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Ruth Bader Ginsburg: Soldier of Social Justice

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Abstract: Ruth Bader Ginsburg, who lived and witnessed inequalities of all sorts (gender, race, disability, etc.) across all spectrums of American society fought like a soldier for equal protection and social justice under the Constitutional principles during her entire judicial career. This article aims to highlight some of her landmark achievements and their profound impact on restoring social justice as a reminder to ongoing polarized racial tensions exemplified by Black Lives Matter movement, police brutality, Proud Boys movement, and voter disenfranchisement efforts in 2020 presidential elections.

Keywords: *Ginsburg, RBG, Equal justice, Constitution, Social justice, Handicapped, Reproductive rights, Supreme Court, Judicial philosophy, Jurisprudence, Sandra O'Connor*

1. Introduction

President George Washington's 1789 Judiciary Act launched the United States federal courts' system and the U.S. Supreme Court holds the final judicial authority. Since its establishment, the Supreme Court has maintained a major and controversial role on any array of public matters including but not limited to citizenship, gender equity, police and prosecutorial discretion—some of which may have been unforeseeable to the Framers. History has documented the Supreme Court's role in helping the country move forward as a bastion of justice and liberty, yet its makeup has lacked the gender diversity for nearly the next two centuries. Nominated by President Reagan, Justice Sandra Day O'Connor was confirmed in 1981 as 102nd Justice—and first woman justice—to serve on the Supreme Court until her retirement on January 31, 2006. Another ground-breaking nomination was of Justice Ruth Bader Ginsburg by President Clinton in 1993 who was confirmed by the overwhelming senate majority (96-3) and served until her recent passage on September 18, 2020.

Of the two, Justice Ruth Bader Ginsburg has become synonymous with the fight for gender equality in our society. Her efforts to ensure equal pay, inclusion in predominantly male spaces, same-sex marriages, abortion and affirmative action reflect a person committed to progressively advancing and keeping America's ideals of freedom and justice for all. Despite her association with more progressive issues over the course of her career, she has equally found a balance between a stricter and more uniform interpretation of the Constitution on issues typically ascribed to conservative judges.

Justice Ginsburg's first majority decision upon her appointment to the Supreme Court in the United States v Virginia revealed her commitment to gender equality and fairness (Oyez, 2020). This case against the Virginia Military Institute focused on its failing policy to provide an equal and fair educational environment for all of its students. The Court's 7-1 ruling was the centerpiece of a decades-long fight by Ginsburg to address the equity clause written into the Fourteenth Amendment (Greenhouse, 2020). Her majority opinion endeared her to the American people as she laid out the plight and rights denied previously to all of American's citizens. She opined that "generalizations about 'the way women are,' estimates of

what is appropriate for most women, no longer justify denying opportunity to women whose talent and capacity place them outside the average description."[1]

Over the latter course of the twentieth century, Ginsburg continued fortifying the rights of America's most vulnerable and inspiring adoration and respect across the aisle. She forged relationships with ideological adversaries like Justice Antonin Scalia, whose conservatism often clashed with her own, and continued to protect and advance American political thought and law (Cox, 2020). Her defense of the rights of same-sex couples in marriage in *United States v. Windsor*[2] and blocking president Trump from ending DACA (Deferred Action for Childhood Arrivals) in June 2020 (Williams & Edelman 2020) only added to her appeal.

Despite her role in landmark rulings, Justice Ginsburg has been criticized by some. For example, her votes with conservative justices in *Samson v. California*[3], *Weinberger v. Wiesenfeld*[4], and *Califano v. Goldfarb*[5] have drawn the ire from critics who questioned her commitment to intersectional politics. Justice Ginsburg has also attracted criticism from both conservatives and liberals alike for her comments on former quarterback Colin Kaepernick's decision to kneel during the national anthem and her thoughts on President Trump, whom she referred to as a faker (Biskupic, 2016). Like any public figure, there has been a tendency to analyze and sometimes rationalize their legacy and decide how to view the said person in memoriam. In the end, Justice Ginsburg should be remembered for her courageous, crafty, and laser sharp commitment to the betterment of all genders in America. Her career reflects the progressive politics that is now in jeopardy with the replacement of conservative Justice Amy Coney Barrett, who was nominated by president Trump and confirmed by the GOP partisan vote (52-48) on October 26, 2020 (Ngangura 2020).

2. Early Experiences and Achievements

Justice Ginsberg has undergone several complexities of her identity in 20th century America—as a Jewish, a woman and a mother (Goldberg, 1993). As a young woman of 17 years, she witnessed the firsthand effects of gender discrimination in a microcosm during her mother's funeral service, as she was denied from participating in the prayer service (minyan) for the deceased (Fields & Stapleton 2020). The indignities of her suffering continued over the years. Ginsburg went on to graduate from Cornell University where she met her husband and lifetime supporter Marty Ginsburg. She followed Marty to Oklahoma and while she was pregnant with first daughter, applied for a position of claims adjuster for the Social Security Office (Carmon & Knizhnik 2015). Once her superior became knowledgeable of her pregnancy, her pay grade was drastically reduced from G-5 to G-2—the lowest rank in the office. Undaunted by this action, Ginsberg decided to pursue a law degree at the prestigious Harvard Law School and upon her admission realized that she was one of the only nine women in a male dominant program.

