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Report
Corporation Council
for year
1924

FILED

At _____ o'clock _____

APR 1 1925

H. W. CARROLL
CITY CONTROLLER
AND EX-OFFICIO CITY CLERK

ANNUAL REPORT OF THE LAW DEPARTMENT
OF THE CITY OF SEATTLE
FOR THE YEAR 1924.

To the Mayor and City Council
Of the City of Seattle:

Gentlemen:

Section 16, Article XXIV, of the City Charter, requires that the head of every department of the government of The City of Seattle, except the Mayor and President of the City Council, make an annual report, on or before the 1st day of April, showing the amount of business transacted in his department and the condition thereof, and containing recommendations as to any municipal legislation by him deemed necessary or advisable to improve the service rendered by his department, such annual report to be for the year ending December 31st preceding the making thereof.

Pursuant to this provision, I herewith submit the annual report of the Law Department for the year ending December 31st, 1924.

-I-

GENERAL STATEMENT OF LITIGATION.

1. Tabulation of cases:

The following is a general tabulation of suits and other proceedings pending in the Superior, Federal and appellate courts and before the Department of Public Works of Washington during the year:

DEPARTMENT OF PUBLIC WORKS
 DIVISION OF THE CITY ENGINEER
 REPORT ON THE WORK OF THE DIVISION
 FOR THE YEAR 1924

	Pending Dec. 31 1923.	Commenced During Year 1924	Ended Dur- ing Year 1924	Pending Dec. 31 1924.
1. Condemnation Suits,	23	19	14	28
Condemnation Suits, Supplementary,	7	9	11	5
Damages for Personal Injuries,	73	62	37	98
Damages other than Personal Injuries,	55	30	16	69
Actions relating to collection of As- sessment Rolls,	1	4	2	3
Injunction Suits,	31	21	13	39
Mandamus Proceedings,	9	9	7	11
Miscellaneous Pro- ceedings,	38	41	26	53
Public Service Pro- ceedings,	2	0	1	1
	239	195	127	307

Total actions pending during period of this report, 434

2. Personal Injury Actions:

	<u>Number</u>	<u>Amt. Involved</u>
Pending December 31, 1923,	73	\$663,797.45
Commenced since Dec. 31, 1923,	62	434,898.83
Total,	135	1,098,696.28
Tried and concluded since 12/31/23	37	246,163.98
Actions pending Dec. 31, 1924,	98	852,532.30

Of the personal injury actions pending in the department during the year, thirty-seven, involving \$246,163.98, were tried and finally disposed of. Eleven of these cases resulted in judgments in favor of the City, and in the remaining twenty-six cases, there were recoveries aggregating

\$32,757.00, as against \$43,835.00 for the preceding year.

Of the sixty-two personal injury actions begun during the year, forty-six, involving \$379,331.68, were occasioned by accidents occurring in connection with the operation of the municipal street railway system.

3. Damages other than personal injuries:

	<u>Number</u>	<u>Amt. Involved</u>
Suits pending Dec. 31, 1923,	55	\$1,840,122.85
Commenced since Dec. 31, 1923,	<u>30</u>	<u>45,092.49</u>
Total covering period of this report,	85	\$1,885,215.34
Tried and concluded since 12/31/23	<u>16</u>	<u>28,890.63</u>
Pending Dec. 31, 1924,	69	1,856,324.71

Of the total of eighty-five cases involving damages other than personal injuries, sixteen cases, involving \$28,890.63, were disposed of during the year. In six cases, there were judgments entered in favor of the City, and in the remaining ten cases, judgments were entered against the City in the aggregate amount of \$13,836.43

4. Injunction Suits:

Of the injunction suits maintained by or against the City, those classes particularly worthy of note relate to Federal income tax against municipal street railway employees, ownership of stolen local improvement bonds, bascule bridge patents, interference with privately owned wharf by municipal bridge, dance halls, dog kennels, pawnbrokers, and the veterans' preference provision of the City Charter.

The injunction proceeding mentioned in the previous report brought by The Pacific Telephone and Telegraph Company against the State Department of Public Works to prevent interference with rate increases is still pending. This case is discussed under Subdivision III.

The Supreme Court, in the case of State ex rel. Man-ker v. American Savings Bank & Trust Co., The City of Seat-
tle, et al., 31 Wash. Dec. 324, (upholding our contention in the case), held that a thief could not pass good title to an innocent purchaser for value and in good faith in respect to stolen local improvement bonds.

