

THE RELATIONSHIP BETWEEN PUBLIC OPINION & SUPREME COURT DECISIONS:

A FOCUS ON MODERN-DAY MEDIA COVERAGE

By

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A Thesis Submitted to the Honors College

In Partial Fulfillment of the Bachelor's Degrees
With Honors in

Political Science & Law

THE UNIVERSITY OF ARIZONA

MAY 2015

Approved by:



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Abstract

The objective of this thesis is to investigate the dynamic relationship between public opinion and Supreme Court decisions. This thesis focuses on how media coverage plays a significant role in effecting this relationship. Using past research and findings, this thesis attempts to apply these conclusions to modern-day media sources such as the Internet. The findings from this thesis suggest that Slotnick and Segal's conclusion that the number of amicus curie briefs filed within a Supreme Court decision in addition to the subject area of a case continue to be the two most determinant factors in the level of media coverage which a Supreme Court decision will receive. Additionally, these findings suggest otherwise in Hoekstra's conclusion that local and national media sources report Supreme Court decisions differently than each other including the extent of their coverage over extended periods of time. Understanding this thesis' findings will assist in conceptualizing the significant role media coverage plays in the relationship between public opinion and Supreme Court decisions.

I: Introduction – Public Opinion & Supreme Court Decisions

Over many decades, researchers have been significantly interested in investigating the relationship of public opinion and Supreme Court decisions. The first aspect of this relationship deals with “the extent to which Supreme Court decisions affect public opinion.” Conversely, the other aspect of the relationship deals with whether public opinion affects Supreme Court decisions. Dissimilar to the other two branches of government, legislative and executive branches, scholars of the Supreme Court have been forced to rely upon assumptions of their research. Additionally, scholars have generalized that besides the rare, significant opinions such as *Roe v. Wade* or *Brown v. Board of Education*, the Court’s decisions have very few, if any, effects on public opinion. Regardless of the case, each decision has consequences that if not felt nationally, play a major role on a local level. Every ruling deals with two parties in conflict and once a decision has been made it tends to affect some part of the population. Researchers are then left with dealing with questions about the effects of the routine decisions that are in the Supreme Court’s docket each year. Or is there any public interest and attention to these other, more ordinary cases?

II: Past Methodology & Limitations

Researchers of Supreme Court decisions and public opinion have struggled to answer some of the most significant questions regarding the first aspect of their relationship. Thus, scholars contend that besides the rare, significant decisions of the Supreme Court, the court tends to have little to no effect on public opinion. National public opinion polls show three major reasons for this assumption: limited knowledge about the Court and its activities, few aggregate shifts in support for issues on which the Court decides, and few shifts in support of the Court (Hoekstra 4). This is the result of the very limited evidence resulting from these studies.

However, the three most common techniques used to study this relationship have been static cross-sectional survey research, longitudinal cross sections and laboratory experiments.

These three common techniques have been found to present its users with both beneficial advantages while also presenting some limitations. The major limitations of these techniques include a failed incorporation of the dynamic nature of the process and measures of the subtlety of the issues of the Court cases, the failure to generalize beyond the laboratory and the failure to identify appropriate populations to sample (Caldeira 1991, Hoekstra and Segal 1996).

Static cross-sectional approaches are the most common of the three studies used in studying public opinion and Supreme Court decisions. This research design enables one to use static, or one-shot cross sections to provide information regarding singular characteristics such as ideology or education and their relation to knowledge or support for the Supreme Court. Additionally, this design allows one to measure how much people are able to remember about the Supreme Court's activities. However, this design fails to deal with the dynamics of how Supreme Court decisions influence opinions on the Court or its deciding issues. This research design has failed to establish a link between specific Court decisions and support of the Supreme Court.

Longitudinal cross-section analysis provides the ability to provide information on the dynamic processes of the Supreme Court by its incorporation of time. This research design focuses on aggregates rather than the individual. These studies also focus on public opinion of a Supreme Court decision at two different points in time while relying on two independent cross sections. Many studies involving this research design have failed as a result of misrepresentation of the Supreme Court's calendar, inappropriate measures, and failure to identify the proper populations to sample.

The third common research design utilized by scholars of the Supreme Court is experimental approaches. Experiments investigate the relationship of the Supreme Court and public opinion within or outside of the laboratory. A major advantage of this research design is that it avoids obstacles that exist within many mass-survey based approaches. Experiments are also able to isolate the impact of the Court relative to other source of influence. As a result, experiments have provided some of the most consistent results such as that Court decisions, under certain conditions, can affect the support for the position taken by the Court and alters support for the Court (Hoekstra 26).

However similar to the rest, experiments present many disadvantages as well. The most significant criticism is the “artificial nature of the setting.” Many of these experiments take place in a laboratory, which does not create a “real world setting.” This has been found to create major problems as why people hear about Court decisions are closely related to attitudes towards the Court or policy issues that are susceptible to change. Additionally, college students tend to be the majority of subjects for experiments creating even greater problems by failing to offer a cross-section of individuals as subjects. While older individuals tend to have firmly held beliefs, college students are susceptible to persuasion creating another variable that must be accounted for within these studies.

Secondly, measuring the other aspect of the relationship, the influence of public opinion on Supreme Court decisions over the decades has been a difficult task. The findings of research among this topic have been highly contested. For example in 1993, Mishler & Sheehan conclude public opinion influences Court’s decision directly and indirectly by stating, “Justices are broadly aware of fundamental trends in the ideological tenor of public opinion and...at least some justices, consciously or not, may adjust their decisions at the margins to accommodate such

fundamental trends.” Conversely, Norpoth & Segal exclaim, “Contrary to Mishler & Sheehan, we find no evidence for a direct path of influence from public opinion to Court decisions.” It is clear the topic of the relationship between decisions and public opinion can be varied.

There has not been any shortage of research analyzing the effects public opinion can have on Supreme Court decision making. Many past researchers have concluded that public opinion can have a direct impact on justice’s decisions. For example in 1995, Stinson et al. analyzed the ideological direction of decisions of each term and found responsiveness to the moods of the public. Another example is Flemming and Wood (1997), who find that the public’s mood produces a small effect on most justices in the majority of legal fields. Finally in 2009, Giles found that as public support for Supreme Court decisions decline, the Court strikes down fewer laws.

