

BOOK REVIEWS

THE JUDICIAL OPINIONS OF OLIVER WENDELL HOLMES. By Harry C. Schriver. Dennis & Co., Inc., Buffalo, 1940. Pp. xvi, 360. Price: \$3.50.

These are not typically the Massachusetts cases of which Holmes himself said: "A thousand cases, many of them upon trifling or transitory matters . . ." Those cases you can pick at random in any volume of the Massachusetts reports (134 to 182 Mass.). I pick one or two, and find an action for tort for the conversion of six ranges;¹ a petition to prevent the carrying out of a contract by a town board of health for the removal of ashes and garbage;² an action for the conversion of "some hay";³ whether a certain notice could be served by a constable.⁴

This book collects only opinions which the compiler designates as Holmes' "principal opinions bearing on constitutional law," while on the highest bench of his state. A few are dissents; altogether there are about 60 complete opinions, with a short factual preface to each.

Precisely, the volume has three parts: Part I, Constitutional Opinions; Part II, Excerpts and Epigrams from many other cases; Part III, five factually revealing appendices of "complementary interest" and an Index to Cases.

There is a foreword and a preface. The foreword is Francis Biddle's, and is perhaps the best of reviews.

Part I classifies itself into nine chapters,—Legislative Freedom, Freedom of Speech, Capital and Labor, Bill of Rights, Impairment of Obligation of Contract, Full Faith and Credit Clause, Due Process under the Massachusetts Constitution, Due Process under the Federal Constitution, and Miscellaneous Constitutional Cases.

It is interesting (and the author so notes) that during his twenty years on the state bench, there was only one case in which Holmes wrote an opinion holding a Massachusetts statute unconstitutional.⁵ There is included the famous dissent in the labor case involving the right to picket.⁶

It is not for me here to set forth, even briefly, a digest of any of these opinions. It is for the deep avail of every reader who does not read as he runs. He will, for single example, find fulness in the opinion over the simple question whether a policeman may talk politics. Says Holmes: "The petitioner may have a constitutional right to talk politics, but he has no constitutional right to be a policeman."

Many will appreciate this book because of its physical advantage in having brought together in one volume many of Holmes' opinions. (It is kindred to *The Dissenting Opinions of Mr. Justice Holmes*, arranged by Alfred Lief.) They will get personal or professional satisfaction by this easy reference or from the epigrams and informative data appended. There is therefore virtue in the work of this compiler in providing a handy source of some of Holmes' decisions. But there is the superior influence. The lawyer probably has read many of Holmes' opinions at different times and may well realize his genius as a judge and scholar. It is only, though,

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1. Plymouth Stove Foundry Co. v. Fee, 182 Mass. 31, 64 N. E. 419 (1902).
 2. Oliver v. Gale, 182 Mass. 39, 64 N. E. 415 (1902).
 3. Rogers v. Dutton, 182 Mass. 187, 65 N. E. 56 (1902).
 4. French v. Goodnow, 175 Mass. 451, 56 N. E. 719 (1900).
 5. Lorden v. Coffey, 178 Mass. 489, 60 N. E. 124 (1901).
 6. Vegelahn v. Guntner *et al.*, 167 Mass. 92, 104, 44 N. E. 1077, 1079 (1896).

when he reads at one sitting a well-chosen collection such as this, that he can get a sense of the development of Holmes' greatness. It is not enough to get Holmes' opinions by the page. Mechanically, procedurally, historically it may be enough. That is all the compiler can do. But the reader,—he must get more and grow, so that as he reads he is less the avid reader and more the balanced thinker. To do less is to be slothful or wooden.

There is a time when a person becomes a specific person, and there is a time when a judge comes to himself. That is a "very wholesome and regenerating change."⁷ With Holmes, remarkably, it was no change. He was a specific person, and came to himself, almost at once. But, he did grow, and this volume shows that unfolding. It is this unfolding that comes at the end. Suitable, then, is the frontispiece statement of the compiler: "A man's spiritual history is best told in what he does in his chosen line." I am brought again to what Bacon said: "Ask counsel of both times; of the Ancient Time, what is best, and of the Latter Time, what is fittest. Reform, therefore, without bravery or scandal of former times and persons, but yet set it down to thyself as well to create good precedents as to follow them." With span of time out, as it must be with greatness, Bacon had Holmes before him when he spoke those words. Holmes did not quit activity when he quit life, for we of sparser fate know how good it is to try to grow with a great man's roots.