Pursuant to an ordinance so directing, this depart-ment instituted suit in the United States District Court against Burns Poe, Collector of Internal Revenue, with a view to enjoining him from collecting Federal income taxes based on the salaries of municipal street railway employees. On April 12th, 1924, Judge Cushman denied a temporary restrain-
ing order. . We anticipate a motion to dismiss the bill, bas-
ed on the theory that relief in such cases cannot be had by
injunction by reason of the terms of Section 3224, Revised
Statutes, but that, on the contrary, the parties aggrieved
must pay under protest and sue to recover back any unlawfully
exacted income tax.

The firm of Neider & Marcus brought suit to restrain the City from constructing barriers and locating fender pil-
ing for the protection of the piers of the West Spokane
Street Bridge, it being claimed that such construction inter-
fered with the privately owned pier of the plaintiffs. This
action was dismissed by the Superior Court.

The Hotel Butler Company and the Hippodrome Amusement Company sought injunctions against the enforcement of public dance hall Ordinance No. 44785, on the ground that the same was unconstitutional. The Superior Court, on January 17th, 1924, handed down a decision upholding the validity of the ordinance and denying the injunctions.

The Strauss Bascule Bridge Company, of Chicago, has filed a suit in equity in the United States District Court for the Western District of Washington, Northern Division, with a view to enjoining the construction of the Montlake Bridge, the plans for which it is claimed by the plaintiff, infringe certain patent rights of said company. An application for a temporary injunction has been made, which will be heard early in the year 1925.

In the case of Hannah Lewis v. The City of Seattle, Superior Court No. 1741111, the plaintiff sought to enjoin the City from enforcing dog kennel Ordinance No. 46189. The plaintiff was the operator of a public dog kennel and dog hospital on Beacon Hill. The Superior Court upheld the dog kennel ordinance as a valid exercise of the police power.

There was mentioned in the last preceding report the case of Asakura v. Seattle, 122 Wash. 81, in which the State Supreme Court upheld the authority of the City to deny pawnbrokers' licenses to aliens under the police power. This decision was reversed by the United States Supreme Court (68 L. Ed. 1041), which held that the ordinance was in contravention of the Treaty with Japan, and that the treaty making power was supreme and therefore overrode the provisions of the police power ordinance.

In the case of State ex rel. Raines v. The City of Seattle, et al., it was sought to enjoin Mr. Henderson from discharging certain temporary employees and substituting for them certain regularly appointed persons appearing on the veterans' preferred eligible list. The plaintiff also sought in the same action a writ of mandamus directed to the Civil Service Commission compelling the Commission to make up an eligible list without reference to veteran preference and to certify eligibles therefrom to the Street Railway Department. On September 19th, 1924, upon our application, the Superior Court dissolved the temporary restraining order and dismissed the action. The case is now pending on appeal to the Supreme Court.

5. Mandamus Proceedings:

There was mentioned in the previous report a mandamus proceeding maintained against the railroad companies operating on Railroad Avenue, brought to compel the joint construction and maintenance by said companies of an overhead viaduct for pedestrian traffic at Yesler Way. The Supreme Court, in the case of State ex rel. Seattle v. Chicago, Milwaukee & St. Paul Railway Company, 128 Wash. 73, in all respects upheld our contentions and directed the joint construction and maintenance of said structure by said railways. The issuance of a peremptory writ in said case has been delayed at the request of the City Council (Resolution No. 7952).

We mentioned in the preceding report the case of State ex rel. Weyant v. Seattle, involving the veterans' preference provision of the City Charter in respect to the or-

der in which civil service employees should be laid off in case of reduction of force. The Supreme Court, on appeal of the case (127 Wash. 681), handed down a decision the effect of which was to further obscure the law applicable in the premises. The net result of the decision is that the Supreme Court held that three employees were entitled to two jobs.

In the case of Roland's Inc. v. City, Superior Court Cause No. 178614, a mandatory injunction was sought compelling the City Council to issue an auctioneer's license to the plaintiff, authorizing him to conduct a jewelry auction during the Christmas holidays. The Superior Court, on December 22nd, 1924, (on an order to show cause), upheld the validity of auctioneer Ordinance No. 44905 and the discretion of the City Council in refusing the license.

In the case of State ex rel. Graznoff v. Carroll, it was sought to compel the City Comptroller to issue a warrant in the sum of \$2500.00 authorized by ordinance and payable from the Light Fund. The son of the plaintiff had been killed by coming into contact with a light wire. No claim had ever been filed, as required by Section 29, Article IV, of the Charter. The Superior Court upheld our contention that there was no authority to issue a warrant under the circumstances, and rendered judgment for the City Comptroller.

