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The following from a letter to the Editor regarding the NOTE in the November number on "Common Law Rules of Evidence in Proceedings before Administrative Tribunals," 36 HARV. L. REV. 79, is so significant that it merits quotation.

"The note in the current REVIEW on evidence before administrative tribunals is interesting and timely. I wish I might know who the author is, for I recognize a kindred spirit. But why stop with *administrative* tribunals? It is an actual fact that four-fifths of the contentious litigation in Massachusetts — numerically — is tried to the court, not to a jury. So far as the true law of Evidence goes — the tail is wagging the dog, and the judiciary is reveling in this *reductio ad absurdum* — 'we, the judges (of superior mentality) are able to discern and segregate those matters by which you, the jurors, might be led astray or biased. But when we come to take your place and try the facts, we will put the same legal blinders on our own eyes, lest we be led astray or biased, though we are all the time able to discern, and so to avoid, that which is liable to lead astray or bias.'

"Wanted — a Moses to lead the lost legal tribes!"

THE LAW SCHOOL. — The following tables show the registration figures for the entering classes of the last twelve years, the geo-

graphical sources from which these classes have been drawn, the division into classes for twelve years, and the colleges represented (as usual the figures are compiled as of the date of November 15):

Class	Massachusetts		New England outside of Massachusetts		Outside of New England		Total in Class
	Number	Percentage	Number	Percentage	Number	Percentage	
1914	73	25	44	15	172	60	289
1915	59	21	34	12	194	67	287
1916	59	22	23	9	179	69	261
1917	65	23	29	10	194	67	288
1918	81	26	39	12	188	62	308
1919	70	21	26	8	239	71	335
1920	25	26	5	5	66	69	96
1921	6	27	4	18	12	55	22
1922	77	18	51	11	307	71	435
1923	49	14	37	10	277	76	363
1924	64	17	21	6	295	77	380
1925	89	21	38	9	304	70	431
	1912-13	1913-14	1914-15	1915-16	1916-17	1917-18	
Res. Grad. . . .	6	4	5	8	10	5	
Third Year . . .	176	169	167	177	213	73	
Second year . . .	186	197	197	226	234	87	
First year . . .	287	260	288	308	335	96	
Unclassified . . .	84	64	68	66	64	31	
Specials	5	1	5	1	2	0	
	744	695	730	786	858	292	
	1918-19	*1919-19	1919-20	1920-21	1921-22	1922-23	
Res. Grad. . . .	3	—	8	11	8	12	
Third year . . .	37	67	156	196	271	232	
Second year . . .	24	66	221	285	246	261	
First year . . .	36	153	438	363	383	431	
Unclassified . . .	13	21	59	90	49	50	
Specials	1	—	1	—	45	32	
	114	307	883	945	1002	1018	

In the present first year class one hundred and seven colleges and universities are represented as follows (the corresponding figures for the other two classes, at the time they entered, will be found in 34 HARV. L. REV. 198 and 35 HARV. L. REV. 184):

Harvard, 89; Princeton, 32; Yale, 18; Amherst, Dartmouth, 14; Brown Univ., Univ. of Michigan, 13; Boston College, 12; Williams Coll., 11; Univ. of California, 8; Bowdoin Coll., Lafayette Coll., Univ. of Pennsylvania, 7; Georgetown Univ., Univ. of Minnesota, 6; Holy Cross Coll., Howard Univ., Wesleyan Univ. (Conn.), 5; Coll. of the City of New York, Colgate Univ., Cornell Univ., Univ. of Illinois, Univ. of North Carolina, Univ. of Notre Dame, Ohio State Univ., Pomona Coll., Trinity Coll. (Conn.), Wabash Coll., 4; Univ. of Chicago, Columbia Univ., Georgetown Coll. (Ky.), Hamilton Coll., Johns Hopkins Univ., New York Univ., Northwestern Univ., Oberlin Coll., Union Coll. (N. Y.), United States Naval Academy, Univ. of Virginia, Univ. of Washington, Univ. of Wisconsin, 3; Univ. of

* These figures are for the special session which began on February 3, 1919, and ended on August 30, 1919.