Joseph Sloane.†

CASES AND MATERIALS ON LEGISLATION. By Frank E. Horack, Jr. Calhagan & Company, Chicago, 1940. Pp. xxix, 829. Price: \$7.00.

This case book is broad enough in scope and detailed enough in treatment to enable the instructor to use it in any year of the law school curriculum in which a course on legislation is given. It avoids, very successfully, encroachment upon the proper domains of administrative law and constitutional law.

The materials presented are wisely selected and (besides cases) consist of extracts from constitutions, law review articles, treatises, statutes, ordinances, and regulations, as well as the editor's comments and problems for analysis. Most commendable is the liberal inclusion of statutes and ordinances. The space and time and treatment of them as subjects of study in a legislation course are more valuable to the student than an equal effort expended on what courts say about them. State materials, particularly Indiana, are emphasized. The choice of federal material is good but could be expanded with profit. Occasionally, the facts of cases are not adequately set forth, and often no indication is given as to how the case came before the court. Too frequently, the date of a statute is not given. Attention to these matters could improve the book.

The editor's comments, questions, and suggested problems deserve special mention. They explore uncharted fields, elaborate the immediate problem, and question "basic principles". They are extremely thought-provoking and correct the deceptive impression, sometimes given by cases, that there are rigid rules in statutory law. Further, they point ways which may bring into some order the almost chaotic state of the law of statutes or suggest considerations which the student may employ in finding symmetry in that law.

⁷ I suggest reading WOODROW WILSON, WHEN A MAN COMES TO HIMSELF (1915). a brochure.

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Mechanically, the elaborate subdivision of the book and the fulsome use of descriptive headings are helpful in enabling the student to know his place in the scheme of the course and to fit the parts into clear relationships with each other.

The author's approach to the content of a course on legislation is that of a person who is aware of the task and who appreciates that his job is to make clear the policy-determining function which the legislatures must perform, the draftsman's technical tasks and pitfalls, the various aids to interpretation, and the judicial attitude toward statutes which the practicing lawyer must take into account in advising his client respecting construction of statutes by courts.

The book has two main parts. The first, entitled "The Legislative Process", has three chapters. The first chapter indicates the considerations which prompt action and the choices available to the legislature. Discussion is centered around representative legislative problems such as safety of buildings, gambling, and milk control. The evil is set forth by means of newspaper and trade journal comment. The inadequacy of existing common law and statutory law to remedy the harm is shown by judicial opinions. The corrective available choices are set forth in comment and statutes and ordinances. Further cases applying the remedial statute show the measure of legislative success.

The second chapter gives an excellent picture of how the legislature operates. It carries a legislative proposal through its various stages with vividness. Quotation from illustrative documents is liberal.

The third chapter deals with influencing legislative action—who does it and how. Common law and statutory inhibitions on lobbying are included.

Except in the chapter on legislative procedure, it seems to me that too much of this part of the book is devoted to considerations which are more peculiarly those of a course on political science. If they are to be used in a law course, I would suggest that they be treated as outside reading.

Part II of the book, "Statutes: The Culmination of the Process", is a fine book in itself. Its substance and analysis is better and more valuable than Part I. The first chapter (IV) classifies statutes as to type. Any pedagogically good classification is bound to be somewhat arbitrary, but the divisions here seem to have great merit. In this chapter, it is made clear that the considerations which prompt a liberal or strict construction do not necessarily represent abstract applications of universal rules as to type of statute.

The remainder of the book consists of two chapters entitled "Interpretation of Statutes" and "Structure and Interpretation of Statutes". They might have been combined, and the reasons for the division are not very apparent. But the substance of the task of statutory interpretation, and of teaching it, is found here. "Legislative intent" is explored, and the various intrinsic and extrinsic aids to construction are discussed. Sources of interpretation, rules laid down by constitutions, separability provisions, repeals, sanctions, internal structure of statutes, and similar and associated problems are dealt with. From these materials the instructor can emphasize, and the student can grasp, that in this field of the law the so-called "rules of statutory construction" are feeble reeds on which to rely and that only the most searching and patient analysis of every word and its relationship to every other word in a statute will bring defensible results. Here, too, are the materials which show the attitude of courts toward the effort of the legislature to make law. The sorry record of the failure

which courts have made in developing an integrated body of law when they are faced with the baffling problem, on the one hand, of laying down the principles of statute law and, on the other, of doing justice in the individual case is exposed. Here, more than in any other place in the book, are the editor's skillful comments useful, for they suggest approaches which may bring order to this branch of the law and to the student's conception of it.

