

compulsory, as the offence was not an offence against exceeding the speed limit imposed by the Act of 1903. That, however, has been held not to be the law, for in *Rex v. Marsham; Ex parte Chamberlain* (97 L.T. Rep. 396; 21 Cox C.C. 510) it was held that the offence of exceeding this speed limit imposed by the regulations made under the powers of the Parks Regulation Act, 1872, stood in the same position with regard to the indorsement of the license as an offence against the speed limit fixed by s. 9 of the Motor Car Act, 1903, and that therefore there was no power to endorse for a first or second conviction of exceeding the speed limit. Although, no doubt, this decision was just and equitable, it seems somewhat straining the words in the section of 1903, "any offence in connection with the driving of a motor-car, other than a first or second offence, consisting solely of exceeding any limit of speed fixed under this Act." The necessary corollary of these cases was *Rex v. Plowden; Ex parte Braithwaite* (126 L.T. Jour. 524), where the applicant had been convicted under s. 4(2) of the Act of 1903, for not producing his license for indorsement. It appeared that he had been convicted of exceeding the speed limit in a park, and, having been twice previously convicted of a similar offence in a park, was ordered to produce his license for indorsement, but failed to do so. It was contended that, as at the date the Act of 1903 came into operation—namely, the 1st Jan., 1904—the regulation of April, 1904, imposing the speed limit had not been made, the words in s. 4(1), "any offence in connection with the driving of the motor-car," did not apply, as they must be understood as being limited to offences existing on the 1st Jan., 1904. It is needless to say this contention was not upheld, and the conviction was held to be good.

So far as skidding is concerned, in *Gibbons v. Vanguard Motor Bus Company, Limited* (25 Times L.R. Rep. 13), a lamp erected on the pavement was knocked down by a motor bus skidding on to it, the road being greasy. The County Court judge found that the motor bus was duly licensed, and that the driver was guilty of no personal negligence, but he was of opinion that it was well known that under certain circumstances these vehicles