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NOTES

COURT SUPERVISION OF REORGANIZATION EXPENSES

Before the passage of section 77B of the Bankruptcy Act,¹ court control over fees and expenses incidental to corporate reorganizations was neither effective nor extensive.² The courts limited their jurisdiction over fees to the compensa-

¹ 48 Stat. 912 (1934), 11 U.S. C.A. Supp. § 207 (1935). Prior to the adoption of § 77B reorganizations were usually effected by means of equity receiverships. See Dodd and Baker, *Cases on Business Reorganization, Reorganization, Introductory note*, 1 (1935).

² Lowenthal, *Railroad Reorganization Act*, 47 *Harv. L. Rev.* 18, 52 (1933); Weiner, *Reorganization under Section 77*, 33 *Col. L. Rev.* 834, 841 (1933).