Pro-Life Legal Defense Fund Newsletter

Winter 2013

Pro-Life Legal Defense Fund, Inc. | 1150 Walnut Street, Newton, MA 02461 | www.plldf.org | info@plldf.org

THE FUTURE OF PLLDF

For nearly 40 years, PLLDF has tried to promote a respect for life and defend the right to life of all human beings, born and unborn. The founders of PLLDF felt that it was necessary for a legal organization to begin defending those who could not defend themselves.

In pursuit of this goal, PLLDF has stalwartly provided pro bono legal services in order to protect human life. PLLDF attorneys have effectively advocated opposition to abortion, assisted suicide, and other practices that disrespect the value of every human life. Even though PLLDF has worked tirelessly, the need for pro-life lawyers is greater than PLLDF can meet without increased support and participation.

Because many attorneys keep their pro-life beliefs private — so as not to offend anyone — it can sometimes appear that there is little support within the legal community. PLLDF believes that there is more support for the pro-life cause than many believe.

PLLDF has begun an expanded effort to reach out to the legal community in order to support and develop a greater network of pro-life attorneys. The hope is that this network will create an environment in which attorneys of all ages feel safe expressing pro-life beliefs. Towards that end, PLLDF recently hosted a social event for young attorneys to show support for the next generation of pro-life advocates.

These are exciting times for the pro-life cause, and PLLDF is hopeful about what the future might bring. Presently, one PLLDF Board member is working on the buffer zone case that will be heard before the Supreme Court in January, and another Board Member's amicus brief challenging the constitutionality of the contraceptive mandate of the Affordable Care Act was quoted by the D.C. Circuit Court of Appeals. With a larger pro-life legal network, there is no telling how far PLLDF can go.

PLLDF looks forward to the day when attorneys of all ages feel comfortable enough to openly and passionately advocate on behalf of the pro-life cause.

INSIDE THIS ISSUE

MCCULLEN V. COAKLEY: THE BUFFER ZONE CASE

By Philip D. Moran, Esq.

The matter of *Eleanor McCullen et al. v. Martha Coakley, Attorney General for the Commonwealth of Massachusetts et al.* will be argued before the nine justices of the Supreme Court of the United States on January 15, 2014.

As a member of the Pro Life Legal Defense Fund, I am proud to be part of a great team that will overturn this unconstitutional infringement on the rights of peaceful protesters at abortion clinics in the Commonwealth of Massachusetts.

By way of background, Massachusetts has made it a crime for speakers to "enter or remain on a public way or sidewalk" within 35 feet of an entrance, exit or driveway of a "reproductive health care facility."

Note that this law only applies to abortion clinics. Could this be selective enforcement? The law also exempts speakers if they work for the clinic. Again, selective enforcement?

Eleanor McCullen and her fellow Petitioners are individuals who believe that women sometimes have abortions because they are pressured to do so by parents, boyfriends and even husbands. They also believe that given the opportunity to provide these women with support, information and practical assistance in a peaceful, non-confrontational way, many women will take advantage of their offer and carry their unborn babies to term. Yet, under the present law signed by Governor Patrick in 2007, the Petitioners are prohibited from being able to converse

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MARY MOE DANGERS: WHAT THE COURT CAN DO

By Robert W. Joyce, Esq.

M.G.L. c. 112, § 12S allows an unemancipated pregnant minor to petition in the Superior Court for a "judicial bypass," thereby enabling her to obtain an abortion without parental consent. In order to help ensure the anonymity of the minor, these cases are referred to as "Mary Moe" petitions.

The statute calls for an appropriate hearing to determine (a) whether the minor is mature, or (b) whether the abortion is in the best interest of an immature minor. Upon review of reliable Mary Moe statistics, PLLDF found that, over a period of two decades, the Court had granted a bypass in over 99.9% of the 16,000 Mary Moe petitions presented. Alarmed by this statistic, PLLDF decided to closely review Mary Moe procedures.

