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Book Reviews

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and inaction cannot be construed as an assent to the offer, *Prescott v. Jones et al.*, 69 N. H. 305, 41 Atl. 352 (1898), but the relation between the parties or other circumstances may justify the offeror in expecting a reply, *Laredo Nat. Bank v. Gordon*, 61 F. (2d) 906 (C. C. A. 5th 1932); *Beugnot v. Tremoulet*, 52 La. Ann. 455, 27 So. 107 (1899). According to Williston, 1 WILLISTON, CONTRACTS § 91 (Rev. Ed. 1936), such cases are those:

- (1) Where the offeree with reasonable opportunity to reject offered services takes the benefit of them under circumstances which would indicate to a reasonable man that they were offered with expectation of compensation.
- (2) Where the offeree has stated or given the offeror reason to understand that consent may be manifested by silence or inaction, and the offeree in remaining silent and inactive intends to accept the offer.
- (3) Where because of previous dealings or otherwise, the offeree has given the offeror reason to understand that the silence or inaction was intended by the offeree as manifestation of assent, and the offeree so intended.

The court pointed out that although the "dead storage" fee seemed exorbitant, the defendant had ample opportunity to negate any inference of acceptance.

It is plausible that in a situation where a reasonable person would construe silence as necessarily indicating assent, one who keeps silent, knowing that his silence will be misinterpreted (as evidenced here by the continued billing for storage), should not be allowed to deny the natural interpretation of such conduct. In such an instance, his privilege of inaction without subjecting himself to obligations should give way to prevent an apparent damage through misconception though he is not otherwise a reasonable cause of that misconception. *Laredo Nat. Bank v. Gordon*, *supra*.

This decision enunciates the equitable principles of law, in particular as contained in the Louisiana Civil Code, Art. 1964 and 1965 which reads as follows:

Art. 1964. Equity, usage and law supply such incidents only as the parties may reasonably be supposed to have been silent upon from a knowledge that they would be supplied from one of these sources.

Art. 1965. The equity intended by this rule is founded in the Christian principle not to do unto others that which we would not wish others should do unto us; and on the moral maxim of the law that no one ought to enrich himself at the expense of another. When the law of the land, and that which the parties have made themselves by their contract, are silent, courts must apply these principles to determine what ought to be incidents to a contract, which are required by equity.

Dale A. Winnie

BOOK REVIEWS

SHARP QUILLETS OF THE LAW. By Charles S. Desmond.¹ Buffalo: Dennis & Co. 1949. 245 pages.—Laymen, lawyers and law students will thoroughly enjoy this book. The author, a distinguished Associate Judge of the New York State Court of Appeals, has selected some eighty cases decided in that court since 1847 and has retold them briefly and attractively. The book was not intended to be a contribution to the science of jurisprudence. It is not a handbook for

¹ Associate Judge of the New York State Court of Appeals.

students preparing for the bar examinations, nor is it a compilation of "leading cases." The cases were selected on the basis of "oddity or general human interest," and the author's treatment of them, running on the average to two or three pages, does not attempt any extended discussion of legal rules. Modestly disclaiming to be writing another "lawbook," Judge Desmond, in this selection of cases does illustrate nevertheless some very vital legal principles. Can one always use his own name in his own business? Must the District Attorney keep his promises to prisoners? May the Committee of an incompetent be compelled to pay for the support of the incompetent's indigent relatives? Is a dead body the subject of ownership? All these and many more questions arise in the cases summarized by the author in language which the layman can read without painful effort and which, incidentally, the law student may well imitate in his briefs or abstracts.

We will all meet many old friends and acquaintances in *Sharp Quillets of the Law*. Lawrence again pursues Fox. *Palsgraf v. Long Island Railroad Co.* is here, and Hamer recovers from Sidway the "wages of virtue." Franklin D. Roosevelt's great grandfather successfully disinherits his grandson James Roosevelt Bayley (afterwards Catholic Archbishop of Baltimore) for becoming a Catholic priest. Oddities of a hundred years of court decisions come to life in Judge Desmond's sprightly re-telling. We hear of the ferry boat that could run in only one direction, of the voter who claimed residence in the Tombs prison, of the marriage which took place in London, Paris and on the high seas, of the convicted murderers set free by the legislature. Some of the cases take us back to other days and other rules of law when the great state of New York provided separate schools for Negroes, when child labor flourished and the laborer, unprotected by Workmen's Compensation legislation, suffered in vain. There are thrilling cases too. Cardozo raises the obligations of partners to each other beyond the levels of "market-place morals," and the ancient writ of habeas corpus gives liberty to "eight colored persons known only by their Christian names."

