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## Civil Rights

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# WASHINGTON LAW REVIEW

AND

## STATE BAR JOURNAL

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### WASHINGTON LEGISLATION—1953

In this series of articles, the faculty of the University of Washington School of Law analyzes the enactments of the Thirty-third Session of the Washington State Legislature. Coverage is limited to those statutes having the greatest significance to the practicing lawyer.

#### CIVIL RIGHTS

*Racial Discrimination.* The 1909 statute<sup>1</sup> forbidding denial of service, etc., at "places of public resort" because of "race, creed, or color," has been amended<sup>2</sup> by providing very broad definitions of all its terms, definitions which, however, are no broader than could reasonably be given the general terms of the original statute.<sup>3</sup> The legislature failed to provide a civil remedy to redress the private injury, which remedy would probably be a more potent deterrent than the threat of criminal prosecution for a misdemeanor, the sanction provided. The courts had created a tort remedy to implement the old statute.<sup>4</sup> It is to be hoped that the new statute will not be construed as an implied legislative repudiation of this judicial invention.

JOHN B. SHOLLEY

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<sup>1</sup> RCW 9.91.010 [RRS § 2686].

<sup>2</sup> L. 1953, c. 87.

<sup>3</sup> In fact, the older statute had, because it was a criminal statute, been rather narrowly construed, even in civil litigation. See *Goff v. Savage*, 122 Wash. 194, 210 Pac. 374 (1922).

<sup>4</sup> *Anderson v. Pantages Theatre Co.*, 114 Wash. 24, 194 Pac. 813 (1921).

#### CORPORATIONS

*Corporate Charitable Contributions.* The Washington state legislature in its 1953 session adopted an act specifically authorizing corpora-