

a compromise entered into before the issue of a writ by an attorney's clerk was not binding on the client. The Court of Appeal has just held that the same rule applies where a solicitor before action brought accepted a small sum in discharge of his client's claim without the latter's sanction. Why the issue of a writ should make a difference in the authority of the solicitor is by no means obvious. It is, however, unsatisfactory that a client should ever be bound by a compromise made without his knowledge or approval, and for this reason the decision of the court is a welcome one.—*Law Journal (London)*.

**THE LAW OF EVIDENCE.**—We recommend to the attention of the opponents of the Criminal Evidence Bill a case heard before Mr. Alderman Davies at the Guildhall Police Court on October 19. A wife was charged with the forgery of her husband's indorsement on a bill of exchange. The husband was not a competent witness either to allege or deny the genuineness of the indorsement, or the authority of the wife to make it for him. This state of the law may on the one hand enable a husband or wife with impunity to forge the name of the other; or on the other hand may subject an innocent husband or wife to a suspicion, which cannot be dispelled by sworn evidence, of having committed such an offence.—*Ib.*

**NOVEL ACTION OF DAMAGES.**—A case of almost novel impression has recently been decided in North Carolina. The holding is that the sale of laudanum as a beverage to a married woman, knowing that it is injuring her mentally and physically, and causing loss to her husband, when continued after his repeated warnings and protests, subjects the seller to a right of action in favour of the husband. This is founded on an old decision in the Supreme Court of New York, and these are the only cases of the kind on record. The doctrine apparently ignores the free moral agency of the wife, but it may be supportable on the same ground that warrants an action of damages for seduction of the wife. Some stress was laid in argument on the novelty of the cause of action, but the Court wisely gave no heed to it. The novelty of the action certainly is no greater than that of a very recent one in New York, in which a man who, in the belief that a woman was virtuous, was induced to marry her by the false representations of a third person by whom she was then pregnant, was allowed to recover damages from the latter on the ground of loss of society.