CHAPTER 619

CRIMES AGAINST THE PERSON

NOTE: Prior to the enactment of the penal code, effective January 1, 1886, the common law as to crime was in force in this state except where abrogated or modified by statute. The penal code abolished all common law offenses and now no act or omission is criminal except as prescribed by statute. It would serve no useful purpose to trace the origin and legislative history of each section prior to the adoption of the code.

619.01 SUICIDE, CHALLENGE, TORTURE, AND CRUELTY.

Unintentional death of another arising out of an attempt to commit suicide. 18 MLR 745.

HOMICIDE

619.05 HOMICIDE CLASSIFIED.

A defendant in a criminal case who becomes a witness subjects his credibility to the usual tests and invites attack upon his character for truthfulness. The extent of the cross-examination to test credibility is largely discretionary. It may be severe. The cross-examination was directed to quarrels alleged to have been had by the defendant with others, to independent offenses committed or assumed to have been committed by him, and to quarrels with and threats against others. It sought to discredit him by insinuation and innuendo. Such cross-examination was not within proper limits. There must be a reversal. State v Nelson, 148 M 285, 181 NW 850.

Statements made by a person fatally wounded within 30 minutes after he was shot and while in bed and suffering, under the circumstances shown in the instant case were properly received in evidenc as part of the res gestae; and there was no reversible error in the introduction of evidence to the same import taken at the hospital bed three hours after the wounding. State v Jue Ming, 180 M 221, 230 NW 639.

The county attorney was not given too wide a range in cross-examining defendant in respect to the other offenses committed by him, or the condition of his parol on probation, since these matters were brought into the case by direct examination. State v Palmer, 206 M 185, 288 NW 160.

Motion for a new trial in a criminal case will not be granted on ground of ignorance or incompetence of the attorney in permitting improper evidence to be offered and received without objection, or because the court, on its own motion did not prevent the giving of such testimony, there being no showing of infidelity on the attorney's part and no strong showing of incompetence. State v Gorman, 219 M 162, 17 NW(2d) 42.

"Recklessness" and "grossly negligent" defined. The crime growing out of offenses outlined in section 169.13 classified. State v Bolsinger, 221 M 154, 21 NW(2d) 480.

The negligent filling of a prescription by a druggist in North Dakota causing death of a child in Minnesota cannot be made the basis of criminal prosecution in Minnesota. OAG Jan. 2, 1947 (133-B-22).

Homicide to avoid illegal arrest. 7 MLR 409.

Insanity as a defense. 13 MLR 64.

Indictment for murder when death occurs more than a year and a day after the assault. 19 MLR 241.

Manslaughter by motorists. 22 MLR 755.

619.06 PROOF OF DEATH, AND OF KILLING BY DEFENDANT.

Corpus delicti must be established by evidence independent of extra-judicial confession. 8 MLR 343.

Indictment for murder, when death occurs more than a year and a day after the assault. 19 MLR 241.

619.07 MURDER IN FIRST DEGREE.

In prosecution for homicide the dying declarations of the deceased as to the cause of his injury or the circumstances which resulted in his injury are admissible if it be shown, to the satisfaction of the trial court, that they were made when the deceased was in actual danger of death and had given up all hope of recovery. The state of the declarant's mind must be exhibited by the evidence and not left to conjecture. State v Elias, 205 M 156, 285 NW 475.

Testimony that on the night of the murder he visited the Nickelae Hotel, and the cross-examination regarding other visits to the same hotel was properly admitted. State v Palmer, 206 M 185, 288 NW 160.

The dying declarations of the victim of a homicide, including a case where death results from an illegal abortion, concerning the facts and circumstances of the infliction of the fatal injury, are admissible upon the trial of the person charged with having committed the homicide, where it appears that the declarations were made when the victim was about to die and that she believed at the time of making them that death was imminent and there was no hope of recovery. The fact that the declarent was about to die and believed that death was imminent and there was no hope of recovery is essential as a predicate for the admission of such declarations. Certain declarations considered and admissible under the rule. State v Brown, 209 M 478, 296 NW 582.

Testimony by witnesses that at various times prior to the alleged murder they had seen deceased with bruises and black eyes is admissible where it was connected with acts of the defendant by other evidence and the inference permissible therefrom. State v Rediker, 214 M 470, 8 NW(2d) 527.

