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CONCERNING THE REVIEW

This number of the REVIEW, nominally April, 1944, Volume Eight, Number Three, is actually being published around February 1, 1946. The delayed publication is the result of the impact of the late War on the Law School, its enrollment, and faculty activities, as well as still existing stringencies in supplies and labor. At present writing it is planned to complete Volume Eight by publishing the fourth and final number as soon as possible. It remains

to be seen how soon it will be possible to resume normal publication by commencing a Volume Nine. This will depend upon complete return to normal conditions in the Law School and in the other factors that enter into the matter. No prediction is now being made as to when this will happen. The REVIEW regrets the delay in completing the overdue Volume Eight for 1943-1944, and is endeavoring to fulfill its obligation to the subscribers in that regard as soon as possible.

NEWS OF THE LAW SCHOOL

The enrollment in the Law School for the Fall of 1945 is 115, of whom 44 are in the Day School, and 71 are in the Evening School. The enrollment for the Fall of 1944 was 90, of whom 27 were in the Day School and 63 in the Evening School. Both figures are well above that for the Fall of 1943, the last one reported in the REVIEW heretofore, when the total enrollment consisted of 76 students, 18 Day and 58 Evening. Thus the experience of the School was that of many other law schools, i. e., that the year 1943-1944 represented the lowest ebb of enrollment due to the War. There is anticipated at this time a considerable influx of both new and returning students in February, 1946, when the Second Semester starts, and the accelerated pace of demobilization will be felt in law school enrollments. The greater number of the men students now in school are, of course, veterans of the late War.

Since the last report in the REVIEW on the graduation of students from the School, 47 have been graduated, as follows: Five at the end of the 1943 Summer School; three at the end of the First Semester 1943-1944; thirteen at the end of the Second Semester 1943-1944; six at the end of the 1944 Summer School; four at the end of the First Semester 1944-1945; ten at the end of the Second Semester 1944-1945; and six at the end of the 1945 Summer School. The School has thus been able to average around twenty graduates per year all through the War's disastrous impact on law school enrollments.

To make the accelerated war-time program possible, the School conducted Summer Sessions during the four War summers, 1942 through 1945. It has been decided not to hold any further Summer Sessions.

The two members of the full-time faculty who have been serving in the armed forces have returned to this country and are expected to resume teaching in the Second Semester 1945-1946 after release from active duty. These are Professor Russell R. Reno, who has been on leave with the Army since June, 1942, and Assistant Professor Frederick W. Invernizzi, who has been on leave with the Navy since December, 1942.

Professor Reno, Major, F. A.—Res., U. S. A., was, at the time of V-E Day, serving in the European Theater in the Twentieth Corps of General Patton's Third Army, where he was awarded the Bronze Star Medal for meritorious service in combat in Germany.

Assistant Professor Invernizzi, Lieutenant, U. S. N. R., was, at the time of V-J Day, serving in the Pacific area as Administrative Assistant and Operations Officer on the Staff of Carrier Air Group Six, aboard the U. S. S. Hancock, a carrier of the Essex class, of the Third Fleet.

Professor G. Kenneth Reiblich took leave starting February 1, 1944, to join the legal staff of the Consolidated Gas, Electric Light and Power Company of Baltimore, and has been offering some of his courses on a part-time basis in the Evening School.

Professor Bridgewater M. Arnold, who was on leave from May, 1942 until October 1, 1944, with the Office of Price Administration, returned to full-time teaching on the latter date.

Professor Laurence M. Jones, on the full-time faculty since the Fall of 1942, continues as Visiting Professor of Law through 1945-1946.

Dean Howell and Professors Ruge and Strahorn continue on the full-time faculty as heretofore.

Richard W. Case, Esq., of the Baltimore City Bar, who joined the part-time faculty during the War, is teaching one section of Bills and Notes during the Fall Semester

of 1945-1946. At various times earlier he had taught the courses in Taxation and Equity Pleading.

During the Summer of 1945, Professor John S. Strahorn, Jr., served as Visiting Professor of Law in the Summer Session of the George Washington University School of Law, Washington, D. C., where he taught the course in Evidence.

VICTORY FOR COURT OF APPEALS REORGANIZATION

Since the appearance of the last issue of the *REVIEW*, the voters of the State, at the November, 1944, general election, have approved by a substantial majority the proposed amendments¹ to the State Constitution (known as the "Bond Plan")² the effect of which is considerably to reorganize and re-constitute the Court of Appeals of Maryland. The new arrangement took effect on January 1, 1945.

