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CONFLICT OF LAWS—RIGHTS IN PROPERTY—LAW GOVERNING MARITIME LIEN ACQUIRED IN FOREIGN PORT.—In a judicial sale in Scotland of a Scotch registered vessel, a party resident in New York claimed preferential ranking because of advances made for the repair of the vessel and the payment of seamen's wages while the vessel was in New York. The advances were made to the owners on their personal credit. *Held*, that the question whether the claimant has a lien on the vessel is determined by Scotch and not by American maritime law. *Clark v. Hine*, 45 Scot. L. R. 879.

As a general rule a maritime lien created by the *lex loci contractus* is enforceable everywhere, even when by the *lex loci fori* no such lien could have attached. *The Maggie Hammond*, 9 Wall. (U. S.) 435. Although this recognition of foreign law is a matter of comity, it is for the self-interest of commercial nations to uphold the sanctity of maritime liens. For otherwise marine hypothecations would be so insecure that the money necessary to enable a foreign vessel to complete her voyage would rarely be forthcoming. An exception to the general rule of maritime law is found in Louisiana, where the domestic law is applied to causes of action arising outside the state. *Owens v. Davis*, 15 La. Ann. 22. The same principle seems to have been invoked in the main case. The case may be rested also on the ground that the loans were made to the vessel owners on their personal credit. In these circumstances it is doubtful whether any lien attached to the ship. *The Haytian Republic*, 65 Fed. 120.

CONSTITUTIONAL LAW—IMPAIRMENT OF THE OBLIGATION OF CONTRACTS—STATUTE REQUIRING SURRENDER OF UNCLAIMED BANK DEPOSITS TO STATE.—A statute provided that all deposits in any savings bank or trust company to the credit of a person whose whereabouts was not known, for which no claim had been made for thirty years, should be paid over to the state subject to be repaid to the legal owner, with three per cent interest from the time it was surrendered to the state. The Attorney-General filed an application in the probate court, according to the statutory provision, for the surrender of unclaimed deposits in the hands of the defendant. *Held*, that the statute is constitutional. *Attorney-General v. Provident Inst. for Savings*, 86 N. E. 912 (Mass.). See NOTES, p. 522.

CONSTITUTIONAL LAW—PERSONAL RIGHTS—ACT REQUIRING CORPORATIONS TO PAY EMPLOYEES MONTHLY.—A statute required corporations, etc., to pay certain employees monthly. *Held*, that the statute is unconstitutional. *Smith v. Ohio Oil Co.*, 86 N. E. 1027 (Ind.).

For a discussion of a similar case with an opposite result, see 21 HARV. L. REV. 444.

CONSTITUTIONAL LAW—SEPARATION OF POWERS—RATE-MAKING AS A JUDICIAL OR LEGISLATIVE ACT.—The relators sued out a writ of certiorari to review the decision of a commission appointed to fix railroad rates as to the reasonableness of a rate not yet enforced. *Held*, that, the commission having acted judicially, the writ lies. *People v. Willcox*, 40 N. Y. L. J. 2365 (N. Y., Ct. App., Feb. 23, 1909).

This view is expressly opposed to the conclusion recently reached by the majority of the United States Supreme Court. See 22 HARV. L. REV. 368; *cf.* 21 *ibid.* 138.

CORPORATIONS—INSOLVENCY OF CORPORATION—FRAUDULENT CONVEYANCES.—A corporation sold all its assets to a second corporation, taking in payment stock of the latter issued to the sole stockholder of the selling corporation. The plaintiff was a creditor of the selling corporation at the time, as the purchasing corporation knew. The stockholder pledged the stock for his individual debts. *Held*, that the plaintiff may follow the assets into the hands of the purchasing corporation. *Luedecke v. Des Moines Cabinet Co.*, 118 N. W. 456 (Iowa). See NOTES, p. 523.