

273. *Forbes Pioneer Boat Line v. Everglades Drainage Dist.*, 258 U.S. 338 (1922).

A Florida law retroactively validating collection of fee for passage through a canal, the use of which was then free by law, was ineffective; a legislature could not retroactively approve what it could not lawfully do.

274. *Texas Co. v. Brown*, 258 U.S. 466 (1922).

A Georgia law levying inspection fees and providing for inspection of oil and gasoline was unconstitutional as applied to gasoline and oil in interstate commerce; for the fees clearly exceeded the cost of inspection and amounted to a tariff levied without the consent of Congress.

275. *Chicago & N.W. Ry. v. Nye Schneider Fowler Co.*, 260 U.S. 35 (1922).

A Nebraska law, as construed, that authorized imposition against carrier, in favor of claimant, of an additional attorney's fee of \$100, upon the basis of the service rendered, time and labor bestowed, and recovery secured by claimant's attorney in resisting appeal by which the carrier obtained a large reduction of an excessive judgment was unreasonable in that it deterred the carrier from vindicating its rights by appeal and therefore violated due process.

276. *St. Louis Compress Co. v. Arkansas*, 260 U.S. 346 (1922).

An Arkansas law exacting of persons insuring property in Arkansas a five-percent tax on amounts paid on premiums to insurers not authorized to do business in Arkansas violated due process insofar as it was applied to insurance contracted and paid for outside Arkansas by a foreign corporation doing a local business.

277. *Champlain Co. v. Brattleboro*, 260 U.S. 366 (1922).

A Vermont levy of a property tax on logs under control of the owner which, in the course of their interstate journey, were being temporarily detained by a boom to await subsidence of high waters and for the sole purpose of saving them from loss, was void as a burden on interstate commerce.

278. *Pennsylvania Coal Co. v. Mahon*, 260 U.S. 393 (1922).

A Pennsylvania law that forbade mining in such a way as to cause subsidence of any human habitation or public street or building and which thereby made commercially impracticable the removal of valuable coal deposits was deemed arbitrary and amounted to a deprivation of property without due process. As applied to an owner of land who, prior to this enactment, had validly deeded the surface with ex-