Methods for determining the extent in which public opinion can have on Supreme Court decisions have been similar in many research models. To measure public opinion, studies have relied on Stimson’s public mood indicator. Stimson’s indicator is calculated by analyzing survey responses to a variety of questions with a dynamic factor analysis model producing a single number to determine the mood of the public. Studies have then used this indicator to analyze term-by-term variation in the Court’s liberal decisions while controlling other variables that could affect the percentage of liberal decisions each year (Epstein 270).

However, the methods for these studies have produced a major challenge. These studies are unable to incorporate controls at the case level because they are measured in the aggregate as opposed to by term. An example of this is given by Epstein, “We know that justices tend to reverse decisions of the court below. To account for this tendency, researchers modeling the ideological direction of the Court’s decisions almost always incorporate a variable encoding the

direction of the lower court's decision." However, measuring this on a term-by-term basis creates the risk of ecological fallacy.

III: Past Research & Findings – Hoekstra / Slotnick & Segal

An example of a research study conducted investigating the relationship between public opinion and Supreme Court decisions is best exemplified by Valerie J. Hoekstra, who examines and analyzes the media reaction and public opinion regarding four Supreme Court decisions in communities in which the controversies originated. This research study exemplifies the struggles in which this type of research constantly deals with in attempting to reach their conclusions. The four cases include *Lamb's Chapel v. Center Moriches Union Free High School District*, *Board of Education of Kiryas Joel v. Grumet*, *Oklahoma Tax Commission v. Chickasaw Nation*, and *Babbitt*, and *Secretary of the Interior v. Sweet Home Chapter of Communities for a Great Oregon*. Additionally, she sets out to investigate the local and national effects in which public opinion can on Supreme Court opinions. An example she gives of this is if the Court is successful in effecting public opinion, it can lead to a more successful implementation of the decision. Her research also looks into the quality and quantity of media coverage, levels of local awareness, and the effect Court decisions have on attitudes towards the cases and changes of support for the Court as a result of these decisions.

Hoekstra's hypotheses are broken into three major categories: media coverage, public awareness and perceptions of the importance of the issue in the Court's decision, change in opinion on the issues contained in the case, and change in support for the Court following its decisions. Hoekstra first hypothesis is that local media should cover local cases more extensively than national media which will then lead to higher levels of awareness in these communities than the national awareness of the case. Furthermore, awareness levels in

immediate communities will be higher than levels of residents in surrounding communities and thus, will find a higher importance of the case than those in surrounding communities. Secondly, surrounding communities will be more willing to align their opinion in the direction of the Court's decisions than those in immediate communities. Moreover, those in higher support for the Court will tend to show a greater change in the direction of the Court's decisions than those with lower levels of support for the Court and the effect of support for the Court on opinion change is likely to be conditioned on respondent's town of residence. Finally, Hoekstra hypothesizes that those who initially agree with the Court's final decisions should show an increase in support for the Court. Also, this also leads to that those from the immediate community should attach greater significance to the decision and show greater change according to how they initially felt about the issue.

Hoekstra conducted her research through a series of surveys to compile charts and corresponding statistical analysis to further evaluate her hypotheses. For example, for each individual court decision, participation from the four communities immediately affected by the researched cases each ranged anywhere from 100 to 250 people. Initial questions for each respondent included questions to identify their activeness in local media and politics. However, Hoekstra mentions statistical limitations such as regression to the mean that were unavoidable within her research.

As a result of her research, Hoekstra is able to make a variety of conclusions. She first points out it is clear that local media is much more likely to provide information on relevant cases to their communities than national media. It was clear local newspapers began covering cases at a much earlier stage and provided much more information to each of the cases. However, it was also found that there were many differences on the type of coverage involved

depending on the details of the cases. The research also suggested that the Court benefits from positive public perceptions of how it operates and solidified the idea that individuals who initially supported the policy of the Court was in favor of became more supportive of the Court in general. Another hypothesis of Hoekstra was confirmed finding that public opinion and interest were higher in immediate communities than in surrounding communities. Additionally as expected, public opinion coincided with media attention as individuals were able to gain more knowledge and interest of the case as a result of higher levels of media coverage. However, it was also found that there was only slight evidence proving that the Court can shape public opinion. Thus, the research design was unable to demonstrate any evidence of the Court's persuasiveness.

However, knowledge and individuals' understanding of Supreme Court decisions generally are derived from the media coverage produced locally and nationally. Thus, it is crucial to investigate the relationship between media coverage of the Supreme Court decision as an aspect to understanding and researching the relationship between Supreme Court decisions and public opinion. An example of this type of research regarding media coverage is a study conducted by Elliot E. Slotnick and Jennifer A. Segal, who focus on the idea that the vast majority of American citizens rely on the use of mass media to represent their participation in politics. Their main intent was to attempt to further examine the nature of media coverage of the Supreme Court by analyzing specifically how television news covers the Supreme Court. Major questions that they hoped to identify including how much media coverage the Court receives or what is it about the Court which increases its likelihood of being reported by national television networks. Slotnick and Segal make it clear that the focus of their research is on the "nature and

implications of television coverage for the Court and the American public than around the problems and implications for the television.”

Slotnick and Segal aimed to analyze their focus in a variety of ways throughout their research. Firstly, they took the perspectives of individual Supreme Court reporters who can offer specialized insights into the television coverage of the Supreme Court. Additionally, they examine the strengths and liabilities of television news for covering the Court and offered two specific case studies, *Regents of the University of California v. Bakke* and *Webster v. Reproductive Health Services*, and how television news covered the cases from beginning to end. They also analyzed the television coverage in a much larger scope by examining how television news covered the Court over a span of two terms. Combining the findings of this research allowed Slotnick and Segal to develop a model to help identify and predict the television network’s choices about which case decisions receive minimal attention.

Throughout the data presented by Slotnick and Segal, it is clear that the television network’s primary interest in the Court is focused on its docket and the decisions made by the Court within each term. Furthermore, a major emphasis by the networks is placed on the Court’s decisions in the term’s leading cases. Using a data collection of 128 decisions with full opinions during the 1989 Court term, Slotnick and Segal develop their own analysis of the network’s choices on covering particular Court rulings. They also took into account many variables that could have contributed to the reporting of decisions by networks such as the decision date and the issue area of a case. Their research found that nearly 74% of decisions during the 1989 term received no coverage. Of the decisions that were reported on, nearly half of them were reported by all three major networks. It was also found that variables such as the greater number of amicus briefs filed in a case increased the likelihood that the case would be reported. However,

several of the variables including such as the United States government involvement were found to have no significant relationship to whether or not a case was reported by the networks.

