



Sarah Pitlyk

President Trump nominated Sarah Pitlyk to serve on the U.S. District Court for the Eastern District of Missouri on August 14, 2019. Pitlyk is anti-choice.

Career¹

- Bachelor of Arts, Boston College, 1999
- Masters of Arts, Katholieke Universiteit Leuven (Belgium), 2001
- Masters of Arts, Georgetown University, 2005
- Juris Doctorate, Yale Law School, 2008
- Clerk, Judge Brett Kavanaugh, U.S. Court of Appeals for the D.C. Circuit, 2010-2011
- Associate, RUNNYMEDE Law Group (formerly Clark & Sauer LLC), 2013-2016
- Special Counsel, Thomas More Society, 2017-present

Record on Reproductive Freedom

Court Cases

- Pitlyk is currently Special Counsel to the anti-choice Thomas More Society, which describes itself as a “national public interest law firm dedicated to restoring respect in law for life, family, and religious liberty.”² The Thomas More Society began its work as an activist litigation firm defending anti-choice protestors, stating that “each and every life saved by those valiant souls who patrol the sidewalks outside abortion facilities has a value that is infinite.”³ Pitlyk’s work at Thomas More Society has included the following cases:
 - Pitlyk represents anti-choice activist David Daleiden, founder of the Center for Medical Progress, in civil cases.⁴ Daleiden is known for using a fake name and business to attend meetings with abortion providers and releasing heavily doctored and now discredited videos of conversations with abortion providers in 2015. Daleiden spearheaded a calculated, politically driven campaign to dismantle Planned Parenthood and undermine women's right to abortion. However, four congressional committees and multiple states failed to find any evidence that Planned Parenthood committed wrongdoing, whereas Daleiden has been charged with criminal offenses related to the videos—Pitlyk referred to these as “baseless, politically motivated criminal charges.”⁵

- Pitlyk represented the anti-choice Susan B. Anthony List in litigation over the domestic gag rule, which prohibits Title X providers from providing abortion or referrals for abortion.⁶ In an amicus brief, Pitlyk wrote that “the fact that the Final Rule would make it more burdensome for Title X-funded programs to provide abortion services only proves that the Rule is warranted and well-justified.”⁷ Pitlyk stated that “[t]he Thomas More Society will continue to support the Susan B. Anthony List’s goal to ensure that taxpayer dollars do not support the abortion industry.”⁸
- On behalf of the state of Iowa, Pitlyk defended a state law that banned abortion before most women know they are pregnant.⁹ Despite the Supreme Court’s holding in *Roe v. Wade* that a woman has a right to abortion free from state interference prior to viability, Pitlyk argued that the issue of viability was not “material to this case.”¹⁰ Pitlyk also tried to argue that the law was not an abortion ban and instead “merely creates a window of opportunity for women to be vigilant in the exercise of their right to terminate a pregnancy...prior to the detection of a fetal heartbeat.”¹¹ In a different case about the same statute, the Iowa Supreme Court found that the Iowa constitution protects the fundamental right to abortion and, therefore, the law was unconstitutional.¹² As a result, the Iowa District Court for Polk County dismissed Pitlyk’s case.¹³
- Pitlyk represented a “pro-life maternity home,” Catholic schools, and a privately-owned business in a case challenging a St. Louis ordinance that would have prohibited discrimination against individuals based on their reproductive health decisions, such as using contraception, IVF, or having an abortion.¹⁴ The lawsuit sought to allow privately owned businesses to discriminate against employees based on the businesses’ “moral and religious beliefs about human life.”¹⁵ Pitlyk argued that religious organizations should be allowed to fire or refuse to employ individuals who have made the decision to have an abortion.¹⁶ In interviews, Pitlyk described the nondiscrimination ordinance as a “thinly-veiled political tactic intended to silence those who seek to protect the unborn” and said the law is “like a page right out of George Orwell’s ‘1984,’ in which people could be prosecuted for thought crimes.”¹⁷ Pitlyk was concerned that Catholic schools “would no longer be able to ask applicants for employment whether they support the Catholic church’s views on abortion.”¹⁸ Pitlyk called the nondiscrimination law “flagrantly un-American.”¹⁹ Pitlyk further argued that it is illegal to require “pro-life employers” to include abortion coverage in their employee health plans.²⁰ This claim was clearly meant to be inflammatory since the law did not have a coverage requirement.

