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BABIES HAVE A BASIC RIGHT TO LIVE INSIDE THEIR MOTHER'S BODIES

L. Darnell Weeden
Roberson King Professor of Law, Texas Southern University
Thurgood Marshall School of Law, Houston, TX;
B.A., Journalism & Political Science, University of Mississippi
Oxford, MS, 1972; J.D., University of Mississippi, 1975.

I. INTRODUCTION

The issue to be addressed is whether the Supreme Court's abortion decision in *Roe v. Wade*[1] merits acceptance as settled law under the Due Process Clause of the Constitution when balanced against anunborn baby's basic fundamental right to live an unaborted life inside her pregnant mother's body. The Due Process Clause of the Fifth Amendment provides that "[n]o person... shall be deprived of life, liberty,.. without due process of law.[2] Unlike the Supreme Court's reasoning in *Roe v. Wade*[3]' many realistic people continue to believe that an unborn baby is in fact a growing biological person inside the body of a pregnant woman or a pregnant girl. At some point in Justice Kavanaugh's Supreme Court confirmation hearing he said that *Roe v. Wade* was "settled as a precedent of the Supreme Court."[4] However, in 2003 Kavanaugh stated: "I am not sure that all legal scholars refer to *Roe* as the settled law of the land at the Supreme Court level since [the] Court can always overrule its precedent, and three current Justices on the Court would do so."[5] I believe Kavanaugh's 2003 statement about the unstable status of *Roe* as settled law is probably more intellectually honest and accurate than the remarks Kavanaugh made about the status of *Roe* as precedent during his confirmation hearing.

The Supreme Court on May 17, 2021, decided to hear an abortion case that will give it an opportunity to revisit the constitutional right to an abortion created by the Supreme Court almost fifty years ago in Roe v. Wade.[6]The abortion case the Supreme Court decided to hear is *Dobbs v. Jackson* Women's Health Organization, No. 19- 1392, which involves a Mississippi law passed in 2018 that prohibitsan abortion when the likely gestational age of the unborn individual exceeds 15 weeks.[7] The Mississippi law contains very limited exemptions for medical emergencies or when a dangerous fetal malformation occurs.[8]

This hot topic abortion case is regulated by a Mississippi law which prohibits nearly all abortions after 15 weeks of pregnancy is widely regarded by concerned observers in the abortion rights controversy as an opportunity for the Court to allow states to impose restrictions on those seeking an abortionin the same way that they did before *Roe v. Wade* existed.[9]

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[1] 410 U.S. 113 (1973).
[2] U.S. CONST. amend. V
[3] Contra, 410 U.S. 113
[4] G. Alexander Nunn and Alan M. Trammell, Settled Law, 107 Va. L. Rev. 57, 60 (2021) (statement of Elena Kagan, Solicitor General of the United States). (citing C-SPAN, Supreme Court Nominee Brett Kavanaugh Confirmation Hearing, Day 2, Part 1, C-SPAN (Sept. 5, 2018), https://www.c-span.org/video/?449705-1/supreme-court-nominee-brett-kavanaugh-confirmation-hearing-day-2-part-1 [https://perma.cc/7N8B-S2MC] (relevant exchange occurring from 48:25 to 49:10))
[5] Id. (citing Charlie Savage, Leaked Kavanaugh Documents Discuss Abortion and Affirmative Action, N.Y. Times (Sept. 6, 2018), https://www.nytimes.com/2018/09/06/us/politics/-kavanaugh-leaked-documents.html [https://perma.cc/3C4Q-7SAH].)
[6] Adam Liptak, *Supreme Court to Hear Abortion Case Challenging Roe v. Wade*, N.Y. Times (May 17, 2021), https://www.nytimes.com/2021/05/17/us/politics/supreme-court-to-hear-abortion-case-challenging-roe-v-wade.htmlpreme
[7] Id.
[8] Id.
[9] Id.