Within their concluding remarks, Slotnick and Segal identify the overall significance of the subject area of the Supreme Court cases combined with interest group amicus participation in those cases help dictate which Supreme Court decisions receive network news time. News reporters identify cases with potentially widespread public importance to help decide which cases should be covered by their networks. They also conclude that they believe the Supreme Court will continue to represent a minimal amount of broadcast time due to other “television-friendly” events going on in the world. Finally, they ended by explaining they believe there is simply “no model of decisional coverage by television newscasts that can completely explain the variance in coverage,” due to the large number of variables which are nearly impossible to identify or measure.

IV: What’s Left to be Determined

From past research regarding public opinion and Supreme Court decisions, a variety of things can be concluded. It is evident that major Supreme Court decisions such as *Brown v. Board of Education* tend to have significant effects on public opinion. However, determining the extent to which the majority of the Court’s decisions seem to have left little, if any, effect on public opinion. Hoekstra’s findings provide support for this conclusion by analyzing the effects of four less-well known Supreme Court decisions on public opinion. She found that in the immediate communities in which the cases dealt with, it was much more likely for the citizens and local media to be involved as opposed to citizens and media in surrounding areas. Additionally, Hoekstra’s further provided that these decisions only slightly affected public opinion and that media coverage played a major role in the public’s interest in these Supreme

Court's decision. Thus, this leads to Segal and Slotnick's research analyzing media coverage on a national level. They were able to conclude that media reporters determine which Supreme Court cases will garner the most widespread public importance but there is simply no model to determine which cases will or will not be selected by the media indirectly affecting how cases will effect public opinion. Furthermore, while it has been disputed, it is also apparent from past research that even in the most minimal way, public opinion tends to have some effect on the decisions of the Supreme Court.

As a result of this research, while many advances have been made to further the research of the relationship of public opinion and Supreme Court decisions, there is still much more left to be determined. However it first must be clear, that when dealing with some aspects of the relationship given current available research methods, they will continue to remain unknown. Despite this, there are other aspects of the relationship which can be continued to be further analyzed and researched to provide additional support of past conclusions.

V: Research Goals

The remainder of this thesis will focus on three modern Supreme Court decisions to examine the effects of media coverage and its effects on the unique relationship between the public opinion and the Supreme Court. These cases include *Arizona v. United States*, *Town of Greece v. Galloway*, and *McCullen v. Coakley*. These three cases were specifically picked to compare and contrast the many factors which may or may not play a role in the level of media coverage given to these Supreme Court decisions.

As the research conducted by both Slotnick and Segal and Hoekstra research were both first published in 1998 and 2003, respectively, the goal of my research will be to analyze whether

the conclusions reached by these authors regarding public opinion and Supreme Court decisions continue to be true or if a new trend in modern day society is beginning to take place.

Furthermore, my thesis will evaluate the many contributing factors within these three Supreme Court case studies which may or may not play a role in its level of media coverage within the United States on local and national levels. Finally, as a result of this research, my thesis will also provide a hypothesis into an on-going Supreme Court case, *Texas Department of Housing and Community Affairs v. The Inclusive Communities Project*, and how it may play out as a result of its relationship with public opinion.

This thesis will apply three distinct conclusions reached by Slotnick and Segal and Hoekstra to modern day Supreme Court cases. (1) This thesis will first look at whether the conclusion reached by Slotnick and Segal that subject area of a given Supreme Court case and interest group amicus participation will be the most significantly effecting features of a Supreme Court case in determining their individual levels of media coverage. Additionally, whether other factors within a Supreme Court case may further significantly affect levels of media coverage. (2) Next, a conclusion reached by Hoekstra that will be analyzed is whether immediate and surrounding communities continue to cover a specific Supreme Court decision differently than each other or the gap between these two levels of society have begun to bridge together. (3) Finally, this thesis will consider a conclusion reached by Hoekstra explaining that immediate communities affected by a specific Supreme Court decision will tend to more extensively analyze a given case than national media.

VI: Case Studies

The first case study is *Arizona v. United States* (2012) which was a challenge to the Arizona state bill passed in 2010 known as S.B. 1070. The Supreme Court was tasked on

focusing on whether the state immigration bill was preempted by federal statute and focused specifically on four provisions within the bill. These four provisions included sections 3, 5(c), 6, and 2(b) of the bill. Section 3 of S.B. 1070 under Arizona law made it a misdemeanor for a failure of aliens to carry their registration documents. The Court held that Section 3 was preempted by Congress' need to regulate the rules for alien registration. Section 5(c) of S.B. 1070 which resulted in criminal penalties for aliens who failed to seek or obtain employment within Arizona. This section was also preempted because it disrupted the goals of the Immigration Reform and Control Act of 1986 as the act imposed penalties to employers who of certain aliens opposed to aliens seeking the employment. Additionally, section 6 of S.B. 1070 authorized the warrantless arrest of aliens who are believed to have committed a deportable offense. Again, this was preempted by the fact that this would grant Arizona a broader police power than federal law allowed. Finally, section 2(b) of S.B. 1070 required Arizona police to determine the immigration status of any lawfully stopped individual who may be an unauthorized citizen. The Court determined that federal law did not facially preempt this section of S.B. 1070.

The majority opinion was written by Justice Anthony Kennedy in a 5-3 decision which specifically struck down certain provisions of S.B. 1070. Kennedy opens his opinion explaining that Congress has a broad and complex power when dealing with the topic of immigration and this created a clear conflict between the federal and state governments. He further explained that it would be a bad idea to have 50 states each with different immigration schemes. Thus, the Supremacy Clause which established the United States, federal statutes, and treaties as the "supreme law of the land," allowed Congress to preempt any laws enacted by the states.

The second case study, *Town of Greece v. Galloway (2013)*, dealt with the issue of whether the opening of the town's board meetings with prayer is a violation of the Establishment Clause of the First Amendment. The town of Greece is governed by a five-member board who conducted official business at monthly public meetings. Beginning in 1999, the town meetings began with an opening prayer conducted by an invited clergyman. While the town did not adopt any specific policy about which religion would lead the prayers, it was acknowledged that the vast majority of the members of the town of Greece who conducted the prayers were from Christian clergies. In 2007, Susan Galloway and Linda Stephens complained about the use of prayer to open the town's board meetings. This was followed by in 2008 when Galloway and Stephens proceeded to sue the town as well as the Town Supervisor, John Auberger. The district court ruled in favor of the town holding that the plaintiffs failed to present sufficient credible evidence that there was intentional seclusion of non-Christian religions. The United States Court of Appeals for the Second Circuit then reversed the decision of the lower court holding that there was a clear violation of the Establishment Clause of the First Amendment as an apparent preference was given to Christian prayers within the town.

