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SUPERIOR COURT OF THE STATE OF CALIFORNIA

COUNTY OF SAN FRANCISCO

UNLIMITED CIVIL JURISDICTION

Coordination Proceeding
Special Title (Rule 1550(b))
MARRIAGE CASES

CITY AND COUNTY OF SAN FRANCISCO, a charter city and county,

Plaintiff/Petitioner,

vs.

STATE OF CALIFORNIA, et al.

Defendants/Respondents.

JUDICIAL COUNCIL COORDINATION PROCEEDING NO. **4365**

Case No. **429-539**
(Consolidated with Case No. 504-038)

DECLARATION OF NANCY F. COTT IN SUPPORT OF CITY AND COUNTY OF SAN FRANCISCO'S CONSTITUTIONAL CHALLENGE TO MARRIAGE STATUTES

Hearing Date: TBD
Hearing Judge: Richard A. Kramer
Time: TBD
Place: 304

Date Action Filed: March 11, 2004
Trial Date: Not set

I, NANCY F. COTT, Ph.D., declare:

1. I have personal knowledge of the following facts and if called upon to testify I could and would testify competently thereto. The opinions expressed herein are my true opinions as an expert in the area of the history of marriage in the United States.

2. I am the Jonathan Trumbull Professor of American History at Harvard University, and Pforzheimer Foundation Director of the Schlesinger Library on the History of Women in America, Radcliffe Institute for Advanced Study. I teach graduate students and undergraduates, and my field is American social history and history of the family.

3. In 1969, I received my Master's degree in History of American Civilization from Brandeis University. In 1974, I received my Ph.D. in History of American Civilization from Brandeis University. Since that time, I have taught history, principally at Yale University, where I was a professor for twenty-six years before coming to Harvard. I have received many fellowships, honors and grants, including a Fulbright Lectureship Grant in 2001, and a John Simon Guggenheim Memorial Foundation Fellowship in 1985.

4. I have written seven published books, including Public Vows: A History of Marriage and the Nation (2000) Harvard Univ. Press, the subject of which is marriage as a public institution in our society. I have also published more than twenty scholarly articles, including several discussing the history of marriage in the United States. I have delivered scores of academic lectures and papers over the past thirty years on a variety of topics. I also serve on many advisory and editorial boards of academic journals. A true and correct copy of my curriculum vitae is attached hereto as Exhibit A.

MARRIAGE IN OUR SOCIETY

5. I spent over a decade researching the history of marriage in the United States—especially its legal attributes and obligations, and its social meaning—in order to write my book Public Vows: A History of Marriage and the Nation (2000) Harvard Univ. Press. The claims and evidence in this declaration come from that research and are more fully documented in the book;

the numerous historical sources that I studied and analyzed, and the other scholars' work that I consulted while researching and writing, can be found in my published footnotes.

6. My research has led me to the conclusion that there is nothing at present that has the same meaning, obligations, rights and benefits as marriage except marriage itself. In previous centuries, many local communities gave informal unions and so-called "common-law" marriages the same force and status as legal marriage, and most courts were willing to recognize them as marriages in order to sustain established households, legitimize children, and enforce fathers' obligations to support dependents. But most states invalidated "common-law" marriage during the late nineteenth and early twentieth century. As the twentieth century progressed, society and government at every level became more ramified and bureaucratic; government functions and benefits, especially at the federal level, expanded enormously; and these developments affected the legal and the economic attributes of marriage. In the United States, a married pair now gains special consideration beyond the individual in many if not most government benefits.

7. State and federal governments' special recognition of marriage appears in many forms, including the areas of immigration and citizenship, tax policy, and property rules. For example, social security and veterans' survivors' benefits, intestate succession rights, and jail visitation privileges are extended only to legally married spouses. As the General Accounting Office reported in 1996, the corpus of federal law mentions more than 1,000 benefits, responsibilities and rights connected with marriage.