Ginsburg also remembered the sexist remarks she and other women faced as law students from male administrators like Dean Erwin Griswold who questioned their intention for taking the so-called men's places (Pressman 1997). Undeterred by such assaults, she acclaimed to serve the head of both journals of Harvard Law Review and Columbia Law Review; and graduated as first in her class from Columbia Law School in 1959 at the age of 26. Even then, Ginsburg had to struggle to find work in male dominant occupational field as it was made clear to her by Supreme Court Justice Felix Frankfurter that "He wasn't

[1] *United States v. Virginia*, 518 US 515 (1996). Retrieved on 12/2/20 from http://law2.umkc.edu/faculty/projects/ftrials/conlaw/vmi.htm

[2] *United States v. Windsor*, 570 US 744 (2013). Retrieved on 12/2/20 from https://www.quimbee.com/cases/united-states-v-windsor

[3] *Sampson v. California*, 547 US 843 (2006). Retrieved on 12/2/20 from https://supreme.justia.com/cases/federal/us/547/843/

[4] *Weinberger v. Wiesenfeld*, 420 US 636 (1975). Retrieved on 12/2/20 from https://supreme.justia.com/cases/federal/us/420/636/

[5] *Califano v. Goldfarb*, 430 US 199 (1977). Retrieved on 12/2/20 from https://supreme.justia.com/cases/federal/us/430/199/

ready to hire a woman." (Pullman 2020). Ginsburg apparently developed resistance to such attacks early on. She "often repeated her mother's advice that getting angry was a waste of your own time. Even more often, she shared her mother-in-law's counsel for marriage: that sometimes it helped to be a little deaf" (Carmon & Knizhnik 2015, p. 5).

Helped by her college professor, Ginsburg got the position of a clerk under Judge Edmund L Palmieri of the U.S. District Court for the Southern District of New York, which unfolded opportunities including her co-authoring a book on Sweden's legal system (Pullman 2020); and, serving as a professor at Rutgers Law School in 1963 (Pressman, 1997). While working with the American Civil Liberties Union (ACLU) she argued on the nation's first gender discrimination suit, *Moritz v Commissioner of Internal Revenue*[6]. The taxpayer, Charles E. Mortiz sued the Internal Revenue Service (IRS) on the grounds that he should have received a tax break for his dependent mother's care in the same way a single woman would in that same predicament. Inspired by the case, both Ruth Ginsburg and Martin Ginsburg teamed up as attorneys for the case. Ginsburg penned the brief arguing against the discriminatory statute. The government argued that Mr. Moritz was not entitled to deduction since he was a single, never married man and that the deduction is limited to a "woman, a widower or divorce, or a husband whose wife is incapacitated or institutionalized." In the end, the U. S. Court of Appeals, Tenth Circuit, concluded on November 22, 1971 that "the taxpayer was entitled to the deduction claimed" and Internal Revenue Service had to change its policy. This was the first time for a court to declare the unconstitutionality of a provision in the IRS code (Thulin, 2018) that laid foundation to Ginsburg's future litigation strategies to shape social justice for all Americans.

Ginsburg, then law professor at Rutgers, co-founded the ACLU Women's Rights Project in 1972 and continued her participation until she was appointed to the federal bench in 1980. During this decade "as a lawyer and advocate for equality, Ginsburg had received widespread recognition as the architect of the litigation strategy that effected a profound change not only in the law, but also in the mindset of many leading jurists, including the Justices of the United States Supreme Court" (Campbell 2002, p. 239).

3. Contributions to Social Justice

1. As an Attorney: Ginsburg was inspired by the legacies of women activists like Pauli Murray, Dorothy Kenyon and Betty Friedan among others (Faust 2018; Strum 2020) as evident from her 1971 amicus brief for *Reed v Reed*, that led the Supreme Court to acknowledge women for the first time as victims of sexual discrimination (Waxman, 2020). The case involved petitions of Sally Reed for her appointment as administratrix and of her separated husband Cecil Reed as administrator to manage the estate of their deceased son, Richard Lynn Reed, who committed suicide on interstate in Ada County, Idaho on March 29, 1967. The Idaho law (sec. 15-314) and the state court ruling supported preference to males over females (though implicitly recognized the equality of entitlement of the two applicants under sec. 15-312), thus favoring Cecil Reed. Sally Reed appealed the decision all the way to the U.S. Supreme Court and the brief was coauthored by Ginsburg with Melvin L. Wulf, Pauli Murray, and Dorothy Kenyon. Ginsburg wrote the denial of Sally Reed as administratrix of her son's estate solely because of her sex "constitutes arbitrary and unequal treatment proscribed the Fourteenth Amendment of the Constitution" (Campbell 2002, p. 170). Chief Justice Warren Burger agreed and wrote in his opinion delivered on November 22, 1971 that, "Having examined the record and considered the briefs and oral arguments of the parties, we have concluded that the arbitrary preference established in favor of males by sec. 15-314 of the Idaho Code cannot stand in the face of the Fourteenth Amendment's command that no State deny the equal protection of the laws to any person withing its jurisdiction." [7] And, the judgment of the Idaho Supreme

[6] Moritz v. C.I.R., 469 F.2d 466 (1972), Retrieved on 12/14/20 from https://www.leagle.com/decision/1972935469f2d4661808

[7] *Reed v. Reed*, 404 US 71 (1971), Retrieved on 12/16/20 from https://www.leagle.com/decision/1971475404us711460

Court was reversed—a ruling that the U.S. Supreme Court held for the first time to protect women's rights in 103-year history of the Fourteenth Amendment's Equal Protection Clause.

