33.3 percent of the six-member jurors.

One explanation, she reasoned, is that "more controversy" occurred in the six-member settings, where more members participated in the proceedings and "the diverse ideas of the minority" were more likely to be voiced.

"The added controversy in the six-member juries seems to have led to more difficulty in reaching consensus, and consequently to less satisfaction with the group product," she wrote. "Perhaps, in a real trial situation the six-member juries would take more time to resolve the conflict and ultimately reach a decision. Presumably, the jurors would then be more satisfied in a smaller group."

In terms of verdicts, the study found that with six-member juries, six cases were decided in favor of the defendant and two ended in hung juries. The results for the 12-member juries were seven cases in favor of the defendant and one hung jury.

The other study, conducted by Lawrence R. Mills, a U-M law student, found "no statistically significant differences" in the proportion of verdicts rendered in favor of plaintiffs and defendants, and in the amounts of money judgments that were awarded.

Mills' study was based on a statistical analysis of automobile negligence and other civil cases (not including divorce cases) conducted at the Wayne County Circuit Court from March 1 to August 31, 1969, and from March to August 31, 1971—before and after Michigan eliminated the 12-member jury requirement for civil cases.

Mills' data revealed some "observed" differences, such as higher damage awards in automobile negligence cases heard by six-member juries. However, the researcher attributed these to "pure chance" or to such other factors as a 10 per cent rate of inflation which had an obvious effect on damage claims in the two periods covered by the study.

Among the findings:

—For both the 6- and 12-member juries, the median trial duration was three days in automobile negligence cases and four days in other general civil cases.

—For the six-member juries, the percentage of verdicts in favor of plaintiffs was 49.2 per cent in automobile negligence cases and 61.5 per cent in other civil cases. For the 12-member juries verdicts in favor of plaintiffs were reached in about 52 per cent of cases in both categories.

—Damage awards ranged from $152 to $2,250,000 in cases heard by six-member juries and from $500 to $315,000 for those of 6-member juries, but most of the awards fell into a range under $10,000. The median amounts awarded in automobile negligence cases were $4,400 for 12-member jury cases and $6,662 in 6-member jury cases. The median amounts for the other general civil cases were $14,750 in 12-member jury cases and $12,965 in 6-member jury cases.

Mills emphasized that "the comparison of data from the 12-member jury cases with data from the 6-member jury cases reveals some differences between them, but these disparities may not result from the change in jury size."

"An important rival explanation is that there is no real difference between the two different-sized juries, and that the observed differences between the two samples arose purely by chance."

Mills noted that "even if the two samples in the study were taken solely from 12-member jury cases, the limited size of the samples would cause some differences between them simply as a chance occurrence."

Paul Kauper Honored
For Legal Contributions

Professor Paul G. Kauper of U-M Law School, an internationally recognized authority on constitutional law, was awarded an honorary doctor of laws degree by Wittenberg University in Springfield, Ohio.

Prof. Kauper was honored at Wittenberg's spring commencement exercises for his contributions as a teacher and scholar and his "special attention to religious liberty and problems of church and state."

The citation also noted Prof. Kauper's involvement in affairs of the Lutheran Church, including his service as a trustee of the U-M's Lutheran Student Foundation and his participation on the Board of College Education of the American Lutheran Church.

Prof. Kauper has been on the U-M law faculty for 37 years and currently holds the Henry M. Butzel professorship. He is the author of many books, including Cases and Materials in Constitutional Law, Frontiers of Constitutional Liberty, Civil Liberties and the Constitution, and Religion and the Constitution.

The recipient of many honors, Prof. Kauper in 1971 was named Henry Russel Lecturer, the highest honor the University can bestow on a senior faculty member, and in 1959 was selected for the U-M's Distinguished Faculty Achievement Award for his scholarship, teaching, and public service. He has also received honorary degrees from other universities including the Heidelberg University in Germany.

Prof. Kauper attended Earlham College and received his law degree from the U-M in 1932. Before joining the U-M faculty in 1936, he worked as a research assistant at the U-M and spent two years with a New York City law firm.

In addition to his service to the Lutheran Church, Prof. Kauper has been active in many Ann Arbor civic and governmental groups. He is a member of the American Bar Association, the Michigan Bar, the American Judicature Society, and served as president of the National Order of the Cofi.

Wright Urges Licenses
For Tax Preparers

The rising number of "both grossly erroneous and fraudulent" individual income tax returns prepared by commercial tax preparers demands that this fast-growing industry be regulated through a government licensing system, a University of Michigan law professor suggests.

Writing in the Law School's Journal of Law Reform, Prof. I. Hart Wright says that instances of fraud and incompetence by a "completely unregulated commercial preparation industry" have now reached "alarming proportions."

In a 1972 Internal Revenue Service (IRS) study covering a seven-state region, for example, only 30 out of 560 samples of commercially-prepared returns were found to be correct, amounting to an average tax loss of $234.99 per return, according to Professor Wright.

Underlying the need for a licensing system, says Wright, is the fact that, despite recent IRS efforts to expand