held the portion of the injunction that banned "demonstrating within fifteen feet from either side or edge of, or in front of, doorways or doorway entrances, parking lot entrances, driveways and driveway entrances of such facilities" what the Court called "fixed buffer zones."[1510] It struck down a prohibition against demonstrating "within fifteen feet of any person or vehicles seeking access to or leaving such facilities" what it called "floating buffer zones."[1511] The Court cited "public safety and order"[1512] in upholding the fixed buffer zones, but it found that the floating buffer zones "burden more speech than is necessary to serve the relevant governmental interests"[1513] because they make it "quite difficult for a protester who wishes to engage in peaceful expressive activity to know how to remain in compliance with the injunction."[1514] The Court also upheld a "provision, specifying that once sidewalk counselors who had entered the buffer zones were required to 'cease and desist' their counseling, they had to retreat 15 feet from the people they had been counseling and had to remain outside the boundaries of the buffer zones."[1515]

In *Hill v. Colorado*,[1516] the Court upheld a Colorado statute that made it unlawful, within 100 feet of the entrance to any health care facility, to "knowingly approach" within eight feet of another person, without that person's consent, "for the purpose of passing a leaflet or handbill to, displaying a sign to, or engaging in oral protest, education, or counseling with such other person."[1517] This decision is notable because it upheld a statute, and not, as in *Madsen* and *Schenck*, merely an injunction directed to particular parties. The Court found the statute to be a content-neutral time, place, and manner regulation of speech that "reflects an acceptable balance between the constitutionally protected rights of law-abiding speakers and the interests of unwilling listeners . . . ."[1518] The restrictions were content-neutral because they regulated only the places where some speech may occur, and because they applied equally to all demonstrators, regardless of viewpoint. Although the restrictions did not apply to all speech, the "kind of cursory examination" that might be required to distinguish casual conversation from protest, education, or counseling is not "problematic."[1519] The law was narrowly tailored to achieve the state's interests. The eight-foot restriction

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[1510] 519 U.S. at 366 n.3.
[1511] 519 U.S. at 366 n.3.
[1512] 519 U.S. at 376.
[1513] 519 U.S. at 377.
[1514] 519 U.S. at 378.
[1515] 519 U.S. at 367.
[1516] 530 U.S. 703 (2000).
[1517] 530 U.S. at 707.
[1518] 530 U.S. at 714.
[1519] 530 U.S. at 722.