In view of the considerable attention paid by the *REVIEW* to the movement for Court of Appeals reorganization while it was still a pending proposal, it is thought well at this time, for the benefit of those who in the future might be interested in the history of the matter, to sketch briefly the sequence of events of the successful movement for reorganization, to collect and restate the arguments for its success, and, by way of an Appendix, to tabulate by citations and titles the respective articles and editorials published in the *REVIEW* about the proposal.

Prior to the taking effect of the new plan, the Court of Appeals of Maryland had consisted of one full-time judge from Baltimore City, and the Chief Judges of the seven Judicial Circuits into which the Counties of the State were divided for trial court purposes. These seven Chief Judges thus divided their time between appellate and trial duties,

¹ Md. Laws 1943, Ch. 772, amending Md. Const. (1867) Art IV, Secs. 5, 14, 18A, 21.

² I.e., because it was submitted by the "Bond Commission", so-called because the late Chief Judge Carroll T. Bond, of the Court of Appeals, was Chairman of the Maryland Commission on the Judiciary Article, which recommended the reform in what proved to be practically its final form.

and this interference of trial duties with proper discharge of appellate responsibilities was one of the arguments for the reform.

Under the reorganization plan, the Court of Appeals now consists basically of five full-time judges, without regular trial duties. Of these, two come from Baltimore City,³ and the other three from the remaining Counties, one each from the Eastern Shore group,⁴ the Central - Southern Maryland group,⁵ and the Western Maryland group.⁶ In addition, but temporarily, there are two additional judges, who had already been elected to the Court prior to the reorganization, and who, under its provisions, will continue to serve on the same basis as theretofore until their terms expire or they reach retirement age.⁷

Because the full details of the movement for the Court's reorganization have already been sufficiently described in the REVIEW, they will not be completely reiterated here, but merely summarized. The first definitive move in recent years⁸ came at the January, 1941, meeting of the Maryland

³ I.e., the Fourth Appellate Judicial Circuit, which is also the Eighth (trial) Judicial Circuit.

⁴ I.e., The First Appellate Judicial Circuit, composed of the First and Second (trial) Judicial Circuits, comprising the Counties of Dorchester, Wicomico, Somerset, Worcester, Cecil, Kent, Queen Anne's, Caroline, and Talbot.

⁵ I.e., The Second Appellate Judicial Circuit, composed of the Third, Seventh, and part of the Fifth (trial) Judicial Circuits, comprising the Counties of Harford, Baltimore, Charles, St. Mary's, Prince George's, Calvert, and Anne Arundel.

⁶ I.e., The Third Appellate Judicial Circuit, composed of the Fourth, Sixth, and part of the Fifth (trial) Judicial Circuits, comprising the Counties of Garrett, Allegany, Washington, Frederick, Montgomery, Howard, and Carroll.

⁷ Other incidental improvements in the judicial system made by the Bond Plan are: (1) A provision that the Chief Judge of the State shall be the administrative head of the judicial system of the State, with power to call for reports of the judicial work and business of the courts; (2) provision for transferring trial judges from one Circuit to another for service when needed, for calling a trial judge to sit on the Court of Appeals in case of a vacancy, and for emergency assignment of appellate judges to trial work; (3) a novel provision for the initial selection of judges, whereby all vacancies are first filled by appointment, subject to the first biennial election occurring after one full year's appointive service, at which others may run against the incumbent appointee; and (4) a provision that no one be appointed to a vacancy who would reach retirement age prior to the election aforesaid, save in the case of the reappointment of a judge at the end of a fifteen year elective term.

⁸ For a description of the earlier movements, circa 1907-1908, and 1921-1924, see (1944) 8 Md. L. Rev. 91, 96-98; and (1942) 6 Md. L. Rev. 119, 120-123.

State Bar Association when a proposal (by many unexpected) was made by the then Attorney General William C. Walsh for a Constitutional amendment to reorganize the Court.⁹ After discussion and debate, the Association approved the recommendation and appointed a Committee¹⁰ to sponsor it before the 1941 Legislature, then in session. The proposal failed of a necessary Constitutional majority in that Legislature. Shortly thereafter Governor O'Connor appointed a Commission,¹¹ which later became known as the "Bond Commission" (after its Chairman, the late Chief Judge Carroll T. Bond), to study the judicial system of the State and make recommendations.