This book is a highly ambitious and very successful effort to organize in teachable form a branch of the law which, only with the greatest of difficulty, lends itself to consistent treatment. This merit can be recognized and, at the same time, a few suggestions can be made to a teacher of statutory law and to the editor for consideration in formulating a new edition. First, I believe it important to discover, if possible, and to stress the relative weight to be given to the various, and sometimes inconsistent, aids to construction. What happens, or ought to happen, when two or more rules seem to indicate contrary meanings? Is the statement in the Committee Report to be ignored when a former statute indicates a different intention? *United States v. Shreveport Grain and Elevator Company*,¹ forcibly presents the problem and is indispensable in a statutes course. Second, a good deal more thought and space than this book devotes can profitably be devoted to the *in pari materia* doctrine. Its development represents a real opportunity for legislatures and courts to create a body of statutory law that has internal unity. Finally, for the practicing lawyer and the law student who wish to understand the legislative process and who may practice before the legislature, knowledge of the investigatory powers of a legislature is real "bread-and-butter" knowledge—to the teacher, that law is handy and pedagogically adaptable.

John O'Brien.†

THE BOTTLENECKS OF BUSINESS. By Thurman W. Arnold. Reynal & Hitchcock, New York, 1940. Pp. xi, 335. Price: \$2.50.

Choosing for the title a catch-phrase without which the economic experts of 1940 rarely completed a sentence and choosing for the time of publication the fiftieth year of the existence of the Sherman Act, when many people were wondering where the anti-trust guns would be pointed in the defense picture, Mr. Arnold provided his book, *The Bottlenecks of Business*, at birth with pretty fair insurance against public indifference, outside as well as within the legal profession. There is, however, nothing sensational about the book. It has not evoked the type of breathless enthusiasm with which the *Folklore of Capitalism* was greeted in some quarters. It is a very readable statement of the author's belief in the potency of the Sherman Act in its present form, if enforced as he would enforce it, to cure most of our economic maladjustments without doing violence to traditional American ideology and wholly within our traditional pattern of legal thinking and behavior.

"The purpose of this book," Mr. Arnold states, "is to explain to the consumer what can be done for him to increase the distribution of goods under our existing laws and by pursuing our traditional ideals of an economy of free and independent enterprise." Avowedly then, the book is written for the consumer which must, in the last analysis, include every-

1. 287 U. S. 77 (1932).

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one, and not for the lawyer as such. Beyond furnishing some interesting reading, the chief value of the book to the practicing lawyer lies in its clear disclosure of Mr. Arnold's concept of the true function of anti-trust legislation in our political organism, a concept which may be expected to extend its influence, in some measure at least, across the immediately succeeding years. That familiarity with this attitude may be turned to some practical advantage in specific cases can scarcely be doubted.

"The maintenance of a free market," says Mr. Arnold, "becomes the first concern of every political democracy." And again, "We have at present only one instrument that can accomplish any practical results in freeing the channels of trade—that is the Sherman Act." Mr. Arnold, unlike some writers on the subject of the anti-trust laws, does not consider size alone as an evil to be eliminated. The force of the law should be directed against industrial inefficiency, and by inefficiency he means the failure to distribute the products of industry to the greatest advantage of the consumer. Within its jurisdictional limits, the Sherman Act provides the policing authority to insure that industry will function in accordance with this standard of efficiency. The greater part of the book is devoted to specific illustrations of the working application of this thesis.

In the course of his twelve chapters the author demonstrates the numerous points at which restraints upon a free market touch the unsuspecting consumer. In fact, if our task were to write a blurb instead of a more or less serious review, we should be tempted to say that, by means of *Bottlenecks of Business*, Mr. Arnold had brought the Sherman Act into the home. It might be added, indeed, that it is brought into every room of the home, for foodstuffs, automobiles, stockings, and many other articles of consumer goods are made the example of how the judicious application of the anti-trust laws, as a specific, has benefited or might benefit the mass of citizens. No fault is found with the law itself, but against his predecessors in office Mr. Arnold makes the charge of inertia, stating that, prior to the time of his taking over, enforcement was allowed to become largely a matter of private suits for damages with consequent abuses, usually at the expense of the little fellow. To his present colleagues he is more generous. To them he dedicates the book and hopes that Congress will make it possible for him to have more like them.