- Pitlyk submitted an amicus brief on behalf of a group of churches and anti-choice advocacy organizations, including the Thomas More Society, in a case challenging an Indiana abortion ban stemming from racist stereotypes.²¹ In the brief, Pitlyk accused abortion providers of “racist, sexist, and eugenic practices performed under the guise of ‘reproductive rights.’”²² Pitlyk called this kind of “invidious discrimination in the provision of abortion services” an “entrenched and escalating phenomenon.”²³ Pitlyk attributed racial disparities in health outcomes to abortion providers “targeting of minority communities” and stated that “there is every reason to believe that racism plays a profound role in the delivery of abortion services.”²⁴ Relying on anti-immigrant stereotypes about sex-selective abortion, Pitlyk accused Asian Americans of having “a known single-gender preference.”²⁵
- Pitlyk represented anti-choice activist John Ryan, who was accused of making a bomb threat to an abortion provider in St. Louis. Pitlyk stated that the criminal charges against Ryan “succeeded in muzzling John and depriving him of his First Amendment rights to use the public sidewalk to voice his pro-life message.”²⁶
- In an amicus brief submitted on behalf of Catholic theologians and ethicists in the *Hobby Lobby* case, Pitlyk argued strongly against the contraceptive-coverage policy under the Affordable Care Act (ACA).²⁷ Pitlyk stated that the policy “requires employers to cooperate in the destruction of human life, which is very gravely objectionable to Catholics and many other Christians.”²⁸ Pitlyk called the use of contraception “evil,” a “seriously wrongful” act, and “a grave moral wrong.”²⁹ Pitlyk favorably cited the United States Conference of Catholic Bishops’ position that “[a]bortion...is never permitted” and “Catholic health care institutions are not to provide abortion services” in any circumstances.³⁰ Pitlyk referred to the Supreme Court’s decision in *Hobby Lobby* to allow closely-held for-profit corporations to deny its employees’ health coverage of contraception as “a welcome vindication of individual liberty and religious freedom.”³¹
- Pitlyk has represented a number of anti-choice activist organizations in cases involving the validity of surrogacy agreements.³² In her briefs, Pitlyk stated that “[s]urrogacy raises an array of troubling issues.”³³ Specifically, Pitlyk argued that “the practice of surrogacy has grave effects on society, such as diminished respect for motherhood and the unique mother-child bond; exploitation of women; commodification of gestation and of children themselves; and weakening of appropriate social mores against eugenic abortion.”³⁴

- Pitlyk represented a woman seeking to gain rights to several frozen embryos created with her ex-husband through in vitro fertilization.³⁵ The woman wanted to use the embryos to become pregnant, but her ex-husband objected, not wanting to have any more children with her. Pitlyk stated that she was one of “the principle drafters” of her firm’s appellate briefing in this case.³⁶ Throughout the briefs, Pitlyk zealously asserted the “personhood” of the embryos using strongly anti-choice language and arguments including referring to the embryos as “embryonic children” and stating that “human embryos are human beings,” “the life of each human being begins at conception,” and “unborn children have protectable interests in life, health, and wellbeing.”³⁷ Pitlyk argued that the trial court’s judgement “was based on its incorrect determination that the embryonic children are not human beings.”³⁸ Pitlyk also suggested that the woman’s existing children would “have to navigate the murky psychological waters of knowing that they had similarly-situated siblings who died at the hand of their father.”³⁹

Notable Information

- The American Bar Association Standing Committee on the Federal Judiciary unanimously determined that Pitlyk is “Not Qualified” for the position of federal district judge.⁴⁰ The Committee stated that: “Ms. Pitlyk’s experience to date has a very substantial gap, namely the absence of any trial or even real litigation experience. Ms. Pitlyk has never tried a case as lead or co-counsel, whether civil or criminal. She has never examined a witness. Though Ms. Pitlyk has argued one case in a court of appeals, she has not taken a deposition. She has not argued any motion in a state or federal trial court. She has never picked a jury. She has never participated in any stage of a criminal matter.”⁴¹ The Committee determined that Pitlyk “does not meet the minimum professional competence standard necessary to perform the responsibilities required by the high office of a federal district judge.”⁴²
- Pitlyk has been a featured speaker at the “Bringing America Back to Life Convention.”⁴³ This convention describes itself as “committed to promoting a culture of life that will overpower and conquer the current culture of death through grassroots efforts on a local, state, and national level through Prayer, Action, Voting, and Education.”⁴⁴ In her 2019 speech, Pitlyk credited the Thomas More Society with “creating a safe space” for anti-choice protestors outside abortion clinics and called her employer “a place where all defenders of the unborn, the family, and religious liberty can seek legal assistance.”⁴⁵
- Pitlyk has been a member of the anti-choice group St. Louis Lawyers for Life.⁴⁶ Lawyers for Life is “a national association of pro-life attorneys and an initiative of Americans United for Life.”⁴⁷