In the case of State ex rel. Ross v. Carroll, the Superintendent of Lighting sought salary warrants on the basis of \$7500.00 per year. Mr. Ross' term expired December 31, 1923, and he was not reappointed for some time thereafter.

At that time and for several months following, the compensation attached to his office was \$6,000 per annum. By an emergency ordinance, effective June 23rd, 1924, the City Council sought to increase the salary to \$7500.00 per annum. On the succeeding day, Mr. Ross was reappointed for a term, by the notice of appointment, purporting to run for three years from July 1st, 1924. The Superior Court upheld our contention that Mr. Ross' reappointment could only be for the unexpired term ending December 31st, 1926, and that the attempted salary raise, having been made after the term had commenced, was invalid and void. The matter is now pending on appeal to the Supreme Court.

6. Miscellaneous Cases:

The miscellaneous actions tried and concluded during the period of this report include numerous actions growing out of police regulations, condemnation proceedings, tax foreclosures, habeas corpus proceedings, proceedings to quiet title, and other matters not involving monetary recoveries.

Forty-one miscellaneous actions were commenced during the year, involving \$85,657.09, in eleven of which, involving \$57,292.00, recoveries were sought against police officers for false arrest, etc. In these actions, this department was authorized by ordinances to defend the said officers.

Of fourteen hearings conducted by the department before the Civil Service Commission, seven decisions were rendered sustaining dismissal of the employees from service. The other proceedings resulted in the reinstatement of the

was permissible under said ordinance.
civil service employees concerned.

Twenty-three minor actions were commenced for the Lighting Department of the City, involving unpaid light and power bills, in which recoveries aggregating \$2,440.25 were sought. Judgments, including costs, were entered in the sum of \$2,390.00, and of this amount \$2,250.00 has been collected. Eight claims were filed for the Lighting Department against estates in bankruptcy and in probate proceedings.

During the year, four tax foreclosure cases were filed, and two are now pending. As a result of the policy of pressing these tax foreclosure suits, many delinquent tax rolls are being paid up in full.

Condemnation proceedings have been commenced, and are now pending, involving the change of grade on Ninth Avenue South. This case involves many serious questions as to compensation subject to be awarded to packing plants and other concerns in the vicinity involved.

The Eddy Street, et al., condemnation, commenced during the current year, involves numerous streets and alleys in the Brighton district, Rainier Valley. This territory has been without sufficient highway access for years. Over three hundred parcels of real estate and nine hundred parties are involved.

In the case of City v. Scopettone, involving zoning Ordinance No. 45382, the Superior Court, upon an appeal from a conviction before the Police Court, upheld the validity of the "Zoning Ordinance" and convicted Scopettone of constructing and maintaining a garage closer to the street margin than

was permissible under said ordinance.

In the case of Pavish v. Myers, et al., 129 Wash. 605, the Supreme Court held that the Chief of Police was not liable in damages for the unlawful, and by him unauthorized, acts of a subordinate police officer, making a distinction in this respect between the liability of a chief of police and the liability of a sheriff for acts of his deputies.

7. Statement and Investigation of Damage Claims Filed Against the City:

	<u>Number</u>	<u>Amt. Involved</u>
Claims for damage under investigation December 31, 1923,	592	\$1,168,174.43
Claims for damages referred to this department for investigation, Dec. 31, 1923, to Dec. 31, 1924,	<u>784</u>	<u>927,417.34</u>
	1376	2,095,591.77

Claims disposed of as follows:

	<u>Number</u>	<u>Amt. Claimed</u>	<u>Amount Paid</u>
Settled,	331	\$190,335.61	\$52,540.03
Rejected,	<u>402</u>	<u>622,994.69</u>	
Total,	733	813,330.30	
Claims pending 12/31/24	643	1,282,261.47	

13 cases in suit, settled in conjunction with Claim Agent:

Amount Involved,	\$51,690.00
Amount of Settlement,	14,696.00
Number of street railway accident reports received from Department of Public Utilities and investigated, December 31, 1923, to December 31, 1924,	6,453

Number of circulars and letters mailed in connection with the investigation of foregoing claims and reports, 14,500

8. Garnishments:

During the period of this report, 158 writs of garnishment were served upon the City, all of which were answered. 130 of these writs were against the wages of city employees, and twenty-eight were for miscellaneous articles.