Advocates of abortion rights may fear the Court's decision to take up the Mississippi abortion case because if a majority of the justices accurately believe that aborted lives had a fundamental right to not be aborted the Court might rationally use the Mississippi case to overturn *Roe v. Wade*.[10] Defenders of Mississippi's restrictive abortion law believe the law will help to protect fetal life and they believe the current Supreme Court is very likely to uphold the law as constitutionally valid.[11]

Since there are many good reasons supporting the view that life begins at conception the *Roe v. Wade* decision that allows abortion at the post conception pre-viability stage of pregnancy should be reversed in order to prevent unborn babies from being aborted and deprived of their independent substantive liberty interest under the Due Process Clause of the Constitution. In the *Casey* opinion it was asserted "a woman's interest in having an abortion is a form of liberty protected by the Due Process Clause.[12] However, in my opinion, since aborted lives had a fundamental right live, the Supreme Court should logically reason that an unborn child living in her mother womb is entitled under the Due Process Clause to have the liberty to live in her mother's womb without being aborted.[13] I advance the argument that an unborn child has a form of liberty interest to live in a pregnant woman's womb without facing a potential abortion. In order to protect an unborn child's manifestation of a liberty interest in living in the mother's womb after conception, but prior to birth, a state may rationally prohibit an abortion in order to protect the unborn baby's compelling liberty interest in living in the mother's womb without being aborted.[14]

This article will discuss in part II recent developments impacting the heated abortion discussion. Part III supports the argument the that the Supreme Court has an obligation to cancel the harms caused by an unconstitutional expansion of its judicial power in deciding the *Roe v. Wade* abortion issue. In my opinion, the rationale of Roe v. *Wade* is inherently flawed because the due process clause liberty interest of a pregnant woman to abort does not supersede the due process liberty interest of the unborn baby to live inside the pregnant woman womb without been aborted because aborted lives have a fundamental right to live outside of a woman's womb. Part IV contendthe constitution allows states to protect the liberty interest of an unborn baby living in the mother's womb.In the conclusion, part V asserts that permitting abortion issues to be regulated exclusively by the states may encourage more states to become protectors of unborn babies by granting these babies a liberty interest to live inside of the body of a pregnant woman from conception to birth without being aborted.

II. RECENT DEVELOPMENTS IMPACTING THE HEATED CURRENT ABORTION DISCUSSION

The Supreme Court in accepting the Mississippi case for its term that began in the fall of 2021 reviewed the issue of whether every single pre-viability ban on elective abortions is unconstitutional.[15] Under its *Roe v. Wade*routine, the Court's jurisprudence typically prohibits any and all pre-viability bans on abortions.[16] However, if aborted lives had a fundamental right to not be terminated, not only should pre-viability abortion bans by a state be allowed, but a state should also be permitted to ban every single post conception elective abortion.[17] The National Abortion and Reproductive Rights Action League (NARAL) Pro-Choice America on May 17, 2021, made a public statement describing the Mississippi's anti-abortion case as an open threat to *Roe v. Wade*.[18] According to the issued statement of NARAL, "It doesn't get any scarier than this. At a time when our right to access abortion is under attack like never before, we need full a full-throated endorsement of reproductive freedom."[19]

[10]Id.
[11]Id.
[12]***Planned Parenthood of Southeastern Pennsylvania v. Casey*, *505 U.S. 833, 966 (1992)***
[13]Contra, id.
[14]Contra, id.
[15]Jennifer Rubin,*Opinion: The Supreme Court's abortion case fundamentally changes upcoming elections,*WASH. POST (May 18, 2021),https://www.washingtonpost.com/opinions/2021/05/18/supreme-courts-abortion-case-fundamentally-changes-upcoming-elections/?utm_campaign=wp_opinions_
[16]Id.
[17]Contra, *Roe v. Wade*410 U.S. 113
[18]Rubin, *supra* note 15
[19]Id.

Unlike the supporters of a *Roe v. Wade* right to an elective abortion, Virginia GOP 2021 gubernatorial nominee, Glenn Youngkin, bluntly implied that he really believes aborted lives had a fundamental pre-abortion right to life by declaring, "We will protect the life of every Virginia child born and unborn." [20]

Abortion rights activists argue that a rejection of abortion rights after almost fifty years would be the direct result of an exercise of raw judicial power by the Supreme Court Justices selected by President Trump because they were known for their anti-abortion judicial philosophy.[21] According to critics, the Justices appointed by President Trump were chosen to act as political handmaidens of anti-abortion political operatives and not to serve as independent guardians of constitutional rights.[22] Some faultfinders believe that using the three Supreme Court justices appointed by President Trump to help reverse*Roe v. Wade* is an example of "results-oriented judging — "fixing" — of the most blatant kind."[23]