- Pitlyk gave a speech at the 2019 Law of Life Summit titled “Defending Life: From the Sidewalks to the U.S. Supreme Court.”⁴⁸ The summit is described as “bringing together pro-life leaders, students and activists to create measurable and achievable objectives for defending the sanctity of human life from conception to natural death.”⁴⁹
- Pitlyk has been a member of the conservative, anti-choice Federalist Society since 2006.⁵⁰ Pitlyk is featured as a contributor on the Federalist Society’s website.⁵¹ The Federalist Society is led by Leonard Leo, the anti-choice activist who is heavily involved in selecting Trump’s Supreme Court and lower court nominees. Leo has been outspoken in his anti-choice views, calling abortion “an act of force” and “a threat to human life,”⁵² and serves as co-chairman of Students for Life,⁵³ a group whose mission is to “abolish abortion.”⁵⁴
- Pitlyk was a founding member of Yale Law Students for Life.⁵⁵ In this role, Pitlyk hosted events focused on anti-choice issues,⁵⁶ including a talk titled “Great Expectations and Sobering Truths: Awaiting the Decision of the Court on Partial Birth-Abortion,” which Pitlyk described as “the next logical step in the effort to protect incipient human life.”⁵⁷ Pitlyk inaccurately described this nationwide abortion ban as “Congress’s proposal to extend that protection [(legal rights)] to the child that is essentially born alive during the procedure called partial birth abortion.”⁵⁸ Pitlyk also gave the opening remarks to a speech by Professor Robert George about his book titled “Embryo: A Defense of Human Life.”⁵⁹
- Pitlyk has made a number of statements over the course of her career regarding her views on abortion. For example, in an interview, Pitlyk said that “[t]he fate of *Roe v. Wade* is really not what’s going to determine the fate of abortion in America. It’s a distraction.”⁶⁰ In response to a California nondiscrimination law, Pitlyk stated: “You certainly could not fire a Catholic school teacher for getting pregnant out of wedlock, or getting an abortion and talking to her students about it, or anything like that. That’s why they’re passing it, to prevent that from happening, to protect people in that situation from being fired, but obviously that flies in the face of what the Catholic Church wants of its teachers.”⁶¹ As a law student, Pitlyk signed on to a letter responding to a work of performance art by a Yale undergraduate student, accusing the student of showing “contempt for the plurality of religious and moral traditions that cherish human life from the moment of conception until natural death.”⁶²
- Pitlyk has expressed anti-choice viewpoints about research that uses fetal tissue. Pitlyk described the use of fetal tissue for stem cell research as “a practice that many find morally objectionable, despite its legal acceptability.”⁶³ Pitlyk appears to have argued that “the prospect of making use of tissue from an aborted fetus for research” could potentially “have a causal effect on women who are deciding whether to have an abortion; that is, that the possibility of donating the tissue would induce women

who otherwise would not to have abortions,” but there is not yet data available to show this link.⁶⁴ Pitlyk has further argued that fetal tissue should be treated the same as human research subjects and that research institutions should integrate elements of the informed consent model for research on human subjects into research that uses fetal tissue.⁶⁵ Pitlyk acknowledged that this would pose difficulty, as research institutions would need to determine “who is the human subject.”⁶⁶ Pitlyk stated that the federal government’s “failure to provide any regulatory guidance for the use of embryos in the private sector is a glaring oversight of all federal policy related to embryo research to date.”⁶⁷