Mary Moe petitions are subject to the 1981 Superior Court Standing Order 5-81 which established uniform procedures for Mary Moe cases and included "Suggested Guidelines." Both the Order and the Guidelines remain in force.

In 2003, PLLDF determined that the Order and Guidelines no longer reflected constitutional imperatives. Changes in constitutional jurisprudence convinced PLLDF that the Guidelines were in need of modification.[1]

PLLDF assembled a committee of retired judges, physicians, attorneys, and a lay person to prepare well-reasoned critiques and suggestions for Guideline improvements. These were presented to two successive Chief Justices of the Superior Court. In each instance, PLLDF was advised that the Guidelines did not require modification.

The Mary Moe statistics have not improved. At a legislative hearing earlier this year, a physician testified that a judicial bypass has only been denied in 2 of more than 20,000 Mary Moe cases presented since 1986. This is consistent with a prior Supreme Judicial Court statement that "The record shows that judicial authorization [in Mary Moe cases] is nearly a certainty."[2]

The Guidelines suggest that the judge not inquire into the minor's view, or the views of her parents, as to the morality of abortion; or whether the minor considers her fetus as an unborn child; or whether she believes that she is destroying life. PLLDF, asserting that these considerations "are the bedrock for mature and informed decisions" and should not be off limits, suggested precise language by which a judge could fairly inquire about these relevant matters.

PLLDF's proposed new guidelines also suggested that the judge inquire as to whether the minor is aware of the health risks associated with childbirth and abortion. *Casey* had established that psychological well-being is a facet of health, and that there is a risk of "devastating psychological consequences" to a woman who "may elect an abortion, only to discover later…that her decision was not fully informed."[3] Standing Order 5-81 fails to acknowledge the insight expressed in *Casey*, and jeopardizes the health of

Continue *Mary Moe Dangers* on Page 4

PREGNANT TEENS: WHERE DO THEY TURN?

By Colbe C. Mazzarella, Esq.

When a teenager becomes pregnant, her usual concerns of term papers, Friday night football games, and college applications yield to much graver matters. Suddenly she confronts issues of life itself. She faces a difficult choice; where will she turn for guidance?

The stigma of being a pregnant teenager has faded over the years, but many girls still won't tell their parents. Without parental support, they turn to friends or "experts" who may not be aware of the available pregnancy resources. It is all too likely that she will be persuaded by these persons to remove the unwanted "tissue" by undergoing an abortion. Under stress, without full information, an inexperienced young woman can choose without knowing the consequences. Dr. Alveda King, niece of Martin Luther King, is a post-abortive woman who deeply regrets her two abortions. She testified that she "never would have had an abortion" if she had known about the health risks.

Young girls may also look for guidance from a school-based health clinic (SBC), which is available for a wide variety of medical services. SBCs are reported to have presented abortion as the only rational option to pregnant teens. Furthermore, in spite of the rhetoric about a woman's choice and the requirement of informed consent, crisis pregnancy centers have been prevented from getting informative booklets into SBCs. Teresa Larkin of A Woman's Concern in Revere, MA, said they have tried to place their resource booklets in the SBC at Revere High School, but "we were completely shut out."

Misleading parental permission slips are sent home by some high schools. The parent can sign to allow a child to visit the school's health clinic, choosing from a checklist of services. A parent may feel secure by rejecting pregnancy, STD or emergency contraceptive services, but that part of

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PHYSICIAN ASSISTED SUICIDE: DEVELOPMENTS

By Henry Luthin, Esq.

Last November, voters in Massachusetts rejected a ballot question that would legalize Physician Assisted Suicide by a narrow margin – 51% to 49%. A broad coalition from across the political spectrum came together to defeat the measure: pro-life groups, including lawyers affiliated with the Pro Life Legal Defense Fund and Massachusetts Citizens for Life, the Massachusetts Catholic Conference, Victoria Reggie Kennedy, the Reverend Liz Walker and many others. Roseanne Bacon Meade, former head of the Massachusetts Teachers Association, chaired the committee that spearheaded opposition to the measure.

