

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

that, a sight record made by Maurice and Ruth Brooks of Morgantown, on September 6, 1935, near Volga, Barbour County, West Virginia, and was published in 'The Auk,' 53: 97, 1936.—GEORGE F. FLOUER, *Lost River State Park, Mathias, West Virginia.*

Wilson's Plover in Massachusetts.—Supplementing the note by Mr. F. H. Allen (Auk, 57: 111, 1940)—for he writes me that he thinks all reasonably authentic records of Wilson's Plover (*Pagolla wilsonia*) in Massachusetts ought to be made public—I wish to call attention, first, to two sight records by that thorough, veteran observer, Miss Fannie A. Stebbins of West Springfield, on September 14, 1928, at Provincetown, and on May 24, 1932, at Longmeadow, as published in 'Birds of the Connecticut Valley in Massachusetts' by Bagg and Eliot (p. 199, 1937); second, to three sight records on Martha's Vineyard (two of which were also published in Bagg's and my book); and third, to a second Connecticut Valley sight record, made in October 1939. I have, moreover, heard of sight records in the State on August 12, 1938, and August 29, 1939, upon the authenticity of which I cannot pass.

On the south coast of Martha's Vineyard (Chilmark Pond eastward to Tisbury Great Pond) a Wilson's Plover was identified on August 25, 1934, by Mr. Guy Emerson (who knew the species perfectly), checked by Mr. Roger Baldwin and Mrs. Marion F. Wakeman. On August 10, 1935, Mrs. Wakeman discovered another, and got Mr. Emerson to confirm it; and on August 23, 1939, after she had become thoroughly familiar with the species in the South, Mrs. Wakeman observed another, in immature plumage.

At the Springfield Reservoir in Ludlow, Massachusetts, on October 16, 1939, Mr. Willard D. Leshure of Longmeadow, a bird student of long experience and keen discrimination, noticed a plover that was not, as he at first guessed, a late Semipalmated, but a species new to him. It was very tame, and let him study it with Peterson's 'Field Guide' in hand; and it answered a Killdeer's call with a shrill, not plaintive call. On several later dates he tried to show it to other observers, but only succeeded in finding it when he was again alone, on October 25. It again allowed very close approach and ample study.

I might add that the very first Massachusetts record, for which Mr. Allen's note refers to Forbush's 'Birds of Massachusetts,' is there mis-dated 1887; it should be 1877. The greatly increased number of records in the last dozen years is paralleled in Connecticut and on Long Island, New York (see, for instance, Auk, 51: 397, 1934). Certainly the bird is occurring northeast of its breeding range, more frequently than the older generation of ornithologists supposed.—SAMUEL A. ELIOT, JR., *Northampton, Massachusetts.*

Wilson's Plover nesting in New Jersey.—The Wilson's Plover (*Pagolla wilsonia*) is believed to be rare in New Jersey where, according to some writers, the bird formerly bred. In Dr. Stone's 'Bird Studies at Old Cape May,' he cites the following records for New Jersey. In May (probably about 1820), George Ord and Titian R. Peale found the birds rather common in the vicinity of Brigantine Beach and also observed them at various places between Great Egg Harbor and Long Beach (Wilson, Amer. Ornithology, 9: 77, 1814). William A. Baird secured two specimens at Cape May on July 15 and 17, 1843. On September 15, 1933, J. Fletcher Street saw an individual at Ludlam's Beach (Cassinia, 29: 5, 1935). On exactly the same date in the following year Julian K. Potter detected a Wilson's Plover on Brigantine Beach (Auk, 52: 80, 1935). F. W. Loetcher found one there