Pleasant and profitable reading is in store for readers of *Sharp Quillets of the Law*. Pen sketches by Harris Steinberg, of the New York Bar, enhance the text. One wishes there were more of them. The student of torts is recommended to Mr. Steinberg's sketch of the sad scene of *Palsgraf v. Long Island Railroad Co.* in which an over-zealous railroad guard, a package of fireworks and a weighing scale combine to give us a twentieth-century variation on the theme of the "Squib case," of happy memory.

Edward F. Barrett*

NATURAL LAW INSTITUTE PROCEEDINGS 1947—Edited by Alfred Long Scanlan.¹ Notre Dame, Indiana: University of Notre Dame Press. 1949. 142 pages. \$2.00.—This small volume of one-hundred and forty-two pages contains the lectures given at the first Natural Law Institute at the College of Law, University of Notre Dame, in 1947. The lectures were delivered by Dean Clarence E. Manion, College of Law, University of Notre Dame; Ben W. Palmer of the Minneapolis Bar; Mortimer J. Adler, Professor of Philosophy, University of Chicago; Harold R. McKinnon of the law firm of Bronson, Bronson & McKinnon, San Francisco, California; and Monsignor William Doheny of the Holy Cross Order. The readers will note the wisdom exercised in selecting the lecturers for the Institute when they observe hereinafter the topics of the lectures.

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In his foreword, Professor Alfred L. Scanlan, editor, calls the Institute the first gathering in modern times by members of the legal profession for the primary purpose of considering the Natural Law. His Excellency John F. O'Hara, Bishop of Buffalo, New York, and former president of the University, in his Invocation forecast the principles of the lectures in referring to the Institute as a religious endeavor going "back to God as the author of order and law" and a patriotic endeavor challenging false philosophies, and seeking to restore the philosophy of the law of our Founding Fathers, to our schools and courts. Reverend John J. Cavanaugh, C.S.C., President of the University of Notre Dame, in his introduction states the postulates and purpose of the Institute, and the purposes of publication of the lectures. The controlling principles of the law are unchangeable. Law is not merely what a court says it is. The application of the principles may vary, but a decision is invalid if it does not conform to the Natural Law. The Institute is established to explain what Natural Law is. The purpose of the publication of the lectures is to spread the explanation and dispel misconceptions. The lectures represent the beginning of an attempt to do what no one has done before, *i. e.* furnish an adequate explanation of Natural Law.

Those who attended the Institute will have the full richness of the experience of reading this book. They will gain knowledge to add to the memories of the lectures, of Notre Dame's hospitality, of the kind thoughtfulness of the law students, the intellectual atmosphere and the delightful gatherings and meals. Those who read the book, not having attended the Institute, will read articles prepared primarily to be spoken. They will gain the knowledge without the rich memories.

The title of Dean Manion's lecture is "The Natural Law Philosophy of Founding Fathers." The Dean presents a vigorous and convincing case for the belief that the Founding Fathers were Natural Law Philosophers.

For centuries men have fought encroachments by government upon personal rights. This was the issue at Runnymede, in the Stamp Act rebellion and in the *Schechter* case.² Governments must be checked. Are the checks ends or means? This question takes us to the heart of the lecture. The Dean argues from the history of the religio-legal views of Coke and Blackstone to the likelihood of their influence on the religion-minded colonists. How eagerly the colonists must have seized on the principles and doctrines of Natural Law as expounded by these great English lawyers! The *Commentaries* were printed in Philadelphia in 1771. It was the handbook of the law students and lawyers of the day. Blackstone wrote that the guiding principle of the Natural Law was "that man shall pursue his own true and substantial happiness." The Founding Fathers knew of the nature of man, unalienable rights, and pursuit of happiness from the doctrine and tradition of Coke and Blackstone.

