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## Preface

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## **PREFACE**

The fifteenth annual edition of the Ninth Circuit Survey focuses on selected decisions of the Court of Appeals for the Ninth Circuit. This issue is primarily a collection of notes and comments regarding cases decided in 1989. A few significant cases have been summarized as well.

In addition, this issue includes two articles selected for publication. The first, by Professor Howard Foss, looks at the methods used by California courts and courts within the Ninth Circuit to interpret the Uniform Commercial Code. The second article, by Christopher Windle, analyzes the impact of a recent Supreme Court decision on copyrights in the context of works for hire. Both of these articles track Ninth Circuit decisions and examine them in the light of developing law.

It is the goal of the Survey to present an in-depth analysis of a few cases reflective of the scope of the Ninth Circuit decisions. We hope you find it interesting and informative.

**Kristen Chesnut**  
Editor, Ninth Circuit Survey