In January, two months following the defeat of the referendum, a bill to legalize physician assisted suicide, House Bill 1998, was introduced in the Massachusetts House of Representatives. Like the ballot question, the bill would allow any adult resident of Massachusetts who is "terminally ill" to request a prescription from his or her attending physician that would "bring about a humane and dignified death."

There are major differences between the ballot question and the bill:

1. The preamble to the bill misleadingly states that the "Commonwealth affirms the existing right" of capable, terminally ill patients to request "compassionate aid in dying" and "obtain medication from a physician" that can be used to bring about death. Nowhere did the ballot question cast a request for deadly medication to be an "existing right".

2. The ballot question required a witnessed written request for medication and a subsequent oral request. The prescription could not be written fewer than fifteen days following the written request and 48 hours following the oral request. The bill eliminates any waiting period.

3. The ballot question required a consulting physician to examine the patient to confirm the diagnosis of the attending physician, and ensure that the patient was competent, acting voluntarily and with full informed consent. The bill allows the attending physician to waive the requirement for the consulting physician for one of two reasons: that the patient's illness is sufficiently advanced that confirmation of the illness is not necessary; or

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INCAPACITATED PERSONS – SUBSTITUTE JUDGMENT

By Tom Harvey, Esq.

Pro-life attorneys are frequently presented with difficult issues when a family member becomes incapacitated and no longer has the ability to make health care decisions for himself. In some instances, the difficulties are enhanced by hospital policies concerning so-called "futile care." In all cases, it is enormously helpful if the attorney is well-versed in the relevant legal principles involved.

If the incapacitated person unable to make health care decisions for himself has not signed a health care proxy in which he has appointed a person whom he trusts to make health care decisions on his behalf, then a dispute may arise among family members or with health care providers as to the appropriate health care. In some situations, family members may feel that other family members or the doctors are pressuring them to agree to expedite the death of the incapacitated family member. In Massachusetts, if the health care issue cannot be resolved and is contested, the court has the authority to appoint a guardian for the incapacitated person and make a "substituted judgment" decision.
In a substituted judgment case the inquiry is directed to discovering what the incompetent individual would do if competent. It is a subjective rather than an objective determination. In other words, the standard is not what the fictitious reasonable person would have wanted for treatment, but rather what that particular individual would have wanted for himself.

Of significance, a substituted judgment decision is distinct from a decision by doctors as to what is medically in the "best interests" of the patient. Thus, the important question that a court must decide is what would the individual have wanted for himself; the question is *not* what the doctors think he should want for himself.

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AN INTERVIEW WITH PLLDF'S NEW PRESIDENT

The following interview will serve as an introduction to Robert W. Joyce, Esq., the recently elected PLLDF President:

How did you become involved with the pro-life movement and PLLDF?

In 1986, I represented (*pro hac vice*) a couple whose full-term child had been stillborn in California as a result of questionable medical practice. They had been advised by a reputable California attorney that, under state law, a wrongful death action would not be permitted under those circumstances. Upon researching California law, I found that a unanimous California Supreme Court had declared that communication and interaction did not occur between a mother and her child until the moment of birth. That opinion seemed irrational to me, and I decided to challenge it on constitutional grounds. Several years after resolution of that claim, and as a result of a 1994 speech given by the late pro-life Congressman Henry Hyde, I decided to become active in the pro-life effort in Massachusetts.

What has been your involvement with PLLDF?

I have served on PLLDF's Board of Directors since 1996, and as its Clerk for three years. Additionally, at PLLDF's request, I have been privileged to represent pro-lifers in cases in the Trial Court of Massachusetts. I have also participated in PLLDF education forums, and presented PLLDF's views in numerous television and radio forums.

