

ized the railroads for their refusal to pay excessive claims, and accordingly effected an arbitrary deprivation of property without due process of law.

193. *Bucks Stove Co. v. Vickers*, 226 U.S. 205 (1912).

A Kansas law that imposed certain requirements, such as obtaining permission of the State Charter Board, paying filing and license fees, and submitting annual statements listing all stockholders, as a condition prerequisite to doing business in Kansas and suing in its courts could not constitutionally be applied to foreign corporations engaged in interstate commerce. A state cannot exact a franchise for the privilege of engaging in such commerce.

194. *Crenshaw v. Arkansas*, 227 U.S. 389 (1913).

An Arkansas statute, exacting a license and fee from peddlers of lightning rods and other articles, as applied to representatives of a Missouri corporation soliciting orders for the sale and subsequent delivery of stoves by said corporation, imposed an invalid burden on interstate commerce.

*Accord: Rogers v. Arkansas*, 227 U.S. 401 (1913).

195. *Accord: Stewart v. Michigan*, 232 U.S. 665 (1914), voiding application of a similar Michigan law.

196. *Ettor v. City of Tacoma*, 228 U.S. 148 (1913).

A Washington statute of 1907 repealing a prior act of 1893, with the result that rights to consequential damages for a change of street grade that had already accrued under the earlier act were destroyed, amounted to a deprivation of property without due process of law.

197. *Missouri Pacific Ry. v. Tucker*, 230 U.S. 340 (1913).

A Kansas statute that did not permit a carrier to have the sufficiency of rates established under it determined by judicial review and that exposed the carrier, when sued for charging rates in excess thereof, to a liability for liquidated damages in the sum of \$500, which was unrelated to actual damages, deprived carrier of property without due process of law.

198. *Chicago, M. & St. P. Ry. v. Polt*, 232 U.S. 165 (1914).

A South Dakota law that made railroads liable for double damages in case of failure to pay a claim, within 60 days after notice, or to offer to pay a sum equal to what a jury found the claimant entitled to, was arbitrary and deprived the carriers of property without due process of law.

*Accord: Chicago, M. & St. P. Ry. v. Kennedy*, 232 U.S. 626 (1914).