choice side, and AHCDL, ALL, and CWA on the pro-life side) mobilize support for their cause and their group. Both the pro-choice and the pro-life groups in this study constantly and consistently reference the Supreme Court in their direct mail, their own appeals to members and potential members to raise money, support, and awareness. These references were not randomly distributed throughout the population of direct mail letters: they were specific to the abortion issue. For this issue, in the NOW direct mail, we saw that letters were more likely to reference the Supreme Court and less likely to mention the other two branches of national government. The regression analyses demonstrated that certain characteristics of each letter had significant effects on whether it mentioned a specific Supreme Court case – these characteristics included size (longer letters being more likely to mention a specific case), NOW Entity sending the letter (the PAC and Foundation were less likely to do so), and the topic of the letter (those addressing abortion were much more likely, those focusing on economic issues or the other branches of government less so).

This study is part of a larger work-in-progress – I plan to collect full data for the pro-life groups mentioned above, as well as data for additional groups on the pro-choice side, to provide a fuller explication of the ideas and data presented here. These findings point to some clear correlations that I plan to test further in future iterations of the project.

In essence, this study lays out the bare bones of the argument. Whether you were the leader or activist with a pro-life or pro-choice bent, *Roe* and the subsequent abortion cases that followed it (especially *Webster* and *Casey*) changed the political landscape in which you could operate. For the losing side especially (the pro-life side after *Roe* and the pro-choice side after *Webster*), the Court decision provided the impetus for vastly different mobilization possibilities – and much better chances of receiving a good response from those you wish to mobilize (something of an “awakening-the-sleeping-giant” effect).

Further research might take up the question of whether, from an interest group perspective,

it might be more beneficial in certain cases to *lose*, for purposes of reaping these additional mobilization rewards. For the winners, the drop-off in mobilization appears to be a real disadvantage in some ways – this was most apparent in the direct mail letters from NOW after Bill Clinton won the 1992 Presidential election, where then-NOW-President Patricia Ireland pleaded with members not to stop sending money based on an assumption that NOW had won and therefore didn't need further help. Pro-life leader Beverly LaHaye of CWA told her members the same thing after the re-election of Ronald Reagan. Winning, in these cases, often meant losing money and members. Losing, however, provided vastly-improved conditions for mobilization of and fundraising from the “losers.” I suggest that the same principle can be applied to the winners and losers of Supreme Court cases. Under which conditions is a key question for further research to address.

The idea that controversial court decisions create a different opportunity structure is by no means a new idea – in fact, it is something of an obvious point. However, the full consequences of this different structure of opportunities have not been fully investigated in the previous literature, and particularly not from the perspective of interest group reaction through their own terms, such as their own direct mail. This study is meant to help inform our broader understanding of how and why things happen in interest groups – what matters to interest groups, what causes a reaction, how opponents respond, and how groups counter-respond to opponents' backlash. The main idea here is to add further nuance to this field, to add some more dots to the white space of the painting, so that the picture as a whole can become clearer.



**Appendix**

SHAMES ROE PROJECT CODESHEET -- Group = NOW

- 1.) Letter Date: Month \_\_\_\_\_ Year \_\_\_\_\_
- 2.) Letter Type (circle): Appeal Prospect Renewal PAC Other: \_\_\_\_\_
- 3.) NOW Entity sending letter (circle): NOW, Inc. PAC Foundation
- 4.) # of pages in letter (circle): 1 2 3 4 More (#) \_\_\_\_\_
- 4-B.) Size of letter pages (circle): Standard-size Legal-size Half-size
- 5.) Point(s) of letter (circle all that apply): Abortion, Economic Issues, NOW as institution, Gay/Lesbian issues, Violence against women, Electing women, Congress, ERA
- Other point(s) – list all not enumerated above:*

**Number of mentions of:**

6.) Specific opposition member: Who? (write all, w/ page # of each mention) \_\_\_\_\_

*Total mentions:* 0 1 2 3 4 5 More (#) \_\_\_\_\_

7.) Specific opposition group: Which? (write all, w/ page # of each mention) \_\_\_\_\_

*Total mentions:* 0 1 2 3 4 5 More (#) \_\_\_\_\_

8.) Nonspecific opposition: What page & what words used? (can write more on back) \_\_\_\_\_

*Total mentions:* 0 1 2 3 4 5 More (#) \_\_\_\_\_

9.) Specific Supreme Court case: Which? (write all, w/ page # of each mention) \_\_\_\_\_

*Total mentions:* 0 1 2 3 4 5 More (#) \_\_\_\_\_

10.) Nonspecific Supreme Court case: 0 1 2 3 4 5 More (#) \_\_\_\_\_

11.) Other case (\*not\* Supreme Court): Which court, if mentioned? \_\_\_\_\_

*Total mentions:* 0 1 2 3 4 5 More (#) \_\_\_\_\_

12.) Mention of "Congress": 0 1 2 3 4 5 More (#) \_\_\_\_\_

13.) Specific ref to House of Reps: 0 1 2 3 4 5 More (#) \_\_\_\_\_  
(inc. any House committees)

14.) Specific ref to Senate/Sen. committees: 0 1 2 3 4 5 More (#) \_\_\_\_\_

15.) Mention of the President: 0 1 2 3 4 5 More (#) \_\_\_\_\_

16.) Mention of Gov. agency: Which? (write all, w/ # mentions) \_\_\_\_\_

*Total mentions:* 0 1 2 3 4 5 More (#) \_\_\_\_\_

17.) Big issues/events/points mentioned in letter, if not one of the above? Please write any that apply:

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