9. Supreme Court:

During the year, there were argued and submitted to the State Supreme Court fourteen cases on appeal. Of these, eight cases were decided favorably to the City, five against the City, and in one case the judgment was modified.

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PUBLIC UTILITIES MUNICIPALLY OWNED.

1. Light and Power:

The department has handled many matters connected with the affairs of the municipal light and power plant and conducted considerable litigation in its behalf.

The case of Willett v. Russell, mentioned in the previous report, was appealed to the Supreme Court by the plaintiff. The substation at Eighth Avenue Northeast and East Seventy-fifth Street having been completed, we have introduced a motion to dismiss the appeal, on the ground that it now presents a moot issue.

Further litigation has been had on behalf of the light and power plant and system in respect to the condemnation of the transmission right of way for the Skagit power project across Snohomish County. Easements over certain tracts had been secured by deed stipulating that the City might procure

the entry of dollar verdicts in respect to the particular property mentioned in the deeds. The Snohomish County Court held that we could not pursue the condemnation proceeding for the purpose of perfecting title to the perpetual easements granted. This matter was determined in our favor by the Supreme Court in the case of Seattle v. Fritsch, 129 Wash. 163. Condemnation proceedings for the purpose of securing said right of way have been fully completed. In addition to actual litigation in respect to this project, we have rendered numerous opinions, attended numerous conferences and drawn numerous resolutions, ordinances, deeds, easements, franchises and other instruments pertaining to the subject matter.

There was mentioned in our previous report the litigation arising out of the Boxley Creek disaster of December 23rd, 1918. We specifically mentioned the pending cases of the North Bend Lumber Company and the Chicago, Milwaukee & St. Paul Railway Company. Neither company has taken any action looking to another hearing on the merits. The plaintiffs, did, however, induce the City Council to pass a settlement ordinance, against which referendum petitions were circulated. The referendum will appear on the ballot at the general municipal election March 10th, 1925. Cases, and verdicts for damages for the trial are pending.

2. Street Railway:

Numerous damage suits arising out of accidents in connection with the municipal street railway system have been tried during the year.

We noted in our last report the pendency of a writ of error sued out by the Puget Sound Power & Light Company in order to review the decision of the State Supreme Court in the so-called street railway tax case, an injunctive proceeding originally instituted by said company with a view to enjoining the collection of the 1919 street railway tax. The City had little interest in this matter, except its own protection in case the company should secure a reversal in the Federal Supreme Court. For this purpose, we joined in the writ of error. The United States Supreme Court, in the case of Puget Sound Power & Light Co. v. King County, et al., 68 L. Ed. 541, affirmed the decision of the State Supreme Court and dismissed the writ of error.

3. Water:

The Honey Creek condemnation proceeding mentioned in our previous report, has been brought to a successful conclusion. This case involved the condemnation of the right to divert the waters of Honey Creek away from Lake Youngs in order to protect the municipal water supply.

Two cases, involving approximately \$11,000, arising out of the bursting of a watermain at Sixth Avenue and Union Street on July 20th, 1923, have been tried, and verdicts for the City obtained. Motions for new trial are pending. Numerous other cases arising out of said accident, involving approximately \$60,000, have not yet been brought to trial.

PUBLIC UTILITIES PRIVATELY OWNED.

1. Seattle Lighting Company:

The rate case instituted before the Department of Public Works of Washington against the Seattle Lighting Company (No. 5527), referred to in our last report, was prosecuted to final order. The Department ruled (Aug. 2, 1924) that the rates charged were not excessive and allowed them to stand.

Two other proceedings against the Seattle Lighting Company were disposed of at approximately the same time:

(1) Proceeding No. 4978, involving an allegation that the company's facilities for manufacture and distribution of gas were insufficient. The Department, on July 10, 1924, ruled that, as the lighting company since the filing of the complaint had very greatly improved its plant facilities, the complaint should be dismissed; (2) in Proceeding No. 5612 of the Department of Public Works, the British Thermal Unit content of the gas furnished by the company was an issue. The company sought an order permitting it to furnish gas of a lower B. T. U. content and made a persistent effort to procure such an order. After a full hearing, the Department, on July 26th, 1924, made an order requiring the company to furnish gas of the same B. T. U. content as that theretofore manufactured by it.