8. Marriage thus is a bundle of rights, obligations, and benefits, but it is more than that. Marriage has a legitimacy that has been earned through many years of validation and institutionalization in law and society. Enhanced by government recognition for so long, legal marriage is a symbol of privilege. The idea that marriage is the happy ending, the ultimate reward, the sign of adult belonging, and the definitive expression of love and commitment is deeply ingrained in our society. This is reflected in and perpetuated in custom and the high and popular arts as well as in law.

9. The relation between government and marriage is especially important in the United States, because valid marriage here has always been authorized only by civil law. Each colony, state and territory of the United States, as it came into being, set up marriage laws and regulations which were supreme over any religious views or practices of marriage. To be sure, marriage is invested with religious significance for many people; marriage ceremonies commonly take religious form; and spokespersons for various religions may try to impose their views of what marriage is and should be on the broader society. Nonetheless, from the very founding of the United States, marriage has always been an institution authorized by civil law to serve the purposes of civil society.

10. Since the colonial era, governments at all levels in the United States have been concerned both to encourage and to regulate marriage because marriage organizes households and figures largely in property ownership and inheritance. These are all matters of civil society in which governments are highly interested.

11. In particular, since the colonial era governments at all levels in the United States have seen marriages as economically beneficial to the public. Marriage creates economic obligations between the parties mutually consenting and binds them to support their dependents.

12. By the nineteenth century, it became clear that legislatures and courts in the United States encouraged marriage and enforced the economic obligations of marriage on the spouses, in order to minimize public expense for poor relief (among other public benefits). Today, the United States is more emphatic than virtually any other industrialized nation in its public policy of channeling economic benefits through spousal relationships. Governments have relied on marriage as the principle vehicle for organizing economic sustenance among members of the population, particularly those who cannot labor to support themselves, such as the dependent young and old.

13. While the ability or willingness to produce progeny has never been a condition of freedom to marry, support for any child born or adopted into a family has always been an obligation. The inability to have children (sterility) in a man or woman has never been a ground for annulment or divorce; but if a divorce or separation occurred in a marriage that had produced

dependent children, support for those children has been required of both the father and the mother. This requirement placed on a married pair acts as a critical limit on the public's responsibilities for dependent children.

14. As a legal and civil institution with important economic consequences, marriage has thus been intended by governments to serve public order. It has, equally, served as a marker of individual freedom. Although these two goals may sometimes seem to conflict, both are aims of American society, and both are necessary to the American way of life.

15. Legal marriage expresses and enhances individual freedoms by being based on consent and freedom of choice. Mutual consent of the two parties has always been seen as essential to the marriage contract. The individual's ability to give such consent is the mark of the free person in possession of basic civil rights. This is a fact compellingly illustrated by the history of slavery in the United States. Slaves were not able to marry legally, most basically because they did not have the freedom to consent. Their masters' power could always intercede and overcome slaves' intentions; thus slaves could not validly consent and contract to carry out the duties of marriage.

16. Building on the association between individual freedom and the consensual basis of marriage, courts during the twentieth century have increasingly articulated a fundamental right to marry—overturning, for example, state laws that prevented parents in arrears on their child support obligations and incarcerated felons from marrying. (See, e.g., *Zablocki v. Redhail* (1978) 434 U.S. 374, *Turner v. Safley* (1987) 482 U.S. 78.) The U.S. Supreme Court in *Zablocki* narrowly and firmly restricted statutory classifications that would "attempt to interfere with the individual's freedom to make a decision as important as marriage." (434 U.S. at 387 n.12.)

CHANGES IN MARRIAGE

17. Marriage in the United States has not been an immutable institution. Certain principles in marriage—namely consent as its basis, and mutual economic support and sexual fidelity as its requirements—have been long lasting. But many other features of legal marriage have evolved over time to keep up with changes in society at large. Marriage has been a successful civil institution precisely because it has been flexible, not static. Flexibility and

adjustment in some features of marital roles, duties, and obligations were necessary to preserve the value and relevance of marriage during centuries of dynamic change. Of course, this does not mean that changes in marriage were always readily welcomed, or that they were not difficult for some in society to accept. Indeed, many features of marriage that we take for granted today, such as the ability of both spouses to act as individuals, marriage across the color line, or the possibility of divorce, were very much resisted as they were coming into being; opponents saw these new features as threatening to destroy the institution of marriage itself.

