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Editorial Notes

CONTRIBUTORS TO THIS ISSUE

RALPH F. FUCHS, who writes on *Collective Labor Agreements in German Law,* is Assistant Professor in the School of Law. He contributed an earlier article upon an allied subject, which is contained in 10 St. Louis L. Rev. at page 1.

J. HUGO GRIMM, who contributed the article on *Developments in the Criminal Law of Missouri,* has written a number of articles in previous issues of the LAW REVIEW. He was for many years Judge of the Circuit Court in St. Louis and reviewed the appellate decisions in felony cases for the Missouri Crime Survey.

A RETRACTION

In the issue of the LAW REVIEW of July, 1929, (14 ST. LOUIS L. REV. 440) the St. Louis Court of Appeals is criticized in a case comment for having ignored the recent act of the Missouri Legislature which directs the courts of this State to take judicial notice of the laws of other states. As a matter of fact the decision in question, *Keena v. Keena* (1928), 10 S. W. (2d) 344, was in a case which arose in 1924 and was tried prior to the passage of the statute in question. The case was transferred to the St. Louis Court of Appeals by the Supreme Court of Missouri, (1928) 3 S. W. (2d) 352. Accordingly, the statute did not apply to the case and the criticism of the court in which the writer of this case comment indulged was unjustified. The carelessness which resulted in the publication of the comment is apparent. This retraction is printed in fairness to the court and to the Commissioner who wrote the opinion.

THE SCHOOL OF LAW

The opening of the current academic year marks an increase in the number on the full-time faculty of the School of Law from six to seven. Professor Philip Mechem, who last year was Acting Dean of the Law School of the University of Kansas, has been appointed Professor of Law and Midell Professor of Equity at Washington University and has assumed the teaching of the courses on Torts, Wills and Administration, Trusts, and Equity I. Professor Mechem, prior to becoming a member of the Kansas faculty in 1925, was assistant professor of law at the University of Idaho from September, 1922, to June, 1924. His academic work was done at Harvard and at Leland Stanford, and he received his LL.B. from the University of Colorado in 1922. He was awarded the degree of J.S.D. by the University of Chicago in 1926. He is co-editor with Professor Thomas Atkinson of the the University of Kansas of a casebook on Wills and Administration published in 1928 and is the author of "The Requirement of Delivery in Gifts of Chattels and of Choses in Action Evidenced by Commercial Instruments" in volume 21 of the Illinois Law Review.

A number of changes in the standards of work required at the School of Law and for admission to the School have become effective with the present academic year. A system of "grade points" has been instituted within the School whereby work which is done with high marks counts more heavily towards graduation than work which is merely of passing quality. Four passing grades at present exist in the School of Law, namely,

A, B, C, and D, to which no percentage value is assigned. These letters carry with them respectively grade points of 4, 3, 2, and 1. Students in the present entering class, in addition to passing 82 semester hours of work, will be required to present 164 grade points in order to graduate. Thus, in effect, a C average is required. In addition, no student may remain in the School at the close of any semester unless he has amassed one and two-thirds times as many grade points as credit hours during his course up to that time. Thus any student who does not remain within reach of his degree may not remain in the School. An exception, however, is made at the end of the first semester of the first year, at which time a student who presents only as many grade points as credit hours will be permitted to re-register.

For admission to the School those students who present less than three years' work in a college or university of recognized standing must have maintained an average of 75 in three-fourths of their pre-legal work, assuming a passing grade of 70. Two years of college work remains the minimum requirement for admission.

The School of Law since last year has offered the degree of J.D. as well as the degree of LL.B. The former is granted to students who enter the School with a college degree and who fulfill certain stricter requirements than those which are necessary for the LL.B. degree. These are laid down in the catalog of the School of Law.

As has been true for a number of years, a student who enters the School of Law with three years of college work at Washington University may upon graduation receive both the A.B. and LL.B. degrees. Since last year the School, in conjunction with the School of Business and Public Administration, has offered a combined six-year course in business and law, at the close of which the degrees of LL.B. and B.S. in Business Administration will be awarded.

Despite the imposition of the stricter entrance requirements noted above, registration in the school has fallen off relatively little as compared with previous years. The following table presents the figures:

	1927	1928	1929
First Year	65	69	55
Second Year	66	48	54
Third Year	57	61	55
Special Students	14	4	2
	202	182	166

The curriculum of the School remains substantially as it was, with the addition, however, of a required course in the Administration of Justice, which extends over one hour a week throughout the senior year. Dean William G. Hale conducts this course.

STATUTORY PRESCRIPTION OF FORM OF OPINIONS IN MISSOURI

A vigorous invective attacking critically two Missouri statutes is contained in the recent case of *Smarr et al. v. Smarr et al.* in which Judge Atwood handed down the opinion.[1] The court says:

> Observing the difficulty that has evidently attended the effort of counsel on both sides of this case to comply with our rule that they present a *fair and concise* statement of the facts of the case without reiteration, statement of law, or argument, we are reminded of our own dilemma when we endeavor to comply with a certain statutory mandate and at the same time bring our statement of the case within the reasonable compass of an opinion.

The statutes which are subjected to criticism follow:

> In each case determined by the supreme court or courts of appeals, or finally disposed of upon a motion, the opinion of the court shall be reduced to writing and filed in the cause, and shall show which of the judges delivered the same, and which concur therein or dissent therefrom. R. S. Mo. (1919) sec. 1518.
>
> The opinion shall always contain a sufficient statement of the case, so that it may be understood without reference to the record and proceedings in the same. R. S. Mo. (1919) sec. 1519.

A brief statutory and case history of these statutes is necessary to a consideration of the court's indictment.

In 1871, the legislature enacted two laws, the antecedents of those now in force, and the substance of those laws was the same as that of the laws in effect at the present time.[2] However, the legislation in 1871 pertained only to the Supreme Court, none of the courts of appeals having been established. In 1879, the statutes were amended, and became applicable to the Saint Louis Court of Appeals.[3]

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[1] (Mo. 1928), 6 S. W. (2d) 860, 861, 862.

[2] Mo. Laws 1871, 50, secs. 39 and 40.

[3] R. S. Mo. (1879) sec. 3781, sec. 3782, sec. 3785.