How do you feel about your new responsibilities with PLLDF?

Well, they can be somewhat intimidating, but I am looking forward to the challenge. Adequately defending the lives and interests of vulnerable persons at the margins of life is a daunting task. However, with the example set by past presidents under whom I have served (John LaHive, Philip Moran, Henry Luthin), and with the help of other board members and supporters, I'm confident that we can achieve significant successes.

What is the greatest challenge facing the Massachusetts pro-life legal community?

I remember the late Msgr. John Dillon Day advising attendees at a PLLDF Century Dinner that (1) we are all called upon to participate in the great pro-life cause, (2) we should not doubt that our good faith efforts will be successful, and (3) if we don't do it – it won't get done. I think our greatest challenge is to convince the broadest possible coalition of Massachusetts pro-life attorneys to understand the wisdom of Msgr. Dillon Day's words, and to put them into action. Every pro-life attorney has skills which can help reinstate respect for life in this Commonwealth and nation. Our challenge is to inspire the exercise, individually and collectively, of those skills.

What do you think is the greatest obstacle to the growth of PLLDF?

I think it is difficult for many pro-life attorneys to believe that there is, or can truly be, broad-based support for pro-life principles in our legal community. The understanding that genuine love can enable us to be publicly pro-life without being disloyal to any client, colleague, family member or friend, is not yet widespread. This obstacle can be overcome as more and more attorneys step forward and defend pro-life principles. Loving and intelligent advocacy, I believe, can and will grow our strength and numbers.

Mary Moe Dangers: What Can the Court Do? **continued from Page 2**

young girls.

Other problems were noted by one Superior Court judge who heard such Mary Moe petitions. She observed that the "ready availability of abortion, courtesy of the court, weakens the family unit and the judicial system by permitting dishonesty." She added that "the concealment of the pregnancy and abortion widens the chasm between parent and child," rendering parents "unable to understand or offer loving support to a child caught in a nightmare." Mary Moe, she asserted, "does nothing to foster family interaction, and in fact, endorses a disregard for familial values."[4]

Pro-life attorneys are encouraged to consider whether renewed attention to Mary Moe procedures might help make Massachusetts Superior Courts safer for pregnant minors and unborn human life, and less destructive of families.

[1] *Planned Parenthood of Southeastern PA. v. Casey*, 505 U.S. 833 (1992).
[2] *Planned Parenthood League of Mass., Inc. v. Attorney General*, 424 Mass. 586, 592 (1997).
[3] See *supra* note 1 at 882.
[4] Elizabeth Butler, *Mary Moe Petitions – One Judge's Viewpoint*, 20 M.L.W. 2081 (1992).

The Buffer Zone Case **continued from Page 1**

within the 35 foot buffer zone, even with willing listeners or hand them literature explaining alternatives.

We argued the case in the Federal District Court of Massachusetts, as well as the First Circuit Court of Appeals, on both the constitutionality of the law on its face and as it is applied. We were unsuccessful. Yet, because we believe that the Act is wrong, we filed a petition of certiorari to the Supreme Court and on June 20th, the Court granted our petition. That means that we have the opportunity to argue the merits of the case before the highest court in the land and as one observer has stated, the Court didn't grant certiorari to sustain the lower courts' opinions.

Our major contentions are that the 2007 Act is not a permissible time, place and manner regulation because it is not content and viewpoint neutral, it is not narrowly tailored to serve significant government interests, and it does not leave open ample alternative channels for communication. It is our position that the Buffer Zone law fails each and every aspect of these tests.

Without getting too specific in this article, we submit that because the Act only applies to abortion clinics and only applies to one issue, abortion, it is not content or viewpoint neutral.

Nor is it narrowly tailored to legitimate interests in public safety since all of the concerns citied by the Commonwealth are already served by other laws.

