ing the remedy, deny enforcement of claims otherwise within the protection of the full faith and credit clause when its courts have general jurisdiction of the subject matter and the parties;[22] (2) that, accordingly, a forum state that has a shorter period of limitations than the state in which a judgment was granted and later revived erred in concluding that, whatever the effect of the revivor under the law of the state of origin, it could refuse enforcement of the revived judgment;[23] (3) that the courts of one state have no jurisdiction to enjoin the enforcement of judgments at law obtained in another state, when the same reasons assigned for granting the restraining order were passed upon on a motion for new trial in the action at law and the motion denied;[24] (4) that the constitutional mandate requires credit to be given to a money judgment rendered in a civil cause of action in another state, even though the forum state would have been under no duty to entertain the suit on which the judgment was founded, because a state cannot, by the adoption of a particular rule of liability or of procedure, exclude from its courts a suit on a judgment;[25] and (5) that, similarly, tort claimants in State A who obtain a judgment against a foreign insurance company, notwithstanding that, prior to judgment, domiciliary State B appointed a liquidator for the company, vested company assets in him, and ordered suits against the company stayed, are entitled to have such judgment recognized in State B for purposes of determining the amount of the claim, although not for determination of what priority, if any, their claim should have.[26]

Jurisdiction: A Prerequisite to Enforcement of Judgments

The jurisdictional question arises both in connection with judgments *in personam* against nonresident defendants to whom it is alleged personal service was not obtained in the state originating the judgment and in relation to judgments *in rem* against property or a status alleged not to have been within the jurisdiction of the

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[22] Broderick v. Rosner, 294 U.S. 629 (1935), approved in Hughes v. Fetter, 341 U.S. 609 (1951).

[23] Union Nat'l Bank v. Lamb, 337 U.S. 38 (1949); *see also* Roche v. McDonald, 275 U.S. 449 (1928).

[24] Embry v. Palmer, 107 U.S. 3, 13 (1883).

[25] Titus v. Wallick, 306 U.S. 282, 291–292 (1939).

[26] Morris v. Jones, 329 U.S. 545 (1947). Moreover, there is no apparent reason why Congress, acting on the implications of Marshall's words in Hampton v. McConnell, 16 U.S. (3 Wheat.) 234 (1818), should not clothe extrastate judgments of any particular type with the full status of domestic judgments of the same type in the several states. Thus, why should not a judgment for alimony be made directly enforceable in sister states instead of merely furnishing the basis of an action in debt?