In a 5-4 decision, Justice Anthony Kennedy delivered the majority opinion of the Supreme Court reversing the decision of the United States Court of Appeals. The Court first held that opening of prayer in a legislative setting is appropriate for acknowledging religion's role within society and set the proper mood. The Court also explains how the Establishment Clause was never intended to block this type of application of prayer in legislative settings and that the prayer is primarily for the members of the legislative body of the town of Greece and did not coerce the public into religious acknowledgement of Christianity. Additionally, the majority opinion explained that the content of the prayers did not need to be non-sectarian because this

type of requirement would have placed the court and government in a position to violate the Establishment Clause. Finally, Kennedy distinguishes the difference between offense and coercion explaining offense does violate the Establishment Clause.

This case also involved various concurring and dissenting opinions from the justices of the Supreme Court. Justice Samuel Alito wrote a concurring opinion explaining that there was a long tradition of constitutionally permissible legislative prayer and that this type of prayer was not required to be non- sectarian as it would have forced the government into policing prayer. Justice Thomas also wrote his own opinion concurring in part and dissenting in part. His argument was centered on the idea that the Establishment Clause should be read as a federalist provision which protected state rights as opposed to individual's rights.

Lastly, Justice Stephen Breyer wrote a dissenting opinion as well as Justice Elena Kagan, who was joined by Justices, Ruth Ginsburg and Sonia Sotomayor. Breyer first argued similar to the Court of Appeals that the town of Greece must do more than make its prayer inclusive of other faiths. Breyer explained that the town of Greece made no effort to inform non-Christian clergies about delivering the opening prayer at the board meetings and as a result, marginalized these religions. Finally, Kagan wrote her dissent explaining that the town had amounted themselves to an unconstitutional preference of one religion over the other by failing to represent the minority religions within the town of Greece. Kagan explains that the use of this type of prayer in a public forum forces individuals to publically acknowledge their disagreement with the religion.

The third case study, *McCullen v. Coakley* (2013), also deals with the possible violation of the First Amendment. In 2009, Massachusetts created a thirty-five foot buffer zone around the entrances, exits, and driveways of abortion clinics. The buffer zone was challenged by

individuals who regularly participated in “pro-life counseling” outside state abortion clinics in district court. These individuals argued that the Massachusetts law violated their First Amendment rights of free speech. The district court ruled that while the law places a restriction on the time, place, and manner of speech, the law was unrelated to the content of the speech and still allowed alternative means of communication. The United States Court of Appeals for the First Circuit then proceeded to affirm this decision holding that *Hill v. Colorado* had already upheld a similar law prohibiting certain activities within 100 feet of abortion clinics in Colorado.

In a unanimous 9-0 decision, Chief Justice John Roberts delivered the opinion of the court reversed the decision of the Court of Appeals explaining that the Massachusetts law violated the First Amendment. The Court first explained that the Massachusetts law is neutral because its violations depend on the location of the speech as opposed to the content within the speech. As a result, the Court explains that strict scrutiny was not necessary in this case. However, the Court also recognized the law was not “sufficiently narrowly tailored to serve a significant government interest” as it placed a substantial burden on individuals’ First Amendment rights. Thus, the type of speech the petitioners were attempting to engage in were the precise protections provided by the First Amendment. The majority opinion concludes by explaining that were other options in which Massachusetts could have pursued to reach their same interests.

There were two separate concurring opinions by Justice Antonin Scalia, joined by Justices Kennedy and Thomas, and Justice Samuel Alito. Scalia’s opinion argued that the law was actually content-based and as a result, must be analyzed under strict scrutiny. Similar to the majority, Scalia argued that the law violated the First Amendment rights of the individuals but went further in stating that the decision in *Hill v. Colorado* should also be overruled. However,

Alito's concurring opinion stated that the law resulted in viewpoint discrimination by silencing abortion opponents while allowing supporters to express their views.'

VII: Conclusion #1 – Model

Following Slotnick and Segal's method of evaluation for which factors played significant roles in effecting a Supreme Court cases' media coverage, I apply a comparable model.

However within the last decade, sources of media coverage has further expanded as society has become more technological. Individuals no longer solely rely on television media coverage as their source of information. Instead, the internet has become a major source for individual to retrieve their daily news and information. Therefore, my study will examine a different range of media coverage as a result of modern's societies expanded dependence on the internet. In determining the level of media coverage given to each Supreme Court case, the dependent variable will work on a range of no coverage to coverage by four major internet news resources. The dependent variable will evaluate coverage of these Supreme Court decisions by USA Today, the New York Times, the Washington Post, and the Los Angeles Times. However, it should be noted that the fundamental question in regards to the levels of media coverage affecting public opinion and Supreme Court decisions is more focused on whether decisions of cases are reported at all.

The independent variables within my model will also correspond to Segal and Slotnick as it will consist of characteristics which are specific to each individual case. Seven distinct characteristics of Supreme Court decisions will be analyzed. The evaluation of these factors will provide reasoning for why media coverage within these cases may or may not have varied between each other.

First, the number of cases announced on the same decision day will be evaluated. This is significant because each network only has a limited amount of time within each day to ensure news is reported. Additionally, other major happenings within the news will be noted as this could also limit the media coverage of a Supreme Court decision. Therefore on a particularly busy Court decision day, cases announced with other decisions are likely to compete among each other. This could possibly lead to some cases not even being reported by networks as they may be forced to decide which cases are deemed to be more “newsworthy” than the others. Slotnick and Segal explain the expectation of is that “as the number of cases announced on the same day increases, the likelihood that any one of them will be reported will decrease.”

Another factor to be analyzed within my model is the lower court involvement in each case. The lower courts in which Supreme Court cases arrive from can vary from federal courts to state Supreme Court. As a result, the populations in which the lower courts serve vary and as a result, there may be a connection between the cases covered by the media and the involvement of the lower court. Therefore, this factor will be measured by placing each case into either the first clustered group of the case coming from the D.C. Circuit Court of Appeals, the Second Circuit, the Ninth Circuit, the Supreme Court of New York, or the Supreme Court of California or the second group of any other lower court.