The Supreme Court, with what has been described as 6-to-3 conservative supermajority, by deciding to hear a challenge to the Mississippi law that would ban most abortions should be rather predictable.[24] President Donald Trump vowed to appoint justices who would reverse the *Roe v. Wade* opinion, which created for a woman a constitutional right to get an abortion.[25] "With Trump's three historic appointments to the high court, all that opponents of *Roe* needed was the right vehicle. The Mississippi case gives them just that. It will be heard in the court's term beginning in October [2021]".[26]

The Mississippi law is a step in the right direction but it does not go far enough because it would only prohibit women from terminating their pregnancies prior to viability, the point at which the unborn baby may live outside of the mother's womb.[27] Because the due process liberty interest of the unborn baby to live in the pregnant woman's womb exists from conception until birth, I believe the protected liberty interest of the unborn baby requires the Supreme Court to overrule *Roe v. Wade*.[28] Because the unborn baby has a protected liberty interest in living in the mother's womb without being subjected to an elected abortion, I think Mississippi has a compelling substantive due process duty to protect the liberty interest of the unborn baby starting at conception.[29]

It would be appropriate for the Supreme Court to use the Mississippi case to reject *Roe* and *Casey* because the two cases are not valid constitutional precedents in U.S. law because *Roe and Casey* were "demonstrably erroneous"[30] the day they were decided. Justice Clarence Thomas has appropriately reasoned[31] that the Court was duty-bound to overrule precedents like *Roe* and *Casey* that were "demonstrably erroneous."[32] Justice Thomas has properly characterized *Roe* and *Casey* as perversions of constitutional law.[33] *Roe* and *Casey* may be treated as perversions of constitutional law because there is no due process liberty interest of a pregnant woman to destroy the liberty interest of an unborn baby to live in her womb after conception until birth because a fetus has a fundamental right to life.[34]In June 2020, a critical review of

[20]Id.
[21]Id.
[22]Id.
[23]Id.
[24]Leah Litman& Melissa Murray,*Opinion: The Supreme Court's conservative supermajority is about to show us its true colors,* WASH. POST (May 17, 2021),https://www.washingtonpost.com/opinions/2021/05/17/supreme-court-mississippi-abortion-restrictions-roe-v-wade/
Leah Litman is an assistant professor of law at the University of Michigan Law School. Melissa Murray is a professor of law at the New York University School of Law. Litman & Murray co-host the "Strict Scrutiny" podcast.
[25]Id.
[26]Id.
[27]*Contra,*Planned Parenthood of Southeastern Pennsylvania v. Casey, 505 U.S. 833
[28]Id.
[29]Id.
[30]Contra, Litman& Murray, *supra*, note 24
[31]Contra, id.
[32]Id.
[33]Contra, id.
[34]*Contra,*Planned Parenthood of Southeastern Pennsylvania v. Casey, 505 U.S. 833

abortion law precedent was on display wen Justices Neil M. Gorsuch and Brett M. Kavanaugh, two of Trump's Supreme Court appointees, voted to reject precedent and accept a couple of abortion limitations.[35]

In 2022, the *Roe* v. *Wade* abortion law precedent might be at an increasing risk of being rejected because the Court's newest member, also a Trump appointee, "Justice Amy Coney Barrett, has, in her academic writing, indicated that she shares Thomas's ideas about precedents and abortion rights."[36]

In October of 2020 the Senate confirmed Barrett to replace Justice Ruth Bader Ginsburg.[37] "It was Ginsburg's dying wish that the winner of the election name her replacement, perhaps in part because Trump promised to appoint justices who would overrule *Roe* and the abortion right that Ginsburg viewed as essential to women's equal citizenship."[38] If a 6-to-3 supermajority of the Court share my belief that aborted lives matter that supermajority has the numbers and the proper constitutional authority under the due process liberty rationaleprotecting babies to reverse*Roe v. Wade* as an unfortunate perversion of the constitution.[39]

III.THE SUPREME COURT HAS AN OBLIGATION TO CANCEL THE TROUBLES CAUSED BY AN UNCONSTITUTIONAL EXPANSION OF ITS JUDICIAL POWER IN DECIDING THE *ROE V. WADE* ABORTION ISSUE

