

**Affidavit of Jane Roe in Support of Plaintiffs' Motion
for Summary Judgment in *Roe v. Wade*, and
Doe v. Wade, Filed May 21, 1970**

IN THE
UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

Civil Action Nos. CA-3-3690 and CA-3-3691

[TITLE OMITTED IN PRINTING]

STATE OF TEXAS,
COUNTY OF DALLAS, ss.:

BEFORE ME, the undersigned authority, on this day personally appeared _____, to me well known, who after being by me first duly sworn, did depose and say as follows:

(1) My name is _____, I am over the age of twenty-one and am fully competent to testify. I presently reside at _____ in Dallas, Texas.

(2) On March 3, 1970 I filed a lawsuit in the United States District Court for the Northern District of Texas, Dallas Division, which cause is presently pending under cause No. CA-3-3690. I filed this suit under the fictitious name of Jane Roe for the following reasons:

(a) I am not married at the present time and have not been at any time in the past six years.

- (b) Because of my pregnancy I have experienced extreme difficulty in securing employment of any kind. I feared the notoriety occasioned by the lawsuit would make it impossible for me to secure any employment in the near future and would severely limit my advancement in any employment which I might secure at some later date.
- (c) I consider the decision of whether to bear a child a highly personal one and feel that the notoriety occasioned by the lawsuit would result in a gross invasion of my personal privacy.
- (3) I was pregnant on March 3, 1970 and am still pregnant at this time. I am and have been otherwise in good health.
- (4) At the time I filed the lawsuit I wanted to terminate my pregnancy by means of an abortion performed by a competent, licensed, physician under safe, clinical conditions. I wanted to terminate my pregnancy because of the economic hardship which pregnancy entailed and because of the social stigma attached to the bearing of illegitimate children in our society.
- (5) I consider myself to be a law-abiding citizen and have never wanted to participate in an act deemed by the State of Texas to be a felony offense.
- (6) It is my understanding that I cannot secure a legal abortion in Dallas County, Texas or any place else in Texas because there has never been any medical indications that my life was endangered by the continuation of my pregnancy.

(7) I have a tenth grade education and have never received any formal training which would prepare me for a well-paying job. Since my pregnancy I have experienced difficulty in securing any kind of employment. Each month I am barely able to make ends meet. Consequently I cannot afford to travel to another jurisdiction in order to secure a legal abortion.

(8) I understand that there are competent licensed physicians in Dallas County who do perform apparently illegal abortions, but I have never been able to afford their services.

(9) I fear that my very life would be endangered if I submitted to an abortion which I could afford.

(10) I believe that the enforcement of the Texas Abortion Laws against licensed physicians has forced me into the dilemma of electing whether to bear an unwanted child or to risk my life by submitting to an abortion at the hands of unqualified personnel outside of clinical settings.

alias Jane Roe

[Jurat omitted in printing.]