

COMMONWEALTH OF MASSACHUSETTS

Suffolk, ss
County of Suffolk

Superior Court
No. 01-1647A

HILLARY GOODRIDGE, *et al.*,

Plaintiffs,

vs.

DEPARTMENT OF PUBLIC HEALTH,
et al.,

Defendants.

BRIEF OF *AMICUS CURIAE*
THE AMERICAN CENTER
FOR LAW AND JUSTICE

BRIEF OF *AMICUS CURIAE* THE AMERICAN CENTER
FOR LAW AND JUSTICE IN OPPOSITION TO PLAINTIFFS’
REQUEST TO DECLARE INVALID MASSACHUSETTS
LAW DISALLOWING SAME-SEX MARRIAGE

INTEREST OF *AMICUS CURIAE*

The American Center for Law and Justice (ACLJ) is a non-profit, public interest law firm and educational organization dedicated to protecting First Amendment freedoms, human life, and the traditional family. ACLJ attorneys have argued and participated as *amicus curiae* in numerous cases involving constitutional and statutory issues before the Supreme Court of the United States, lower federal courts, and State

courts throughout the Land. For example, ACLJ attorneys successfully argued against granting employee benefits to same-sex domestic partners of public employees in *Connors v. City of Boston*, 430 Mass. 31, 714 N.E.2d 335 (1999). In this present case, the ACLJ is very concerned about the attempted subversion of Massachusetts law and public policy regarding marriage and familial relationships as a means of furthering the gay rights and same-sex marriage agendas. The ACLJ is concerned that Plaintiffs are attempting to obtain by judicial fiat what they cannot obtain by statute. Judicial sanctioning of such an attempt would subvert Massachusetts law and public policy regarding marriage as well as undermine the will of the People of Massachusetts as expressed through their elected representatives. Courts should tread lightly when tinkering with what constitutes a valid marriage, and any decision to change the historic definition and understanding of marriage, even indirectly or subtly, should follow vigorous public debate of the matter by the People's elected representatives.

INTRODUCTION

This lawsuit is part of the gay rights strategy to undermine the Commonwealth's legitimate preference for, and support of, traditional marriage and to obtain, through the judiciary, state-recognized legitimacy for same-sex relationships mimicking common law marriage. In this matter, seven same-sex couples are attempting to accomplish by judicial fiat in the courts of this Commonwealth what gay rights advocates have been unable to accomplish by statute in any State or territory of the Land, *i.e.*, to have their

same-sex cohabitation, presently masquerading as a form of common law marriage, declared to be lawful marriages or the lawful equivalent of marriage. Yet, as the Supreme Judicial Court of Massachusetts noted in *Connors*, any legal adjustments to reflect changes in social arrangements which have occurred over the past few decades “must come from the Legislature” *Connors*, 430 Mass. at 42-42, 714 N.E.2d at 341-42.

ARGUMENT

I. MASSACHUSETTS RECOGNIZES TRADITIONAL MARRIAGE AS THE FUNDAMENTAL CORNERSTONE OF SOCIETY

The Commonwealth of Massachusetts recognizes marriage as being fundamental to society, and Massachusetts limits marriage to its traditional, historic understanding, *i.e.*, that only two persons of the opposite sex can become “married.”

Marriage is unquestionably a civil contract, founded in the social nature of man, and intended to regulate, chasten, and refine, the intercourse *between the sexes*; and to multiply, preserve, and improve the species. It is an engagement, by which *a single man and a single woman*, of sufficient discretion, take each other for husband and wife.¹

Inhabitants of Town of Milford v. Inhabitants of Town of Worcester, 7 Mass. 48, 52

(1810) (emphasis added). Yet, “[m]arriage is not merely a contract between the parties.

¹ “Husband” is defined as “a married man.” AMERICAN HERITAGE DICTIONARY 628 (2d College ed. 1991). “Wife” is commonly defined as “a woman married to a man.” *Id.* at 1381. Husband and wife are defined as correlative of each other. BLACK’S LAW DICTIONARY 741 (6th ed. 1990).

It is the foundation of the family. *It is a social institution of the highest importance. The Commonwealth has a deep interest that its integrity is not jeopardized.* *French v. McAnarney*, 290 Mass. 544, 546, 195 N.E. 714, 715 (1935) (emphasis added). As such, the Commonwealth may, as part of its police powers and for the overall good of all its citizens, enact legislation which furthers and favors the institution of marriage.