18. To be successful for so many hundreds of years, the institution of marriage has had to be resilient, absorbing change when necessary to reflect and embody societal norms. The examples of change over time in the laws of marriage highlighted below are in the areas of racial regulation and spousal roles.

19. As mentioned earlier, slaves, being deprived of all civil rights, including the legal capacity to consent, could not legally marry. Where slaveholders allowed it, slave couples often wed informally, creating long-lasting unions and family units. However, slaveholders broke up slave unions with impunity. Not being legally valid, slave marriages received no defense from state governments. Forced migration or sale by their owners very commonly prevented African American slaves from maintaining stable families, and they developed patterns of informal unions, self-divorce, and serial monogamy, which then (in circular fashion) generated stereotypes of African American infidelity and promiscuity. The very slaveholders who prevented slave marriages then blamed slaves for loose sexual behavior, and thereby justified their own sexual assaults on slave women. Anti-slavery advocates who lambasted the "barbarism" of slavery very often focused on slavery's grievous desecration of marriage and family life as evidence.

20. After emancipation, former slaves could for the first time turn to the government to uphold their marriages. At the end of the Civil War the victorious Union government, through the U.S. Freedmen's Bureau, actively sought to enable former slaves to marry legally and to gain employment by contract. The Freedmen's Bureau sought to avoid having the support of impoverished former slaves fall on the public purse. Its policy reflected general anti-slavery

sentiment that legal marriage was the best route to creating stable, productive, economically viable households among the emancipated slaves. Freedpersons, who flocked to get married legally, had their own motivations. They saw marriage as an expression of their newly acquired civil rights. Now being individuals in the eyes of the law, they could consent, and therefore could enter into legal marriage; their marriages deserved protection by the state from disruption by white overlords.

21. Former slaves were still constrained in their choice of a spouse, however. Even after emancipation, most states still had (and several newly passed or reinforced) laws prohibiting marriage between a white person and a person who was defined as a Negro or "mulatto". Despite the principle of freedom of choice in marriage, for hundreds of years in the United States there were legal bars to marriage across the color line. In as many as forty-one states and territories at some time in their history, marriages between white persons and Negroes or 'mulattos', and sometimes between white persons and native Americans, Chinese, Japanese, or Filipinos, were criminal or void. These laws were justified on several grounds, but were usually said to enact what nature or God dictated and to prevent "corruption" of the institution of marriage.

22. In California, race-based restrictions on marriage had been in place since the first session of California's legislature in 1850. State officials who supported these restrictions stated that "[n]egroes are socially inferior and have so been judicially recognized. . . . [M]arriage between Caucasians and non-Caucasians is socially undesirable because of the physical disabilities of the latter. . . ." (See *Perez v. Sharp* (1948) 32 Cal.2d 711, 723, 727.) The authorities that passed these laws considered it appropriate and defensible to place restrictions on marriages across the color line.

23. Slowly but unmistakably, however, social and legal views changed; courts and society came to see these marriage restrictions as inconsistent with the fundamental right to marry freely. As free African Americans were able to join American society more fully in the generations after emancipation, these laws were deemed to be inconsistent with principles of equal rights, and damaging to members of non-white groups. Laws restricting marriage choice

on the basis of race came to be seen as antithetical to the concept of marriage as founded on consent and choice.

24. California was the first state to find that race-based restrictions on marriages were unconstitutional. In 1948, the California Supreme Court recognized that the right to marry is a "fundamental right" that is "'essential to the orderly pursuit of happiness by free men.'" (*Perez v. Sharp* (1948) 32 Cal.2d 711, 714.) As a result, the Court struck down race-based restrictions on choice of marriage partner, holding that legislation addressing the right to marry "must be free from oppressive discrimination to comply with the constitutional requirements of due process and equal protection of the laws." (*Id.* at 715.)