But Blackstone took the step toward realism. Who can effectively control Parliament when it legislates against reason? England abandoned her ancient tradition by extending the principle of parliamentary absolutism. The colonists could have worked out their affairs through compromise. They refused. Jefferson, Adams, Hamilton, Otis and Justice James Wilson were typical of the colonists who adhered to the Natural Law-Common Law tradition. The Declaration of Independence and the Constitution were written in that tradition. In America alone may a citizen protect his God-given rights against his government.

Ben Palmer has been jousting with the pragmatists for years on the pages of the American Bar Association Journals and in other writings and lectures. The subject of his lecture is "The Natural Law and Pragmatism." His sweeping scrutiny of the field of secular knowledge shows the corroding effect of pragmatism.

² A. L. A. *Schechter Poultry Corp. v. United States*, 295 U. S. 495, 55 S. Ct. 837, 79 L. Ed. 1570 (1935).

Unnoticed hairline cracks in the foundation of a building can collectively bring destructive revolutionary change in the products of the intellect and will. Mr. Palmer looks for the change in thought in America to the year 1859 and the publication of Darwin's *Origin of Species*. This was seen; yet the birth of John Dewey in the same year, while seen, was not generally perceived. Charles Pierce stated and William James developed the popular theory of pragmatism. John Dewey became its great expositor. Ideas are true only so far and so long as they work. The truth is only the expedient in our thinking as the right is only the expedient in our acting.

Pragmatism, during the last half century has come to represent or express the dominant American thought. For several centuries the soil was conditioned for the seeds. Pragmatism suited the practical, individualistic American. Darwin's evolutionary theories disturbed the faith of those who accepted *Genesis* as a scientific book. The scientific method was popularized and attracted the social sciences. Political science "severed" its connection with morality. Economics, history, anthropology, psychology followed suit. In legal education Blackstone dominated until the end of the Civil War. Lawyers were educated to be gentlemen, not artisans. Lectures on Natural Law and the Law of Nations were the rule. The great turning point in legal education was Langdell's case system introduced at Harvard College in 1870. Cases were read without relation to philosophy by students with no general education. Law was "separated" from morals. Courses in legal ethics became hasty deferential curtsies to Bar Association Canons of Ethics—which are manners not morals. The late Mr. Justice Holmes, in high office, with his popular felicitous style, influenced a rapid growth of realism. Out of this confusion comes a clear need of an integrating philosophy to give life and standards to the law. One hundred and forty million Americans seek refuge in the temple of the law. They expect to find the protection of reason. If they find force and no protection, they will shatter the edifice. They will seek other gods. Perhaps the gods of force.

Mortimer Adler, characteristically, stirred up the placid waters of the Institute. His subject is "The Doctrine of Natural Law in Philosophy." He finds that Plato, Locke, Rousseau, Kant and to some extent Hobbes and Spinoza are in the Naturalist camp with Aristotle and St. Thomas. The trouble is that there is confusion in the issue between the Naturalists and Positivists. It arises out of ambiguity in the use of the term law. There are two sorts of opponents of Natural Law, those who deny universal validity to moral or political principle and those who admit the reality of the principle but deny that it is a law. Hobbes and "many good lawyers" are of the second sort. Since Natural Law is without effective temporal sanction, it is not law. It is merely advisory. Mr. Adler agrees with Hobbes that Natural Law and civil law are not laws in the same sense. He says they cannot be covered by the same definition.

Mr. Adler turns to the *Summa* to support his view. He poses questions for Thomists which are intended to show the essential difference between Natural and positive law. What of the difference in coercion, promulgation, changeability, relativity and fallibility? What about the will factor in Natural Law? For these and related questions I know Thomists will have ready answers. Natural Law, Law of Nations or International Law cannot be relied upon to effectively direct the efforts of men or nations. It is a mistake to rely upon anything but positive law for world peace. Naturalists should see that Natural Law without positive law cannot be effective. Positivists should see that positive law without Natural Law is purely arbitrary and without a criterion of its validity. Law schools should help in clarifying the issue between the naturalists and positivists by making a true distinction between Natural and positive law. The doctrine of Natural Law does a disservice if it obscures truth about the need for positive law as a basis of peace.