On the subject of the method of enforcement Mr. Arnold sounds a note often recurring in his repertoire, namely, that any suggestion of substituting a bureau or commission for the courts as the medium of enforcing the law should be discarded. This is for the reason that we can not afford to scrap the authoritarian symbols which our courts provide and which have become a part of our traditional thinking about the law. That theme was played upon persuasively in a previous work, *Symbols of Government*, which is quoted freely.

Of current interest will be the chapter entitled "A Free Market in Time of National Emergency or War". The author does not believe that, as a general proposition, enforcement efforts should be relaxed in such times. His actions in this respect, with which the public is now well acquainted, attest the sincerity, if not the wisdom, of this belief.

For all its merits the book shows signs of hasty writing. For example, on page 169, the reader is told how the moving picture producers invoked the "Statute of Frauds" to defeat the claims of theatre operators based on alleged representations made to them by sales agents which were not written into the contracts. Obviously, Mr. Arnold was referring to the parol evidence rule and not the statute of frauds. But this, after all, may be simply cavilling. On the mechanical side, the text is amply anno-

tated and the notes contain an interesting bibliography of wide range. Appendices contain the text of the Sherman Act and a brief digest of some of the leading decisions interpreting it.

In conclusion it may be said that if, at times, the anti-trust laws are depicted too much in the character of a universal economic nostrum, this is an error among specialists as common as it is frequently unconscious. The book is commended to lawyers who are interested in the motivating policy underlying the alert and vigorous prosecution of trade restraints under Mr. Arnold's direction and it is commended to general readers for its over-all picture of the operation of the system.

T. Munford Boyd.†

THE SCIENCE OF INTERNATIONAL RELATIONS, LAW, AND ORGANIZATION. (Geneva Studies, Vol. XI, No. 2.) By Paul Guggenheim and Pitman B. Potter. Geneva Research Centre, 1940. Pp. 35. Price: \$.40.

LEAGUE REFORM: AN ANALYSIS OF OFFICIAL PROPOSALS AND DISCUSSIONS, 1936-1939. (Geneva Studies, Vol. XI, Nos. 3-4.) By S. Engel. Geneva Research Centre, 1940. Pp. 282. Price: \$.80.

The Geneva Research Centre states "that in spite of the unusual circumstances at the present moment, it has every intention of continuing its publications as they exist at the present time." A perusal of the Guggenheim-Potter *Kulturkampf* reprinted "for the English-speaking world" in *The Science of International Relations, Law, and Organization* from *Mélanges Streit*, leads this reviewer to hope that the Geneva Centre will take a hasty advantage of the unusual circumstances of the present moment to cease publication forthwith.

It seems that Guggenheim wrote a paper in which he stated that although the science of international law is a normative science "sufficient unto itself", it nevertheless "needs to be perfected" by the study of international relations which is a "natural science". He added that whatever unity this "natural" science may possess is due exclusively to the fact that a teacher collects certain diverse materials into a course of instruction and labels it "international relations".

Now, whereas Guggenheim teaches international law, Potter teaches "international organization", and Guggenheim's paper seemed "gratuitously offensive" to Potter and a personal reflection on him by his Geneva colleague. He therefore wrote an essay questioning Guggenheim's reputation, referring darkly to "racial and even personal aspects of the problem", and missing the point of Guggenheim's criticism, by stating that he taught international relations because he felt "that greater service could be rendered to humanity" by teaching international organization than international law. Just why anyone thought these pretentious papers were worthy of appearing in print, the reviewer would not care to say.

Dr. Engel's study of proposals to reform the League of Nations Covenant is obviously the result of much research, classification, and analysis, but it is pedestrian at best. The patient reader gets the impression that Dr. Engel is overwhelmed by his materials rather than their master. It would be more profitable to read the documents themselves than Dr. Engel's quotations and comments. To read long discussions today of Articles 10, 11, 15, and 16 of the Covenant requires some will power, but as Dr. Engel observes these

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"discussions reveal the problems with which any attempt at international organisation in the future will be faced. It will always be necessary to consider and solve the question as to the composition of such organisation, its relationship with non-members, the composition and functions of its organs, the prevention of war between and against its members, the settlement of disputes between them, the upholding and also peaceful changing of their territorial and other status, the enforcement of their common obligations and, in general, all sorts of co-operation among them."