The standards of conduct required by section 169.11, making it homicide to cause the death of a human being by operating or driving a vehicle "in a reckless or grossly negligent manner" satisfy the requirement of due process that a statute creating a crime must prescribe standards of guilt that are reasonably ascertainable. State v Bolsinger, 221 M 154, 21 NW(2d) 480.

Jury triers; consent that challenge be tried by the court. 9 MLR 353, 357.

Presumption of malice from fact of homicide with deadly weapon. 11 MLR 562.

First degree murder trial as bar to subsequent trial for second degree murder and manslaughter. 18 MLR 221.

Unintentional death of another arising out of attempt to commit suicide. 18 MLR 745.

619.08 MURDER IN SECOND DEGREE.

Defendant was charged with murder in the first degree, it being claimed by the state that he murdered his wife. Evidence examined and found sufficient to sustain a verdict of the jury finding him guilty of murder in the second degree. State v Poelaert, 200 M 30, 273 NW 641.

In prosecutions for homicide the dying declarations of the deceased as to the cause of his injury or the circumstances which resulted in his injury are admissible if it be shown, to the satisfaction of the trial court, that they were made when the deceased was in actual danger of death and had given up all hope of recovery. The state of the declarant's mind must be exhibited by the evidence and not left to conjecture. State v Elias, 205 M 156, 285 NW 475.

As used in section 169.11, defining the crime of "criminal negligence in the operation of a vehicle resulting in death" as causing the death of a human being under circumstances not constituting murder in first, second, or third degree, or manslaughter in first or second degree, by operating or driving a vehicle "in a reckless or grossly negligent manner," the word "reckless" means, as defined in section 169.13, either a wilful or a wanton disregard for the safety of persons or property, which involves intentional conduct, but not intentional harm as a result thereof; and the words "grossly negligent" mean very great negligence or the want of even scant care, but not such reckless disregard of probable consequences as is equivalent to a wilful and intentional wrong. State v Bolsinger, 221 M 154, 21 NW(2d) 480.

Defendant was properly convicted of the crime of murder in the second degree. On appeal from conviction, the appellate court must take the most favorable view of the state's testimony of which it is reasonably susceptible, and it must be assumed that the jury believed the state's testimony and disbelieved that which contradicted it. State v Schabert, 222 M 261, 24 NW(2d) 846.

See, L. 1941, c. 314, s. 1, raising the punishment for killing while in the commission of a sex crime from seven to thirty years. 26 MLR 222.

619.10 MURDER IN THIRD DEGREE.

The state may prosecute vigorously, but the prosecution must observe the law which protects the accused. Evidence was sufficient to justify submission to the jury of defendant's guilt of murder in the third degree or manslaughter in the first degree. Conviction of murder in the first degree is reversed. State v Nelson, 148 M 285, 181 NW 850.

To establish the charge of murder in the third degree, the state need not show that defendant was inherently of depraved mind. The nature of the act causing the death of another, and the circumstances attending it, may be prima facie evidence that the doer of the act was a man of depraved mind. The evidence justified the jury in finding from defendant's act alone, viewed in the light of the attending circumstances, that he was a man of depraved mind within the meaning of section 619.10, defining third degree murder. State v Weltz, 155 M 143, 193 NW 42.

The court did not err in refusing to submit to the jury the question of whether the defendant could be convicted of manslaughter in the first degree. State v Horton, 194 M 410, 260 NW 502.

As used in section 169.11, defining the crime of "criminal negligence in the operation of a vehicle resulting in death" as causing the death of a human being under circumstances not constituting murder in first, second, or third degree, or manslaughter in first or second degree, by operating or driving a vehicle "in a reckless or grossly negligent manner," the word "reckless" means, as defined in section 169.13, either a wilful or a wanton disregard for the safety of persons or property, which involves intentional conduct, but not intentional harm as a result thereof; and the words " grossly negligent" mean very great negligence or the want of even scant care, but not such reckless disregard of probable consequences as is equivalent to a wilful and intentional wrong. State v Bolsinger, 221 M 154, 21 NW(2d) 480.

Homicide in the commission of a felony. 21 MLR 333.

Manslaughter by motorists. 22 MLR 755.

Indictment by grand jury. 26 MLR 153, 170.

619.13 MANSLAUGHTER.

See, State v Bolsinger, 221 M 154, 21 NW(2d) 480, noted under section 619.10.