Theradical *Roe v. Wade* Supreme Court decision created a constitutional liberty based right to abortion. Since January 1973, the decision virtually assured that the America's social and political separations of the 1960s and 70s would grow even wider.[40] It should come as no surprise that the right to abortion remains a divisive issue because an elective abortion of a living unborn baby should not be treated as good trouble. In 2021, the Supreme Court decided to hear a Mississippi abortion case that might decisively nullify and cancel *Roe*'s considerable enhancement of the power of the federal judiciary.[41] However, the expectation that the justices would cease and desist from expanding the Court's judicial power to create a protected liberty interest in the right of a woman to have an abortion has disappointed anti-abortion observers in the past.[42]"President Ronald Reagan — to whose 1980 election was aided by a pro-life movement responding to *Roe* — appointed Supreme Court Justices Sandra Day O'Connor, Antonin G. Scalia and Anthony M. Kennedy, raising expectations that the court would repudiate its overreach."[43] And high hopes for the demise of *Roe* v. *Wade* grew significantly when Republican President Reagan's Republican replacement, George H.W. Bush, selected Justices David H. Souter and Clarence Thomas to serve on the Court.[44]

In 1992, in Planned Parenthood v. Casey[45] the Supreme Court — guided by a "joint opinion" from O'Connor, Kennedy and Souter created a new "test" for abortion rights by declaring the Court would determine whether an abortion regulation would place an "undue burden" on pregnant women looking for a chance to abort their unborn babies.[46]The *Casey*[47]court should have reasoned that allowing women to abort their unborn babies creates an unacceptable occasion for pregnant women to destroy the life of an innocent unborn baby in violation of the unborn baby's liberty interest to live his mother womb without being aborted before birth. "*Roe* had been the first breach of the court's banks of appropriate authority; this ruling was a second, even greater assertion of judicial power. And it set a pattern for decades to come."[48] I agree with Hugh Hewitt that both Roe and Casey were unconstitutional expansion of the Court's judicial power.[49]

[35]Litman& Murray, *supra*, note 24
[36]Id.
[37]Id.
[38]Id.
[39]Contra, id.
[40]Hugh Hewitt,*Opinion: The Supreme Court Must Undo The Harms That Flowed From Its Roe V. Wade Overreach*, WASH. POST (May 25, 2021), https://www.washingtonpost.com/opinions/2021/05/25/supreme-court-must-undo-harms-that-flowed-its-roe-v-wade-overreach/
[41]Id.
[42]Id.
[43]Id.
[44]Id.
[45]505 U.S. 833
[46]Hewitt, supra note 41
[47]*Contra*, 505 U.S. 833
[48]Hewitt, supra note 41
[49]Id.

I believe the Court has the judicial authority to demonstrate its compelling devotion to protecting the liberty interest of people by grantingan unborn baby a liberty interest to live in the womb of a pregnant woman without been aborted.[50]

If the court finally truly grasps the harmful consequences of its decision in *Roe* and *Casey* while reviewing the Mississippi law which prohibits nearly all abortions after 15 weeks of pregnancy (*Roe* prohibited abortion at six months), the court wwould deny states the right to establish their own abortion laws and overrule *Roe* and *Casey* because aborted lives matter.[51]*Roe* and *Casey* should be rejected because no state shall deny any unborn baby the substantive due process liberty interest to live in the womb of the pregnant woman during the entire pregnancy without being aborted.[52] The Mississippi anti-abortion law could be invalidated because it allows for an abortion.[53] In my view because aborted lives matter any law that allows a pregnant woman to aborted her unborn baby prior to that unborn baby's birth is an unconstitutional violation of the baby's liberty interest to live in the mother's womb during the entire pregnancy.[54] It is my opinion that the due process liberty interest of an unborn baby to live in a pregnant woman's body prohibits a state from allowing a woman to terminate her pregnancy by an elective abortion.[55] Defenders of *Roe* and *Casey* should be denied the benefit of stare decisis because *Roe* and *Casey* are terrible decisions.[56] "Terrible decisions must be struck from the books even if they have set the law for more than 50 years."[57]*Roe* and *Casey*[58] should be overturned, and the Court should recognize that abortions rights are a legal fiction and no state or person has right to rip an unborn baby from a pregnant woman's womb by an abortion.[59] It may be helpful if the disavowal and rejection of *Roe* and *Casey* could also come with the admission that judicial expansion in *Roe* and *Casey* were both wrong-headed and wrong hearted because no state nor person shall deny an unborn baby the due process liberty right to live in the womb of a pregnant woman without being aborted. [60]