The third independent variable is the action of the Supreme Court in regards to the decisions of the lower court. It has been recognized that conflict is a major point of emphasis for media coverage of events. Conflict in regards to the Supreme Court can be defined as when the Supreme Court reverses the decision of the lower court decision. Therefore, the expectation with this factor as explained by Slotnick and Segal is “Supreme Court affirmances of lower court

decisions are perceived as less newsworthy and...reversals of lower court rulings are more likely to receive coverage.”

The fourth independent variable is the Supreme Court case vote which reflects another type of conflict of disagreement among the justices. It is expected that the greater division within the case vote, the more likely it is that the case will receive greater attention by the media networks. This factor will be measured under the same five-point scale created by Slotnick and Segal which ranges from a unanimous vote to a highly divided vote such as a 5-4 or 4-3 decision. The middle of the range will account for a highly cohesive vote such as 8-1, a moderately cohesive vote such as 7-2, and a moderately divided vote such as 6-3.

Fifth, the United States government involvement is significant because they have a direct relationship with the Supreme Court and is recognized as winning cases on their merits within the Court. This involvement of the United States within a Supreme Court case is expected to signal to the media that the case has the potential to deal with an important piece of legislation which is likely to lead to an increased level of media coverage of the case. This will be measured on a range from either no involvement in the case to being a direct part within the case. The middle range will represent involvement by the government if they filed an amicus brief in support or against one of the parties within a case or participation within an oral argument of a case.

Sixth, the total number of amicus briefs filed in case shows a direct correlation to the interest group participation and concern to a specific case. The expectation in this case will be that the higher number of amicus briefs filed within a case will lead to a greater level of media coverage. This will be measured on a range from no briefs filed (zero briefs) to an extreme number of amicus briefs being filed (over twenty briefs). The middle of this range will include a

mild (one to five briefs), moderate (six to ten briefs), and high number of amicus briefs filed (eleven to nineteen briefs).

Finally, the issue area of each case will be assessed. Slotnick and Segal recognized the complicated task of distinctly categorizing issues among each other. However, relying on *U.S. Reports* they were able to create a coding system which consisted of two major categories of cases. The first grouping will include First Amendment, criminal justice, other rights and liberties, judicial power, federalism, and economic issues. The other group will include cases such as civil procedure, federal programs, labor and employment and attorney-related cases. However, my model will simply account for the issues covered within each case utilizing the issues categorized by Slotnick and Segal. Therefore, my expectation will rely on that the higher number of issues covered by a Supreme Court case will lead to an increased level of media coverage.

VIII: Conclusion #1 – Results & Analysis

In applying my model to these three Supreme Court cases, the level of media coverage given to each of these decisions must be first be analyzed. The Supreme Court ruling in *Arizona v. United States* was reported in all of the major sources with the exception of the Los Angeles Times. The decision of *Town of Greece v. Galloway* appeared in all four media sources including USA Today, the New York Times, the Los Angeles Times, and the Washington Post. The ruling in *McCullen v. Coakley* was reported by all media sources except for USA Today. However, it can be inferred that all three rulings appeared to have received a substantial level of media coverage within the United States as they each were reported by at least three of the four major news sources. It should be noted that the fact that these three cases were covered extensively by these media sources does not imply that modern-day media coverage tends to

cover every case of the Supreme Court. Slotnick and Segal's model performed an analysis of media coverage of an entire of the Supreme Court while my model is analyzing three distinct cases of the court.

Additionally to help further quantify and individualize the levels of media coverage for these cases in general, the LexisNexis database of national and regional news media sources was utilized. It was determined that *Arizona v. United States* and *Town of Greece v. Galloway* both received the highest level of media coverage with 167 and 168 news stories, respectively. These cases were followed up by *McCullen v. Coakley*, with only 153 stories. As previously stated though, the importance of the level of media coverage is simply that the decisions of these cases clearly are evident within news sources throughout the United States. Consequently, this brings about the question of which factors may have played a role in determining the level of media coverage in each of these cases.

The first factor to be evaluated is whether any other cases were decided on the same day as these cases. *Arizona v. United States* was decided on June 25th, 2012 on the same day as two other decisions including *Miller v. Alabama* and *American Tradition Partnership, Inc. v. Bullock*. Further, on this same day tropical storm Debby was also a significant news story with the state of Florida and its governor declaring a state of emergency. Officials reported that over 35,000 businesses and homes were directly affected by the storm. *Town of Greece v. Galloway* was decided on May 5th, 2014 with two cases, *Roberts v. United States* and *Tolan v. Cotton* also being decided on the same day. President Barack Obama announced a federal review of death penalties after the botched killing of death row prisoner, Clayton Lockett. Additionally, Nigerian President Goodluck Jonathan requested international assistance with the kidnapping of 276 schoolgirls took place in the previous month. *McCullen v. Coakley* was decided on June 26th,

2014 with one other case, *NLRB v. Noel Canning*. This was a significant Supreme Court case dealing with the Senate Recess Appointment Clause. Additionally, the Supreme Court's decision in *Riley v. California* which was made a day prior this decision was still being reported throughout media sources. This case dealt with warrant requirements to in order to search cell phones. Other news on this day included 10th Circuit U.S. Court of Appeals ruling that bans by Indiana and Utah regarding marriage equality were unconstitutional.

The lower court involvement among these three Supreme Court rulings all varied among each other. *Arizona v. United States* falls into the first clustered group of this factor as it was brought up by the Supreme Court from the Ninth Circuit Court of Appeals. *Town of Greece v. Galloway* also falls into the same grouping the lower court involvement as it arrived to the Supreme Court Second Circuit. However, *McCullen v. Coakley* falls into the second group as their case was brought to the Supreme Court from the 1st Circuit of the United States Court of Appeals.

Next, the Supreme Court's decision in regards to the lower court's ruling must be accounted for. The majority opinion in *Arizona v. United States* affirmed, in part and reversed, in part the previous decision made by the lower court. The decision in *Town of Greece v. Galloway* reversed the ruling of the lower court. The Supreme Court also reversed the ruling of the lower court in *McCullen v. Coakley*.

