

Chenoweth!

OWEN

INSERT E, New footnote 8a.

was '60?

10

8a/ The Court implies that unless municipalities are strictly liable under § 1983, constitutional law could be frozen "in its current state of development." Ante, at 28, n.33. ^{I find} ~~this~~ ^{uniquely} a curious ^{notion} ~~idea~~. The period between 1960, when Monroe declared local government absolutely immune from § 1983 suits, and 1978, when Monell reversed Monroe, has infrequently been described as one of static constitutional standards.

I hazard the guess that this is the first time that the