

close to the latest record. The specimen is now in the collection of the writer.—
JOHN C. JONES, *Bureau of Biological Survey, Washington, D. C.*

Bald Eagle robbing Marsh Hawk.—On March 22, 1939, a party consisting of Mr. and Mrs. Ludlow Griscom, Mr. and Mrs. Harold S. Peters, Mr. and Mrs. E. Burnham Chamberlain, Mr. William L. Hills, and the writer witnessed an interesting sight on Bull Island, South Carolina (a unit of the Cape Romain Migratory Bird Refuge). As we looked over a dead *Spartina* marsh, we saw a Marsh Hawk (*Circus hudsonius*) drop to the ground several times after some sort of small prey. The hawk, a few minutes later, flew out over the adjacent ocean beach, fairly close to us. At this point, an adult Bald Eagle (*Haliaeetus leucocephalus leucocephalus*), which had been circling above, dropped on the Marsh Hawk and forced it to release its prey. The eagle quickly landed on the beach, and, with a few steps, seized the object and was off again. Arriving at the spot, we picked up a few scattered feathers from the sand; these were identified then (and later compared with study skins at the Charleston Museum) as those of a Sora (*Porzana carolina*). Although the Bald Eagle's habit of robbing the Osprey is well known, this tyrannical act against other birds of prey is not widely reported.

Sporadic collections around the base of an eagle's nest-tree, which was used from about the first of December to the middle of March, resulted in the recovery of the remains of the following birds: seven Clapper Rails (*Rallus longirostris waynei*), four Lesser Scaup Ducks (*Nyroca affinis*), three Black Ducks (*Anas rubripes* subsp.), three unidentified ducks, one Coot (*Fulica americana*), one Great Blue Heron (*Ardea herodias herodias*), one Louisiana Heron (*Hydranassa tricolor ruficollis*), one Ring-billed Gull (*Larus delawarensis*), and one (imm.) Laughing Gull (*Larus atricilla*). Since the interior of the nest was not examined it is realized that this small list is not indicative of the entire nesting diet. On several occasions during February one of the eagles was seen flying to the nest with stout-bodied snakes. Adult and immature eagles were seen many times feeding along the beach on carrion fish and hogs. A piece of yellow, filiform *Gorgonia* coral, also found at the base of the tree, may have been brought to the nest by an eagle as some sort of gift for the mated bird.

While it is conceivable that some of the birds listed above may have been able-bodied but caught unawares, it is more likely that most of them were crippled, diseased, or dead birds, or were taken away from some other predator. In the light of the Marsh Hawk encounter, it would appear that some of the smaller prey listed could have been obtained from hawks of various species which are abundant here in winter.—W. P. BALDWIN, *U. S. Biological Survey, Awendaw, South Carolina.*

Yellow Rail in West Virginia.—A specimen of the Yellow Rail (*Coturnicops noveboracensis*) was found by the writer in Ohio County, in the northern panhandle of West Virginia on October 8, 1939. The bird was lying on the Clinton-West Liberty Pike between Warwood and Oglebay Park. It had apparently been struck by an automobile during the night or early morning, as the body was in a perfect condition except for a spot on top of the head where a few feathers were missing. The bird was taken to the Carnegie Museum, Pittsburgh, Pennsylvania, by Mr. Wm. LeRoy Black, and there a study skin was made of it. I have been informed by Miss Ruth Trimble, Assistant Curator, that the bird was an adult male, and that it now reposes in the study collection of the Museum.

Due perhaps to its inconspicuousness rather than to its rarity, this bird has been previously reported only once, to the best of my knowledge, in West Virginia and