

in that State typewritten corporate minutes not actually signed by the secretary, but only stamped with his name, are not, *per se* admissible in evidence as such. While the distinction between ink and pencil writing is gone in Pennsylvania, yet this does not apply to routine business of the Courts, whose records must be written in ink, or typewritten or printed, in order to be accepted as such. And where a statute requires the notes of testimony to be certified in *writing* by the court stenographer, a certificate in *shorthand* characters was held not to be "written" within the meaning of the Act.

The document may have been prepared by different instrumentalities, resulting in conflicting provisions; in such cases that which has been inserted by the *more personal* means, overcomes that made in the less personal manner, the former alone being held to be "written"—for the purposes of the case. Thus, handwritten provisions in a printed form and inconsistent therewith, will prevail over the printed words; so, also, if the printed form were filled up on a typewriter whereby an inconsistency appeared, the print would give way to the typewritten words; and where a printed form was consistently filled up on a typewriter, and then a provision at variance with the typewriting was added with pen and ink, the typewriting was considered the same as printing, and the handwriting prevailed.

Assuming then, that we hold that which will pass muster as being "written," we may need to rely upon it as evidence. If it *purports* to be more than 30 years old when offered in evidence, and if it appears to be an old document and free from alterations and other suspicious conditions, it is admissible as an ancient document without proof of execution. If not so admissible, then we must be prepared to prove the signatures, if any, thereto.

*Signatures.*—When it comes to *signatures*, the prevalent idea, that here at last, we have something definitely, fixedly, and personally, a part of the individuality of the purported signer, is legally wrong. True, we generally find such a condition, and sometimes it is required by statute; but wherever possible the Courts hold that such is not necessarily the case, and that whatever the form of symbol, and however, and by whomsoever, made, *if*