harder to achieve, harmony among the Justices more difficult to obtain, and pressures to compromise with new political forces mounting. The same year the *Willson* decision was handed down Andrew Jackson took the oath of office.

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The two remaining cases considered in this chapter were likewise from the last phase of the Marshall Court's history. *Craig* v. *Missouri*[385] considered the affirmative limitation on state "Bills of Credit" imposed by Article I, Section 10, and *Barron* v. *Baltimore* considered whether the provisions of the Bill of Rights were themselves limits on state sovereignty.

Craig was a decision that reflected the altered character of the Court in the years after 1827. Trimble's death in 1828 and Washington's in 1829, and the inauguration of the Jackson administration, changed the character of Court appointments. McLean, who replaced Trimble, and Baldwin, who succeeded Washington, were expected to be less antagonistic to state sovereignty than their predecessors. Also on the Court were Johnson, who had written separately on every major constitutional case since *Gibbons*, and Thompson, who struck the balance on sovereignty questions closer toward state autonomy than nearly any of the Justices on the Court he joined in 1823. Those factors, and, after 1830, the breaking up of the boardinghouse as an exclusive residence, precipitated fewer unanimous decisions in controversial cases. *Craig* was typical: it was a 4–3 decision, with Marshall writing for himself, holdovers Story and Duvall, and the unpredictable Baldwin, who was in his first Term and not yet a thoroughgoing maverick. Johnson, Thompson, and McLean dissented, none of them taking the time to reconcile his views with the others.

Craig was concededly a very close case, best summarized by Johnson's observation that the fiscal arrangement created by Missouri "approach[ed] as near to a violation of the constitution as it can well go, without violating its provision."[386] Article I, Section 10 of the Constitution prohibited states from "emit[ting] Bills of Credit" and from "mak[ing] any Thing but gold and silver Coin a Tender in Payment of Debts." Taken together, those clauses suggested that the states could borrow money but neither issue "bills of credit" nor redeem their debts in any currency save specie. Missouri issued certain certificates in exchange for promissory notes. The certificates, in various denominations, could be redeemed as payment for state taxes or state debts. Hiram Craig, having borrowed money from the state and having been issued one such certificate in the amount of $199.99 plus interest, never made good on

[385] Supra, note 9.

[386] 4 Pet. at 444.