- In the materials that Pitlyk submitted to the Senate Judiciary Committee, she stated that she was recruited to become a nominee to a federal district court by anti-choice Sen. Josh Hawley (R-MO).⁶⁸
- Pitlyk clerked for Associate Justice Brett Kavanaugh when he was a judge on the D.C. Circuit and was a vocal advocate for his nomination to the Supreme Court.⁶⁹
 - Pitlyk authored an article for the *National Review* praising Kavanaugh’s anti-choice record: “On the vital issues of protecting religious liberty and enforcing restrictions on abortion, no court-of-appeals judge in the nation has a stronger, more consistent record than Judge Brett Kavanaugh. On these issues, as on so many others, he has fought for his principles and stood firm against pressure. He would do the same on the Supreme Court.”⁷⁰ Pitlyk called Kavanaugh’s decision in *Garza v. Hargan*, in which he held that “the government is not constitutionally compelled to facilitate an immediate abortion” for a young woman in immigration custody, “a strong, bold, and correct application of current law.”⁷¹ Pitlyk stated in interviews that Kavanaugh will “yield decisions that are favorable to religious believers” and that Kavanaugh “is precisely the sort of justice who will recognize the defects in the Supreme Court’s activist abortion jurisprudence.”⁷²
 - In response to Dr. Christine Blasey Ford’s allegations that Kavanaugh sexually assaulted her, Pitlyk stated: “Judge Kavanaugh is one of the most honorable men we have had the privilege to know. Now, on the basis of a single, unsubstantiated, anonymous allegation about an alleged incident in high school – some 35 years ago – opponents of his nomination are trying to tarnish the character of a man we and so many other people admire and respect.”⁷³ Pitlyk called the Senate Judiciary Committee’s questioning of Kavanaugh “invasive and intrusive” and “a little unfair.”⁷⁴ Pitlyk further stated that “[i]n light of the overwhelming evidence of his integrity and good character, it is very hard to find this allegation credible, especially when it has come to light in such a transparently politically-motivated manner.”⁷⁵

September 19, 2019

¹ Questionnaire for Judicial Nominees: Sarah Elizabeth Pitlyk, UNITED STATES SENATE COMMITTEE ON THE JUDICIARY.

² THOMAS MORE SOCIETY, <https://www.thomasmoresociety.org/> (last visited Sept. 17, 2019).

³ History, THOMAS MORE SOCIETY, <https://www.thomasmoresociety.org/about/history/> (last visited Sept. 17, 2019).

⁴ See, e.g., *Nat'l Abortion Fed'n v. Ctr. for Med. Progress*, 926 F.3d 534 (9th Cir. 2019).

⁵ Press Release, Thomas More Society, Court Refuses to Lift Contempt Fines or Remove Prejudiced Judge in Abortion Baby Parts Trafficking Trial (June 10, 2019).

⁶ *Family Planning Ass'n of Maine v. U.S. Dep't of Health & Human Servs.*, No. 1:19-cv-00100-LEW, 2019 WL 2866832 (D. Maine July 3, 2019); *Family Planning Ass'n of Maine v. U.S. Dep't of Health & Human Servs.*, No. 1:19-cv-00100-LEW, 2019 WL 3774619 (D. Maine Aug. 9, 2019); Brief of Amicus Curiae Susan B. Anthony List in Support of Defendants-Appellants and Reversal, *State of Washington v. Azar* (9th Cir. 2019) (No. 19-35394), 2019 WL 2489125; Brief of Amicus Curiae Susan B. Anthony List in Support of Defendants-Appellants and Reversal, *State of Oregon v. Azar* (9th Cir. 2019) (No. 19-35386(L)), 2019 WL 2489122; Brief of Amicus Curiae Susan B. Anthony List in Support of Defendants-Appellants and Reversal, *State of California v. Azar* (9th Cir. 2019) (Nos. 19-15974, 19-15979), 2019 WL 2526818.

⁷ Brief of Amicus Curiae Susan B. Anthony List in Support of Defendants-Appellants and Reversal, *State of Washington v. Azar* (9th Cir. 2019) (No. 19-35394), 2019 WL 2489125; Brief of Amicus Curiae Susan B. Anthony List in Support of Defendants-Appellants and Reversal, *State of Oregon v. Azar* (9th Cir. 2019) (No. 19-35386(L)), 2019 WL 2489122; Brief of Amicus Curiae Susan B. Anthony List in Support of Defendants-Appellants and Reversal, *State of California v. Azar* (9th Cir. 2019) (Nos. 19-15974, 19-15979), 2019 WL 2526818.