Manslaughter defined. State v Norton, 194 M 412, 260 NW 502.

Operation of motor vehicle by intoxicated person. 8 MLR 165.

Manslaughter by motorists. 22 MLR 755.

Death resulting from commission of a misdemeanor. 23 MLR 95.

619.15 MANSLAUGHTER IN FIRST DEGREE.

See, State v Bolsinger, 221 M 154, 21 NW(2d) 480, noted under section 619.10.

Manslaughter by motorists. 22 MLR 755.

Death resulting from commission of a misdemeanor. 23 MLR 95.

Indictment by grand jury. 26 MLR 153, 170.

Admissibility of testimony of one spouse against the other. 27 MLR 205.

619.16 KILLING OF UNBORN CHILD OR MOTHER.

The omission by the trial court to give certain instructions, where no instructions were offered by appellant or exceptions taken to those given, does not make a new trial necessary; nor is the conduct of the prosecuting attorney such as to require a new trial. State v Lemke, 207 M 35, 290 NW 307.

The dying declarations of the victim of a homicide, including a case where death results from an illegal abortion, concerning the facts and circumstances of the infliction of the fatal injury, are admissible upon the trial of the person charged with having committed the homicide, where it appears that the declarations were made when the victim was about to die and that she believed at the time of making them that death was imminent and there was no hope of recovery. The fact that the declarant was about to die and believed that death was imminent and there was no hope of recovery is essential as a predicate for the admission of such declarations. Certain declarations considered and admissible under the rule. State v Brown, 209 M 478, 296 NW 582.

619.17 MANSLAUGHTER IN FIRST DEGREE; PENALTY.

Manslaughter by motorists. 22 MLR 755.

619.18 MANSLAUGHTER IN SECOND DEGREE.

Where one is killed by an intoxicated driver of an automobile, the state need not show the driver was negligent, nor that death was not the result of unavoidable accident, nor need the court instruct the jury, at defendant's request, that it was not necessarily negligent to straddle the center line of the road. State v Puent, 198 M 175, 269 NW 372.

Because in this manslaughter case the evidence as strongly supports an inference of innocence as it does one of guilt, a new trial is ordered. State v Larson, 207 M 515, 292 NW 107.

Upon adoption of our penal code, all common-law offenses were abolished, so that now no act or omission is a crime except as defined and prescribed by statute. The legislature prescribes as manslaughter negligent or reckless acts or omissions causing death. Leaving a house fumigated with poisonous gas unguarded and unlocked while workman visited a tavern, so that an 8 year old boy entered and was killed by the gas, was manslaughter in second degree. State v Cantrell, 220 M 13, 18 NW(2d) 681.

See, State v Bolsinger, 221 M 154, 21 NW(2d) 480, noted under section 619.10.

When death occurs caused by criminal negligence in use of a motor vehicle, defendant may be charged under section 169.11 or under section 619.18. OAG June 20, 1946 (133-a-8).

Manslaughter by motorists. 22 MLR 755.

619.20 NEGLIGENT USE OF MACHINERY.

An indictment charging defendant while fumigating a house left it to go to a tavern leaving the doors unlocked, and the house unguarded so that an eight-year-old boy entered and was killed by gas used in fumigation, properly charged defendant with second degree manslaughter, and as being guilty of "culpable negligence" in that his acts were reckless. State v Cantrell, 220 M 13, 18 NW(2d) 681.

Section 169.11 sets forth the elements of the offense, and an information in the language of the statute informs an accused of the crime charged with sufficient definiteness. State v Bolsinger, 221 M 154, 21 NW(2d) 480.

619.25 KEEPING GUNPOWDER UNLAWFULLY; DEATH RESULTING.

See, State v Bolsinger, 221 M 154, 21 NW(2d) 480.

619.26 MANSLAUGHTER IN SECOND DEGREE; PENALTY.

Manslaughter by motorists. 22 MLR 755.

619.27 EXCUSABLE HOMICIDE.

An indictment for second degree manslaughter, alleging that defendant, employed to fumigate a house, left it unguarded, and an eight-year-old boy entered and was stricken with hydrocyanic gas, sufficiently met requirements, and stated facts justifying conclusion of negligence. State v Cantrell, 220 M 13, 18 NW(2d) 681.