Ginsburg argued six cases involving women's rights before the U.S. Supreme Court between 1973 and 1976 and won five of them (Roland 2016, p. 23). *Frontiero v Richardson*[8] was the first case that Ginsburg argued before the Supreme Court (Blakemore 2018). This case involved Lt. Sharron Fontiero of the U. S. Air Force, whose claim for her husband Joseph as a "dependent" to secure housing and medical benefits was denied. Generally, when a male spouse applied for benefits from the military, no inquiry was conducted into wife's earnings since it was automatically assumed her to be a dependent; however, when a female applied for benefits for her husband, the inquiry was inevitable to determine his dependent status. Upon losing her case in Federal District Court, Frontiero appealed directly to the U.S. Supreme Court, contending that the statutes under 37 USC Sections 401 and 403 and 10 USC Sections 1072 and 1076 deprived servicewoman of due process. Arguing on the behalf of Sharon Frontiero's husband, Ginsburg flipped the paradigm, suggesting that men too could be victims of gender discrimination, invoking the history of *Plessy v Ferguson* as an instance of the Supreme Court wrongfully attributing ability to skin and in this case gender. The long laborious fight yielded favorable decision from the Supreme Court. While reversing the decision of the Federal District Court, Justice William Brennan wrote in the majority opinion that "As a result of notions such as these, our statute books gradually became laden with gross, stereotyped distinctions between the sexes, and, indeed, throughout much of the 19th century, the position of women in our society was, in many respects, comparable to that of blacks under the pre-Civil War slave codes. … We therefore conclude that … the challenged statutes violate Due Process Clause of the Fifth Amendment insofar as they require a female member to prove the dependency of her husband."[9] The crux of Ginsburg's argument in this case was to reform outdated and unproven assumptions about gender inequality.

Weinberger v Wiesenfeld[10] in 1975 was yet another example of Ginsburg's genius in reshaping the legal landscape (Duck, 2018). This case involved Stephen C. Weisenfeld, a widower, who applied for Social Security survivors' benefits for himself and his infant son Jason Paul after the death of his wife Paula on June 5, 1972 in childbirth. He received benefits only for his son and not himself because under the existing Social Security Act 402(g) such benefits were available only to women. Hence, the suit was filed in a Federal District Court for the District of New Jersey and its decision was appealed to the U.S. Supreme Court. Arguing on behalf of Wiesenfeld, Ginsburg challenged the existing discriminatory clause 402(g) that was based solely on sex and sought declaration of its unconstitutionality since it violates the Due Process Clause of the Fifth Amendment. Justice William Brennan delivered the Court opinion, "And a father, no less than a mother, has a constitutionally protected right to the 'companionship, care, custody, and management' of 'the children he has sired and raised, [which] undeniably warrants deference and, absent a powerful countervailing interest, protection'."[11] Therefore, "Like the statutes there, 'b[y] providing dissimilar treatment for men and women who are … similarly situated, the challenged section violates the [Due Process] Clause'."[12] This ruling helped Ginsburg as she collected and presented subsequent cases in a similar vein.

Ginsburg saw the stereotypes entrenched in the legislation when she argued in *Craig v Boren*[13] in 1976 against Oklahoma drinking laws that mandated the minimum age for sale of "nonintoxicating" 3.2% beer at 21 years for males and 18 years for females. Curtis Craig, a male between 18 and 21 years, and Carolyn Whitener, a licensed vendor for 3.2% beer filed suit against David Boren, Governor of Oklahoma in the

[8] *Frontiero v. Richardson,* 411 US 677 (1973), Retrieved on 12/16/20 from https://supreme.justia.com/cases/federal/us/411/677/
[9] Ibid. at pp. 685, 690-691.
[10] Weinberger v. Wiesenfeld, 420 US 636 (1975). Retrieved on 12/19/20 from https://supreme.justia.com/cases/federal/us/420/636/
[11] Ibid. p. 652.
[12] Ibid. p. 653.
[13] Craig v. Boren, 429 US 190 (1976. Retrieved on 12/19/20 from https://supreme.justia.com/cases/federal/us/429/190/

Federal District Court for the Western District of Oklahoma on December 20, 1972 on the grounds of violation of 14th Amendment's Equal Protection Clause. Since the district court upheld the state statute, Craig appealed to the U.S. Supreme Court. The Court ruled that "Oklahoma's gender-based differential constitutes an invidious discrimination against males 18-20 years of age in violation of the Equal Protection Clause"[14] and reversed the judgment of the Federal District Court. The decision, which then required the Supreme Court to review cases with gender classifications using intermediate scrutiny— "a lower overall threshold to justify a law that affects the class" under equal protection challenge to undertake a legitimate interest (Pippala 2016).