Harold McKinnon is a successful practitioner. He has been Ben Palmer's principal aid in the philosophical struggle in the legal profession. Mr. McKinnon says Natural Law is at the bottom of our legal tradition but rejected by prevailing philosophies. It formed the tradition and is denied by those in it. It is applied with confidence and satisfaction by those who deny it. The doctrine of Natural Law evolved from cloudy notions of the Greeks to the practical application of its principles in the medieval period. Rulers are servants of the people and lawful authority requires consent of the people. The medieval doctrine of the dignity of man and the nature of society clearly pre-figured constitutional government. Constitutions came into being but the doctrinal basis began to disintegrate. In this country legal philosophers deny the reality of the Natural Law but the practitioners extend the doctrine in statutes and decisions. Analytical, historical and positive jurisprudence have taken over the legal-philosophical arena.

Natural Law is in evidence all about us. In the *Jus Gentium*, in equity, in the Declaration of Independence, and in the Constitution. *Malum in se*, right, justice, immutable principles, due process, free government—what do these mean? What did Holmes mean by “fair play” and “substantial justice”? Does the Natural Law doctrine persist through accident or is there an abiding objective link between man-made laws and immutable principles?

Mr. McKinnon says there are three levels of law corresponding to Mr. Adler's terminology: principles, precepts and rules. The science of right and wrong starts with the first principle of the practical reason. “Good must be done and evil avoided.” The phrase “seek the good” refers to the whole of goods, including the good of the whole community, which is but a partial good of each individual. It may be broken down into various principles referring to various goods of man including the common political good, and its requirements of justice. Precepts are the necessary conclusions from the first principles. They are the basis of the *Jus Gentium* and are universal. The principles and precepts are general, and to be effective must be specified according to the variations in localities where human laws are made. The general precept against killing is not specific as to justifiable homicide or manslaughter. These variable specifications are the rules. They are contingent, being based on fact. They are not conclusions from Natural Law. They are determinations. There is an art in making the right choice of the various determinations offered. It is the legislator's art.

Progress in law can come from greater knowledge of more changes in circumstances. It can also come from an increasing awareness of Natural Law. The latter has freed slaves and emancipated women. It can result in abolition of racial discrimination and the attainment of peace.

There is no choice between the principles of Natural Law as the criterion of law and another criterion. There is no choice because man's nature is universally the same and Natural Law is its constant suitable guiding principle. Truth crushed to the earth will rise again. However we have seen that it can be crushed. There is a prevailing dangerous alien philosophy. The salvation of truth in law depends on practitioners if legal philosophers embrace the false philosophy. There must be a dedication of practice to the principles which give law meaning. The day may yet be saved.

Monsignor Doheny's lecture indicates his profound knowledge of the subject. He refers to Encyclicals and letters of Pope Pius XI and Pope Pius XII to show that they attributed recurring world political crises to the attempted “separation” of law from God. Secularism has excluded Christ as God from modern life. In earlier times of political convulsion an effective moral sense gave hope of settlement. Today the moral sense is gone. The result is pessimism. In the Sixth Century, Justinian set a pattern for religious government by invoking in his Code the aid of the Holy Trinity and by dedicating his Institutes to Jesus Christ as Supreme

Law Giver. The practice prevailed until the pragmatic influence took hold. Modern international covenants exclude the name of God. No wonder we have war. The new Irish Free State in 1937 and the State of New Jersey in 1947, however, have returned to the pattern of Justinian.

Eternal law is the Eternal plan of government according to which all things are guided to their goal, namely, "His own glory and eternal happiness of mankind." It extends to the stars, planets, animals, men and angels. Pope Leo XIII in his Encyclical Letter on *Human Liberty* said that human law properly promulgated does for citizens of states what reason and the Natural Law do for individuals. These human laws have not their origin in civil society. If they had, their sanction and authority would be merely temporal. They come from Eternal Law and Natural Law and have a higher and august sanction. From Eternal Law comes the binding force of human law. Remote conclusions from Natural Law are subject to the diversity of human reason and will. An unerring guide is necessary to the precious goal which is man's final happiness. Moreover, human law cannot direct man's private acts and thoughts. This necessary guide and direction is Divine Law. Eternal Law is known by man in its effects as a kind of reflection, as one not seeing the sun may know it by its rays. We know it through the Natural Law.

Monsignor Doheny points out the insidious danger of false philosophies of law which menace American jurisprudence. Once we see the relationship between law and God, we see clearly that disrespect for law is proportioned to disbelief and rejection of Christ as God. The defense of the principles of Divine Eternal Law calls for heroic enlightened legal minds firmly grounded in truth. Monsignor Doheny calls upon the young lawyers to dedicate their lives to the cause of truth and the spread of the correct concepts of Natural and Eternal Law.