After study, the Commission made recommendations essentially similar to the proposal before the 1941 Legislature, which recommendations were later laid before the 1943 Legislature. With minor modifications,¹² that Legislature passed the proposals relating to the Court of Appeals by the necessary majority for submitting a Constitutional amendment, with provision for the popular vote on ratification at the 1944 general election.

An attempt by court action¹³ to block the vote on the amendment failed of success, and the vote at the ensuing election gave a substantial majority¹⁴ in favor of the reorganization plan, which, therefore, took effect on January 1, 1945.

Under the new plan, Governor O'Connor appointed the incumbent judge from Baltimore City, Hon. William L. Henderson, as one of the judges from that area, i. e., the Fourth Appellate Judicial Circuit, and he appointed Charles Markell, Esq., of the Baltimore City Bar, as the

⁹ (1942) 6 Md. L. Rev. 119, 123.

¹⁰ *Ibid.*

¹¹ For names of the members, see (1941) 6 Md. L. Rev. 75.

¹² The Legislature made two minor changes in the proposals of the Bond Commission concerning Court of Appeals reorganization. It provided for selecting the County members by districts, rather than at large from all the Counties, and it rejected the proposal that appointed judges should be opposed at elections only by those nominated by petitions. The remaining recommendations of the Bond Commission, concerning consolidation of the Courts of Baltimore City, did not come to a vote in the Legislature. On this, see (1944) 8 Md. L. Rev. 91, 104-105.

¹³ *Hillman v. Stockett*, 39 A. (2d) 803 (Md. 1944).

¹⁴ The official proclamation, Md. Laws 1945, p. 2002, shows 130,478 votes for the proposal and 72,773 votes against it.

second judge from there. In the First Appellate Judicial Circuit, Hon. Stephen R. Collins, and in the Third Appellate Judicial Circuit, Hon. Edward S. Delaplaine, already elected members of the Court, were automatically¹⁵ entitled to be appointed and were so appointed.

In the Second Appellate Judicial Circuit there were three members of the Court who had been earlier elected, Hon. Ogle Marbury, Hon. C. Gus Grason, and Hon. Ridgely P. Melvin.^{15a} From these Governor O'Connor appointed Chief Judge Marbury, who was again designated as Chief Judge of the Court, to the regular Judgeship from that area. Judges Grason and Melvin thus became the additional judges, to serve both on the Court and as Chief Judges of their trial Circuits until retirement or expiration of terms.¹⁶

Judges Levin Claude Bailey and Walter C. Capper, both temporarily serving by appointment on the Court as Circuit Chief Judges under the old plan, then ceased to be members of the Court of Appeals, but were immediately re-appointed as trial judges in their circuits.

After the initial outspoken public proposal for the reform, in January, 1941, the REVIEW published considerable material in favor of its success, to be outlined below. Furthermore, prior to that time, in June, 1940, the REVIEW had published two articles on the subject. While neither definitely advocated Court of Appeals reorganization, yet both hinted in that direction and they supplied factual and historical detail which later proved useful in supporting the reform.

The first of these articles, written by the late Chief Judge Carroll T. Bond, was entitled *An Introductory Description of the Court of Appeals of Maryland*.¹⁷ This article was a preface to the other article then published, and it described the method of functioning of the Court. It also summarized its history, particularly with reference to other schemes of

¹⁵ I.e., because they were each the only members of the Court resident in the particular Appellate Circuits who had already been elected to membership on the Court.

^{15a} Judge Melvin died on December 14, 1945, after this portion of the present issue had been set in type.

¹⁶ Since Judge Melvin's death Judge Grason is the only additional judge.

¹⁷ (1940) 4 Md. L. Rev. 333.

constituting the Court that had prevailed under earlier State Constitutions, which schemes had differed from the plan then prevalent under the 1867 Constitution.

In this article Judge Bond did not openly advocate Court of Appeals reorganization. Later, however, he did so, first by oral support given immediately upon the proposal's being laid before the January, 1941, meeting of the State Bar Association; then by accepting and vigorously performing the duties of Chairman of the Bond Commission; and finally by subsequent support of its recommendations after they were laid before the Governor and the 1943 Legislature. In fact, Judge Bond's last public appearance, just prior to his terminal illness, was at a meeting of the Baltimore City Bar Association, called to discuss the Bond Commission's recommendations.