⁸ Press Release, Susan B. Anthony List, Federal Judges, Pelosi Congress Work to Block President Trump's Protect Life Rule (Apr. 30, 2019).

⁹ *Planned Parenthood of the Heartlands, Inc. v. Reynolds*, No. EQCE083074 (Iowa Dist. Ct., Polk Cty.).

¹⁰ Ruling on Motion for Summary Judgement, *Planned Parenthood of the Heartlands, Inc. v. Reynolds*, No. EQCE083074 (Iowa Dist. Ct., Polk Cty. 2019).

¹¹ *Id.*

¹² *Planned Parenthood of the Heartlands v. Reynolds*, 915 N.W.2d 206 (Iowa 2018)

¹³ Ruling on Motion for Summary Judgement, *Planned Parenthood of the Heartlands, Inc. v. Reynolds*, No. EQCE083074 (Iowa Dist. Ct., Polk Cty. 2019).

¹⁴ *Our Lady's Inn v. City of St. Louis*, 349 F.Supp.3d 805 (E.D. Mo. 2018).

¹⁵ Complaint, *Our Lady's Inn v. City of St. Louis*, No. 4:17-CV-01543-AGF (E.D.Mo.).

¹⁶ *Id.*

¹⁷ Kevin McDermott, *St. Louis Archdiocese, Others Sue City Over Abortion Anti-Discrimination Ordinance*, St. Louis Post-Dispatch (May 23, 2017); Press Release, Thomas More Society, Thomas More Society Attorneys Say the City Has No Case for Abortion Sanctuary Ordinance (Sept. 28, 2017).

¹⁸ *A St. Louis City Abortion Sanctuary Law*, ISSUES, ETC., (May 23, 2018), <https://issuesetc.org/2017/05/23/1433-a-st-louis-city-abortion-sanctuary-law-sarah-pitlyk-52317/>.

¹⁹ *Janet Interviews Sarah Pitlyk on St. Louis' Sanctuary City Ordinance on Abortions Overruled*, JANET MEFFERD LIVE (Oct. 10, 2018), <https://afr.net/podcasts/janet-mefferd-live/2018/october/janet-interviews-sarah-pitlyk-on-st-louis-sanctuary-city-ordinance-on-abortions-overruled/>.

²⁰ Press Release, Thomas More Society, Judge Finds St. Louis "Abortion Ordinance" Discriminatory and Unconstitutional (Oct. 4, 2018).

²¹ Brief of the Restoration Project; Pastor Joseph Parker, Pastor of Greater Turner Chapel A.M.E. Church; Everlasting Light Ministries; Protect Life and Marriage Texas; and the Thomas More Society as Amici Curiae in Support of Petitioners, *Box v. Planned Parenthood of Indiana & Kentucky, Inc.* (U.S. 2018) (No. 18-483), 2018 WL 6042850.

²² *Id.*

²³ *Id.*

²⁴ *Id.*

²⁵ *Id.*

²⁶ Press Release, Thomas More Society, Wrongly Accused Pro-Life Advocate Sues Planned Parenthood for False Arrest (Sept. 21, 2018).

²⁷ Brief of 67 Catholic Theologians and Ethicists as Amici Curiae in Support of Hobby Lobby Stores, Inc., and Conestoga Wood Specialties Corp., *Sebelius v. Hobby Lobby Stores, Inc.* (U.S. 2014) (Nos. 13-354, 13-356), 2014 WL 316716.

²⁸ *Id.*

²⁹ *Id.*

³⁰ *Id.*

³¹ “Hobby Lobby Lunch & Learn” hosted by St. Louis University chapters of the American Constitution Society and the Federalist Society on September 22, 2014. *Questionnaire for Judicial Nominees: Sarah Elizabeth Pitlyk*, UNITED STATES SENATE COMMITTEE ON THE JUDICIARY; see also *Attachments to Questionnaire for Judicial Nominees: Sarah Elizabeth Pitlyk*, UNITED STATES SENATE COMMITTEE ON THE JUDICIARY, p.214.

