

The question of balancing competing interests is an extremely important one in this situation, Steiner noted. Thus, in their brief, the lawyers asked the court to take into account the fact that Roberts' research had nothing to do with the issue in the case—the failure of the modules to perform to PG&E's satisfaction—and that the information Richards sought from the professor's notes could be obtained directly from PG&E personnel under questioning.

In addition to legal arguments, lawyers for Roberts produced affidavits from 12 leading scholars about the devastating consequences of an order compelling Roberts to violate his pledge of confidentiality. Among those speaking on Roberts' behalf, and on behalf of all researchers, were Don K. Price, dean of Harvard's Kennedy School of Government, Arjay Miller, dean of the Graduate School of Business at Stanford University and former president of the Ford Motor Company, and Earl Cheit, dean of the School of Business Administration of the University of California at Berkeley.

Clearly, Judge Renfrew was responsive to what they had to say, and noted in his opinion that "counsel . . . have produced an impressive series of affidavits from scholars throughout the country attesting to the necessity of maintaining confidential relationships if their research is to be accomplished." Roberts said the affidavits were all the more impressive for being produced on just a couple of days' notice. "People immediately recognized what was at stake here and were willing to drop other things to submit affidavits," he said with obvious gratitude.

In a telephone conversation with *Science*, Renfrew explained why he decided the case on grounds of his authority over admitting evidence rather than on First Amendment grounds. "It is difficult," he said, "for a trial court to establish constitutional standards. And, there is no case I know of that grants academic researchers any privilege with respect to confidentiality of sources. This is a very new area of law and it seems prudent to take small steps to establish it."

In reaching his decision to deny Richards access to Roberts' academic notes, Renfrew's reasoning closely followed the pattern of analysis that applies in First Amendment cases. He hopes that his decision in this case will prove to be a foundation on which to build a body of law so that one day a researcher's "privilege" of maintaining confidential sources will be generally recognized in law and, perhaps, even affirmed by the Supreme Court.—BARBARA J. CULLITON

RECENT DEATHS

Dorothy C. Adkins, 63; former chairman, psychology department, University of North Carolina, Chapel Hill; 19 December.

Arthur M. Bannerman, 75; president emeritus, Warren Wilson College; 16 January.

W. Montfort Barr, 70; professor emeritus of education, Indiana University; 25 January.

Seymour M. Blaug, 51; dean, School of Pharmacy, University of North Carolina, Chapel Hill; 19 November.

Albert J. Bocage, 45; associate professor of physiology, Louisiana State University Medical Center; 12 January.

Harold C. Bradley, 97; professor emeritus of physiological chemistry, University of Wisconsin, Madison; 4 January.

John E. Burchard, 77; dean emeritus, School of Humanities and Social Science, Massachusetts Institute of Technology; 25 December.

William H. Coppock, 64; former chairman, chemistry department, Drake University; 26 December.

Leo M. Davidoff, 73; former chairman, surgery and neurological surgery departments, Albert Einstein College of Medicine; 23 December.

Russell A. Dixon, 77; former dean, School of Dentistry, Howard University; 3 January.

Charles L. Dunham, 68; former director, biology and medicine division, Atomic Energy Commission; 7 December.

Stephen D. Durrant, 74; retired professor of biology, University of Utah; 1 November.

Mac V. Edds, Jr., 58; professor of neurobiology, Massachusetts Institute of Technology; 29 November.

Bernard Ehrenpreis, 78; former clinical professor of radiology, Downstate Medical Center, State University of New York; 2 January.

Harold P. Fawcett, 81; professor emeritus of education, Ohio State University; 6 January.

Antonio Ferri, 63; professor of aerospace science, New York University; 28 December.

Thomas M. French, 83; former director, Chicago Institute of Psychoanalysis; 27 January.

Seymour Gang, 50; former vice president for academic affairs, Pratt Institute; 3 January.

Oliver K. Garretson, 79; former dean, College of Education, University of Arizona; 21 December.

Walter H. Gillette, 44; professor of sociology, Ferris State College; 29 December.

Herbert Grinnell, 67; professor emeritus of operative dentistry, New York University; 23 December.

Sam P. Hewitt, 67; dean emeritus, School of Arts and Sciences, Central Missouri State University; 8 November.

Arthur E. Morgan, 97; president emeritus, Antioch College; 16 November.

Vera Morrison, 93; former professor of mathematics and education, Columbia Union College; 27 November.

John P. Murray, 63; associate professor of mathematics, Fairfield University; 7 January.

Simon Pasternack, 61; editor, *The Physical Review*, American Physical Society; 26 January.

Ernest N. Patty, 81; president emeritus, University of Alaska; 13 January.

Edwin A. Quain, 69; former academic vice president, Fordham University; 23 December.

Walker H. Quarles, 64; president, Virginia State College; 21 January.

William B. Reiner, 65; retired professor of education, Hunter College; 24 January.

LeRoy H. Saxe, Jr., 58; professor of pharmacology and pharmacy, West Virginia University; 15 January.

Jacob R. Schramm, 91; professor emeritus of botany, University of Pennsylvania; 13 January.

George J. Schulz, 50; professor of applied science, Yale University; 15 January.

William P. Sears, Jr., 73; professor emeritus of education, New York University; 29 January.

Thomas K. Sherwood, 72; former dean of engineering, Massachusetts Institute of Technology; 14 January.

L. Joseph Stone, 63; former chairman, psychology department, Vassar College; 13 December.

Frederic Stuart, 46; professor of quantitative methods, Hofstra University; 15 November.

John C. Thompson, 63; professor of mathematics, Dickinson State College; 3 August.

Verne V. Varney, 79; professor emeritus of agriculture, University of Wisconsin; 17 January.

Leo Wade, 66; retired vice president for administration, Sloan-Kettering Institute for Cancer Research; 7 December.

Bruce P. Webster, 74; clinical professor emeritus of medicine, Cornell University; 5 January.

Rupert Wildt, 70; retired professor of astrophysics, Yale University; 9 January.