“The traditional police power of the States is defined as the authority to provide for the public health, safety, and morals” *Barnes v. Glen Theatre, Inc.*, 501 U.S. 560, 569 (1991). There is a “substantial government interest in protecting order and morality.” *Id.* There is a “right of the Nation and of the States to maintain a decent society” *Paris Adult Theatre v. Slaton*, 413 U.S. 49, 60 (1973) (quoting *Jacobellis v. Ohio*, 378 U.S. 184, 199 (1964) (Warren, C.J., dissenting)). “The State is not powerless to prevent or control situations which threaten the proper functioning of a family unit as an important segment of the total society.” *Commonwealth v. Brasher*, 359 Mass. 550, 557, 270 N.E.2d 389, 394 (1971). Hence, given the strong public policy interest in protecting and furthering the traditional family as the cornerstone of society, the Commonwealth of Massachusetts may take all reasonable steps to prefer and protect the traditional institution of marriage. That the institution of marriage is not perfect and may, in fact, exhibit some fragility (as evidenced, for example, by the divorce rate) does not negate its critical nature to society. Moreover, the very alleged fragility of marriage is a powerful argument for proceeding with great caution, lest society’s foundation

crumble further. Further, if the key institution underlying Massachusetts society is fragile, then even greater protection by the Commonwealth may be required, not the creation of artificial same-sex constructs which mimic marriage, but which cannot duplicate what traditional marriage does for society.

Plaintiffs in this case argue that they are denied benefits which accrue to those who are lawfully married because they are unable to marry under Massachusetts law. As such, Plaintiffs are focusing on the individualized legal benefits which flow from marriage, *whereas the Commonwealth's emphasis is on furthering and strengthening the institution of marriage which forms the cornerstone of society as a whole.* Any benefits which flow to lawfully married couples are intended to strengthen this key institution and thereby to benefit society as a whole, not to benefit the individuals within the marriage (even though they may coincidentally have such an impact). That such benefits also expand rights to individuals is an ancillary effect and not the goal. Instead, the Commonwealth's goal in furthering traditional marriage is to reinforce the foundation of Massachusetts society as a whole, a benefit which accrues to all citizens of Massachusetts, including the same-sex couples in this case. Hence, to the extent that Massachusetts society is strengthened by State law and public policy concerning marriage, Plaintiffs in this case are already reaping a benefit from the law favoring traditional marriage.

Plaintiffs' contrary reasoning appears to boil down to this: the Commonwealth gives certain benefits to lawfully married couples that it does not give to other couples; what the Commonwealth has done is unfair to those who may not lawfully marry; therefore, the court should strike down Massachusetts marriage law as it exists and extend the same benefits to every couple that it now extends only to lawfully married couples.² *Such reasoning presumes that traditional marriage is no more efficacious to society than other relationships, a belief not shared historically by the Commonwealth.*

² Changing the traditional concept of marriage may have numerous unintended, social consequences:

If one removes th[e] core concept [of marriage as the union of a man and a woman], ... [i]nstead of a unique community, marriage becomes one more relationship. And why should this relationship be so special? If it has no necessary connection to children, or even to sex, what makes it different from an ordinary friendship? Friendships are multiple; why limit marriage to two persons? Sexual relationships can be multiple; why promote exclusivity? Relationships can come and go, and reasonably so; why promote permanence? If marriage is a freely chosen relationship unconnected to sex, children, exclusivity or permanence, why have legal marriage at all?

David Orgon Coolidge & William C. Duncan, *Reaffirming Marriage: A Presidential Priority*, 24 Harv. J.L. & Pub. Pol'y 623, 639 (2001) (hereafter, "Coolidge") (citing Stanley N. Kurtz, *What is Wrong with Gay Marriage*, Commentary, Sept. 2000, at 35 (Kurtz argues that same-sex "marriage" opens the door to "polyamory")). Professor David Chambers of the University of Michigan has written in support of changing the traditional concept of marriage:

"If the law of marriage can be seen as facilitating the opportunities of two people to live an emotional life that they find satisfying - rather than as imposing a view of proper relationships - the law ought to be able to achieve the same for units of more than two. . . . By ceasing to conceive of marriage as a partnership composed of one person of each sex, the state may become more receptive of units of three or more All desirable changes in family law need not be made at once."

