

Wilson's Plover in Massachusetts.—On May 25, 1939, in company with Messrs. Seymour H. Stone and Robert W. Puffer, I saw at Third Cliff, Scituate, Massachusetts, a plover that was unmistakably a *Pagolla wilsonia* and presumably, of course, *P. wilsonia wilsonia*. We had just been watching a Piping Plover, when Puffer called attention to a bird not far away which, as soon as we had got our glasses on it, we saw at once to have the long black bill, the medium-dark upper parts, and the white stripe over the eye that characterize Wilson's Plover. From the moment we got a square look at it there was not the slightest doubt of the identification, but this was still further confirmed by the note *whit*, which was uttered several times when, after a considerable chase, the bird took wing. Though none of us was familiar with Wilson's Plover, we do know both the Piping Plover and the Semipalmated Plover very well indeed, both by sight and by ear. This appears to be the fifth reasonably authentic record of the species in Massachusetts. Two are given in Forbush's 'Birds of Massachusetts' (besides what may, perhaps, be a doubtful sight record of a flock of twenty-five). The third is that of a bird taken by Oliver L. Austin, Jr., at Truro, June 26, 1929 (Auk, 46: 538, 1929), and the fourth that of one seen on the Lynn-Nahant beach, May 15, 1932, by Samuel A. Eliot, Jr., Ludlow Griscom, and S. G. Emilio (Auk, 49: 465, 1932).—FRANCIS H. ALLEN, *West Roxbury, Massachusetts*.

The winnowing note of Wilson's Snipe.—Incidental to my observations of waterfowl in the Province of New Brunswick, I found Wilson's Snipe (*Capella delicata*) a common nesting bird in the area from Fredericton to St. John in the St. John River valley between May 21 and 28, 1938. Since I was working in the marshes most of the time, I had excellent opportunity to hear the peculiar winnowing note characteristic of this bird when in flight on the nesting grounds. During this eight-day period of observations I recorded this flight note at the following hours: 1 a. m., 7 a. m., 10 a. m., noon, 2 p. m., 5 p. m., 7 p. m., and 10 p. m.; this indicates that it may be used at practically any hour of the day or night during the nesting season. Snipes were observed to alight on dead snags and on a fence post in the area near Sheffield, Sunbury County, New Brunswick, during the same period.—HAROLD S. PETERS, *U. S. Biological Survey, Charleston, South Carolina*.

Red Phalarope in Kentucky.—On November 15, 1938, the writer, while hunting ducks on the Ohio River near Carrollton, Carroll County, Kentucky, in company with Mr. Jacob P. Doughty, of Louisville, observed a Red Phalarope (*Phalaropus fulicarius*) swimming in the water very close to the Kentucky shore. We paddled on the bird which was shot by Mr. Doughty. I made up the skin which is now in my possession. The bird was sent to Dr. Josselyn Van Tyne, of the University of Michigan Museum at Ann Arbor, who confirmed the identification after comparing it with the specimens in the museum. As far as I can ascertain, this is the first record of this species for the State of Kentucky.—BURT L. MONROE, *207 N. Birchwood Ave., Louisville, Kentucky*.

Courtship note on the Laughing Gull.—Because there appears to exist practically nothing in our literature concerning courtship in the Laughing Gull, *Larus atricilla*, and since there is no reasonable chance of my supplementing the following observation, I wish to record a single ceremony as it was noted by Colvin Farley and the writer on May 12, 1935, an alternately clear and cloudy day, at Old Greenwich, Connecticut. A pair of this species was observed standing alone on the shore of Long Island Sound. The female (as ultimately determined) stood slightly in front of the male and rather suddenly began calling with characteristic cries,