Finally, the Act does not leave ample alternative channels for communication. The alternative means suggested by the Court of Appeals, namely standing outside the 35 foot exclusion zones and shouting, using bullhorns or waving large signs, are not remotely adequate substitutes. The Court actually concludes that shouting, using bullhorns or waving signs is the same as one of our Petitioners peacefully speaking to a prospective abortion patient in a normal conversational tone. Maybe that is why we feel so positive about our position.

Hopefully, as the result of the efforts of a great body of pro-life supporters, we will persuade the Supreme Court that it should, at a minimum, hold that the Act goes well beyond the outer limit of government power to criminalize peaceful, non-obstructive speech on public sidewalks.

2014 PLLDF THOMAS MORE AWARD AND CENTURY DINNER

"*The law is a tool for structuring society. It is a tool for protecting the weak, the oppressed and the voiceless. It is a tool for protecting freedom."* – Mark Rienzi, Esq.

PLLDF is delighted to announce that Attorney Mark Rienzi will be the recipient of the 2014 PLLDF Thomas More Award. The award will be presented at the Century Dinner, where Attorney Rienzi will also serve as the guest speaker.

Attorney Rienzi, an associate professor at The Catholic University of America, Columbus Law School, as well as Senior Counsel at the Becket Fund for Religious Liberty, has been a long time defender of the unborn.

Attorney Rienzi's litigation and research interests focus on the First and Fourteenth Amendments, emphasizing free speech and the free exercise of religion. He is counsel in several constitutional cases, including a First Amendment challenge to the Massachusetts abortion clinic buffer zone law. Additionally, through his work at the Becket Fund, Attorney Rienzi is counsel in several challenges to the HHS mandate. He is a widely sought after speaker on constitutional issues, particularly on abortion and the First Amendment.

The Century Dinner will be held at the Boston Marriot in Newton on Friday, April 11, 2014.

PLLDF will be honored to present Attorney Rienzi with the PLLDF Thomas More Award for all of his contributions to the defense of life.

Please email info@plldf.org if you are interested in learning more about the Century Dinner or would like to reserve your ticket.

Incapacitated Persons – Substituted Judgment **continued from Page 3**

Considerations which are relevant to the substituted judgment inquiry are as follows:

1) the incapacitated person's expressed preferences regarding treatment;
2) his religious beliefs;
3) the impact upon the person's family;
4) the probability of adverse side effects;
5) the consequences if treatment is refused; and
6) the prognosis with treatment.

Regarding religious belief, pursuant to statute, the guardian is obligated to protect and preserve the incapacitated person's right of freedom of religion and religious practice.

The wishes of the incapacitated person's family are relevant only to the extent that the person himself would take their wishes into account in making his choice. Family members of the incapacitated person might be able to provide key testimony. For example, they might be able to testify as to whether that person had ever made statements regarding his preferred health care should he ever become incompetent.

The testimony of a health care provider who had never known the person before he became incapacitated would have limited importance. Its only value would be that the medical opinion could be one factor that the incapacitated person would have considered in arriving at his decision regarding his health care.

In one recent substituted judgment case that I handled, a guardian was seeking to have the court expand his powers to allow him to authorize DNR (do not resuscitate)/ DNH (do not hospitalize) orders regarding an elderly incapacitated person. My client, a family member of the incapacitated person, opposed this. At trial, the guardian presented medical testimony and testimony of the incapacitated person's guardian ad litem that DNR/DNH orders would be in that person's best interest. However, the witnesses admitted on cross-examination that they had never known the incapacitated person when she had been competent. In opposition, family members testified that they had known their relative all of their lives and that she would not have wanted DNR/DNH orders. Based on that testimony, the court denied the expansion of the guardian's powers.

In sum, in a substituted judgment case, the court cannot authorize the administration of a proposed treatment merely upon a finding that the treatment is clinically desirable or likely to be efficacious. Rather, the court must determine, taking into account all of the factors and concerns that would likely serve to form the particular incapacitated person's subjective perspective, which, if any, treatment the person would consent to if he were competent.

