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It is with a sense of irreparable loss that we record that former JUDGE WILLIAM A. KEENER, yielding to the demands of his practice, has retired from his professorship in the Columbia Law School. It was largely his interest and the inspiration and spirit of his teaching that made this REVIEW possible. It will be our earnest endeavor to perpetuate that spirit in these pages.

We take pleasure in welcoming to the School, as members of the teaching staff, JAMES B. SCOTT, FRANCIS C. HUNTINGTON AND JACKSON E. REYNOLDS.

HERMAN FOSTER ROBINSON, a graduate of the Columbia Law School, of the Class of 1901, died June 21, 1903. He was one of the founders of the REVIEW, and his energy, enthusiasm and executive ability were essential factors in its progress during its early career. The editors, past and present, feel deeply his loss as that of an able advisor and sincere friend.

NOTES.

RIGHT OF ACTION FOR THE MALICIOUS PROSECUTION OF A CIVIL SUIT.—A decision which has stood since 1828, and often been cited in other jurisdictions as New York law, has recently been disapproved. In *Pangburn v. Bull* (1828), 1 Wend. 345, the Supreme Court held that the defendant in an ordinary civil suit, prosecuted maliciously and without probable cause, could maintain an action for such malicious prosecution, even though, in the original action, there had been no interference with the defendant's person or property by arrest, attachment or other provisional remedy. That some such in-