Alabama, Univ. of Delaware, Indiana Univ., Univ. of Kansas, Leland Stanford Jr. Univ., Univ. of Maine, Mass. Institute of Technology, Univ. of Nebraska, Oxford Univ., Swarthmore Coll., United States Military Academy, Washington & Jefferson Coll., Washington & Lee University, West Virginia Univ., 2; Allegheny Coll., Univ. of Arkansas, Cambridge Univ. (England), Case School of Applied Science, Clark Coll., Clarkson Coll. (Ky.), Colby Coll., Colorado Coll., Univ. of Colorado, De Pauw Univ., Dickinson Coll., Fairmount Coll., Fordham Univ., Furman Coll., George Washington Univ., Gonzaga Univ. (Wash.), Grinnell Coll., Hamline Univ., Havana Univ., Haverford Univ., Hope Coll., Lehigh Univ., Middlebury Coll., Mississippi Agr. & Mech. Coll., Univ. of Mississippi, Missouri State Teachers Coll., Univ. of Missouri, Univ. of Montana, Morningside Coll., Mount Allison Univ., Univ. of Nevada, North Dakota Agr. Coll., Univ. of Oklahoma, Univ. of Oregon, Pennsylvania State Coll., Purdue Univ., Univ. of Redlands, Rice Institute, Rutgers Coll., St. John's Coll. (Md.), St. Louis Univ., Univ. of the South, Univ. of Southern California, Univ. of Tennessee, Univ. of Texas, Tufts Coll., Tulane Univ., Ursinus Coll., Vanderbilt Univ., Washington Coll., Westminster Coll., Wofford Coll., 1.

THE SERVICE LETTER LAWS. — "We have attempted merely to indicate sufficient grounds upon which they might reasonably have acted . . . to show that it is not demonstrated that they acted arbitrarily, and hence that there is no sufficient reason for holding that the statute deprives the corporation of its liberty or property without due process of law."¹ In thus disposing of its first case on the constitutionality of the Service Letter Laws, the United States Supreme Court reasserts its consciousness of the relation of the courts to "police" legislation. Articulated by Chief Justice Marshall,² this consciousness has been constantly reiterated by succeeding courts;³ but it has been practically denied by the iron-bound conception of liberty which has followed interpretation of the Fourteenth Amendment.⁴ The extending labor legislation of the past fifty years

¹ Mr. Justice Pitney in *Prudential Insurance Co. v. Cheek*, 42 Sup. Ct. Rep. 516, 523 (1922). For the facts of this case see RECENT CASES, *infra*, p. 216.

² See *McCulloch v. Maryland*, 4 Wheat. (U. S.) 316, 421 (1819).

³ See *Holden v. Hardy*, 169 U. S. 366, 395 (1898); *Booth v. Illinois*, 184 U. S. 425, 429 (1902); *Chi., B., & Q. Ry. Co. v. McGuire*, 219 U. S. 549, 569 (1911); *Block v. Hirsch*, 256 U. S. 135, 158 (1921).

⁴ *Allgeyer v. Louisiana*, 165 U. S. 578 (1897); *Lochner v. New York*, 198 U. S. 45 (1905); *Coppage v. Kansas*, 236 U. S. 1, 19 *ff.* (1915); *Opinion of the Justices*, 220 Mass. 627 (1915). See Roscoe Pound, "Liberty of Contract," 18 *YALE L. J.* 454. It is now clear that the term "liberty" includes the freedom of contract. *Allgeyer v. La.*, *supra*; *Lochner v. N. Y.*, *supra*. It is equally clear that these rights are not absolute, but recede before the exercise of the "police power." *McLean v. Arkansas*, 211 U. S. 539 (1909). See FREUND, POLICE POWER, 308, §§ 498-503. See 28 *HARV. L. REV.* 496. Less definite are the limits of this power: what acts aim "directly to secure and promote public welfare," and what acts are unreasonable or arbitrary in the attainment of those aims, are troublesome questions. See *Lochner v. N. Y.*, *supra*, 57, 61. See George W. Wickersham, "The Police Power: A Product