Ginsburg continued her mission, further solidifying her prowess in subsequent cases such as *Duren v Missouri*[15], wherein the Missouri law for jury selection system afforded women an additional opportunity to decline service either "by returning the summons or by simply not reporting for jury duty" was successfully challenged; and, *Orr v. Orr*[16], the first case to challenge the Alabama statute that required only husbands but not wives to pay alimony upon divorce as in violation of the 14th Amendment's Equal Protection Clause. Though not widely referenced in literature, cases such as *Cox v Stanton*[17] serve as a testament to Ginsburg's commitment social justice across color lines. In the case of *Cox v Stanton,* Nial Ruth Cox, a 27-year-old black woman was forced to undergo temporary sterilization, shortly after her 18th birthday and gave birth to a daughter, for which her mother consented since the welfare worker who allegedly told her she would not receive welfare benefits otherwise. However, defendant Stanton performed an irreversible bilateral salpingectomy sterilization on Cox as opposed to the authorized tubal ligation, on February 19, 1965. The case was brought before the Federal District Court for the Eastern District of North Carolina in 1973, and Ginsburg offered her help on the amicus brief, arguing that the state of North Carolina had violated Cox's rights, but by 1974 failed to garner a victory since the time limits for North Carolina statutory limits expired. Likewise, in the1974 U.S. Supreme Court ruling in *Geduldig v Aiello*[18] held that "pregnancy discrimination is not sex discrimination under the Equal Protection Clause of the Fourteenth Amendment" (Manian 2016) –yet another challenge for Ginsburg to overcome. Nonetheless, she believed that "the habits of a vigorous mind are formed in contending with difficulties" (quoted in Korr 2020).

In the case of *Struck v Secretary of Defense*[19], Susan R. Struck, an Air Force Captain and a pregnant woman, filed suit in the Federal District Court for the Western District of Washington to prevent unlawful discharge of pregnant officers from military service, but the District Court concluded that her discharge under the existing Air Force regulation was reasonable and constitutional. Ginsburg wrote, "Until very recent years, jurists have regarded any discrimination in the treatment of pregnant women and mothers as 'benignly in their favor.' But in fact, restrictive rules, and particularly discharge for pregnancy rules, operate as 'built-in headwinds' that drastically curtail women's opportunities" (Link, 2020). The eventual persuasion of the Justice Department's top legal counsel, the Solicitor General, resulted in waiving Struck's discharge and changing the Air Force pregnancy regulation. Though Supreme Court never heard the case, it paved way for the historic case of *Roe v Wade* which was ruled on months later (Link 2020). Thus, Ginsburg's values focused on correcting the institutional challenges that permeated women's personal lives from pregnancy to equal pay and opportunity.

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[14] Ibid. p. 191.

[15] *Duren v Missouri*, 439 US 357 (1979), Retrieved on 12/20/20 from https://supreme.justia.com/cases/federal/us/439/357/

[16] Orr v. Orr, 440 US 268 (1979). Retrieved on 12/20/20 from https://supreme.justia.com/cases/federal/us/440/268/

[17] Cox v. Stanton, 381 F. Supp. 349 (1974). Retrieved on 12/20/20 from http://ecases.us/case/nced/2005610/cox-v-stanton

[18] Geduldig v. Aiello, 417 US 484 (1974). Retrieved on 12/21/20 from https://www.cambridge.org/core/books/feminist-judgments/geduldig-v-aiello-417-us-484-1974/47351E5D62E43AA896160DFFCBCBA420

[19] Struck v. Secretary of Defence, 460 F.2d 1372 (1971). Retrieved on 12/21/20 from https://openjurist.org/460/f2d/1372/struck-v-secretary-of-defense

2. As a Judge and Justice: Ginsburg, who spent her time in 1970s in arguing cases before judges as an attorney, staged to listening and ruling on cases with unwavering commitment to women's rights and greater equality for all individuals. In 1980, Ginsburg, nominated by President Jimmy Carter, was appointed to the U.S. Court of Appeals; and in 1993, President Clinton appointed her to serve the first term as the second woman to ever sit on the U.S. Supreme Court (Pressman 1997). By this time, Justice Ginsburg had overcome significant barriers in her fights towards gender equality in America; and, the world in which she was born and existed looked significantly different. The landmark legislation of the Equal Pay Act of 1963[20] passed under President John F. Kennedy was one major step in the right direction of creating gender equality in America. In 1964, Congress then passed Title VII of the Civil Rights Act of 1964, which banned discrimination on the grounds of sex (Thomas 2016). By the time Ginsburg became a federal judge under President Carter's administration, there had been significant reform in the areas of gender discrimination, much of which could be rightfully credited to her earlier work as well as others.