Pregnant Teens: Where Do They Turn? **continued from Page 2**

the form may be of no consequence; under MGL 112 § 12F and the Massachusetts Mature Minor Rule, girls may be able to obtain these services without parental permission.

A young woman reported that, at age 17, the SBC in her Boston-area high school referred her to a nearby abortion center without her parents' knowledge. When she arrived, she was surprised to find that her personal information had already been provided to the clinic by the SBC. Without any payment or discussion, they performed an abortion. As she matured, she felt that she had been rushed into it unethically. She sought legal advice, but unfortunately the statute of limitations had expired.

PLLDF is committed to exploring all strategies which might ensure a pregnant teenager's informed choice. Anyone who would like to help or to get more information may contact Attorney Colbe Mazzarella, mazzarellac@gmail.com.

PLLDF MEMBER SPEAKS AT BC LAW SCHOOL

On November 7, 2013, PLLDF Board Member, Francis H. Fox, Esq., of Bingham McCutchen, LLP, spoke with students at Boston College Law School about his involvement in the landmark cases, *First National Bank of Boston v. Bellotti* (1978) and *FEC v. Massachusetts Citizens for Life, Inc.* (1986). Attorney Fox took this opportunity to discuss pro-life legal challenges, premised on First Amendment grounds, to federal regulations on corporate spending in elections.

REVIVING THE PRO-LIFE CAUSE AT BOSTON COLLEGE LAW SCHOOL

By Hanford Chiu, J.D. Candidate May 2015

Deciding to attend Boston College Law School (BCLS), I anticipated that the pro-life philosophy would be deeply rooted among my colleagues. I found, however, that the pro-life cause has sorely lacked representation at BCLS in recent years. Despite the noble efforts of BCLS students and professors who established pro-life student organizations in the past, I found that such societies had dissolved. As such, there was no organized student voice for the unborn and dying for over five years at BCLS.

All that has changed.

With encouragement from PLLDF, and the support of BCLS Professor Scott Fitzgibbon, I have been successful in reestablishing a pro-life student organization known as Lex Vitae (Latin for "Law of Life"). Lex Vitae is founded with the fundamental ethical belief that all humans are granted the inalienable right to life, and with the primary purpose of assisting lawyers in providing pro bono legal aid to further this belief.

Our initial efforts lead us to believe that there are a significant number of students willing to publicly unite in support of the pro-life cause. We hope that, with continued activity, more students will feel comfortable stepping forward and uniting with us. I believe, with the right support and leadership, our students can be given a chance to defend life and help people while developing ethical and legal skills as aspiring young lawyers.

Within a few weeks of its founding, Lex Vitae has managed to attract over a dozen student members. General meetings are regularly held to discuss the new and challenging legal issues that arise in the post-*Roe v. Wade* era. We feel that, as law students, we are able to do research on the status of the law and communicate effectively with one another about the results of our research. We also feel that our research skills can be helpful to practicing attorneys and their clients.

In order to promote student involvement in Lex Vitae, we are hopeful that lawyers will come to BCLS and speak with us about their case experiences. We believe that their opinions on how the law can be made to work for the pro-life cause will be invaluable to us.

Participation by pro-life lawyers is crucial to the success of Lex Vitae. It is only with substantial assistance from pro-life lawyers that we can make a significant contribution to the pro-life cause. Lex Vitae is eager to work with attorneys, in any appropriate way, to raise awareness of the pro-life cause.

I am happy that the pro-life movement has taken on a new life at BCLS. I am convinced that, by partnering with established pro-life lawyers, Lex Vitae can help sow the seeds for the next generation of pro-life attorneys.

If you would like to help Lex Vitae work to protect the lives of the innocent by offering pro bono legal opportunities, time as a speaker or panelist, or any other means of support, please contact Hanford Chiu at Hanford.Chiu@bc.edu.