619.28 JUSTIFIABLE HOMICIDE BY PUBLIC OFFICER.

Degree of force which an officer may lawfully use in making an arrest for a misdemeanor. 12 MLR 539.

619.29 HOMICIDE BY OTHER PERSON: JUSTIFIABLE WHEN.

Self-defense; evidence of deceased's character. 5 MLR 230.

Duty to retreat. Club rooms as one's castle. 7 MLR 59.

Right to defend another. 8 MLR 340.

Defense of person not a relative. 11 MLR 170.

Spring guns, defense of property. 18 MLR 77.

Extent of the right of self-defense in one who is the aggressor. 20 MLR 433.

Self-defense. Character of parties on issue of aggression. 24 MLR 426.

Loss of right of self-defense when assailant abandons the attack. 26 MLR 662.

KIDNAPPING

619.34 KIDNAPPING, HOW PUNISHED.

There was no error on which to base a new trial. The defendant was properly convicted of the crime of kidnapping. State v Newman, 127 M 445, 149 NW 945.

The detaining of a child after the expiration of a legal visitation period allowed to a divorced father is not kidnapping in the county where the child was detained. OAG Sept. 17, 1945 (133-B-44).

Limited construction of federal kidnapping act. 30 MLR 206.

ASSAULT

619.37 ASSAULT IN FIRST DEGREE, HOW PUNISHED.

Evidence offered was irrelevant or remote and there was no error in the trial court excluding it. State v Bresky, 213 M 323, 6 NW(2d) 464.

Operator of an "on sale" liquor establishment was required to use reasonable care to protect its guests and patrons from injury at the hands of vicious or lawless persons whom it knowingly permitted to be in and about the premises. Windorski v Doyle, 219 M 402, 18 NW(2d) 142.

Assault with deadly weapon. 9 MLR 71.

Battery as including assault. 12 MLR 405.

Consent as defense in prosecution for assault and battery when obtained by misrepresentation. 23 MLR 521.

Second and third degree murder. 26 MLR 222.

619.38 ASSAULT IN SECOND DEGREE, HOW PUNISHED.

What constitutes grievous injury is a question of fact for the court or jury. OAG Nov. 18, 1946 (494-B-4).

619.39 ASSAULT IN THIRD DEGREE, HOW PUNISHED.

Defendant was convicted of assault in the first degree, and thereafter was tried and convicted of prior conviction. The state was properly permitted to show defendant's flight after the finding of the indictment. Evidence was properly admitted respecting defendant's motive to commit the crime with which he was charged and that he and his associates had made threats against the complaining witness. State v Barnett, 193 M 336, 258 NW 508.

The evidence sustained the conviction for sodomy. The sodomy statute is limited in its scope and purpose. There are no degrees as to this offense. An assault to carnally know or to take indecent liberties does not appear to be within its purview. Either the defendant was guilty of the crime charged, or he was innocent. He could not be found guilty of a lesser degree as there is none. He could not be found guilty of an offense for which he was not charged. State v Nelson, 199 M 93, 271 NW 114.

Assault and battery, mutual combat, consent as defense in civil action for damages inflicted. 22 MLR 546.

619.40 FORCE OR VIOLENCE, WHEN LAWFUL.

Right of dependant infant to recover from its parent for personal injuries. 8 MLR 71.

Five-year-old child incapable of contributory negligence. 8 MLR 73.

Workmen's compensation, application to minors illegally employed. 8 MLR 74.

Degree of force which an officer may lawfully use in making an arrest for a misdemeanor. 12 MLR 539.

ROBBERY

619.41 DEFINITION.

Under sections 610.28 and 610.31, a person convicted in this state of grand larceny in the second degree, and of prior conviction for armed robbery in the state of Ohio, is subject to double the punishment prescribed for grand larceny in the second degree. Willoughby v Utecht, 223 M 572, 27 NW(2d) 779.

Loser at cards forceably retaking money from possession of winner as constituting robbery. 8 MLR 443.

Degree of proximity of overt acts necessary to constitute an attempt to commit robbery. 12 MLR 658.

Robbery, putting in fear. 24 MLR 708.

619.43 IN SECOND DEGREE, HOW PUNISHED.

The district court sentence to state prison was valid and not subject to collateral attack in habeas corpus proceeding. Willoughby v Utecht, 223 M 572, 27 NW(2d) 780.