The case vote must also be evaluated in each Supreme Court ruling. *Arizona v. United States* was a 5-3 decision. Three separate opinions were written by different justices in which they each concurred, in part, and dissented, in part, to the majority opinion in this case. *Town of Greece v. Galloway* was a 5-4 decision which involved two concurring and two dissenting

opinions. Lastly, the Supreme Court produced a unanimous 9-0 decision in *McCullen v. Coakley*.

The involvement of the United States were present in each of these three case studies. The United States' government was substantially involved in *Arizona v. United States* as one of the parties within the case. Within *Town of Greece v. Galloway*, the United States Congress filed an amicus curiae brief while several United States government officials such as Ian H. Gershengorn, the Deputy Solicitor General in the Department of Justice participated in oral arguments for *McCullen v. Coakley*.

The total number of amicus curiae briefs are accounted for in each decision. *Arizona v. United States* had forty-two amicus curiae briefs filed in total. *Town of Greece v. Galloway* had a total of forty-five amicus curiae briefs filed. *McCullen v. Coakley* had the lowest number of amicus curiae briefs filed with only thirty-two.

Finally, the issue area of the three cases are noted. *Arizona v. United States* dealt with issues regarding federal law and immigration. *Town of Greece v. Galloway* dealt with First Amendment rights including the Establishment Clause and religion. *McCullen v. Coakley* also dealt with the First Amendments but in regards to abortion and a prior Supreme Court decision of *Hill v. Colorado*.

An evaluation of these three Supreme Court rulings through the scopes of these various factors appear to show a wide variety of parallels. Similarly, on the same day as each of the cases, other decisions were also made but there appeared to differences in the type of events also taking place on these decision days. This may help to explain why the Los Angeles Times, for example, may not have been focused on covering the *Arizona v. United States* decision as the

storm in Florida may have been a more appealing story due to the immense damage created by the storm. Furthermore, this may help to explain why the *McCullen v. Coakley* decision failed to be reported by USA Today as multiple other rulings by the Supreme Court were decided either the day prior or the same day as this decision. Media outlets may have been more inclined to focus on issues regarding the constitutionality of a specific search and seizure or marriage equality at that time. Conversely, with *Town of Greece v. Galloway*, being reported by all four media outlets, this may be explained by the fact that while other Supreme Court decisions were announced, no substantial events were taking place other than announcements or requests by national leaders.

Another similarity among the three cases was the involvement of the United States government. All three cases involved in the United States court in some fashion. The fact that *Arizona v. United States* directly involved the government as one of the parties in dispute while in the other two cases, the United States government only participated in oral arguments or filed an amicus curiae brief, should have indicated that this ruling would have received the most coverage. However, as my results indicate otherwise, this then suggests that the government involvement is irrelevant to the level of media coverage of a Supreme Court decision.

The third similarity among the cases was the total number of amicus curiae briefs filed. While the total number was not exactly the same, it is clear that each of the cases had relatively similar total number of amicus briefs ranging from 32 to 45. Therefore, all of these cases fall under the category of having a high number of amicus curiae briefs filed. This shows that media coverage of a decision will increase as more briefs are filed. This is a representation of the many interests and groups who play a role in the case which then shows a growing population within the United States who appear to have concerns in the decision of the case. As Slotnick and Segal

concluded, there does appear to be a positive correlation between the amicus curiae briefs filed within a Supreme Court case and the media coverage of its decision.

The results of my model also produced many differences between the cases. The lower court involvement varied from case to case. While *Arizona v. United States* and *Town of Greece v. Galloway* fell into the first grouping of lower court involvement, *McCullen v. Coakley* fell into the second grouping as it arrived from the First Circuit. This suggests that regardless of the involvement of the lower courts, coverage of Supreme Court decisions seems to vary from case to case.

However, with high levels of media coverage involved in each case, the issues dealt with by each case varied. Slotnick and Segal's research concluded that when cases dealt with the First Amendment or other rights and liberties as these case studies present, their rulings tend to be reported by media while cases involving economics tend to receive the least media coverage. The results from my model support this conclusion and does not present any evidence suggesting otherwise.

Conflict within and outside the Supreme Court was also supposed to be a signal for increased media coverage during Slotnick and Segal's research. Despite this, their concluding research indicated that this was not necessarily an indicator of high levels of media coverage. The results after evaluating these three decisions also produced mixed results of whether conflict is an indicator of increased media coverage. Given that each of three cases received high levels of media coverage, it is significant that each decision involved the Supreme Court to at least reverse some part of the decision of the lower courts. Contrary to this, while all three cases received high levels of media coverage, the case vote of *Arizona v. United States* and *Town of Greece v. Galloway* included multiple dissenting and concurring opinions while *McCullen v.*

Coakley received a unanimous decision. Therefore, this indicates that the conflict within the case vote of each decision is not significant to each rulings' media coverage.

Overall, my model of research involving modern-day media coverage of Supreme Court decisions appears to support the conclusion reached by Slotnick and Segal that the total number of amicus curiae briefs filed and the specific issue of each Supreme Court decision tend to be the highest predictors of how the media will cover a decision. The other factors evaluated within my case studies appear to have multiple variances suggesting that they either play little, if any, type of role in determining whether the media will cover these decisions. However, the evaluation of my case studies produced mixed results on whether conflict from within or outside of the Supreme Court can be predictors of the media coverage of these decisions. Therefore, whether conflict plays a role in modern-day media coverage of a Supreme Court decision is at this point, inconclusive.

IX: Conclusion #2 & 3 – Results & Analysis

Hoekstra's conclusions that immediate (local media) and surrounding (national media) areas cover Supreme Court decisions differently and to different extents than each other will now be examined. With modern-day news media adapting to technological advances such as the Internet, this research may produce conclusions contrary to what Hoekstra previously found and thereby suggest, that these different communities now cover Supreme Court decisions similarly. Additionally, this may or may not support Hoekstra in concluding that immediate and surrounding areas cover Supreme Court cases to different extents to each and this modern shift to the Internet may provide reasoning that conclusion. In evaluating both of Hoekstra's conclusions, local and national media coverage of the case studies' rulings will be analyzed

while the extent will be evaluated in terms of media coverage around the day of the decision and then six months or later after the decision.