Herbert W. Briggs.†

PRICE CONTROL UNDER FAIR TRADE LEGISLATION. By Ewald T. Grether. Oxford University Press, New York, 1939. Pp. x, 517. Price: \$5.00.

The current monographs and hearings and the impending final report of the Temporary National Economic Committee render of special value Professor Grether's scholarly survey and analysis of a series of comparatively new fields of legal interest opened up by recent state and federal legislation.

Already, intimations from the Department of Justice and the Federal Trade Commission that all is not well with the workings of resale price maintenance laws and the fair trade practice acts pose the question of whether demands for repeal, or at least substantial statutory modification, will soon resound in Congressional and state legislative chambers.

When the effects of the trend to stability, and even uniformity, of price among sellers and the abuse of these laws are brought to the attention of the lawgivers by enforcement officers and aggrieved complainants, agitation for their appraisal and reform can be expected.

Professor Grether's book contains a survey, historical, economic, and legal, of the subject matter covered by two groups of statutes: (1) resale price, or fair trade, laws enacted by 44 states and reinforced by exemptions from federal law secured by the federal Miller-Tydings Act; (2) a series of statutes such as the federal Robinson-Patman Act and a growing group of state statutes akin to it, which are denominated unfair practices acts, and which were enacted to protect purchasers from unlawful discriminations and matters related thereto. These latter acts control, and even prohibit, "loss leaders" and sales below cost. It is a complex and widespread subject covering all aspects of retailing, spread over many states, each jurisdiction having its own local variations, and presenting administrative aspects no less burdensome than finally contributed to the demise of the N. R. A.

The author's qualifications of professional competence are the highest. A recognized research scholar in these fields, author of *Resale Price Maintenance in Great Britain*, frequent contributor to legal, economic, and marketing journals, and director of several field studies, Professor Grether is well equipped to present the results of his combined academic and practical knowledge in this field. The author's scholarship and his grasp of the economic, governmental, and legal realities are commendable.

To indicate the scope of the book, it is necessary to refer to the order of treatment, so that the development of the subject matter may be ascertained.

After an introduction which discusses the economic and business background of the problems surveyed, the experience in the pioneer state

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in these matters, California, is set forth. Then follows the legal setting which records the events which led to the California Fair Trade Law, its judicial interpretation and amendments. Then, with its validation by the Supreme Court of the United States, on constitutional grounds, in the cases which, in effect, upheld the California and Illinois Statutes, the movement spread to other states, and now is practically universal law throughout the entire country.

Similar California legislation, the Unfair Practices Act, following the federal Robinson-Patman Act, has been copied in other jurisdictions, but not on so widespread a basis as the resale price laws. This indicates the powerful influence which the decisions of the courts wield upon the legislative process, either accelerating or impeding legislative imitation. The author states, and he is probably correct, that the fate of the unfair trade practices statutes must abide the event of a final Supreme Court decision, as did the resale price laws.

After a survey of legal developments in California, there follows a discussion of the most important trades interested in the legislation—the food and drug trades and others.

The discussion continues with the reasons why some trades are distinguished from others in effectiveness in invoking the new statutes. This is considered in an interesting manner in two chapters entitled "Fields Within Price Control" and "Fields With No Price Control".

The practical economic and business problems presented are contained in chapters "Leaders and Loss Leaders", "The Play of Interests in Retailing", "Manufacturers and Distributors" and "The Effects Upon Consumers". These chapters survey the practical business problems involved.

The remainder of the book sums up the broad social, governmental, and legal issues which the legislation has posed.

Evaluations and conclusions in this field are not easy to reach, even by those searching for a sound estimate of their social value. Once attained, they are often colored by one's particular bias. Therefore, as these subjects are likely to be debated in the near future, the reviewer commends this excellent volume to any lawyer whose field of interest brings him into contact with these problems. It will prove an especially valuable source book for the contestants in the ensuing struggle to retain or repeal these new statutes.

