sufficient, on the ground that a party may waive service of process by any act clearly evidencing an intention to do so; but this is doubtful law, and it is reasonably clear that a bare admission of service would be of no value: *Jones* v. *Merrill*, 71 N.W.R. 838; *Cheney* v. *Harding*, 31 N.W.R. 255; *Machine Co.* v. *Marble*, 20 Fed. Rep. 117; *Ex parte Schollenberger*, 96 U.S. 369; *Graham* v. *Spencer*, 14 Fed. Rep. 606; *Scott* v. *Noble*, 72 Penna. St. 115. But see *Butterworth* v. *Hill*, 114 U.S. 130.

While it is recognized that each State or foreign country has a right to establish the formalities necessary to constitute proper notice to a defendant within its jurisdiction of the institution of proceedings in its Courts against him, this being a matter of procedure, or affecting the status of its citizens: *Harryman* v. *Roberts*, 52 Md. 64; *Williams* v. *Williams*, 130 N.Y. 198; yet the service or notification required for the enforcement of the judgment must be such as is reasonable and fairly calculated to bring home to the defendant timely notice that the proceedings have been begun. It has even been held that publication under a State statute which substituted publication of a summons in place of personal service for a defendant within the jurisdiction and readily found was not "due process of law" and hence unconstitutional; *Bardwell* v. *Collins*, 9 L.R.A. 152; 44 Minn. 97. The practice established by the State itself, however slipshod and little calculated to afford the defendant that complete, fair and timely notice of proceedings which the common sense of reasonable men would deem him entitled to, may well bind the citizens of that State: *Sim* v. *Frank*, 25 Ill. 125; but it is another matter when the aid of a tribunal outside its jurisdiction is demanded to compel the enforcement of the judgment recovered: *Jardine* v. *Reichardt*, 10 Vroom, 165. Before the decision of the leading case of *Pennoyer* v. *Neff*, 95 U.S. 120, a large amount of uncertainty prevailed regarding the legal right of the enforcing Court to declare the service insufficient, based principally upon a strict construction of the Federal Constitution and statutes. This will be found indicated in such cases as *Huntly* v. *Baker*, 33 Hun. 578; *Thouvenia* v. *Roderiguez*, 24 Tex. 468; *Rudford* v. *Kirkpatrick*, 13 Ark. 33, and others; cc *Eliot* v. *McCormick*, 3 N.E.Rep. 871.

Pennoyer v. *Neff* determined that a personal judgment rendered by a State Court in an action upon a money demand against a non-resident who was served by publication of the summons but