The wealth of matter in the five lectures has necessitated this extensive review. This volume is a *must* for anyone interested in understanding the doctrine of the Natural Law. Certainly all that can be said on the subject is not in the book. It is a definitive beginning of a process. These lectures give instruction in the knowledge of the definition of Natural Law; of its Divine origin; of its relation to the laws by which our nations, states, counties, cities and hamlets are governed; of its place in the foundation of the United States; and of its critical position in world and American jurisprudence. The book should, for apparent reasons, have a special appeal to law professors and students, lawyers and judges. It may help them to see the necessity of adopting an attitude toward their work based on the reality of the Natural Law. The creation of this attitude must be a goal of the Institutes. Unless this goal is reached the doctrine of Natural Law may be like the currency of the Musical Banks in Erewhon—good only on Sunday.

Roger J. Kiley*

THERE'S FREEDOM FOR THE BRAVE. By Paul McGuire.¹ New York: William Morrow and Co. 1949. 309 Pages. \$4.00.—This book by an Australian economist and political scientist contains a thoroughgoing analysis of all the factors which presently and unhappily divide our world, and a theory for its moral reordering based upon a recapturing of the spirit of community which the world has lost and sorely needs. The structure of the book is quite simple: in the first half, an analysis of the world's disorder and the reasons for it, and in the second half a survey of the contributions which the peoples and nations can make to the saving principles of community. Its principal thesis is this: that the modern world is

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¹ Australian political economist, historian, lecturer and correspondent.

built on principles of division and separateness; nationalism and the growth of political power have enclosed the nations within walls; the only salvation for the world is to restate and put into practice ideals of world community, of law and freedom, based upon the Natural Moral Law which is common to all peoples and states, and which is superior to the selfish ambitions and wilfulness of all of them.

We tend to blame our current crisis on impersonal forces, on machinery and economic processes; the fault is in ourselves. Western civilization was founded upon the ideas of a moral community, of beliefs and purposes, of rational agreement and of common ends, all ruled by the laws of nature and of nature's God. We pay lip-service to these radical ideas in political speeches, but have abandoned them in our institutions and ways of life. We place so much of the emphasis on elements of conflict and competition and division, while we neglect all of the facts of community, the many factors which keep us together. We have even found "scientific" ground upon which to base a social order of conflict, in the Darwinian theory of natural selection and the survival of the fittest. The Marxist class war is only Darwinism carried brutally to its conclusion in the social order. We have abandoned our principles of personal freedom, and have handed too much of our freedom over to the monstrous state, which is always glad to get it. For the laws of nature and of nature's God, we have substituted the "mortal gods" of Nationalism, which is the agency of the antagonism which divides mankind. The author's brilliant indictment of Nationalism brings together all of the great names and institutions which have brought this divisive and antagonistic force into the world. Among the names: Marsilio, Machiavelli, Luther, Hobbes, Napoleon, Bismarck, Marx, and their offspring, Stalin and Hitler and Mussolini. Among the ideas: *laissez faire* industrialism and the modern social welfare state which is the obvious reaction to the brutality and inequality of that system.

What we need is a restoration of the deliberate sense of community all over the world—not a power-founded organization of sovereign states, but an extension to the whole world of all we have in common: religion, science, art, and an open economy. All peoples can make their contribution to this world community, and the leading contribution must be made by Britain, where the sense of community is most solidly grounded in tradition, and by the United States, which almost alone among the nations still respects personal liberty and distrusts the omniscient and omnipotent state. But nations alone do not form this community: "It is a job for each of us where he is. Each man makes his own world, and the organization of all our little worlds is the great world itself." Freedom is for persons to secure, and it is for the brave.

A short and general review cannot bring out the profuse wealth of illustrative detail in this book. Many, many sidelights enliven it and cast light on a great many of the problems of our modern world. For example, on the Russian mind and Russian military strength, the author states: "Climate imposes on the Russian a strong sense of the impersonal forces that invest him. Generals January and February are still the first commanders in the Russian field, as Hitler, like his predecessors from the West, learned." And the explanation of the power and strength of American isolationism: first of all, the obvious fact that the settlers of America wanted to get out of Europe and stay out; but the further fact of the western movement and development of the continent, which gave the United States a continental feeling, in place of the world feeling which characterized the British. "The land-mass has a centripetal pull, sea power a centrifugal."