Benjamin S. Kirsh.†

THE BUSCH JEWELRY STORES LABOR INJUNCTION. By John H. Mariano. The Christopher Publishing House, Boston, 1940. Pp. 238. Price: \$2.50.

On July 11, 1939, the New York Court of Appeals, in the case of *Busch Jewelry Co. v. United Retail Employees' Union*,¹ utilized the judicial process to amend Section 876 (a) (1) (f) (5) of the New York Civil Practice Act, which prohibits, in any case involving a labor dispute, the issuance of an injunction against peaceful picketing. Said the court: when striking unions deliberately advise and encourage violence, "they are no longer entitled to the benefit of special statutes enacted to protect them

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1. 281 N. Y. 150, 22 N. E. (2d) 320 (1939); *c.f.* Milk Wagon Drivers Union of Chicago v. Meadowmoor Dairies, Inc., 61 Sup. Ct. 552 (1941).

in the enjoyment of their conceded right of peaceful picketing," and *all* future picketing may be enjoined where there is danger of the continuance of such violence if any picketing whatever be allowed. That this attempt at judicial nullification of an anti-injunction statute may have shocked even the court itself, and that the rule of the *Busch* case may die a natural death from persistent disuse, is indicated, to some degree, by the manner in which the case was distinguished in two more recent opinions² by the same court. Regardless of its subsequent history, the *Busch* case, with its vast implications, almost unanimously decided,³ is a landmark in the law of labor relations and, as such, deserves the extended factual treatment it receives in this book.

The story of the bitter controversy between the Busch Jewelry Stores and their striking employees—a fight which captured the attention of all New York City at the time—is dramatic in the telling. The author, who served as secretary of the arbitration committee and as referee in the proceedings; sets down the facts of the case in great detail. Opening up the record in labor cases and publishing the story at length is becoming, it would seem, the fashion of the day; moreover, the result, as here, is often interesting and quite instructive.⁴

It is unfortunate, however, that mediocrity characterizes the workmanship of this book. Numerous typographical errors are disturbing, and imperfect diction is at times too noticeable. Furthermore, much repetition might have been eliminated if the many opinions and orders of the trial court, which are presented in full, had been carefully edited. Despite all these serious faults, this little volume has value as a detailed factual study, replete with documents *et al.*, of an important labor dispute. The chapter on "The Role of the Labor Attorney", dealing with the circumstances surrounding the issuance of a citation for contempt against one of the union's lawyers, may also be of special interest to those engaged in this field of practice.

Arnold R. Ginsburg.†

2. *Baillis v. Fuchs*, 283 N. Y. 133, 138, 27 N. E. (2d) 812, 814 (1940); *May's Furs & Ready-To-Wear, Inc. v. Bauer*, 282 N. Y. 331, 344, 26 N. E. (2d) 279, 285 (1940).

3. Judge, now Chief Judge, Lehman registered a vigorous dissent.

4. See, for example, the masterful presentation in Hart and Princhar, *The Fansteel Case: Employee Misconduct and the Remedial Powers of the National Labor Relations Board* (1939) 52 HARV. L. REV. 1275.

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BOOK NOTE

SOCIAL CHANGE AND LABOR LAW. By Malcolm Sharp and Charles Gregory. University of Chicago Press, Chicago, 1939. Pp. vii, 175. Price: \$2.00.

The lectures which are printed in this book were originally delivered informally by the authors, two members of the law faculty of the University of Chicago. The title is somewhat more ambitious than the impression which is left on the reader; this is mostly because of the fact that while the first half is devoted to a general discussion of some basic legal conceptions as changing and flexible things, and the second to a summary of the development of labor law in the courts and the legislatures, no correlation between the two is attempted.

"Responsibility, Damages and the Protection of Property"; "Contract and Constitution"; "Industrial Management in the Law"—these are the subjects embraced in the first three chapters, which undoubtedly form the more stimulating half of the work. Of these, the best is the third, expounding several interesting ideas relative to the conflict which sometimes arises between the respective duties owed by industrial management to its stockholders and to the community. The second half reveals nothing new; it tells once again the story already familiar to anyone who has had occasion to do research in the field. As is the case in most discussions of the subject, the viewpoint adopted is quite favorable to organized labor. Now that the scales of justice have been more or less equalized, if not tipped in favor of the unions, one wonders whether the prevalence of that sympathy will continue in the face of the ultimate implications of widespread labor organization.

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