The other article then published, to which Judge Bond's was a preface, was written by Messrs. Herbert M. Brune, Jr., and John S. Strahorn, Jr., and was entitled *The Court of Appeals of Maryland—A Five Year Case Study*.¹⁸ The authors surveyed, for the five year period 1935-1939, the work of the Court of Appeals, and compiled various statistics about that work, principally concerning the subject matter of the cases appealed, types of courts from which appeals were taken, comparative success of plaintiffs and defendants, extent of reversals of trial judges, volume of business by Court terms, by circuits, and by counties, and the number and average length of the opinions written by the various judges. Tables were published presenting the various compilations.

While this article did not directly advocate reorganization of the Court of Appeals, yet this possibility was suggested indirectly in various ways. One¹⁹ was by calling for preservation of the tenure of the sitting judges in the event of any such reorganization, a point which was actually followed in the plan later adopted and now in force.²⁰

¹⁸ (1940) 4 Md. L. Rev. 343.

¹⁹ *Ibid.*, 370.

²⁰ No such provision for preserving the tenure of the sitting judges was contained in the draft of the proposal as it had been laid before the 1941 Legislature, wherein it was defeated.

Another²¹ was by presenting information about the method of constituting the appellate courts of other States, wherein it was pointed out that Maryland was one of the two remaining States (Delaware was and still is the only other one) which had their appellate judges do regular trial work. Still another²² was by carrying two maps of the State, one showing the Circuit divisions (still in effect for trial court purposes) together with figures giving the percentages of appealed cases from the respective Circuits, each one of which was then entitled to one appellate judge. The other map, based on a supposition of reducing the number of County appellate judges to four, indicated a possible grouping of the Counties in terms of approximate equality of number of appeals.²³

From and after the first open proposal of Court of Appeals reorganization in January, 1941, the REVIEW carried unsigned editorials at appropriate intervals favoring the reform. The first, entitled *The Pending Proposal to Reorganize the Court of Appeals of Maryland*,²⁴ appeared while the project was still pending (later temporarily to fail) in the 1941 Legislature. Then, when the Bond Commission submitted its first report proposing the plan now in force, another editorial, entitled *The Interim Report of the Commission on the Judiciary Article*²⁵ supported the proposal in that form.

When the proposal was successful in the 1943 Legislature, that fact was noted in an editorial, *Court of Appeals Amendment Passes Legislature*,²⁶ and, finally, the arguments in favor of the reorganization were summarized in a later editorial entitled *The Proposed Court of Appeals*

²¹ (1940) 4 Md. L. Rev. 343, 373-374.

²² *Ibid.*, 374-375, 376-377.

²³ The grouping of Counties in that map was the same as that which had been provided for in the Constitution of 1864. It is interesting to notice, on comparing that second map's suggested grouping with that actually arrived at under the plan now in force, that the present First Appellate Judicial Circuit exactly coincides with the Area A therein suggested; that the Second Appellate Judicial Circuit coincides with Areas B and C of the map, less Montgomery County; and that the Third Appellate Judicial Circuit coincides with Area D, plus Montgomery County.

²⁴ (1941) 5 Md. L. Rev. 203.

²⁵ (1942) 6 Md. L. Rev. 304.

²⁶ (1943) 7 Md. L. Rev. 143.

*Amendment.*²⁷ In that one it was principally stressed that the chief vice of the pre-existing scheme was that it tended to cause the County Court of Appeals judgeships to be monopolies of single Counties, and also to cause the matter of the appointee's fitness for appellate service to be subordinated to that of spreading trial judgeships among as many counties as possible. Incidental mention of the proposal was also made in three other editorials primarily serving other purposes.²⁸

In addition to the unsigned editorials mentioned above, the REVIEW also carried signed contributions from outside authors about the matter. In the February, 1942, issue (in the interim between the project's failure in the 1941 Legislature and its success in the 1943 one), the REVIEW provided a forum for discussing the merits and demerits of the proposal by publishing two leading articles. In the first, *The Movement to Reorganize the Court of Appeals of Maryland*,²⁹ by the then Attorney General William C. Walsh, the history of the movement and the arguments for its success were presented. In the other, *Proposals to Change the Maryland Appellate Court System*,³⁰ by Walter H. Buck, Esq., of the Baltimore City Bar, the arguments against adoption were carried.