In 1981, President Ronald Reagan appointed America's first female Supreme Court Judge, Sandra Day O'Connor. Though not as progressive as was Ginsburg, Sandra Day's presence and commitment to the fight of gender equality was tangible and real (Totenberg, 2015). Justice O'Connor in her majority opinion in the case of *Mississippi University for Women v. Hogan*[21] affirmed that "MUW's policy tends to perpetuate the stereotyped view of nursing as an exclusively women's job. … MUW's policy of permitting men to attend classes as auditors fatally undermines its claim that women, at least in the School of Nursing, are adversely affected by the presence of men. Thus the State has fallen far short of establishing the "exceedingly persuasive justification" needed to sustain the gender-based classification," [22] thereby reinforcing fair and inclusive stances for both sexes. O'Connor protected women's right to choose as well in the case of *Akron v. Akron Center for Reproductive Health*[23] in 1983 and again in 1992 with *Planned Parenthood v Casey*.[24] With *Akron v Akron Center for Reproductive Health*, O'Connor wrote in her personal notes, "There is simply no justification in Constitutional theory for having a different standard or test for the different trimesters. Seems it puts us in the business of being a science review board. The interest of the state in protecting the unborn is essentially the same at all stages of pregnancy. I would permit state regulations at every stage which do not unduly burden the right of the woman to terminate her pregnancy" (Thomas, 2019). O'Connor introduced the notion of undue burden as a requirement to abortion, requiring states to decide how they would deal with abortion as long as it did not put undue stress on a woman's right to choose (Thomas, 2019). In the landmark case of *Planned Parenthood v Casey*, O'Connor voted to preserve *Roe v Wade*, but introduced a precedent that threatens the future legality of *Roe v Wade*. The political landscape during O'Connor's time was extremely conservative and yet, her legacy would influence Ginsburg, who viewed her as a friend despite differences in their backgrounds and political leanings (Hirshman 2015).

When President appointed Ginsburg as the 107th justice to the U.S. Supreme Court in 1993, she began her impactful legal reasoning as she authored and led the way on major social issues. For example, the 1996 case of the *United States v Virginia*[25] removed years of systemic and structural discrimination (Webster & Wolper, 2020). At the time the Virginia Military Institute (VMI) was the only all male undergraduate institution with a mission to produce "citizen-soldiers" for leadership in civilian and military services. The

[20] The Equal Pay Act, signed in to law by President John F. Kennedy on June 10, 1963, was one of the first federal anti-discrimination laws addressed wage differences based on gender. See https://www.dol.gov/agencies/oasam/regulatory/statutes/equal-pay-act

[21] Mississippi Univ. for Women v. Hogan, 458 US 718 (1982). Retrieved on 12/21/20 from https://supreme.justia.com/cases/federal/us/458/718/

[22] Ibid. at p. 719.

[23] Akron v. Akron Ctr. for Reprod. Health, 462 US 416 (1983). Retrieved on 12/21/20 from https://supreme.justia.com/cases/federal/us/462/416/

[24] Planned Parenthood of Southeastern Pa. v. Casey, 505 US 833 (1992), Retrieved on 12/21/20 from https://supreme.justia.com/cases/federal/us/505/833/

[25] United States v. Virginia, 518 US 515 (1996). Retrieved on 12/22/20 from https://supreme.justia.com/cases/federal/us/518/515/

United States sued VMI for violation of the 14th Amendment's Equal Protection Clause. The state of Virginia argued that its male admission policy is based on rigorous training requirements of the program and as such it was too much for women; and, that any alterations to accommodate women would significantly dilute the program strength and credibility. The Federal District Court ruled in VMI's favor, but the Fourth Circuit reversed it and ordered VMI to change its policy as to remedy the constitutional violation. In response, Virginia offered to create a parallel program for women at the Virginia Women's Institute for Leadership (VWIL) at Mary Baldwin College, a private school for women. The case went before the Supreme Court in 1996 because Virginia chose to continue VMI's exclusionary policy and the proposed VWIL program is different from and unequal to that of VMI in tangible and intangible facilities. In a seven-to-one ruling, the U.S. Supreme Court ruled against VMI for violating the Equal Protection Clause under the Fourteenth Amendment. Ginsburg delivered the opinion of the Court wherein it was written that, "The notion that admission of women would downgrade VMI's stature, destroy the adversative system and, with it, even the school is a judgment hardly proved, a prediction hardly different from other "self-fulfilling profec[ies] once routinely used to deny rights or opportunities"[26] and that "The justification must be genuine, not hypothesized or invented *post hoc* in response to litigation. And it must not rely on overboard generalizations about the different talents, capacities, or preferences of males and females."[27] This case illustrates how Ginsburg shifted the boundaries of equal protection and defended progressive constitutionalism (Gibson 2018). When she visited VMI nearly two decades later in 2017, she noticed that nearly 11 percent of the students enrolled at the institution were women and that 394 women had already graduated—a living testimony to her confidence that the inclusion of women would strengthen rather than destroying the program or institution (Nelson 2020).

Ginsburg's views towards communities that lacked representation was impressive. In the 1999 case, *Olmstead v LC*[28], for example, Ginsburg announced the judgment and delivered the opinion of the U.S. Supreme Court that "States are required to place persons with mental disabilities in community settings rather than in institutions when State's treatment professionals have determined that community placement is appropriate … and the placement can be reasonably accommodated, taking into account the resources available to the State and needs of others with mental disabilities."[29] Viewed as one of the most important civil rights cases, it served as yet another reminder of Ginsburg's commitment to the plight of America's most vulnerable. Still, her stances on matters like the aforementioned were viewed as moderate. It wasn't until 2000 when she became known for vehemently disagreeing with her peers.

