VIRGINIA LAW REVIEW

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FOREWORD.—With this number the VIRGINIA LAW REVIEW begins its ninth volume. It is the purpose of the present Board of Editors to pursue the same policy as has been pursued by our predecessors in publishing articles of general interest to the profession, and commenting upon recent decisions of courts of record throughout the United States. The same relative proportion will be preserved between the several departments. The leading articles will be prepared by prominent members of the Bench and Bar and by teachers of the profession, while the Notes, Recent Decisions and Virginia Section will be the work of members of the Board. The competitive system for admission to the Board, instituted last year, will be continued.

Owing to the fact that the Cumulative Index, covering the first eight volumes, was published last June, Volume Eight contained no index. However Volume Nine, being without the scope of the Cumulative Index, will contain its own index.

We wish to express our genuine gratitude to our contributors of leading articles. It is to those who have contributed articles in the past that we owe whatever success the REVIEW has attained and to those who have so generously promised to contribute in the future that we owe our chief encouragement.

THE LAW SCHOOL.—Beginning with this session the requirements for admission to the Law School include, in addition to the standard high school course, at least two years of college work. As a result

the enrollment is slightly lower than it was last year, there being 226 students at the date of going to press. The following table indicates the enrollment by States and counties:

Alabama	3	New Jersey	3
Arkansas	5	New York	1
Connecticut	1	North Carolina	1
California	1	Ohio	2
Delaware	2	Oklahoma	1
District of Columbia	4	Pennsylvania	8
Florida	7	South Carolina	6
Georgia	6	Tennessee	3
Kentucky	9	Texas	4
Maryland	4	Virginia	134
Minnesota	2	Washington	3
Mississippi	3	West Virginia	10
Missouri	1	Porto Rico	1
Montana	1		
		Total	226

The opening of the session marks a number of changes in the Department. Professor Minor has been granted a leave of absence and Assistant Professor F. D. G. Ribble, Jr., has charge of his work. Professor Dobie, who has been on leave of absence for the past two years, has returned.

The subject of Bankruptcy has been changed from a required course to an elective and Taxation is again part of the curriculum.

THE CORONADO CASE AS IT AFFECTS THE SUABILITY OF LABOR UNIONS.—In the case of the *United Mine Workers of America* v. *Coronado Coal Co.*,[1] the Supreme Court of the United States held, among other things, that trade unions, though unincorporated, are suable as a body in the federal courts under the Sherman Anti-Trust Act, and that funds accumulated by them to be expended in conducting strikes are subject to execution in suits for torts committed by them in connection with such strikes. It was further held, however, that the dependent trade union (the plaintiff in error) had neither engaged in the destruction of plaintiff's property nor entered into a conspiracy to restrain or monopolize interstate commerce,[2] and that therefore the union was not liable. In other words, while it was laid down as a general proposition that unincorporated associations may be *sued,* the Court said that the facts in this case were not sufficient to render the defendant trade union liable. So that the question of the suability of unions was not essential to the ultimate decision, which held them not liable in this case. It was mere dictum; but it was so expressly declared that and so clearly demonstrated why such bodies should be liable, that the dictum will likely be followed in the future.

[1] (U. S. 1922), 42 Sup. Ct. 570.
[2] U. S. Comp. St. (1916), § 8820.