Finally, in the last issue of the REVIEW, published just before the election of 1944, there was carried a leading article, *Reorganization of the Court of Appeals of Maryland*,³¹ by Hon. Morris A. Soper, United States Circuit Judge for the Fourth Judicial Circuit, formerly United States District Judge for the District of Maryland, and also formerly Chief Judge of the Supreme Bench of Baltimore City. This article, which had been originally pre-

²⁷ (1943) 7 Md. L. Rev. 324.

²⁸ Editorial, *News of the Bar Associations* (1941) 6 Md. L. Rev. 75 (concerning the appointment and personnel of the Bond Commission); Editorial, *Carroll T. Bond, 1873-1943* (1943) 7 Md. L. Rev. 138, 139-40 (concerning Judge Bond's support of the reorganization); and Editorial, *Constitutional Amendments Since the 1939 Code* (1943) 7 Md. L. Rev. 233, 234-36 (mention of the Bond Plan amendments in connection with all amendments, passed or pending).

²⁹ (1942) 6 Md. L. Rev. 119.

³⁰ (1942) 6 Md. L. Rev. 148.

³¹ (1944) 8 Md. L. Rev. 91.

pared at the request of the State Bar Association's committee to sponsor the constitutional amendment, was reprinted in advance of publication and circulated as a pamphlet in furtherance of the committee's work. It thoroughly summarized the arguments for the proposal and disposed of the objections thereto which had earlier been raised and presented.

Many arguments in favor of the reorganization of the Court were made by its proponents, in the pages of the *REVIEW*, and in numerous other publications and addresses. One was that the interference of trial duties with appellate ones lessened the efficiency of the County appellate judges. Another was that Baltimore City, with half the population and more than half the lawyers of the State, was entitled to more adequate representation on the Court. Still another was that the areas provided for the selection of individual County appellate judges were too small to insure the best choices. Incidental to this was the fact that the accidents of geography and politics had tended to cause certain specific Counties to have monopolies of the Chief Judgeships of the Circuits, so that the areas of choice were even smaller than was apparent by the Constitutional scheme. Also incidental was the point that the existing plan caused the appointee's fitness as an appellate judge to be subordinated to the matter of spreading trial judgeships throughout the counties of the circuit as far as possible. Finally, it was argued that a smaller group of appellate judges (five under the new plan) would work better than the larger group of eight under the previous one.

The reorganization of the Court under the Bond Plan has borne incidental fruit in the way of improving the Maryland appellate system. Shortly after the new Court was installed, it announced some drastic changes in the rules of court applicable to the taking of appeals.³² The "Fourth Circuit Rule" which dispenses with printing the whole record was adopted. Now, each party prints in an Appendix to his brief such part of the manuscript record as he wishes the Court to read. Provision was also made

³² These changes were ordered January 30, 1945.

for a single annual term of the Court, starting in October of each year, to replace the three terms per year which previously had been observed. Other minor changes in the procedure of appeal were also made.

Later, other improvements were made.³³ Exceptions to trial court rulings or orders have been made unnecessary; and bills of exceptions are no longer required in law cases, civil or criminal.

Furthermore, individual private offices for the members of the Court have recently been provided in the Court of Appeals building at Annapolis. The REVIEW has been informed, however, that, due to the wartime difficulty in securing proper furnishings, they have not yet been occupied. As a consequence, no appointment has yet been made of the "Law Clerk" recently provided for by statute³⁴ and there is a similar delay in making available to the judges more adequate secretarial service.³⁵

Adoption of the reorganization plan thus is both actually and potentially productive of good in the improvement of the Maryland appellate system. It was a much needed legal and Constitutional reform, long overdue. It capped the climax of the recent move for procedural reform in Maryland which had in recent years accomplished improvement in the Justice of the Peace system in the Counties,³⁶ in the People's Court of Baltimore City,³⁷ and in the Juvenile Courts of Baltimore City³⁸ and certain of the Counties, together with adoption of the new General Rules of Practice and Procedure.³⁹

³³ These changes were ordered July 28, 1945.

