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## Conflict of Laws--Personal Jurisdiction--Award of the Custody of a Child After Divorce

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*mer Co. v. Louisville etc. Co.*, 178 Ky. 712, 199 S. W. 1050. See 4 L. R. A. N. S. 1035n.; L. R. A. 1918c 108n.; L. R. A. 1918c 114n.; 13 HARV. L. REV. 304n. Also a passenger may recover for the loss of baggage carried as his own but belonging to his wife and minor children. *Withey v. Pere Marquette etc. Co.*, 141 Mich. 412, 104 N. W. 773. See MICHIE, CARRIERS, § 3432. See also 1 L. R. A. N. S. 353n.; L. R. A. 1918c 114n.

—W. F. K.

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CONFLICT OF LAWS—PERSONAL JURISDICTION—AWARD OF THE CUSTODY OF A CHILD AFTER DIVORCE.—A court of California, where all the parties were domiciled awarded custody of the children, after a divorce decree, to the mother with a prohibition against taking them out of the jurisdiction without permission. She obtained permission to take them to Oregon, on condition that she bring them back. She did not do so. The California court then modified its first decree, after a defective service on the mother in Oregon, and gave custody to the father who brought *habeas corpus* in Oregon to obtain the children. *Held*, the petition should be denied. *Griffin v. Griffin*, 187 Pac. 598 (Ore. 1920).

For a discussion of this case, see NOTES.

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CORPORATIONS—LIBEL AND SLANDER—RIGHT OF CORPORATION TO MAINTAIN ACTION FOR SLANDER.—A corporation, organized and doing business under the laws of the State of West Virginia, brought an action of trespass on the case to recover damages to plaintiff's business occasioned by certain alleged acts and conduct of the defendant, and published statements and offensive language used by him of and concerning the business and property of the plaintiff. *Held*, recovery should be allowed. *Coal Land Development Co. v. Chidester*, 103 S. E. 923 (W. Va. 1920).

It was held formerly that a corporation, having a purely intellectual and ideal existence, was incapable of malice, since that was an emotion of the heart; and, consequently, that a corporation could not maintain an action for libel and slander. See NEWELL, LIBEL AND SLANDER, § 448. But the general rule now is that a corporation may maintain an action to recover damages for libel or slander concerning it in its trade or occupation. *American Book Co. v. Gates*, 85 Fed. 729; *St. James Military Academy v. Gaiser*, 125 Mo. 517, 28 S. W. 851. The words, in order to be ac-