4. Dissention rather than Consensus

In an arena governed by centuries of tradition and decorum, the notion of one deviating from it is considered revolutionary. But when one analyzes the career of Ginsburg, a case can be made for her penchant for salient discontent. In the 2000 Presidential case *Bush v. Gore,*[30] the Supreme Court overruled the decision of Florida's Supreme Court to recount votes in areas of Florida that had been discounted because "it is evident that any recount seeking to meet 3 U. S. C. § 5's December 12 "safe-harbor" date would be unconstitutional under the Equal Protection Clause."[31] The Court's decision to stop the recount upset Ginsburg, as she "persuasively explained in her own dissenting opinion, our customary respect for state interpretations of state law counsels against rejection of the Florida court's determinations in this case."[32]

[26] Ibid. p. 518
[27] Ibid. p. 533
[28] Olmstead v. L.C., 527 US 581 (1999). Retrieved on 12/22/20 from Olmstead v. L. C. :: 527 U.S. 581 (1999) :: Justia US Supreme Court Center
[29] Ibid. p. 582.
[30] Bush v. Gore, 531 US 98 (2000). Retrieved on 12/22/20 from https://supreme.justia.com/cases/federal/us/531/98/
[31] Ibid. p.98.
[32] Ibid. p.133.

Ruth's legacy of skirting rigid social norms was ingrained in her at an earlier age and only grew more pronounced as she ascended in her judicial career. For example, in 2003, President Bush took aim at the tenants of *Roe v. Wade* by signing the Partial-Birth Abortion Ban Act to proscribe a particular method (dilation and evacuation or D&E) of ending fetal life in the later stages of pregnancy. The matter went to the U.S. Supreme Court in 2005 *Gonzalez v Carhart*[33] after Leroy Carhart et al, abortion doctors challenged the Act's constitutionality and the Federal District Court granted a permanent injunction prohibiting petitioner Attorney General, Alberto R. Gonzales, "from enforcing the Act in all cases but those in in which there was no dispute the fetus was viable" because the Act failed to include an exception to permit the procedure in necessary circumstances of protecting mother's health and it covered not just intact D&E but other D&Es as well; and, the Eighth Circuit found a lack of consensus within the medical community regarding the necessity of banned procedures. In 2007, the U.S. Supreme Court held that the Act was constitutional since the ban was both clear and narrow and that it did not post an "undue burden" on a woman's right to obtain abortion. Ginsburg knew the attack was coming years in advance, dissented loudly, voicing her thoughts from the bench. She stated in her dissent, confronting the boundaries of abortion, that, "Today's decision is alarming. It refuses to take *Casey and Stenberg* seriously. It tolerates, indeed applauds, federal intervention to ban nationwide a procedure found necessary and proper in certain cases by the American College of Obstetricians and Gynecologists (ACOG). It blurs the line, firmly drawn in *Casey,* between previability and postviability abortions. And, for the first time since *Roe,* the Court blesses a prohibition with no exception safeguarding a woman's health. I dissent from the Court's disposition,"[34] and concluded that, "In candor, the Act, and the Court's defense of it, cannot be understood as anything other than an effort to chip away at a right declared again and again by this Court — and with increasing comprehension of its centrality to women's lives."[35] For years Ginsburg had spoken about how *Roe v Wade* and subsequent legislation opened the door for future reform and how this decision was yet another instance of men regulating women's choices under a misguided sense of care.

Ginsburg's moderate views gradually changed as the tide of conservatism grew stronger. During President Bush's second term, Chief Justice William Rehnquist Died in 2005 and Justice Sandra Day O' Connor retired in 2006. They were replaced by two conservatives, John Roberts as Chief Justice and Samuel Alito as Associate Justice, thus leaving Ginsburg as the only female justice in the Supreme Court. The mostly male dominated court had never given Ginsburg any major reservations before, but over time she began to increasingly become uneasy about how callously her counterparts viewed women's inequities. Because of how precarious the times were, Ginsburg adopted a progressively aggressive stance in comparison to her younger days, voicing her displeasure openly. In the instance of the 2007 equal pay case of *Ledbetter v Goodyear Tire & Rubber Co*[36], the Supreme Court ruled in a 5-4 decision authored by Justice Alito, against Lilly Ledbetter, who worked as a supervisor for Goodyear Tire & Rubber Company at its Gadsden, Alabama plant from 1979 until her retirement in 1998, on the grounds that she failed to bring an action for her alleged pay inequity within the statutory period of 180 days under Title VII of the Civil Rights Act of 1964 for pay discrimination. Sharply disagreed with majority ruling, Ginsburg once again filed her passionate dissenting opinion. Joined by Justices Stevens, Souter and Breyer, Justice Ginsburg wrote, "The Court's insistence on immediate contest overlooks common characteristics of pay discrimination. Pay disparities often occur, as they did in Ledbetter's case, in small increments; cause to suspect that discrimination is at work develops only over time. Comparative pay information, moreover, is often hidden

[33] Gonzales v. Carhart, 550 US 124 (2007). Retrieved on 12/22/20 from https://supreme.justia.com/cases/federal/us/550/124/

[34] Ginsburg, J., Dissenting, Gonzales V. Carhart, 550 U.S.124 (2007). Retrieved on 12/22/20 from https://supreme.justia.com/cases/federal/us/550/124/

[35] Ibid.