As the result of *Arizona v. United States* taking place nearly three years ago, the local news media regarding this decision is limited. Therefore when considering the immediate communities within this case, the Southwest area of the United States will be considered. This includes states which are directly touching the borders of Arizona while the surrounding communities will be considered as the United States as a whole. On June 25th, 2012, the immediate communities were extremely swift in reporting the ruling with articles regarding the case being posted as early as 8:37 AM that day. Similar to the conclusions reached by Hoekstra, local media news reports for this case provided an in-depth look on the case vote of the Supreme Court and went on to explain in depth the rulings made by the Supreme Court. For example, an article produced by FOX 13 in Salt Lake City explained how the case reached the Supreme Court and the major disputes between the two parties. Local news articles included quotes from the justices and also went into depth regarding the four provisions that were in question within this case and included discussion about involvement of lower courts and other participating states. The Arizona Republic also provided substantial depth into the case by reporting the case and including reactions to the decision from the many leaders within the society of the United States. Individuals who were quoted included the Jon Kyl, John McCain, Greg Stanton, Barack Obama, Jan Brewer, and Mitt Romney.

Unlike the news stories from the immediate communities regarding this ruling, much of the news media from the surrounding communities of this decision still exists. While national news media also reported the case vote of the decision and quotes from the majority opinion, national media appeared to be more focused on connecting the court's ruling to Barack Obama

and his involvement of the case. For example, the Washington Post, New York Times, and USA Today all focused on how the two potential candidates for the next presidency at the time, Barack Obama and Mitt Romney reacted to the decision of the ruling. Furthermore, many national news reports explained how the dissent written by Justice Scalia included a reference to Barack Obama.

However, the extensiveness of the media coverage of this case appears to have clear distinction between the immediate and surrounding communities of the case. Clearly, both communities thoroughly and efficiently covered the decision when it was reached three years ago. There are numerous recent articles within the past few months which continue to reference the decision reached by *Arizona v. United States* and how Arizona's SB 1070 law continues to effect the state. However, there appears to be very little continued coverage of the decision on a national level. The Washington Post was found to have talked about the decision a year later in an article in August of 2013 but present day national news media regarding the decision appears to be limited.

For *Town of Greece v Galloway*, the immediate communities will be considered solely in the state of New York while the surrounding communities will again be considered the United States as a whole. News media from immediate communities such as The New Yorker opened by explaining how the Supreme Court ruled in this case and went on to further explain many quotes given by the justices as well as providing depth into how town officials in the city of Greece in New York felt in regards to their case. Additionally, the New York Times provided past legal precedence of *Marsh v. Chalmers* in their article and explained how the case reached the Supreme Court.

Similarly, news media from surrounding communities including the Washington Post and USA Today opened their articles by explaining the Supreme Court case vote in *Town of Greece v. Galloway* and then began explaining the opinions and quotes of the justices. Again, these articles also explained the prior precedence set in *Marsh v. Chalmers* and explained how this case reached the Supreme Court. Finally, these articles concluded with how this decision overturned the decision of the lower court.

The extensiveness of the news media covering this decision appears to be a steady continuance of coverage for this case. It appears that on both the local and national news media level that the decision of *Town of Greece v. Galloway* continues to be referenced by media sources throughout today's society. For example, a recent article in April 2015 regarding the Supreme Court of Canada, referenced in utilized this decision within their discussion of the differences of this court and the Supreme Court of the United States.

For *McCullen v. Coakley*, the immediate communities will be considered the state of Massachusetts and the states which border it while the surrounding community will be considered the United States. The news reports from the immediate communities first highlighted that this was a unanimous decision reached by the Supreme Court and then quoted the majority opinion. These articles then provided insight into the Massachusetts law that was in question in this case and the effects of this decision. Additionally, an example of this was the New York Times who also referenced the connection of *Hill v. Colorado* and even included a quote from the Boston police commissioner.

In national media, the decision of *McCullen v. Coakley* was also highly reported. Two major sources on the national media level which provided articles regarding the decision included the Washington Post and the Huffington Post. Again, these articles thoroughly covered

the ruling by first explaining how the Supreme Court reached their conclusion and included quotes from the majority opinion. These articles also thoroughly explained the Massachusetts law in question and the restrictions it places on individuals. Furthermore, quotes from the National Abortion Federation and Americans United for Life were also included. Finally, these articles included the participation of other states into the related subject of abortion clinic access.

The extensiveness of the media coverage of this decision also appears to be intensely covered on both the local and national levels. When reporting about religious freedoms, local and national media continues to use *McCullen v. Coakley* to help explain how the United States and its Supreme Court will interpret this issue. For example, a recent article published by the Huffington Post in April 2015 questioned whether religious freedoms trumped other constitutional rights.

So what does this all mean? It very clearly appears to suggest that the decisions reached by Hoekstra in regards to media coverage on local and national levels may no longer hold true. These three case studies provide examples of the both immediate and surrounding communities appear to be reporting these rulings very thoroughly with the exception of including or excluding minor details. Evaluating these cases show that regardless of local or national level, the stories report how the Supreme Court ruled including quotes from the majority opinion and then go on to explain the effects of the decision and how the case reached the Supreme Court. Furthermore, it appears that for the most part, these decisions also are being extensively reported by both levels of media with articles referencing these decisions being reported years after their decisions. This may very easily be the result of the Internet becoming the major source of news for individuals within the society of the United States. With the Internet, news media sources no longer have to worry about fitting all of their stories into a single newspaper or within a single

hour of television. The Internet allows media sources to take an in-depth look into these Supreme Court cases without being constrained to these limits. This may explain why there appears to be a clear shift in modern day media away from the conclusions reached by Hoekstra in 2003.

XI: Predicting *Texas Department of Housing and Community Affairs v. The Inclusive Communities Project*

An on-going case within the Supreme Court is *Texas Department of Housing and Community Affairs (TDHCA) v. The Inclusive Communities Project (ICP)*. Low income housing tax credits are distributed by the United States through an application process for low-income housing developers. In 2009, the Inclusive Communities Project sued the TDHCA claiming that they disproportionately granted these tax credits to minority neighborhoods discriminating against Caucasian neighborhoods. Furthermore, the ICP alleged that segregation was perpetuated by this causing a clear violation of the Fair Housing Act. The United States Court of Appeals for the Fifth Circuit affirmed the decision reached by the lower courts which ruled in favor ICP stating that the burden was on TDHCA to show a compelling government interest with no other less discriminatory alternatives. This case was then granted by the Supreme Court on October 2nd, 2014 and oral arguments were presented on January 21st, 2015.