2. The Pacific Telephone and Telegraph Company:

The litigation pending in the United States Courts between the telephone company and the Department of Public Works of Washington has not yet been finally determined. The

company prosecuted an appeal to the United States Supreme Court from the order entered by Judge Cushman on December 31, 1923, dismissing the company's bill of complaint. The Supreme Court of the United States reversed Judge Cushman's order, directed that the issues be made up on the complaint as filed, and that the suit proceed to trial (68 L. Ed. 975). This department collaborated with the Attorney General in preparing an answer to the telephone company's complaint and in resisting a motion against said answer filed by the telephone company, argued September 8th, 1924. Later an amended answer was filed and plaintiff thereafter moved for leave to file an amended complaint, which motion has been granted.

On July 15th, 1924, a second hearing was had before a "three-judge court" on the application of the telephone company for an interlocutory order permitting it to raise its rates during the pendency of the action. This hearing resulted in an order of the three-judge court permitting the telephone company to raise its rates during the pendency of the action upon filing bonds conditioned to return any excess collected over the rates allowed by the final decree when entered. It is anticipated that the hearing on the merits will be had during the Spring of 1925.

The writ of review sued out by the City to procure a revision of the order of the Department of Public Works entered March 31st, 1923, is still pending before the Superior Court for Thurston County, that matter having been continued from time to time at the request of the Attorney General.

In order to compel the company to come to terms, so far as the local situation is concerned, we instituted in the

Superior Court the case of State ex rel. Seattle v. Myers, Phillips and The Pacific Telephone and Telegraph Company.

Superior Court Judge King Dykeman granted the company's petition for removal to the Federal Court. Our motion to remand was denied by Judge Neterer, on the theory that, in part at least, the same issues were involved as in the decision previously mentioned as having been rendered by a three-judge court. On the request of the Attorney General and counsel for the other cities, we have refrained from pressing this matter to an issue, pending the determination of the main case.

3. Puget Sound Power & Light Company:

This department having ruled that the City could not lawfully pay a proportional part of the street railway tax assessed against the Puget Sound Traction, Light & Power Company's street railway system for the year 1919, and the county officers having distrained the personal property of said company to compel the payment of the entire amount of the tax, with interest thereon, the Puget Sound Power & Light Company and the Old Colony Trust Company instituted two companion cases in equity in the United States District Court for the Western District of Washington with a view to enjoining the sale of the distrained property and compelling the payment by the City of a proportional share of said tax and interest. Our motions to dismiss having been granted by the District Court, the Old Colony Trust Company appealed to the United States Supreme Court direct on the question of jurisdiction. The Puget Sound Power & Light Company appealed to the Circuit Court of Appeals. Both of said appeals are now pending.

These suits involve approximately half a million dollars.

4. Water Companies:

The Supreme Court having decided, in the case of Monroe Water Company v. Monroe, that the Department of Public Works had authority to abrogate a free municipal service provision contained in a franchise (a decision affecting some of our own franchises), and the City of Monroe having requested our assistance in the matter, we have appeared amicus curiae and filed a brief. A decision has not yet been rendered.

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MISCELLANEOUS BOARD HEARINGS.

1. Zoning Commission:

The Corporation Counsel being constituted legal adviser to the Zoning Commission created by Ordinance No. 40407, an Assistant Corporation Counsel has been detailed to sit in at the numerous regular and special meetings of the Commission and to advise it from time to time. This Commission will shortly be superseded by a City Planning Commission.

2. Building Code Commission:

The Building Code Commission, organized during 1921, continued to function until November 3rd, 1924. An Assistant Corporation Counsel was detailed to sit in with and to advise said Commission until said date.

3. Draw Bridge Regulations:

At a hearing held November 25th, 1924, before the United States District Engineer, Col. W. J. Barden, Engineer

Corps, U. S. Army, on an application for an order providing that the draw bridges across Lake Union and across the Duwamish Waterway at West Spokane Street be kept closed during certain hours, this department appeared on behalf of the City. As a result of this hearing, an order was made by the War Department granting the City very material relief in the matter of the closing of these bridges during the rush hours.

-V-

WORK OF THE CITY ATTORNEY

1. Prosecutions for Violations of City Ordinances:

During the year, the City Attorney disposed of 25,673 cases in the Police Court, resulting in the imposition and collection of fines and forfeitures to the amount of \$165,364.50. Of the cases involved, 615 were prosecutions for violation of the liquor ordinances and proceedings upon search warrants. Appeals to the Superior Court were taken in thirty-eight cases, of which thirteen were tried and disposed of.

