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## Preface

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## **PREFACE**

The fourteenth annual edition of the Ninth Circuit Survey analyzes decisions of the Court of Appeals for the Ninth Circuit. This issue is primarily a collection of notes and comments regarding cases decided in 1988. A few summaries of significant cases have been included as well.

One article has been selected for publication in this issue. It should be of particular interest to criminal law practitioners in the West. The article by Shawn B. Jensen analyzes the impact of a recent U.S. Supreme Court decision on the use of the "Allen charge" in the Ninth Circuit.

Through its variety of topics and depth of analysis, this issue of the Golden Gate University Law Review will be of interest to practitioners, students, and researchers.

> Susan H. Handelman Editor, Ninth Circuit Survey