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# EDITORIAL NOTES

## THE SCHOOL OF LAW

Two new courses have been added to the curriculum this year as a part of the four-year law course. One of these courses, Law and the Adjustment of the Individual, is being given the first semester, and the other, Law and Economic Problems, will be

Single copies, 75 cents.

given the second semester. Both courses are required for secondyear students enrolled under the four-year law course.

Mr. Arno C. Becht, who was last year a member of the faculty of the University of Georgia School of Law, has been appointed Assistant Professor of Law for 1940-1941. Mr. Becht will teach courses in Labor Law, Sales, and Legislation, and will also act as Faculty Advisor to the Washington University Law Quarterly.

The Law School has for the academic year 1940-1941 a total enrollment of 158, with an entering class of 58. Of the entering students, fourteen are taking the four-year law course which was initiated last year for those students presenting only two years of college work. The three-year law curriculum continues for the benefit of those students having a degree or presenting at least three years of college credit.

The total number of bound volumes in the Law Library has now reached 52,106, including some very welcome gifts received during the past year.

# NOTES

## GARNISHMENT IN MISSOURI-CONFLICT OF LAWS PROBLEMS\*

In this paper the term "garnishment" will be used to designate a proceeding against an intangible money debt as distinguished from a proceeding against tangible property. The primary problems in a garnishment proceeding when the facts present a conflict of laws situation are jurisdictional. The question most difficult to answer appears in a dual aspect: what facts must concur before the forum will have such jurisdiction of the persons and property involved that due process of law requirements will be met, and that the judgment will be entitled to full faith and credit in other states? A second problem arises out of the various jurisdictional difficulties: How can the interests of the garnishee and the principal debtor best be protected in the garnishment proceeding?

I

As related to garnishment proceedings the term "jurisdiction" has two distinct connotations. The first of these relates to what

<sup>\*</sup> This note follows in general the outline of problems considered in Kennedy, Garnishment of Intangible Debts in New York (1926) 35 Yale L. J. 689, to which the present writer is indebted.