IV. The Constitution Allows States To Protect The Liberty Interest Of UnbornBaby Living In the Womb

The liberty interest of the Constitution does not expressly require states to either permit or to deny abortions. While writing about the upcoming Supreme Court battle regarding the abortion issue certainly involves discussing the relevant precedent;[61] however, those precedents must be abandoned because they fail to protect the substance due process liberty interest of the unborn baby to live in the pregnant woman's womb without being aborted.[62] Since the Constitution does not expressly protect the right to an abortion plausible sound policy should favor the due process liberty interest of the unborn to live in the womb of the pregnant woman without been aborted.[63]

I believe that the framers of the Fourteenth Amendment understood that the Due Process Clause necessarily and properly protects the right of an unborn baby to live in the womb of the pregnant woman to birth without being aborted. At the time the Due Process Clause was adopted there is no reasonable doubt in my mind that the public would have been much more likely to accept the proposition that the due process liberty interest of the unborn to live in the womb of a pregnant woman would prevail over the reproductive rights of the woman to abort the unborn baby. If the Constitution is reasonably interpreted "the language of the text, the history leading up to it, and the understanding of the Framers, abortion is a constitutional no-brainer — it's not up to judges to say, and the court had no business constitutionalizing the issue in *Roe v. Wade*."[64]

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[50]*Contra*, Casey, 505 U.S. 833
[51]*Contra*, Hewitt, supra note 41
[52]*Contra*, Casey, 505 U.S. 833
[53]Id.
[54]Id.t
[55]Id.
[56]Hewitt, supra note 41
[57]Id.
[58]*Contra*, Casey, 505 U.S. 833
[59]*Contra*, Hewitt, supra note 41
[60]Id.
[61]Ruth Marcus, (Deputy editorial page editor, Wash. Post) *Opinion: Leaving Abortion To The States Makes Them Agents Of Oppression*, WASH. POST (June 4, 2021), https://www.washingtonpost.com/opinions/2021/06/04/leaving-abortion-states-makes-them-agents-oppression/
[62]*Contra* id.
[63]Contra, Roe v, Wade, 410 U.S. 113
[64]Marcus, supra note 62

An appropriate approach to the abortion issue as a no brainer recognizes the paramount federal liberty interest to be allowed is the right of the unborn baby living in the body of the pregnant woman to continue to live in the womb free from abortion because unborn babies have a fundamental right to live.[65]

The intentionally generous phrases of the Constitution, due process of law and liberty "were purposely left to gather meaning from experience," [66] according to Justice Felix Frankfurter. Justice John Harlan believed that an all-embracing range of liberty guaranteed by the Due Process Clause should not be controlled by the precise terms of the Due Process Clause unlike those explicit guarantees generally identified in the Constitution.[67] While writing in the *Roe v. Wade* decision Justice Harlan conceded that everyone reading the constitution will agree that the Constitution does not state in any identifiable terms that it protects a woman's right to choose an elective abortion.[68] "Yet the court has long interpreted the due process clause to protect substantive rights, not just mandate procedural fairness."[69] *Roe v. Wade*[70] decided to ignore the inconvenient truth that inside the body of a pregnant woman at the time of conception is the developing body of an unborn baby continues to grow within the pregnant woman's body. Since an unborn baby is inside a pregnant woman's body at conception the pregnant woman is no longer in possession of a single body because the unborn baby inside her body is a growing developing body entitled to the liberty of staying in womb without being aborted.[71] Since a pregnant woman has a body living inside her body the generous liberty language used in the Due Process Clause to justify substantive rights should first protect the liberty interest of the unborn baby.[72] I believe judicial experience almost fifty years after *Roe v. Wade* now supports the argument that the intentionally generous phrases of the Constitution's due process of law and liberty support my argument that the unborn baby has a substantive due process liberty right to live inside the pregnant woman's womb without being aborted because an unborn child has a fundamental right to be born.[73]

Ruth Marcus contends that *Roe* emerges logically from the Supreme Court's recognition of a constitutionalized right of privacy[74] eight years before *Roe* in Griswold v. Connecticut.[75] Since the *Griswold* case, unlike *Roe,* involved the right of married couples to obtain contraceptives and not the right of a pregnant woman to unilaterally obtain an abortion I argue that *Griswold* is not a reasonable precedent for *Roe.*[76] I contend that Marcus' position that the right to an abortion emerges logically from the understanding that since women who are not pregnant have the right to control what contraceptives they use to control their own bodies pregnant women also have a privacy right to an abortion should be rejected.[77] Marcus argument that *Roe* automatically radiates from *Griswold* should be rejected[78] because the developing body of an unborn baby living and growing inside of a pregnant woman's body has an independent due process liberty interest to live inside the pregnant woman's body until birth without being removed by an abortion[79] while contraceptives do not rationally possess an independent liberty interest to either enter or remain in a woman's body.