³² Motion and Brief of American Association of Pro-Life Obstetricians & Gynecologists, Charlotte Lozier Institute, National Catholic Bioethics Center, National Association Of Catholic Nurses - U.S.A., Catholic Medical Association, Concerned Women for America, Center for Family & Human Rights, and American College of Pediatricians as Amici Curiae in Support of Petitioners, *Cook v. Harding* (U.S. 2018) (No. 17-1487), 2018 WL 2558407; Motion and Brief of American Association of Pro-Life Obstetricians & Gynecologists, Charlotte Lozier Institute, National Catholic Bioethics Center, National Association of Catholic Nurses-U.S.A., and Catholic Medical Association as Amici Curiae in Support of Petitioner, *M.C. v. C.M.* (U.S. 2017) (No. 17-129), 2017 WL 3809734.

³³ Motion and Brief of American Association of Pro-Life Obstetricians & Gynecologists, Charlotte Lozier Institute, National Catholic Bioethics Center, National Association Of Catholic Nurses - U.S.A., Catholic Medical Association, Concerned Women for America, Center for Family & Human Rights, and American College of Pediatricians as Amici Curiae in Support of Petitioners, *Cook v. Harding* (U.S. 2018) (No. 17-1487), 2018 WL 2558407; Motion and Brief of American Association of Pro-Life Obstetricians & Gynecologists, Charlotte Lozier Institute, National Catholic Bioethics Center, National Association of Catholic Nurses-U.S.A., and Catholic Medical Association as Amici Curiae in Support of Petitioner, *M.C. v. C.M.* (U.S. 2017) (No. 17-129), 2017 WL 3809734.

³⁴ Motion and Brief of American Association of Pro-Life Obstetricians & Gynecologists, Charlotte Lozier Institute, National Catholic Bioethics Center, National Association Of Catholic Nurses - U.S.A., Catholic Medical Association, Concerned Women for America, Center for Family & Human Rights, and American College of Pediatricians as Amici Curiae in Support of Petitioners, *Cook v. Harding* (U.S. 2018) (No. 17-1487), 2018 WL 2558407; Motion and Brief of American Association of Pro-Life Obstetricians & Gynecologists, Charlotte Lozier Institute, National Catholic Bioethics Center, National Association of Catholic Nurses-U.S.A., and Catholic Medical Association as Amici Curiae in Support of Petitioner, *M.C. v. C.M.* (U.S. 2017) (No. 17-129), 2017 WL 3809734.

³⁵ *McQueen v. Gadberry*, 507 S.W.3d 127 (Mo. App. 2016).

³⁶ *Questionnaire for Judicial Nominees: Sarah Elizabeth Pitlyk*, UNITED STATES SENATE COMMITTEE ON THE JUDICIARY.

³⁷ Appellant’s Brief, *McQueen-Gadberry v. Gadberry*, 507 S.W.3d 127 (Mo. App. 2016) (No. ED1031318), 2015 WL 9582009 (2015).

³⁸ *Id.* at 13.

³⁹ *Id.* at 22.

⁴⁰ Letter from William C. Hubbard, Chair, Am. Bar. Ass'n Standing Comm. on the Federal Judiciary, to Hon. Lindsey Graham, Chairman, & Hon. Dianne Feinstein, Ranking Member, United States Senate Comm. on the Judiciary (Sept. 24, 2019), https://www.americanbar.org/content/dam/aba/administrative/government_affairs_office/2019-09-24-re-nomination-of-sarah-pitlyk.pdf?logActivity=true.

⁴¹ *Id.*

⁴² *Id.*

⁴³ “Justice Kavanaugh on Life and Religious Liberty: What We Know & What We Can Expect” speech given at the 2019 Bringing America Back to Life Convention. *Questionnaire for Judicial Nominees: Sarah Elizabeth Pitlyk*, UNITED STATES SENATE COMMITTEE ON THE JUDICIARY; see also *Attachments to Questionnaire for Judicial Nominees: Sarah Elizabeth Pitlyk*, UNITED STATES SENATE COMMITTEE ON THE JUDICIARY, p.131.

⁴⁴ About Us, BRINGING AMERICA BACK TO LIFE CONVENTION, <https://bringingamericabacktolife.org/about-us/> (last visited Sept. 17, 2019).