Coolidge at 640 (quoting David L. Chambers, *What if? The Legal Consequences of Marriage and the Legal Needs of Lesbian and Gay Male Couples*, 95 Mich. L. Rev. 447, 490-91 (1996)) (emphasis added).

See, e.g., Inhabitants of the Town of Milford, 7 Mass. at 52 (an 1810 decision describing marriage as an institution “intended to regulate, chasten, and refine, the intercourse between the sexes It is an engagement, by which a single man and a single woman take each other for husband and wife”); *French*, 290 Mass. at 546, 195 N.E. at 715 (describing marriage as “the foundation of the family[,]” “a social institution of the highest importance”).

While it may be tempting at first blush to respond affirmatively to a plea for “fairness” in extending benefits to unmarried couples (after all, who wants to be accused of being *unfair* in applying the law), such reasoning is severely flawed. Many laws discriminate in their effects, and discrimination *per se* is not necessarily unlawful. Under Plaintiffs’ reasoning, for example, one could legitimately challenge the “fairness” of the Commonwealth’s graduated income tax system. After all, using such reasoning, why is it not *unfair* (and discriminatory) that some citizens are required to pay taxes at a higher tax rate than other citizens, thereby paying a higher percentage of their income to the Commonwealth’s coffers? Or, yet again, why should a taxpayer with one child receive fewer personal exemptions than a taxpayer with a large family, thereby bearing a disproportionate share of the tax burden? Is it not *unfair* (and discriminatory) to force the taxpayer with the single child to subsidize the larger family by paying a higher percentage of his income in taxes? One could also challenge the provision of welfare benefits. After all, why is it not *unfair* (and discriminatory) for one citizen of Massachusetts to receive

welfare benefits from the Commonwealth's coffers when other citizens are denied identical benefits?

Such a list of “unfairness horrors” could go on and on. This is especially true when one considers that there are usually multiple policy options which could be adopted to meet society's needs. At some point, the People's representatives in the State Legislature must determine what is best for Massachusetts society as a whole, and it falls to the legislators, as representatives of the People of Massachusetts, to decide how best to serve the People's interests and meet their legitimate needs. *This the Massachusetts Legislature has already done concerning marriage. See discussion, infra.* The Supreme Judicial Court of Massachusetts noted in *Connors* that the make-up of “family” has changed over the past 30-40 years, but concluded that “[a]djustments in the legislation to reflect these new social and economic realities must come from the Legislature” *Connors*, 430 Mass. at 42-42, 714 N.E.2d at 341-42. As such, the judiciary should not second-guess the Massachusetts Legislature regarding the law and public policy concerning lawful marriage. That responsibility resides rightly and solely in the Legislature. *See discussion, infra.*

II. THE MASSACHUSETTS LEGISLATURE HAS THE RIGHT TO REGULATE THE INCIDENTS OF MARRIAGE FOR THE OVERALL BENEFIT OF SOCIETY

The Massachusetts Legislature determines what constitutes a lawful marriage within the Commonwealth: “What marriages between our citizens shall be recognized as valid in this Commonwealth is a subject within the power of the Legislature to regulate.”

Commonwealth v. Lane, 113 Mass. 458, 462-63 (1873). Further, “Massachusetts has a strong public interest in ensuring that its rules governing marriage are not subverted.” *Green v. Richmond*, 369 Mass. 47, 51, 337 N.E.2d 691, 695 (1975) (citing *French*, 290 Mass. at 546). *Subverting the Commonwealth’s rules governing marriage is at the heart of this case.*

Marriage is a special and unique relationship between one man and one women. Yet, even though marriage is uniquely *heterosexual* in nature, not every heterosexual relationship constitutes a marriage or meets the standards of lawful marriage in Massachusetts. For example, the Commonwealth does not recognize so-called common law marriages. *Davis v. Misiano*, 373 Mass. 261, 366 N.E.2d 752 (1977). From this it follows that the Commonwealth also does not recognize as constituting lawful marriage heterosexual cohabitation which lacks the stability and mutual commitment of common law marriage. The fact that not every relationship between heterosexuals merits favor from the Commonwealth helps put to rest arguments that the Commonwealth’s ban on same-sex marriage reflects the majority’s hatred of, or malice towards, homosexuals. Such a conclusion is simply a gross *non sequitur*.