Mr. McGuire's book is vigorously and often eloquently written. Its theme is freedom, and it should make a great appeal to all who desire to see freedom established throughout the world.

Charles Sheedy, C.S.C.*

*Professor of Legal Ethics, University of Notre Dame.

THE EDUCATION OF A JUSTICE. By Joel Francis Paschal.¹ 1 JOURNAL OF LEGAL EDUCATION 333 (1949).—This article is a fragment of a book-length biography of Supreme Court Justice George Sutherland, now in preparation by the author.

Mr. Paschal relies mainly on the U. S. Reports, but has also drawn from Sutherland's letters, from various newspapers, and a great deal from the political science written by Herbert Spencer and by others during Sutherland's formative years. Another type of source used by Mr. Paschal, which commends itself to historians of the American mind, is the student notebook — in this case the notebooks of contemporary students at the University of Michigan where Sutherland studied law.

George Sutherland, although not a Mormon, was reared in Utah at a time when the Mormon belief that the Constitution of the United States was divinely inspired held the field. Mormon scripture states that the Constitution is divinely ordained to establish freedom (as freedom was understood in Utah in the 1870's and 1880's). In 1936 Sutherland said that he believed this to be true. He attended Brigham Young Academy where his mind was then saturated with the ideas of Herbert Spencer, a saturation repeated at the University of Michigan law school by Professor Thomas M. Cooley, Sutherland's most influential instructor.

From the Spencerians Sutherland acquired two basic ideas: Evolution and Liberty—the one leading, by inevitable progress, to the other. Progress, in a manner of speaking, was frequently cruel in order to be kind. In the march of Progress all men stepped along. If some could not keep up with others it was, no doubt, their own fault; the march could not be held up for the sake of weaklings, who must, rather, lie down and let the others walk on them. If they protested, the State, a kind of negative policeman, prevented them from interfering with the advance of the others.

At the University of Michigan, Cooley and others made their own original contribution to the Spencerian *corpus*: the United States Constitution affirmed the truth that *laissez faire* had a cosmic sanction. And it is true that the Supreme Court of Sutherland's youth was captivated by these ideas.

Thus the education of a Justice: the Constitution is divinely inspired. *Laissez faire* is divinely inspired. The Constitution exists to protect *laissez faire*.

The importance of Mr. Paschal's explanation of the mind of Justice Sutherland can hardly be exaggerated. It throws a floodlight into certain corners of the history of the Age of Roosevelt II. As he said ". . . no other justice spoke for the majority in so many great cases." (p. 333). Looking back at such cases where this man spoke for the Court in *Adkins v. Children's Hospital*,² *Carter v. Carter Coal Co.*,³ and other social cases, one almost wonders, whether it was the voice of the Court, or a duet sung by the Angel Moroni and Herbert Spencer. Anyone who has confused the Court of the 1930's with the Twelve Apostles (and some have), had better look again. That wasn't always the *Gospel*; it was quite often Spencer's *Social Statics*.

Marshall Smelser*

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² 261 U. S. 525, 43 S. Ct. 394, 67 L. Ed. 785 (1923).

³ 298 U. S. 238, 56 S. Ct. 855, 80 L. Ed. 1160 (1936).

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**STATEMENT OF THE OWNERSHIP, MANAGEMENT, CIRCULATION,
ETC., REQUIRED BY THE ACT OF CONGRESS OF
AUGUST 24, 1912.**

Of the **NOTRE DAME LAWYER**, published quarterly, in the Winter, Spring, Summer and Fall, at Notre Dame, Indiana, for May, 1949.

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St. Joseph County }ss.

Before me, a Notary Public in and for the State and County aforesaid, personally appeared Joseph V. Wilcox, who having been duly sworn according to law, deposes and says that he is Editor-in-Chief of the **NOTRE DAME LAWYER** and that the following is, to the best of his knowledge and belief, a true statement of the ownership, management, etc. of the aforesaid publication for the date shown in the above caption, required by the Act of August 24, 1912, embodied in Section 411, Postal Laws and Regulations, printed on the reverse of this form to-wit:

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HELEN HOSINSKI,
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[SEAL]

My commission expires October 17, 1951.