LIBEL AND SLANDER

619.51 LIBEL; GROSS MISDEMEANOR; PUNISHMENT; PROSECUTION BY COUNTY ATTORNEYS OR ATTORNEY GENERAL.

In an action for libel, wherein it was shown that defendant published in his newspaper a letter referring to a cafe, which plaintiff claimed she owned and in

which she did cooking, as a brothel, question whether letter was defamatory of plaintiff was, under the circumstances, properly for the jury. Morey v Barnes, 212 M 153, 2 NW(2d) 829.

When words charged as defamatory are not so upon their face, it is for the court to determine whether the construction of the language put forward by the innuendo is permissible. In the case at bar we hold that the innuendo of insolvency or financial embarrassment here pleaded is not warranted by the language used. Although the complaint fails to state a cause of action for defamation, it contains an adequate statement of malicious injury to plaintiffs' business and is therefore not vulnerable to a demurrer interposed upon the ground that it does not state a cause of action. An allegation of general damage to business is sufficient to admit evidence of loss of trade. Marudas v Odegard, 215 M 357, 10 NW(2d) 233.

Recitals in books which are injurious without the aid of extrinsic facts, and published words that expose one to public hatred, contempt, and ridicule are libelous per se. In the instant case the libel was based on defamatory statements in a book respecting a character given the same name and occupation as plaintiff, but the evidence failed to establish that the author of the defamatory book intended to write of and concerning the plaintiff. Clare v Farrell, 70 F. Supp. 276.

Libel by act; charivari. 5 MLR 233.

Defamation, attack on reputation, exposing to hatred, contempt, or ridicule. 7 MLR 352.

Defamation of quality of property as defamation to individual. 12 MLR 187.

Recent developments in newspaper libel. 13 MLR 21.

Excessive publication in defamation. 16 MLR 160.

Privilege, information supplied by a commercial agency as a privileged communication. 16 MLR 715.

Radio, basis for liability for defamation by. 19 MLR 611.

Defamation by radio. 19 MLR 642.

Legal immunity for defamation. 24 MLR 607.

Defamation or disparagement. 24 MLR 625.

Defamation of a dead person; right of surviving relative to sue. 25 MLR 243.

Inadvertent defamatory material. 25 MLR 495.

Right of privacy. 25 MLR 619.

Publication, date of. 26 MLR 131.

Imputation of poverty as defamatory. 26 MLR 563.

Libel, grand jury, absolute privilege accorded in reporting misconduct of public official. 31 MLR 500.

619.52 HOW JUSTIFIED OR EXCUSED; MALICE, WHEN PRESUMED.

Newspaper libel. 13 MLR 21.

When is a suit against a state officer a suit against the state. 13 MLR 137.

Truth, a defense to libel. 16 MLR 43.

Legal immunity for defamation. 24 MLR 607.

Defamation or disparagement. 24 MLR 625.

Publication of inadvertent defamatory material. 25 MLR 495.

619.53 PUBLICATION.

NOTE: "Dost know that old Mansfield,
Who writes like the Bible,
Says the more 'tis a truth, sir,
The more 'tis a libel?"
("The Reproof") (Burns)

"It was nuts for the Father of Lies,
As that wily fiend is named in the Bible,
To find it settled by laws so wise,
The greater the truth, the greater the libel."
("A Case of Libel") (Moore)

26 Canadian Law Times, 394

Communication to defendant corporation's branch office as "publication." 12 MLR 188.

Libel and slander, publication, liability for unintentional publication. 22 MLR 571.

Magazines and newspapers, publication defined. 26 MLR 131.

619.54 LIABILITY OF EDITORS AND OTHERS.

Laws 1925, c. 285, permitting the suppression by injunction of the business of publishing malicious, scandalous, or defamatory newspaper or periodical, is void. Near v State of Minnesota, 51 SC 625, 283 US 697.

Non-trading corporation's right to sue for libel which destroys public confidence in its integrity. 12 MLR 186.

Newspaper libel. 13 MLR 21.

Newspaper's liability for publication of false news dispatch. 17 MLR 820.

Libel; absolute privilege accorded in reporting misconduct of public official. 31 MLR 500.

619.55 REPORTS OF PROCEEDINGS PRIVILEGED.

Report of judicial proceedings as qualifiedly privileged. 16 MLR 868.

Qualified privilege, burden of proof. 22 MLR 572.