⁴⁵ “Justice Kavanaugh on Life and Religious Liberty: What We Know & What We Can Expect” speech given at the 2019 Bringing America Back to Life Convention. *Questionnaire for Judicial Nominees: Sarah Elizabeth Pitlyk*, UNITED STATES SENATE COMMITTEE ON THE JUDICIARY; see also *Attachments to Questionnaire for Judicial Nominees: Sarah Elizabeth Pitlyk*, UNITED STATES SENATE COMMITTEE ON THE JUDICIARY, p.131.

⁴⁶ *Questionnaire for Judicial Nominees: Sarah Elizabeth Pitlyk*, UNITED STATES SENATE COMMITTEE ON THE JUDICIARY.

⁴⁷ Evangeline Bartz, AMERICANS UNITED FOR LIFE, <https://aul.org/about/leadership/evangeline-bartz/> (last visited Sept. 17, 2019).

⁴⁸ “Defending Life: From the Sidewalks to the U.S. Supreme Court” speech given at the 2019 Law of Life Summit. *Questionnaire for Judicial Nominees: Sarah Elizabeth Pitlyk*, UNITED STATES SENATE COMMITTEE ON THE JUDICIARY; see also *Attachments to Questionnaire for Judicial Nominees: Sarah Elizabeth Pitlyk*, UNITED STATES SENATE COMMITTEE ON THE JUDICIARY, p.144.

⁴⁹ About, LAW OF LIFE SUMMIT, http://lawlife.org/?page_id=588 (last visited Sept. 17, 2019).

⁵⁰ *Questionnaire for Judicial Nominees: Sarah Elizabeth Pitlyk*, UNITED STATES SENATE COMMITTEE ON THE JUDICIARY.

⁵¹ Sarah Pitlyk, THE FEDERALIST SOCIETY, <https://fedsoc.org/contributors/sarah-pitlyk-1> (last visited Sept. 17, 2019).

⁵² Jeffrey Toobin, *The Conservative Pipeline to the Supreme Court*, *The New Yorker* (April 17, 2017), <https://www.newyorker.com/magazine/2017/04/17/the-conservative-pipeline-to-the-supreme-court>

⁵³ *Board of Directors*, STUDENTS FOR LIFE, <http://studentsforlife.org/supporters/board-of-directors-1> (last visited July 5, 2018)

⁵⁴ *Mission Statement*, STUDENTS FOR LIFE, <http://studentsforlife.org/about/mission-statement/> (last visited July 5, 2018)

⁵⁵ Trump Nominates Former Students for Life Leader to Federal Judgeship, STUDENTS FOR LIFE OF AMERICA <https://studentsforlife.org/2019/08/15/trump-nominates-former-students-for-life-leader-to-federal-judgeship/> (last visited Sept. 17, 2019).

⁵⁶ *Questionnaire for Judicial Nominees: Sarah Elizabeth Pitlyk*, UNITED STATES SENATE COMMITTEE ON THE JUDICIARY; see also *Attachments to Questionnaire for Judicial Nominees: Sarah Elizabeth Pitlyk*, UNITED STATES SENATE COMMITTEE ON THE JUDICIARY, p.219.

⁵⁷ *Questionnaire for Judicial Nominees: Sarah Elizabeth Pitlyk*, UNITED STATES SENATE COMMITTEE ON THE JUDICIARY; see also *Attachments to Questionnaire for Judicial Nominees: Sarah Elizabeth Pitlyk*, UNITED STATES SENATE COMMITTEE ON THE JUDICIARY, p.221.

⁵⁸ *Id.*

⁵⁹ *Questionnaire for Judicial Nominees: Sarah Elizabeth Pitlyk*, UNITED STATES SENATE COMMITTEE ON THE JUDICIARY; see also *Attachments to Questionnaire for Judicial Nominees: Sarah Elizabeth Pitlyk*, UNITED STATES SENATE COMMITTEE ON THE JUDICIARY, p.218.

⁶⁰ Kelsey Bolar, *What 2 Women Who Actually Clerked for Kavanaugh Really Think of Him*, The Daily Signal (Aug. 19, 2018), <https://www.dailysignal.com/2018/08/29/what-2-women-who-actually-clerked-for-kavanaugh-really-think-of-him/>.

⁶¹ Samantha Gobba, *California Bill Threatens Freedoms of Religion and Speech*, Pathway (Oct. 13, 2017).

