officer's duty, and he had a right to make personal service of the writ, and in the performance of this duty the plaintiff had no right to obstruct or resist him. If she did so, the defendant had an undoubted right to use all the force necessary to overcome such obstruction or resistance: (*Hagar and Wife* v. *Danforth*, 20 Barb. 16.) The right to overcome with necessary force all active resistance is clear, but is there the same right to overcome, by the same means, mere passive resistance? We think not. It is obvious that the plaintiff could do, or omit to do, many things to delay, hinder and embarrass the service of a writ not only with impunity, but without giving the officer any right to use force. She could flee from town to town and hide herself. She could make identification difficult by change of dress, by cutting or dyeing her hair, or blackening her face, or wearing a mask or a veil. The law must declare the circumstances and occasions when an assault is justifiable. It would not do to leave it to the jury to determine whether the conduct was reasonable unless the law first declares it to be a case for the use of such force. There are no authorities that determine the precise question that controls this case. It must be settled by the analogies of the law, and in such manner as to secure those immunities and rights which the law holds most precious. Suppose Mrs. Hull had fled before the officer, and had entered her own dwelling house, closing after her the outer doors; the law surely would have said to the officer, 'thus far and no further;' but the dwelling surely is not more sacred than the person of the dweller. The law has given every one an inherent right to immunity from interference with or injury to his body at the hands of any other person. The exceptions where an assault is justifiable are all founded on the highest necessity. We do not think the mere importance of identifying a person for the service of civil process comes up to the spirit and reason of any of the recognized grounds for justifying an assault."—*Central Law Journal.*

Simultaneously with the great scare about Wiggins' storm has arisen a scare among the newspapers about the great number of lawyers in this country. This scare has now reached Albany, and the *Evening Journal is* quite despondent over it. That excellent and usually courageous newspaper remarks: "In all Great Britain and Ireland, with a population approximating 37,000,0000, there are between 11,000 and 12,000 lawyers. In the United States, by a population larger by only 15,000,000, there are 65,000 lawyers; and in this State of ours, with a tenth of the country's population, abide a sixth of its entire body of lawyers. It will not do to explain the fact that there is a lawyer to every 3,000 people in Great Britain, while in America there is a lawyer to every 800 upon any hypothesis which asserts a marked difference between the needs of the two countries for legal activity. As a matter of fact we have a ridiculous excess of lawyers over here. In every city east of the Mississippi there are more lawyers than there are legitimate cases in court for them to take care of. . . The result of this state of affairs deserves to rank among the most grinding of our social evils. The harm which a professionally united band of men, with invention sharpened by poverty and zeal, robbed of tempering scruples by the pressure of creditors, can do in a community by stirring up litigations among citizens, inciting peaceable folks to sue each other, prolonging cases indefinitely by resort to every quibble and pretext possible under our loosely-drawn laws, and devoting all their collective ingenuity and skill to the work of making business for themselves at the expense of the public—cannot well be over-estimated. . . We look to see, sooner or later, a very decided expression of public opinion on this question of the supply of lawyers. In the eyes of the law they are officers of the courts. Logically there ought to be a limit to their creation, just as there is a limit to the creation of district attorneys, or constables, or letter-carriers. . . . Popular opinion has not been directed with much clearness or concentration towards this evil as yet, but it will be one of these days, and then we take it that a radical —perhaps too radical—reform will be wrought in the whole system." It seems to us that the *Journal* is unnecessarily frightened. As a class the lawyers seem to do pretty well—they are neither richer nor poorer than their fellows of other occupations. It is no more dangerous to have 65,000 lawyers than it is to have—what the census shows to be the fact—85,000 physicians and 41,851 barbers, to threaten our health and our throats. It is highly probably that the 12,000 "journalists" or the 19,000 plumbers make more mischief