619.57 PRIVILEGED COMMUNICATIONS.

In a prosecution for a criminal libel the jury has the right to determine the law as well as the facts involved and may infer in a case where the language of the libel is scurrilous and abusive that the same was published from an improper motive and with malicious intent. State v Ford, 82 M 452, 85 NW 217.

A telegraph company is liable in damages to a wife for sending to her husband a defamatory message, neither true nor privileged, concerning her. The court properly instructed the jury that the sending of the defamatory message was privileged, if the operator acted carefully and in good faith, but was not privileged if he was negligent or wanting in good faith. Receiving from an utter stranger a message charging plaintiff with adultery, and sending it to her husband without any knowledge as to its truth, or as to whether the writer was entitled to send it as a privileged communication, and without making any inquiry, made the good faith of the operator a question for the jury. Paton v Gt. N. W. Tel. Co. 141 M 430, 170 NW 511.

The publication loses its qualified privilege if the statement or part of it is in fact false and knowledge of the falsity is brought home to the person making it. Likewise if the publication is malicious the occasion gives no protection. Good faith and absence of malice is a good standard where there is a qualified privilege. Friedell v Blakely Prtg. Co. 163 M 227, 203 NW 974.

Proof of actual malice in such cases consists in showing bad faith in the defendant. Actual malice may appear from a showing that the occasion was made use of as a camouflage behind which to hide for the purpose of maligning a candidate for office in a way not justified by the facts; it may be made to appear by proving that the publisher knows the statements he made were false; it may be proved by extrinsic evidence of personal ill feeling or by intrinsic evidence such as the exaggerated language of the libel, the character of the language used, the

mode and extent of publication and other matter in excess of the privilege. Friedell v Blakely Prtg. Co. 163 M 227, 203 NW 974.

Allegations in pleadings as privileged communication. 10 MLR 352.

Misstatement of fact concerning public officers as qualifiedly privileged. 11 MLR 474.

Qualified privilege; refutation of defamatory statements made against a third person. 20 MLR 438.

Radio broadcast of trial of criminal case. 23 MLR 100.

Absolute privilege of judge in circulation of judicial opinions. 28 MLR 195.

Libel; absolute privilege accorded in reporting misconduct of public official. 31 MLR 500.

619.59 SLANDER OF WOMEN.

In an action for libel, wherein it was shown that defendant published in his newspaper a letter referring to a cafe, which plaintiff claimed she owned and in which she did cooking, as a brothel, question whether letter was defamatory of plaintiff was, under the circumstances, properly for the jury. Morey v Barnes, 212 M 153, 2 NW(2d) 829.

619.60 TESTIMONY NECESSARY TO CONVICT.

Excessive publication in defamation. 16 MLR 160.

619.62 SLANDER.

It is slanderous per se to say to the customers of a salesman that the salesman is a thief and ought to be sent to the penitentiary, and that he failed to turn in money of his employer. The employer is liable if the slander is uttered by an employee in the course of his employment with a view to further employer's business and not for a purpose personal to himself. Manion v Jewel Tea Company, 135 M 250, 160 NW 767.

An act which is a wrongful invasion of a legal right and causes an injury to the body or mind, recognized by reputable physicians as an injury of which the act was the proximate cause, gives rise to a right of action against the wrongdoer, although there was no visible hurt at the time of the act complained of. Under section 619.59, a false charge of unchastity made against a school girl 15 years of age, in her immediate presence and in the presence of another, is a misdemeanor if there was no justification for the accusation, and, if it was the direct cause of mental or bodily injury, there may be a recovery of damages in an action other than one for slander. Johnson v Sampson, 167 M 203, 208 NW 814.

Criticism and comment concerning services rendered by an attorney at law imputing to him gross neglect and unskilfulness, if untrue, are slanderous and actionable per se, even though the words spoken relate to a single case. Notwithstanding the fact that they have benevolent and charitable features, benevolent and beneficial associations, corporate and noncorporate, are liable in tort the same as other groups of individuals. High v Supreme Lodge of the World, 214 M 164, 7 NW(2d) 675.

Statements injurious to writer, inaccuracies of broadcast indirectly reflecting on reputation. 22 MLR 738.

Radio, liability of radio broadcaster for defamatory utterance made by one not in its employ. 24 MLR 118.

Legal immunity for defamation. 24 MLR 607.

Defamation or disparagement. 24 MLR 625.