³⁴ Md. Code. Supp. (1943) Art. 26, Sec 40A, added by Md. Laws 1943, Ch. 794.

³⁵ See Bond, *An Introductory Description of the Court of Appeals of Maryland* (1940) 4 Md. L. Rev. 333, 340, concerning the limited amount of secretarial assistance then provided for the members of the Court. On the need for law clerks and secretarial assistance, see Brune and Strahorn, *The Court of Appeals of Maryland—A Five Year Case Study* (1940) 4 Md. L. Rev. 343, 369-370; and Buck, *Proposals to Change the Maryland Appellate Court System* (1942) 6 Md. L. Rev. 148, 151-152.

³⁶ Md. Code (1939) Art. 52, Secs. 93-114, as variously amended, establishing the "Trial Magistrate" system.

³⁷ Md. Const. (1867) Art. 4, Secs. 41A, 41B, added by Md. Laws 1939, Ch. 163, ratified in 1940.

³⁸ Baltimore City Charter (1938) Secs. 420A-420S, as added by Md. Laws 1943, Ch. 818.

³⁹ On which see (1941) 6 Md. L. Rev. 1-114.

Success of the reform was principally made possible by the support given it by the Maryland State Bar Association and by the enthusiastic activity of those who individually participated in the campaign it sponsored, commencing with the first public proposal before its January, 1941, meeting, and ending with the activity of its committee appointed to arouse public sentiment in favor of success at the polls. This latter committee circulated pamphlets and arranged a series of radio addresses. The *Baltimore Sunpapers* gave considerable support all through the movement and also contributed greatly to its success.

While numerous individuals aided with their support of the plan, both in and out of the State Bar Association, yet perhaps all would agree that, if a small group of those who did the most were to be named, it would include four who, appropriately enough, occupied such key public positions as to make their participation proper. These would be Governor Herbert R. O'Connor, who announced support of the plan as first before the Legislature; the then Attorney General William C. Walsh, who first proposed it before the Association and continued thereafter to support it; the late Chief Judge Carroll T. Bond, the then incumbent head of the Court of Appeals, who supported the idea in the various ways mentioned earlier herein; and the senior resident judge of the State, the Hon. Morris A. Soper, who played an important part in the last phase of the campaign, just prior to the popular vote, by his published writings and his radio addresses on the subject.

Now that this much-needed reform is an accomplished fact, it might be remarked that it is a source of satisfaction to the REVIEW that it was able in a small way to participate in the movement for its success by providing a medium of publication and permanent recording of the arguments for and against it, particularly the former. It should be a source of gratification to those concerned with the legal welfare of the State that there has been adopted this reform so long needed to insure the continuance of satisfactory appellate procedure in Maryland.

APPENDIX.

A list of citations to all material published in the REVIEW on Court of Appeals reorganization.

Leading Articles.

- (1940) 4 Md. L. Rev. 333, An Introductory Description of the Court of Appeals of Maryland, by Carroll T. Bond.
(1940) 4 Md. L. Rev. 343, The Court of Appeals of Maryland—A Five Year Case Study, by Herbert M. Brune, Jr., and John S. Strahorn, Jr.
(1942) 6 Md. L. Rev. 119, The Movement to Reorganize the Court of Appeals of Maryland, by William C. Walsh.
(1942) 6 Md. L. Rev. 148, Proposals to Change the Maryland Appellate Court System, by Walter H. Buck.
(1944) 8 Md. L. Rev. 91, Reorganization of the Court of Appeals of Maryland, by Morris A. Soper.

Editorials.

- (1941) 5 Md. L. Rev. 203, The Pending Proposal to Reorganize the Court of Appeals of Maryland.
(1942) 6 Md. L. Rev. 304, The Interim Report of the Commission on the Judiciary Article.
(1943) 7 Md. L. Rev. 143, Court of Appeals Amendment Passes Legislature.
(1943) 7 Md. L. Rev. 324, The Proposed Court of Appeals Amendment.
(1944) 8 Md. L. Rev. 226, Victory for Court of Appeals Reorganization.

Incidental Editorial Mention.

- (1941) 6 Md. L. Rev. 75, News of the Bar Associations.
(1943) 7 Md. L. Rev. 138, 139 - 140, Carroll T. Bond, 1873-1943.
(1943) 7 Md. L. Rev. 233, 234-236, Constitutional Amendments Since the 1939 Code.