25. The *Perez* case sparked debate in other states about changing marriage laws to reflect society's evolving views about racial equality. Eventually, in 1967, the principle of freedom of choice of marriage partner triumphed in *Loving v. Virginia*, (1967) 388 U.S. 1, where the U.S. Supreme Court struck down all marriage bars based on racial attribution as unconstitutional. Today, virtually no one questions the legal right of individuals of different races to marry.

26. *Loving v. Virginia* overturned a legal practice in marriage that had been in place for three centuries, since its origin in the American colonies. Affirming that freedom of choice of one's partner was basic to the civil right to marry, the Court strengthened and validated the institution of marriage within society. Thus laws constraining the choice of marriage partners by race were changed over time to reflect society's evolving views of racial equality.

27. In the definition of spousal roles, marriage law has changed as noticeably as on race. Traditionally, marriage law and practice gave very different roles to husband and wife. The husband was seen as the independent partner and economic provider, the wife his dependent, whose service and labor the husband could command.

28. Traditional marriage was based on the legal fiction that married couples were a single entity, with the husband serving as the legal, economic and political representative of that unit. This doctrine of marital unity was called coverture. The wife had no separate legal existence under the oldest formulations of the coverture doctrine. As a result, a wife could not

even commit a crime (her husband would be the responsible party); and husbands and wives could not enter into enforceable agreements between themselves, because they were one person. According to the law of coverture, wives could not own or dispose of property, earn money, or sue or be sued in their own name, but could do these things only through their husbands. This legal regime reflected society's view of the marital couple as a unit naturally headed by the husband, a view that, in turn, reflected society's views about the proper role of men and women in society.

29. In the United States, the notion that wives had neither legal individuality nor economic maneuverability apart from their husbands began to clash with the realities of the developing society as early as the mid-1800s. While coverture defined the roles of the two spouses as absolutely different with respect to law and domestic economy, in practice the tasks of husband and wife overlapped. Wives needed, and began to demand, rights to their own property and labor. In a dynamic market economy (not a static rural economy like the one in which coverture doctrine had been born) husbands saw advantages to their wives being able to have property in their own names. Judges and legislators saw the advantages in a wife's separate property, to keep ordinary families solvent if the husband's creditors sought his assets; and they saw savings for the public purse in married women being able to earn their own income to support their children if their husbands were profligate.

30. Rather than view marriage as immutable in definition, courts and legislatures altered marriage to take account of spouses' actual relationships with each other and society. In addition to arguments for wives' individuality from an equal rights point of view, functional economic arguments for change were persuasive to many.

31. Coverture had for hundreds of years been understood as basic and essential to marriage, but it was gradually eliminated by all the states. The rule of coverture was rejected early in California's statehood. For example, in *Wilson v. Wilson* (1868) 36 Cal. 447, the California Supreme Court permitted a wife to sue her husband to recover money due upon a note executed by him in her favor before the marriage, stating: "The present policy of the law is to recognize the separate legal and civil existence of the wife, and separate rights of property, and .

. . [this recognition] involves a necessity for opening the doors of judicial tribunals to her, in order that the rights guaranteed to her may be protected and enforced." (*Id.* at 454.) Similarly, courts in California also granted married women the right to manage and control their separate property. (*Alexander v. Bouton* (1880) 55 Cal. 15, 19) (a wife "has the absolute right to use and enjoy [her separate property] and the rents, issues, and profits thereof, and to dispose of the same, by her own act and deed, without the consent of her husband.")

