

ple can only be taken so far.

Campbell's claim for Henderson's significance in his introduction seems almost unnecessary, and at times also off the historiographical mark. He sees the book challenging the "claim made by Canadian historians that being a maternal feminist...involved the depoliticization of women," yet many feminist historians recognize the deeply political nature of maternal feminism – even if they are critical of it. Similarly, to argue that Bettina Bradbury "shifted" feminist scholarship away from Joan Sangster's focus on "elite women" (4) to a new emphasis on "ordinary women," suggests political and scholarly differences between two socialist-feminist historians which did not really exist. Campbell's biography of Henderson is so important, so very well done, that it needs little historiographical justification. Henderson was, on one hand, a unique, extraordinary, politically talented woman whose life is interesting in its own right. She was also a political actor among others, part of wider efforts to build resistance to capitalism, gender oppression, and war. We are in great debt to Campbell for reconstructing an extraordinary life neglected for too long.

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**Marc Stein, *Sexual Injustice: Supreme Court Decisions from Griswold to Roe* (Chapel Hill, University of North Carolina Press, 2010).**

Clive Boutilier, a Canadian immigrant to the United States who had had homosexual experiences, was refused naturalization in a 1967 Supreme Court decision, *Boutilier v. the Immigration and Naturalization Service* on the basis of a 1952 immigration law permitting exclusion of those "afflicted with psychopathic personality" (61). He was deported to Canada in 1968 after being severely injured and permanently disabled when a car struck him on a New York street in what may have been a suicide attempt. Moved by this tragic and little known story, Marc Stein has investigated the contradiction between Boutilier's treatment and the powerful narrative of sexual liberalization that has dominated accounts of five significant U.S. Supreme Court decisions between 1965 and 1973, especially *Griswold v. Connecticut* (birth control), *Memoirs of a Woman of Pleasure [Fanny Hill] v. Massachusetts* (obscenity), *Loving v. Virginia* (interracial marriage), *Eisenstadt v. Baird* (access to birth control for the unmarried), and *Roe v. Wade* (abortion). He argues that the narrative of liberalization ignores how the Court's decisions upheld "a legal regime of heteronormative supremacy" (21) and liberalized only reproductive and marital, not broadly sexual, rights. Hence, the *Lawrence v. Texas* decision of 2003 that invalidated sodomy laws was not a culmination but a reversal of earlier views.

This book is very clearly written and comprehensively researched, addressing the above six Supreme Court decisions and dissents of 1965-73 in detail and a few others more briefly: records of justices' internal discussions; backgrounds, rhetoric, and reasoning of lawyers making the cases; and responses of mainstream and gay and lesbian media, as well as of lower court judges, to the Court's decisions. Some repetition occurs as we return to the cases in each of the three parts of the book, organized around the Court, the advocates, and the media response. (An appendix with dates and basic details of each important case would have been helpful.) But this organization usefully articulates Stein's main points - that the actual texts of the decisions were heteronormative, that advocates also mostly failed to argue for universal sexual freedom and equality, and that the media and often even lower court judges read the decisions selectively as "liberal," while "forgetting" both *Boutilier* and conservative elements of other decisions.

Stein shows the texts of decisions and justices' discussions centred on freedom and privacy for married couples while sustaining sexual regulation generally. Hence *Griswold* invalidated Connecticut's anti-contraceptive law but also noted the state's right to prohibit adultery or homosexuality (30-32). Advocates also used heteronormative language, did not challenge broader state controls, and often resorted to the politics of respectability, defending *Boutilier* and other clients as decent, gender-appropriate, and citizen-like (20). Stein's account often has a critical edge, although he acknowledges that advocates sought to protect individual clients by actually winning the cases and that their arguments were limited by dominant heterosexual assumptions. More egalitarian discourses did exist, but they were confined to minority libertarian, left, and homophile organizations that lacked significant influence; lawyers feared using them would harm their cases. Perhaps studying the court led him to overemphasize the cultural power of law vs. that of the social and cultural environment.

Most fascinating is Part III, where Stein demonstrates how different popular conceptions of the Court's "liberalism" were from the actual, more conservative, texts of the decisions. Not only mainstream but also the more critical gay and lesbian media sometimes assumed rights to (marital) privacy or equal protection (for the single and married) asserted in the "liberal" cases implied rights for gay men and lesbians (228). More surprisingly, sometimes lower courts also did, as in 1971, when "a federal judge in New York granted the naturalization petition of a Cuban-born homosexual, citing *Griswold* to support the claim that 'it is now established that official inquiry into a person's private sexual habits does violence to his constitutionally protected zone of privacy'"(238). The negative import of the *Boutilier* decision was forgotten because it disrupted this narrative of liberal progress.

Stein attributes these “misreadings” to the desire of some to promote the sexual liberalization that they then read into the Supreme Court’s words. He also notes what I think is a major reason – that “sex” remained so culturally entwined with reproduction and marriage that decisions we see now as specifically heterosexual could be more easily read then as leading to a general “sexual freedom.” We might see the Court’s heteronormative assertions as part of a defensive effort to preserve heterosexist structures then beginning to fracture. Contradictions between the Court’s words and popular interpretations vividly illustrate that “truth” is not singular; perhaps those who got it wrong in Stein’s view are in the end at least equally right.

*Sexual Injustice* is extremely valuable. It reminds us of the deeply-rooted heteronormative thinking of the Supreme Court, reveals the complexities of legal change in relation to the wider society, and, not least, tells us the important story of Clive Boutilier.

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