Now is the time for the Supreme Court to use the Mississippi abortion case to hold that the government has a compelling interest in allowing the due process liberty interest of the unborn life residing inside the body of a pregnant woman from conception to birth to be protected by the state.[80] The due process liberty interest of fetal life under state law may supersede a pregnant woman's decision to end her pregnancy any time prior to the fetus birth because unborn babies in the womb have a fundamental right to live.[81]

[65]Contra, Roe v, Wade, 410 U.S. 113
[66]Marcus, supra note 62
[67]Id.
[68]Id.
[69]Id.
[70]Roe v, Wade, 410 U.S. 113
[71]Contra, Roe v, Wade, 410 U.S. 113
[72]Marcus, supra note 62
[73]Id.
[74]Id.
[75]381 U.S. 479 (1965)
[76]*Contra*,Marcus, supra note 62
[77]Contra, id.
[78]Contra, id.
[79]Contra, *Roe v. Wade*, 410 U.S. 113
[80]*Contra*,Marcus, supra note 62
[81]Contra, id.

Even if most Americans believe that abortion should be available in the early stages of pregnancy, abortion tolerance is not properly permitted under state constitutions or the federal constitutionbecause an unborn baby has substantive due process liberty interest to live in her mother's womb without being aborted.[82]

Paul Benjamin Linton contends "it is long past time for the Court to reexamine and overrule *Roe v. Wade* and acknowledge the states' repudiation of Roe.[83] According to Linton, "the overwhelming majority of states have expressed their profound disagreement with (and rejection of) the abortion regime imposed upon them by the Court in *Roe*."[84] More specifically Linton declares "since *Roe v. Wade*, thirty-nine states have adopted resolutions calling for a federal constitutional amendment to overturn *Roe v. Wade*."[85]

V. CONCLUSION

Roe v. Wade deserves to be overruled by the Supreme Court as soon as possible because an unborn baby has an independent liberty interest to remain in the pregnant woman's body until birth without being terminated by an abortion. Although the abortion issue is extremely divisive,[86] antiabortion advocates must continue to make the case that unborn babies inside the mother's womb have a fundamental right to live. It is not plausible to contend that the decision whether to terminate a pregnancy by personal choice may be tolerated by the Constitution under relevant state law because the federal constitution should protect the unborn babies right to live in her mother's womb without being aborted..[87]Allowing abortion issues to be regulated exclusively by the states may encourage many states to become protectors of unborn babies by granting them a liberty right to live inside of the body of a pregnant woman from conception to birth without being aborted.[88] "In oral arguments last year, conservative justices, who hold a 6-to-3 majority on the court, seemed open to overturning *Roe v. Wade* and 50 years of jurisprudence that guarantees a fundamental right to abortion."[89] In my opinion a progressive and protective view of the due process liberty interest of the unborn baby should protect her from being aborted by her mother under either federal, state or local law. Protecting an unborn baby's liberty interest to live in her mother's womb without being aborted means neither a state or Congress may authorize abortions.

[82]Contra, id.
[83]Paul Benton Linton, Overruling Roe v. Wade Lessons From the Death Penalty, 48 Pepp. L. Rev. 261, 264 (2021). "Mr. Linton is an attorney in private practice who specializes in state and federal constitutional law, legislative consulting, and scholarly writing. He has submitted amicus curiae briefs on beginning-of-life and end-of-life issues in the United States Supreme Court, most of the federal courts of appeals, and more than one-half of all the state reviewing courts in the United States." Id. at 261 (f00tnote a1)
[84]Id. at 274 (citations omitted)
[85]Id. at 280-81.
[86]Marcus, supra note 62
[87]Printz v. U.S., 521 U.S. 898, 919 (1997).
[88]Meryl Kornfield, Caroline Anders and Audra Heinrichs, *Texas Created A Blueprint For Abortion Restrictions. Republican-controlled States May Follow Suit,* WASH. POST, (September 3, 2021), https://www.washingtonpost.com/nation/2021/09/03/texas-abortion-ban-states/
[89]Caroline Kitchener, Okla. Lawmakers Approve A Bill To Make Performing An Abortion Illegal, https://www.washingtonpost.com/politics/2022/04/05/okla-lawmakers-approve-bill-make-performing-an-abortion-illegal/?utm_source=alert&utm_medium=