The Commonwealth, in the interest of the overall welfare of its citizens, regulates which persons of the opposite sex may lawfully marry and under what conditions. For example, the Commonwealth has established consanguinity and affinity standards which limit who may marry whom. MASS. GEN. L. ch. 207, §§ 1-2 (2001). Although there is no explicit “male-may-not-marry-male” or “female-may-not-marry-female” prohibition in

the statute, the historic definition of the term “marriage,” *see Inhabitants of Town of Milford*, 7 Mass. at 52 (marriage involves “a single man and a single woman” who “take each other for husband and wife”); MERRIAM WEBSTER’S COLLEGIATE DICTIONARY 713 (10th ed. 1993), automatically precludes such an understanding, thereby making its mention superfluous.

The Commonwealth regulates other aspects of marriage as well. The Commonwealth has established 18 as the age when persons may lawfully marry. MASS. GEN. L. ch. 207, § 7 (2001). The Commonwealth proscribes polygamous marriages. MASS. GEN. L. ch. 207, § 4 (2001). The Commonwealth determines what marriages are void and voidable. *See, e.g.*, MASS. GEN. L. ch. 207, §§ 8-11, 14 (2001). The Commonwealth also establishes how, and on what bases, a lawful marriage may be terminated. *See, e.g.*, MASS. GEN. L. ch. 208, §§ 1, 1A, 1B, 4, 6B (2001). As such, the Legislature is fully capable of amending the laws regarding marriage if it determines that changes are called for.

III. CHILDREN RAISED IN HOUSEHOLDS OF SAME-SEX PARTNERS FARE DIFFERENTLY THAN CHILDREN RAISED IN HOUSEHOLDS WITH MARRIED PARENTS

There is a great deal of contradictory information afoot concerning the impact on children living in same-sex couple households. For example, J.R. Harris, in her book, *THE NURTURE ASSUMPTION: WHY CHILDREN TURN OUT THE WAY THEY DO*, asserts there is no meaningful difference between children raised in same-sex partner households and children with a mother and father living together. *See* Robert Lerner, Ph.D., and Althea

K. Nagai, Ph.D., *No Basis: What the Studies Don't Tell Us About Same-Sex Parenting*, Marriage Law Project,³ January 2001, at 6 (hereafter, "Lerner") (citing J.R. HARRIS, *THE NURTURE ASSUMPTION: WHY CHILDREN TURN OUT THE WAY THEY DO* 51 (1998) ("[C]hildren with two parents of the same gender are as well adjusted as children with one of each kind."); Judith Stacey, *Virtual Truth with a Vengeance*, *Contemporary Sociology: A Journal of Reviews* 28, 1999, at 21 ("thus far the research on the effects of lesbian parenting on child development is remarkably positive and therefore challenging [the status quo]"); see also Lynn D. Wardle, *The Potential Impact of Homosexual Parenting on Children*, 1997 U. ILL. L. REV. 833, 844 (1997)⁴ (hereafter, "Wardle") (citing Charlotte J. Patterson, *Adoption of Minor Children by Lesbian and Gay Adults: A Social Science Perspective*, 2 DUKE J. GENDER L. & POL'Y 191, 195 (1995) (the studies have "failed to produce conclusive evidence that children of lesbian mothers or gay fathers have significant difficulties in development" but show instead that "children of lesbian mothers . . . develop normally"); Bonnie R. Strickland, *Research on Sexual Orientation and Human Development: A Commentary*, 31 *Development* 137, 139 (1995) (stating that "when differences do emerge, they are most likely in favor of lesbian families"))).

³ This is an extensive critique of the seriously flawed social science research methodology used in the various studies purporting to establish that children are not adversely affected by living in same-sex households.

⁴ This article also points out the numerous, serious procedural violations in the studies which conclude that same-sex parenting has little if any adverse impact on children.