32. Changes in California and elsewhere along these lines were protracted, and some laws well into the twentieth century still expressed preconceived notions highly differentiating the two spouses' roles. The shift to individuality and presumptive equality for both marriage partners was heralded by the U.S. Supreme Court in 1971 in *Eisenstadt v. Baird* (1971) 405 U.S. 438. "The marital couple is not an independent entity with a mind and heart of its own, but an association of two individuals each with a separate intellectual and emotional makeup." *(Id. at 453.)* In 1981, the U.S. Supreme Court struck down a provision of Louisiana's community property law that treated a husband as 'head and master' of property jointly owned with his wife. (*Kirchberg v. Feenstra* (1981) 450 U.S. 455, 461.)

33. The evolution of judicial views on gender-neutrality and the equality of the spouses can be tracked in California as well. With regard to child custody, the California Supreme Court in *In re Marriage of Carney* (1979) 24 Cal.3d 725, 736-37, declared that the child's best interests, not gender-based stereotypes, must be decisive. Similarly, the California Supreme Court in 1980 noted the elimination of outmoded sex discrimination in parental rights and responsibilities in overturning prior holdings that a father had a "primary right" to have his wife and children assume his surname. (*In re Marriage of Schiffman* (1980) 28 Cal.3d 640, 643-44.)

34. In the example of premarital agreements, courts had often held that these agreements were not enforceable, in part because women were seen stereotypically as "uninformed, uneducated, or readily subjected to unfair advantage in marital agreements." (See *In re Marriage of Pendleton and Fireman* (1998) 62 Cal.App.4th 751, 762, n. 13.) In 2000, however, the California Supreme Court rejected the argument that women lack the shrewdness to make

reasonable agreements, and affirmed a ruling that such agreements could be enforceable. (*In re Marriage of Pendleton and Fireman* (2000) 24 Cal.4th 39, 52-54.)

35. California's legislature and courts have not acted alone in ending differential treatment of men and women in marriage. Over time, many other states have taken steps to transform marriage from an institution based on gender inequality and gender-based roles to one in which the gender of the spouses is immaterial to their legal obligations. At the federal level also, laws governing the respective duties and rights of the two spouses in marriage have changed over time toward gender neutrality. For example, in the nineteenth century the relation between marriage and citizenship was entirely different for husbands and wives. Husbands could convey their American citizenship to their wives, while American women marrying foreigners could not do the same. Children of American male citizens born abroad could claim American citizenship, while children of American female citizens could not. Through a series of protests forcing reforms beginning at the time that women were enfranchised, these regulations were changed so that the relation between citizenship and marriage is the same for both spouses.

36. Especially since the Civil Rights Act of 1964 and the "women's rights revolution" of the 1970s, views of sex discrimination have changed so far as to eliminate most legal rules based on gender, in order to remain consistent with broader societal views about sex equality. For example, the New Deal-era federal benefit programs, the most important being the Social Security Act, incorporated sex discriminations with respect to husbands' and wives' entitlements. As a result of legal challenges in the 1970s, however, court decisions eliminated these discriminations so that spousal benefits are gender-neutral. The same change took place in veterans' benefits.

37. All of these rectifications bearing on the rights and benefits accruing to legally married spouses reflect changing views about fairness between the partners in marriage. Current legal interpretation is gender-neutral in its assignment of marriage obligations and benefits. This supports the modern view of marriage as an arrangement between two equal and consenting parties.

38. Legal and judicial views of divorce have likewise evolved to reflect societal assumptions about marriage as an expression of individual consent, and marital roles as not pre-assigned by law or stereotype but up to the spouses themselves to define.

39. When divorce was first introduced in many states (just after the American Revolution), it was available only in extremely limited circumstances. The expansion of grounds for divorce was hotly debated all through the nineteenth century. Critics viewed divorce as anathema to the institution of marriage. Major religions opposed divorce entirely, or accepted adultery as the sole justification for divorce. Alarmists believed that provision of divorce would undermine marriage. Judges and legislators in favor of providing legal modes of divorce did not intend, however, to undermine marriage, but to perfect, preserve, and protect it, by indicating what breaches of marital expectations were so unacceptable as to warrant ending a marriage. Proponents wanted to provide a legal vehicle for separations, with enforceable post-divorce arrangements for dependents, rather than countenance informal desertions and marital breakups that occurred in the absence of divorce laws.