[36] Ledbetter v. Goodyear Tire & Rubber Co., 550 US 618 (2007). Retrieved on 12/22/20 from https://www.supremecourt.gov/opinions/06pdf/05-1074.pdf

from the employee's view. Employers may keep under wraps the pay differentials maintained among supervisors, no less the reasons for those differentials. Small initial discrepancies may not be seen as meet for a federal case, particularly when the employee is trying to succeed in nontraditional environment, is averse to making waves."[37] She reiterated that, "This is not the first time the Court has ordered a cramped interpretation of Title VII, incompatible with the statute's broad remedial purpose"[38] and hoped that "As in 1991, the Legislature may act to correct this Court's parsimonious reading of Title VII."[39] Within the next two years, the Lilly Ledbetter Fair Pay Act of 2009 was signed by President Obama—which reversed the Supreme Court's decision and provided for 180-day limit for each discriminatory paycheck to file a claim so that individuals with discriminatory pay issues can effectively exercise their rights.

In another landmark case *Burwell v. Hobby Lobby Stores, Inc.,*[40] the contraceptive mandate of the Patient Protection and Affordable Care Act (ACA), requiring non-exempt employer (i.e., other than religious non-profit organizations) provided health insurance coverage for 20 FDA-approved contraceptives, was challenged. Justice Alito delivered the majority (5-4 vote) opinion of the Court, "We hold that the regulations that impose this obligation violate RFRA, which prohibits the Federal Government from taking any action that substantially burdens the exercise of religion unless that action constitutes the least restrictive means of serving a compelling government interest."[41] Disagreeing with the ruling, Justice Ginsburg, joined by Justices Sotomayor, Breyer, and Kagan, wrote in her dissent, "The Court does not pretend that the First Amendment's Free Exercise Clause demands religion-based accommodations so extreme, for our decisions leave no doubt on that score. Instead, the Court holds that Congress, in the Religious Freedom Restoration Act of 1993 (RFRA), 42 U. S. C. §2000bb et seq., dictated the extraordinary religion-based exemptions today's decision endorses. In the Court's view, RFRA demands accommodation of a for-profit corporation's religious beliefs no matter the impact that accommodation may have on third parties who do not share the corporation owners' religious faith—in these cases, thousands of women employed by Hobby Lobby and Conestoga or dependents of persons those corporations employ. Persuaded that Congress enacted RFRA to serve a far less radical purpose, and mindful of the havoc the Court's judgment can introduce, I dissent."[42] Her ideological distance in this opinion from her conservative colleagues is similar to that of the *Gonzales* decision as she asserted that while she respected the Christian belief of the Hobby Lobby owners, they have no constitutional right to force it on hundreds of women who work for them and do not share that belief (Eversley 2016, p.291).

Carmon and Knizhnik (2015) explained in their book on *Notorious RBG: The Life and Times of Ruth Bader Ginsburg*, how Ginsburg's judicial voice gradually gained authority, passion, and edge during her second decade in the U.S. Supreme Court, apart from its composition. They acknowledged that in 2012-13 term, "reading dissents from the bench in five cases, RBG broke a half-century-long record of all justices" (Carmon and Knizhnik 2015, p.5). Ginsburg offered her profound thoughts of equal protection under constitutionality through dissents. In the 2013 case of *Shelby County v Holder*[43], the U.S. Supreme Court ruled by a 5-4 vote that Section 4 of the Voting Rights Act is unconstitutional; its formula can no longer be used as a basis for subjecting jurisdictions to pre-clearance. Justice Roberts delivered the majority (5-4 vote) opinion of the Court, wherein it stated that, "In 1965, the States could be divided in to those with a recent history of voting tests and low voter registration and turnout and those without those characteristics.

[37] Ginsburg, J. Dissenting, Ledbetter v. Good Year Tire & Rubber Co., May 29, 2007, pp.2-3, Retrieved on 12/22/20 from https://www.supremecourt.gov/opinions/06pdf/05-1074.pdf
[38] Ibid. p. 19
[39] Ibid. p.19
[40] Burwell v. Hobby Lobby Stores, Inc., 573 US 682 (2014). Retrieved on 12/23/20 from https://supreme.justia.com/cases/federal/us/573/682/
[41] Ibid. para 1.
[42] Ginsburg, J. Dissenting, Burwell v. Hobby Lobby Stores, Inc., June 30, 2014, p.1. Retrieved on 12/23/20 from https://supreme.justia.com/cases/federal/us/573/682/
[43] Shelby Country v. Holder, 570 US 529 (2013). Retrieved on 12/23/20 from https://www.supremecourt.gov/opinions/12pdf/12-96_6k47.pdf