Yet, “[m]ost of the studies of homosexual parenting are based on very unreliable quantitative research, flawed methodologically and analytically (some of little more than anecdotal quality), and provide a very tenuous empirical basis for setting public policy.” Wardle at 844; *see also* Lerner and note 3, *supra*. In fact, “studies indicate that children raised by parents engaged in homosexual relationships are at substantially greater risk (at least 3.5 to 7 times heightened risk) of being drawn in to homosexual behavior themselves.” Wardle at 851. Further,

[m]isunderstanding and misinterpretation of statistical analysis is common. For example, one study that reported that nine of twenty-five children of lesbian mothers reported same-sex attraction, but only four of twenty children of heterosexual mothers reported same-sex attraction, ignored the significant statistical fact that it is highly improbable that two random samples would produce such ratios.

Wardle at 851.

Judith Stacey and Timothy Biblarz, two University of Southern California sociology professors who describe themselves as “personally oppose[d to] discrimination on the basis of sexual orientation,” take issue with many of the studies which assert that there is no difference among children raised in same-sex households and those raised in traditional family households. Judith Stacey & Timothy J. Biblarz, *(How) Does the Sexual Orientation of Parents Matter?*, 66 *American Sociological Review*, April 2001, at 161, 170 (noting that “at least 15 intriguing, statistically significant differences in gender behavior and preference among children . . . in lesbian and heterosexual single-mother homes” were found in a 1986 study, yet the study concluded that “[n]o significant

differences were found between the two types of households”; likewise in a 1997 study, “an arresting continuum of data [were] reported, but ignored”), 171 (noting that a 1997 study found that “adolescent and young girls raised by lesbian mothers appear to have been more sexually adventurous and less chaste, whereas the sons of lesbians evince the opposite pattern In other words, . . . children (especially girls) raised by lesbians appear to depart from traditional gender-based norms, while children raised by heterosexual mothers appear to conform to them”).

The questionable nature of the research instruments casts doubt on the results of studies which assert that children are not affected by living in same-sex households, and Courts should be wary of relying on such flawed data for decisions which radically affect social mores and the institution of marriage which underlies the whole of society.

Since the data do not confirm that same-sex parenting does not adversely affect children (and suggest, instead, that living in same-sex households may, in fact, be harmful), before a Court of this Commonwealth acts to change marriage law, the burden should fall on the advocates of changing the law to establish *by sound empirical evidence* that neither the children of this Commonwealth nor Massachusetts society as a whole will be adversely affected by any changes to Massachusetts law and public policy concerning what constitutes lawful marriage. Until it can be proven by convincing evidence based on sound empirical research that changing Massachusetts marriage law will not harm Massachusetts society, the Commonwealth has a legitimate societal interest in preferring and furthering lawful marriage as opposed to other relationships, and the authority to

promulgate policy that furthers the interests of Massachusetts society as a whole rightly resides in the Massachusetts Legislature, not in the courts of the Commonwealth.

IV. SIGNIFICANT PROBLEMS ARE ASSOCIATED WITH THE GAY LIFESTYLE AND SAME-SEX RELATIONSHIPS WHICH STATE LAW AND PUBLIC POLICY MAY LEGITIMATELY SEEK TO MINIMIZE

Same-sex relationships tend to be more destructive than other relationships, *see, e.g.,* JEFFREY SATINOVER, M.D., *HOMOSEXUALITY AND THE POLITICS OF TRUTH* (hereafter, “HOMOSEXUALITY”) 49-60 (1996), and the Massachusetts Legislature may, in the prudent exercise of its police powers, legitimately act to minimize such effects on society as a whole. For example, “epidemiologists estimate that 30 percent of all twenty-year-old homosexual males will be HIV-positive or dead of AIDS by the time they are thirty.” *HOMOSEXUALITY* at 57 (citing E.L. GOLDMAN, *Psychological Factors Generate HIV Resurgence in Young Gay Men*, *Clinical Psychiatric News*, October 1994, at 5). The above statistic “means that the incidence of AIDS among twenty- to thirty-year-old homosexual men is roughly 430 times greater than among the heterosexual population at large.” *HOMOSEXUALITY* at 57. Hence, there is ample evidence that same-sex relationships bring increased health risks. Further, the most rigorous single study – the Multicenter AIDS Cohort Study – recruited nearly 5,000 men and found that “a significant majority . . . reported having 50 or more lifetime sexual partners” *HOMOSEXUALITY* at 55 (quoting R.A. Kaslow *et al.*, *The Multicenter AIDS Cohort Study: Rationale, Organization, and Selected Characteristics of the Participants*, *American Journal of Epidemiology* 126, no.2, August 1987, at 310-18). Another study of

homosexual pairs, itself researched and written by a homosexual couple, found the following concerning the 156 same-sex couples studied:

[O]nly seven had maintained sexual fidelity; of the hundred couples that had been together more than five years, none had been able to maintain sexual fidelity. The authors noted that “[t]he *expectation for outside sexual activity was the rule for male couples and the exception for heterosexuals.*”

HOMOSEXUALITY at 55 (quoting D. MCWHIRTER and A. MATTISON, THE MALE COUPLE: HOW RELATIONSHIPS DEVELOP 3 (1984)) (emphasis added). Continuing in that vein, “[a] 1981 study revealed that only 2 percent of homosexuals were monogamous or semi-monogamous – generously defined as ten or fewer lifetime partners.” HOMOSEXUALITY at 55 (citing A.P. BELL *ET AL.*, SEXUAL PREFERENCE (1981)). Further,

a 1978 study found that *43 percent of male homosexuals estimated having sex with five hundred or more different partners and 28 percent with a thousand or more different partners.* Seventy-nine percent said that more than half of these partners were strangers and 70 percent said that more than half were men with whom they had sex only once.

HOMOSEXUALITY at 55 (citing A.P. BELL & M.S. WEINBERG, HOMOSEXUALITIES: A STUDY OF DIVERSITY AMONG MEN AND WOMEN 308-9 (1978)) (emphasis added). There is also no evidence that changing marriage laws would change this risky behavior. *See, e.g.*, HOMOSEXUALITY at 55 (quoting D. MCWHIRTER and A. MATTISON, THE MALE COUPLE: HOW RELATIONSHIPS DEVELOP 3 (1984) (noting that “[t]he expectation for outside sexual activity was the rule for male couples and the exception for heterosexuals”)). There is, in fact, evidence that changing marriage law would result in an increased incidence of promiscuous sex. *See note 2, supra.*

In light of the above, the Massachusetts Legislature may – to further the health and morals of the Commonwealth – legitimately take steps to reinforce traditional marriage, the cornerstone of Massachusetts society, while declining to take steps which encourage relationships destructive to society’s interests, such as same-sex relationships. Further, the critical policy debate over same-sex marriage is not about recognizing individual exceptions or permitting same-sex marriages only in exceptional circumstances (such as, where there appear to be no such destructive tendencies). Rather, the advocates of same-sex marriage are seeking to establish a general policy and rule of law in Massachusetts (and, ultimately, throughout the Land) to make same-sex relationships mimicking common law marriage fully equal to lawful marriage. The Courts of this Commonwealth are not the place to change the marriage laws of Massachusetts. *Connors*, 430 Mass. at 42-42, 714 N.E.2d at 341-42 (noting that any legal adjustments to reflect changes in social arrangements which have occurred over the past few decades “must come from the Legislature . . .”). Such responsibility rightly and solely resides in the Massachusetts Legislature, and no change should be made absent vigorous public debate by the People of Massachusetts as represented by their elected representatives.

CONCLUSION

WHEREFORE, in light of the foregoing, *Amicus Curiae* The American Center for Law and Justice respectfully urges this Court to dismiss this case as presenting a nonjusticiable political matter whose resolution lies solely within the ambit of the Legislature of this Commonwealth. *Amicus Curiae* further urges this Court to reaffirm the strong public policy of the Commonwealth of Massachusetts favoring traditional marriage and the critical, foundational role that marriage, as traditionally understood, serves in undergirding a strong society, which, in turn, benefits every citizen of the Commonwealth, including Plaintiffs in this lawsuit.

DATED: _____, 2001

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned hereby certifies that on the ____ day of _____, 2001,
two true and exact copies of the **BRIEF OF AMICUS CURIAE THE AMERICAN
CENTER FOR LAW AND JUSTICE IN OPPOSITION TO PLAINTIFFS’
REQUEST TO DECLARE INVALID MASSACHUSETTS LAW DISALLOWING
SAME-SEX MARRIAGE** have been forwarded to the person(s) listed below:

XXXX
XXX
XXX

by the method identified as follows:

- U.S. Mail, Postage Prepaid
- Hand Delivered
- Overnight Delivery Service
- Certified Mail, Return Receipt Requested
- Facsimile

Robert W. Ash