Physician Assisted Suicide **continued from Page 3**

that the appointment with the consulting physician cannot be made in a reasonable time or that the consulting physician is not within a reasonable distance from the patient's residence. Note that the confirmation that the patient is competent, acting voluntarily and with full informed consent is ignored if a waiver is given by the attending physician.

4. Conscience protections for health care providers including health care facilities are made more burdensome in the bill. Facilities must have a formal policy and a consumer disclosure outlining the extent to which the facility refuses to provide medication pursuant to the bill, describing any differences between institution-wide objections and those that may be raised by licensed providers at the facility, and describing any consumer complaint processes available to persons who would be affected by the exercise of the facility's conscience rights.

The ballot question had few enough safeguards, a point repeatedly made by speakers, including lawyers from the Pro Life Legal Defense Fund. House Bill 1998 strips away those minimal safeguards and would be a disastrous law. Please review the bill yourself and rebut proponents of it. Copies of the bill can be found at the General Court website, https://malegislature.gov.

WEBSITE AND FACEBOOK

In an effort to be more accessible and reach a greater audience, PLLDF has developed a website. Please browse our new website at **www.PLLDF.org.**

Please also "Like" us on **Facebook** so we can let you know about upcoming PLLDF events!

PLLDF YOUNG ATTORNEY SOCIAL EVENT

PLLDF has decided to host another young attorney social event. In our efforts to develop a broader network of pro-life attorneys, we welcome all young pro-life attorneys and law students to join us in Boston on **Thursday, January 30, 2014 from 6-8pm at The Point**, for an evening of networking and fun. For more information or to RSVP, please email info@plldf.org.

WE NEED YOUR SUPPORT!

Please consider making a financial contribution today. Your generosity will allow PLLDF provide trained and committed pro-life voices in our courtrooms and other public forums, and continue our life-saving work.

All contributions to the Pro-Life Legal Defense Fund are tax deductible.

Please make checks payable to "PLLDF" and mail them, or any correspondence, to:

Pro-Life Legal Defense Fund
c/o Robert W. Joyce, Esq.
1150 Walnut Street,
Newton, MA 02461

ADDRESS CORRECTION

We are encouraged by the success we have had thus far in establishing a database to keep in touch with our many friends and supporters. However, if you are receiving more than one mailing, or the mailing label needs a correction, please let us know! Also, if you know anyone who might like to hear from PLLDF, let us know and we will send them a copy of our newsletter and ask if they would like to be added to our mailing list.

HELP WANTED

As a lawyer, you can help save lives! The Pro-Life Legal Defense Fund is building a resource bank of lawyers willing, within their time limitations, to match their legal skills with the needs of the pro-life community.

If you would consider discussing how you might be able to help PLLDF in this effort, regardless of how you might be able to do so, please contact PLLDF President, Robert W. Joyce, at (617) 969 – 8383, or send an email to info@PLLDF.org identifying any of the following areas of law in which you have experience and/or interest:

- **Constitutional** (sidewalk counselors, other "right-to-life" infringements)
- **Criminal** (protection of women in crisis pregnancies, defense of protestors)
- **Medical Malpractice** (botched abortions, wrongful termination of life support)
- **Licensing, Zoning** (support crisis pregnancy centers, regulations for abortion clinics)
- **Contracts, Employment, Real Estate, Tax** (assist crisis pregnancy centers, pro-life groups)
- **Probate** (end-of-life issues, health care proxies, guardianship matters)
- **Family, Immigration, Housing** (for women in crisis pregnancy centers)
- **Appeals** (for any of the above areas of law)
- **Legislation/Regulation** (drafting and critiquing life-related legislation and/or regulation)
- **Other** (specify)

Additionally:

- Would you be interested in speaking to pro-life or student groups?
- Would you consider testifying before a legislative committee on a pro-life issue?
- Would you consider hiring a pro-life law student on a volunteer, paid, or work-study basis?