Applying the analysis reached by the three case studies, the levels of media coverage and the extent to which this case is covered can be predicated. Using the two most significant factors effecting levels of media coverage, the number of amicus curie briefs filed and the subject area of the case, it can be predicated that this case's ruling will receive a high level of media coverage. Currently, 43 amicus curie briefs have been filed for this case which places this case into the same category as the previous three cases studied while the issue is significant in dealing

with a federal program and act and an alleged discrimination in violation of that act. Therefore, it can be concluded that this is likely to warrant high levels of media coverage when a decision is reached. Furthermore, from the results found regarding media coverage immediate and surrounding communities and their extensiveness of coverage, it is likely that this case will be covered similarly on both levels while extensively being referenced to months after its decision.

XII: Limitations & Conclusions

While my thesis provides support for its conclusions reached, there were three major limitations of my research. Firstly, my research was limited to three case studies within a single term of the Supreme Court of the United States. Conversely, Slotnick & Segal's research looked an entire term of the Supreme Court and how cases differed in levels of media coverage. This limitation presented problems because it may simply too small a sample size to truly conclude which factors play the most significance in determining levels of media coverage. The second major limitation of my research was that I failed to have a true model to determine any significant difference of the factors which may have effected levels of media coverage. Again, this limited my ability to truly conclude which factors played the most significant roles in media coverage. My third major limitation was my access to limited numbers of news sources. Many local news media sources constrained my ability to view articles regarding the decisions of the cases which narrowed my ability to analyze the differences of the local and national coverage of the decisions.

However, it is important to recognize that clearly media coverage plays a key role in the relationship between public opinion and Supreme Court decisions. While my research suggests that Slotnick and Segal's conclusion continues to be accurate while Hoekstra's findings may be evolving, it is also important to consider that there are numerous other factors which may

indirectly affect these conclusions. Currently there will never be an exact measurement for determining a precise conclusion of these questions. One can only merely use the evidence to provide support for this evidence may suggest. Media in modern society surrounds individuals constantly through their use of the Internet on computer and cell phone devices. This media coverage is how individuals receive the details of a Supreme Court case and allows them to begin forming their opinions on the issue at hand within moments. This then indirectly affects Supreme Court decisions because the justices are subjected to consider public opinion as a whole and how their rulings may affect the country. In conclusion, it is absolutely critical to account for media coverage when considering the relationship and its effects between public opinion and Supreme Court decisions.

Bibliography

Arizona v. United States, 132 U.S. 2492 (2012)

Borowitz, Andy. "In Landmark Decision, Supreme Court Strikes Down Main Reason Country Was Started." *The New Yorker* [New York, NY]. The New Yorker, 6 May 2014. Web. 5 May 2015. <<http://www.newyorker.com/humor/borowitz-report/in-landmark-decision-supreme-court-strikes-down-main-reason-country-was-started>>.

Epstein, Lee, and Andrew D. Martin. "Does Public Opinion Influence the Supreme Court? Possibly Yes." *Journal of Constitutional Law* 13.2 (2010): 263-281. Web. 5 May 2015. <<https://www.law.upenn.edu/journals/conlaw/articles/volume13/issue2/EpsteinMartin13U.Pa.J.Const.L.263%282010%29.pdf>>

Goodman, Amy, and Juan Gonzalez. "A Daily Independent Global News Hour." *Democracy Now!*. N.p., n.d. Web. 5 May 2015. <<http://www.democracynow.org/>>.

Gryboski, Michael. "Canada Supreme Court Rules Against Christian Prayers at City Council Meetings, Says It 'Stigmatizes' Atheists." *Christian Post*. The Christian Post, 7 Apr. 2015. Web. 5 May 2015. <<http://www.newyorker.com/humor/borowitz-report/in-landmark-decision-supreme-court-strikes-down-main-reason-country-was-started>>.

Hill v. Colorado, 530 U.S. 703 (2000)

Hoekstra, Valerie J. *Public Reaction to Supreme Court Decisions*. New York, NY: Cambridge University Press, 2003. Print.

LexisNexis Academic. LexisNexis, n.d. Web. 5 Apr. 2015. <www.lexisnexis.com>.

Los Angeles Times. Tribune Publishing Company, n.d. Web. 5 May 2015. <<http://www.latimes.com/>>.

Manuel, Kate, and Michael Garcia. "Arizona v. United States: A Limited Role for States in Immigration Enforcement." *CRS Report for Congress* (2012): 1-19. *Congressional Research Service*. Web. 5 May 2015.

Marsh v. Chambers, 463 U.S. 783 (1983)

McCullen v. Coakley, 12 U.S. 1168 (2014)

"SB 1070: Reactions in Arizona from community leaders." *azcentral.com* [Phoenix, AZ]. Arizona Republic, 26 June 2012. Web. 5 May 2015. <<http://www.azcentral.com/news/politics/articles/2012/06/25/20120625sb1070-ruling-reactions-arizona-community-leaders.html>>.

SCOTUSblog. SCOTUSblog, n.d. Web. 5 Apr. 2015. <<http://www.scotusblog.com/>>.

Slotnick, Elliot E., and Jennifer A. Segal. *Television News and the Supreme Court: All the News that's Fit to Air?* New York, NY: Cambridge University Press, 1998. Print.

The New York Times. The New York Times Company, n.d. Web. 5 May 2015. <<http://www.nytimes.com/>>.

The Washington Post. The Washington Post, n.d. Web. 5 May 2015. <<http://www.washingtonpost.com/>>.

Town of Greece v. Galloway, 12 U.S. 696 (2014)

US Supreme Court Media; Oyez. Oyez, Inc., n.d. Web. 5 Apr. 2015. <<http://www.oyez.org/>>.

USA Today. Gannett Satellite Information Network, Inc., n.d. Web. 5 May 2015. <<http://www.usatoday.com/>>.

Wells, David. "Supreme Court sides with U.S. in Arizona immigration case." *Fox13 Salt Lake City* [Salt Lake City, UT]. KSTU, 25 June 2012. Web. 5 May 2015. <<http://fox13now.com/2012/06/25/supreme-court-sides-with-u-s-in-arizona-immigration-case/>>.

Zirin, James. "Does Religious Freedom Trump Other Constitutional Rights?" *Huffington Post*. The Huffington Post, 27 Apr. 2015. Web. 5 May 2015. <http://www.huffingtonpost.com/james-d-zirin/does-religious-freedom-tr_b_7135502.html>.