Congress based its coverage formula on that distinction. Today the Nation is no longer divided along those lines, yet Voting Rights Act continues to treat it as if it were. … Regardless of how one looks at that record, no one can fairly say that it shows anything approaching the "pervasive," "flagrant," "widespread," and "rampant" discrimination that clearly distinguished the covered jurisdictions from the rest of the Nation in current conditions. … a formula based on 40-year-old facts having no logical relation to the present day."[44] Thus the ruling abolished a key feature of the Voting Rights Act of 1964 which required States with a history of discriminatory policies against minority voters to be subject to federal oversight. Ginsberg feared that such ruling would cause backsliding and undermine the progress made thus far in voter participation among the states with history of discriminatory laws and disenfranchisement, as expressed in her dissent, "In the Court's view, the very success of §5 of the Voting Rights Act demands its dormancy. Congress was of another mind. Recognizing that large progress has been made, Congress determined, based on a voluminous record, that the scourge of discrimination was not yet extirpated. The question this case presents is who decides whether, as currently operative, §5 remains justifiable, this Court, or a Congress charged with the obligation to enforce the post-Civil War Amendments "by appropriate legislation." With overwhelming support in both Houses, Congress concluded that, for two prime reasons, §5 should continue in force, unabated. First, continuance would facilitate completion of the impressive gains thus far made; and second, continuance would guard against backsliding. Those assessments were well within Congress' province to make and should elicit this Court's unstinting approbation."[45] She also cited several examples of discriminatory laws blocked or deterred by the preclearance requirement in 1990s from the states of Alabama, Georgia, Mississippi, Texas, and South Carolina—leading to reauthorization of Voting Rights Act in 2006, and let it be known that, "The sad irony of today's decision lies in its utter failure to grasp why the VRA has proven effective. The Court appears to believe that the VRA's success in eliminating the specific devices extant in 1965 means that preclearance is no longer needed."[46] And, concluded her 37-page dissent by saying, "In my judgment, the Court errs egregiously by overriding Congress' decision."[47]

Ginsburg's predictions came true. Brennan Center (2016) found that 14 states enacted new restrictive voting laws that ranged from cuts to early voting to burdens on voter registration to strict voter ID requirements following the *Shelby* decision. Levin and Rao (2020) observed that 1,688 polling places were closed in states previous covered under section five of the Voting Rights Act, of which 114 were in Georgia; Texas resurrected voter ID law; Alabama, Mississippi, and North Carolina enforced laws requiring photo ID; Arizona implemented a new system requiring residents to show proof of US citizenship. All these actions since infamous *Shelby* ruling validate Ginsburg's views that, "Throwing out preclearance when it has worked and is continuing to work to stop discriminatory changes is like throwing away your umbrella in a rainstorm because you are not getting wet."[48]

5. Conclusion

Ruth Bader Ginsburg's judicial philosophy as an attorney, a judge, and justice of the Supreme Court centered around social justice issues with a profound pledge of "equal justice under law," whether it is gender discrimination involving education, employment, equal pay or reproductive rights or corporate corruption or disability or racial equality and voting rights. Throughout her career, she strived to maintain a balance between honoring the Constitutional principles and conservative ideals, while laying the bedrock for equality. Author of more than three hundred opinions, Ginsburg developed reputation for building consensus among her fellow justices, despite differential political and judicial philosophies. Merritt and Lieberman (2020, pp.46-48) identified three aspects of her legacy: (1) enormous impact of her jurisprudence on the lives of women and men; (2) power of her lifetime work to reduce stereotypical

[44] Ibid. pp.3-4.
[45] Ginsburg, J. Dissenting, Shelby Country v. Holder, 570 US 529, June 25, 2013, p.1. Retrieved on 12/23/20 from https://www.supremecourt.gov/opinions/12pdf/12-96_6k47.pdf
[46] Ibid., p. 36
[47] Ibid., p.37
[48] Ibid., p.33

thinking in our everyday lives; and, (3) inspiration of her jurisprudence teachings on the stability and adaptability of our most fundamental principles. Her masterpiece work resulted in the Supreme Court's adaptation of a new, intermediate standard of scrutiny for sex-based equal protection claims, passage of the Lilly Ledbetter Fair Pay Act of 2009, among others. Klarman (2009, p.302) concluded that "Thurgood Marshall and Ruth Bader Ginsburg both capped their illustrious legal careers with accomplishments to the U.S. Supreme Court—Marshall as the first African American justice in the Court's history, Ginsburg as the second woman. Such appointments would have been inconceivable only a decade or two before they were made." In 2015, Ginsburg was named among the 100 Most Influential People in a 2015 *Time* magazine article (Scalia 2015) and received Radcliffe Medal from Harvard's Radcliffe Institute for Advanced Study that was given to an individual who has had "a transformative impact on society," where she advised women audience "Fight for the things you care about, but do it in a way that will lead others to join you" (Grant 2020), the path she led by example. No doubt, as Hulett (2020, p.6) rightly pointed out Justice Ginsburg "was a pillar of humanity and wisdom, who will be gravely missed." She blazed a trail for men and women following in her footsteps and positively affected the world she lived in.

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