⁶² *From Yale Women to Shvarts: Consider the Repercussions*, The Yale Daily News (Apr. 25, 2008).

⁶³ Eric M. Meslin & Sarah E. Martin, *From Stem to Stern: A Brief Review of Ethical Issues in the Stem Cell Debate*, NewoReviews (July 2003).

⁶⁴ *Id.*

⁶⁵ *Id.*

⁶⁶ *Id.*

⁶⁷ *Id.*

⁶⁸ *Questionnaire for Judicial Nominees: Sarah Elizabeth Pitlyk*, UNITED STATES SENATE COMMITTEE ON THE JUDICIARY.

⁶⁹ See, e.g., Elizabeth Williamson, *Judge Kavanaugh's Former Clerks: Diverse, and Deployed to Vouch for Him*, The New York Times (July 11, 2018), <https://www.nytimes.com/2018/07/11/us/politics/kavanaugh-supreme-court-clerks.html>; Kelsey Bolar, *What 2 Women Who Actually Clerked for Kavanaugh Really Think of Him*, The Daily Signal (Aug. 19, 2018), <https://www.dailysignal.com/2018/08/29/what-2-women-who-actually-clerked-for-kavanaugh-really-think-of-him/>; Mollie Hemingway & Carrie Severino, *JUSTICE ON TRIAL: THE KAVANAUGH CONFIRMATION AND THE FUTURE OF THE SUPREME COURT* (2019); CNN Newsroom (Oct. 8, 2018), *Attachments to Questionnaire for Judicial Nominees: Sarah Elizabeth Pitlyk*, UNITED STATES SENATE COMMITTEE ON THE JUDICIARY, p.272; *Did an Illegal Kill Mollie Tibbetts*, THE ED MARTIN MOVEMENT: A MOVEMENT TO PAINT THE MAP RED (Aug. 23, 2018), <https://theanswerstl.com/content/blogs/ed-martin-blog-08232018>; *A Closer Look with Sheila Liaugminas*, RELEVANT RADIO (July 17, 2018), <https://relevantradio.com/2018/07/a-closer-look-with-sheila-liaugminas-july-17-2018/?highlight=pitlyk>; *Clerking for Brett Kavanaugh*, SON RISE MORNING SHOW (July 12, 2018), <https://soundcloud.com/sacred-heart-radio/sarah-pitlyk-clerking-for-brett-kavanaugh>; Sarah Pitlyk & Rebecca Taibleson, *Brett Kavanaugh is a Man of Rock-Solid Character and Integrity*, Fox News (Sept. 14, 2019); *Judge Kavanaugh's Former Clerks on the Nominee*, C-SPAN (Aug. 9, 2018), <https://www.c-span.org/video/?449526-1/judge-kavanaughs-clerks-discuss-supreme-court-nominee>.

⁷⁰ Sarah Pitlyk, *Judge Brett Kavanaugh's Impeccable Record of Constitutional Conservatism*, Nat'l Rev. (July 3, 2018) <https://www.nationalreview.com/2018/07/judge-brett-kavanaughs-impeccable-record-of-constitutional-conservatism/>.

⁷¹ *Id.*

⁷² Joan Frawley Desmond, *Will Brett Kavanaugh Protect Religious Freedom?*, Nat'l Catholic Register (July 24, 2018); "Justice Kavanaugh on Life and Religious Liberty: What We Know & What We Can Expect" speech given at the 2019 Bringing America Back to Life Convention. *Questionnaire for Judicial Nominees: Sarah Elizabeth Pitlyk*, UNITED STATES SENATE COMMITTEE ON THE JUDICIARY; see also *Attachments to Questionnaire for Judicial Nominees: Sarah Elizabeth Pitlyk*, UNITED STATES SENATE COMMITTEE ON THE JUDICIARY, p.131.

⁷³ Sarah Pitlyk & Rebecca Taibleson, *Brett Kavanaugh is a Man of Rock-Solid Character and Integrity*, Fox News (Sept. 14, 2019).

⁷⁴ GOP Exploring Call for FBI Probe Into Kavanaugh, CNN Newsroom (Sept. 28, 2018).

⁷⁵ Tony Mauro, *Female Clerks Stand by Kavanaugh Despite Assault Allegation*, Nat'l L.J. (Sept. 18, 2018).