

latter, its business was interstate commerce and a Massachusetts annual excise could not be validly applied thereto.

244. *New York Life Ins. Co. v. Dodge*, 246 U.S. 357 (1918).

Liberty of contract, as protected by the due process clause of the Fourteenth Amendment, precluded enforcement of the Missouri nonforfeiture statute, prescribing how net value of a life insurance policy is to be applied to avert a forfeiture in the event the annual premium is not paid, so as to prevent a Missouri resident from executing in the New York office of the insurer a different agreement sanctioned by New York law whereby the policy was pledged as security for a loan and later canceled in satisfaction of the indebtedness.

Justices concurring: McReynolds, McKenna, Holmes, Van Devanter, White, C.J.  
Justices dissenting: Brandeis, Day, Pitney, Clarke

245. *Georgia v. Cincinnati So. Ry.*, 248 U.S. 26 (1918).

Georgia act of 1916 revoking a grant in 1879 of a perpetual right of way to a railroad impaired the obligation of contract (Art. I, § 10).

246. *Union Pac. R.R. v. Public Service Comm'n*, 248 U.S. 67 (1918).

Missouri act, insofar as it authorized the Missouri Public Service Commission to exact a fee of \$10,000 for a certificate of authority for issuance by an interstate railroad, doing no intrastate business in Missouri, of a \$30,000,000 mortgage bond issue to meet expenditures incurred but in small part in that State, imposed an invalid burden on interstate commerce.

247. *Flexner v. Farson*, 248 U.S. 289 (1919).

Kentucky law, insofar as it authorized a judgment against nonresident individuals based on service against their Kentucky agent after his appointment had expired, violated due process.

248. *Central of Georgia Ry. v. Wright*, 248 U.S. 525 (1919).

Tax exemptions in charters granted to certain railroads inured to their lessee, and, accordingly, a Georgia tax authorized by a constitutional provision postdating such charters and imposed on the leasehold interest of the lessee impaired the obligation of contract.

249. *Union Tank Line Co. v. Wright*, 249 U.S. 275 (1919).

A Georgia law under which a New Jersey company's tank cars operating in and out of that state were assessed upon a track-mileage basis, i.e., in an amount bearing the same ratio to the value of all its cars and other personal property as the ratio of the miles of railroad over which the cars were run in Georgia to the total miles over which