2. Police Court Bond Difficulties:

The year 1924 was characterized by the same old perennial trouble with bail and appeal bonds in Police Court. Recognizance bonds and bonds on appeal are taken and approved in the absence of, and without being submitted to, the City Attorney. The sureties are seldom, if ever, required to justify. No schedule of property is ever required. Neither the sureties nor the principal are required to furnish their addresses. The wives of the sureties are seldom required to join in the bond. Although, under Section 8993, Rem. Comp. Stat., the power and obligation to forfeit recogni-

zance bonds and to issue execution thereon is imposed upon the Police Judge, as a matter of actual practice and in courtesy to the Police Judge, the City Attorney voluntarily attempts to aid the collections on recognizance bonds when forfeited. We emphasize the voluntary nature of this task in view of the recent report of the "State Examiners" which assumed that a legal obligation rested upon the City Attorney to effect such collection on such bonds. The situation demands corrective legislation. Where personal sureties are accepted on such bonds, the wives should be required to join and a schedule of real property of the sureties should be attached thereto, as well as the names and addresses of the sureties owning the same. The existing provisions relating to the number and justification of sureties, as well as the suggested amendatory provisions, should be made clearly mandatory upon the Police Judge. In the absence of authorization by the City Council of efforts to secure such legislation at the next session of the Legislature, the City Attorney will discontinue his voluntary efforts to assist the Police Judge in collecting on such bonds. There should also be incorporated in the proposed legislation a provision authorizing this department (instead of the Prosecuting Attorney) to proceed on forfeited Police Court recognizance bonds certified to the County Clerk under Rem. Comp. Stat., § 2234.

-VI-

O P I N I O N S .

During the year, in addition to innumerable conferences with city officials concerning municipal affairs, of

which no formal record is kept, this department rendered one hundred seventeen written legal opinions upon various questions submitted by the several departments of city government.

-VII-

ORDINANCES, RESOLUTIONS AND BONDS.

The members of the City Council and the Mayor have, from time to time, requested this department to prepare ordinances and resolutions. Complying with such requests, the department has drawn, during the period of this report, one hundred seventy-five ordinances and resolutions.

During the year, 1241 bonds of officials, bidders, depositaries and others were examined and approved.

-VIII-

SERVICE OF PROCESS.

During the year, 2900 services of process were made by our witness clerk, who travelled 16,000 miles by the Ford automobile assigned to this department, making such service at an expense of approximately \$200.00, exclusive of salary. The cost of such service of process represents a saving of about \$3,500.00 as compared with the cost of the same service if performed by the County Sheriff. Condemnation cases consumed about two-thirds of the time of the witness clerk for the year.

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MISCELLANEOUS MATTERS.

1. Charter Amendments:

A number of requests for the preparation of resolu-

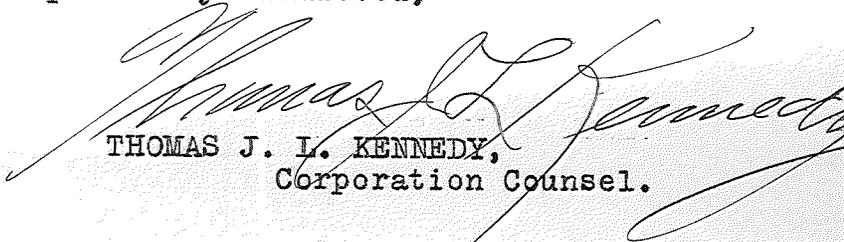
tions proposing charter amendments have been received, but at the close of the period covered by this report said resolutions had not as yet been drafted. The requests for resolutions were as follows: Amendment removing the limitation on the tax levy for the Park Fund; amendment increasing the salary of city councilmen; and amendment increasing the salaries of the City Treasurer and City Comptroller. These resolutions will be drafted in sufficient time to permit the same being voted upon at the election to be held March 10th, 1925.

C O N C L U S I O N

In concluding this report, it is proper to express a high degree of appreciation of the industry, efficiency and loyalty of the personnel of this department. The measure of their devotion to the service is not prescribed by the office hours designated in the City Charter. They have at all times been anxious and willing, during office hours and after office hours, to do anything and everything necessary to the success of the cause and the interests of the City.

Public expression of appreciation is also due the other department heads and the personnel of their departments for their uniform courtesy and consideration in their dealings with this department. They have all shown a commendable spirit of help and co-operation.

Respectfully submitted,


THOMAS J. L. KENNEDY,
Corporation Counsel.