40. Like other rules concerning marriage, early divorce laws presupposed different and asymmetrical marital roles for husband and wife. For instance, desertion by either spouse was a ground for divorce; but failure to provide was a breach that only the husband could commit. By the time California became a state, it allowed six fairly expansive grounds for divorce: adultery, extreme cruelty, willful desertion, habitual intemperance, willful neglect, and conviction of a felony. At that time, divorce was an adversary proceeding. That is, one spouse had to accuse the other of committing a wrong against the marriage. The essence of divorce was that one of the partners had broken the bargain embodied in marriage (for instance, the husband had failed in his obligation to provide for his wife). One spouse showed in court that the other had broken the terms of marriage set by the state. The guilty party's fault was a fault against the state's requirements for the marriage, as well as against the spouse.

41. In 1969, California enacted the nation's first complete no-fault divorce law, removing consideration of marital fault from the grounds for divorce, the award of spousal support, and the division of property. The move to no-fault divorce reflected society's view that

spouses deserved more freedom than in the past to set marital roles for themselves. Rather than the states stipulating only certain grounds for divorce through an adversary procedure, couples now were assumed to be fit to assess their own performance of marital roles.

42. In a no-fault divorce system, courts retained a strong role in the ending of marriages; courts not only have to approve the terms of any divorce for it to be valid, but also oversee post-divorce arrangements. The public requirement for both spouses to provide for dependents remains, when a marriage dissolves.

46. Courts now expect gender-neutrality in marriage partners' roles, in contrast to earlier patterns. For example, current family law is based not on the husband's sole requirement to support the couple (as in the past), but on both partners' responsibility for one another. Alimony is gender-neutral in current divorce law.

47. Similarly, gender neutrality rules child support after divorce. In the nineteenth century, when a marriage broke up, the husband was responsible for the economic support of any dependent children, whereas courts gave the mother preference for custody of the very young children. Current divorce laws, in contrast, assume that both partners in a marriage have equal rights and responsibilities, without reference to gender or gender stereotypes. Both parents of dependent children are deemed to have responsibilities both for economic support and nurturance. The ALI's Principles of the Law of Family Dissolution recommend that all decisions required by a family's break-up, such as decisions about property, support, responsibility for children, and the enforcement of agreements, be treated in a gender-neutral fashion.

48. California has been a leader in reforms bringing marriage into step with contemporary social norms and beliefs about racial and gender equality. It was at the forefront in ending race-based restrictions on marriage choice. It was again at the forefront in ending the adversary divorce regime, which, in requiring blame, often caused resort to damaging gender-based stereotypes about spousal conduct within marriage.

49. California courts and lawmakers remedied the inequities in earlier marriage laws by reforming those laws. They thus took important steps to change marriage from an institution

based on gender-determined roles, and inequality, to an institution based on symmetry and equality. Over time, many other states have followed suit.

50. Marriage has evolved into a civil institution through which the state formally recognizes and ennobles individuals' choices to enter into long-term, committed, intimate relationships. These relationships are founded on the free choice of the parties and their continuing mutual consent to stay together.

51. California, along with other states, has eliminated gender-based rules and distinctions relating to marriage in order to reflect contemporary views of racial and gender equality and to uphold fundamental fairness to both marriage partners. California marriage law treats men and women identically—except in the statutory requirement that marriage must be between a man and a woman. Insofar as differentiated roles for husband and wife are no longer either assigned by law or enforced by courts, this gender-based requirement is now out of step with the gender neutral approach of contemporary marriage law.

I declare under the penalty of perjury under the laws of the State of California that the foregoing is true and correct.

Executed this 31st day of August, 2004 at Cambridge, Massachusetts.

By: Nancy F. Cott
NANCY F. COTT

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NOTES/COMMENTS: