SALE OF GOODS EX STORE ROTTERDAM—CONGESTED P' .T—GOODS IN LIGHTERS.

Fisher v. *Armour* (1920) 3 K.B. 614. In this case the construction of a contract for the sale of goods "ex store Rotterdam" was in question. It appeared that the goods in question had arrived in Rotterdam some months prior to the contract consigned to the seller's agents; but owing to the congested state of the port there was no room in any warehouse to store the goods, and they had to be stored in lighters where they were, at and after the date of the contract. In these circumstances Bailhache, J., held that the goods answered the contract; but the Court of Appeal (Bankes and Scrutton, L.JJ., and Eve, J.) were of the opinion that they did not, and reversed his decision.

COSTS — TAXATION — BANKRUPTCY — ORDER FOR BANKRUPT'S WIFE TO ACCOUNT ON OATH FOR FURNITURE—VALUATION—VALUER'S FEE.

In re Lavey (1920) 3 K.B. 625. In this case on motion of the trustee a bankrupt's wife was ordered to account on oath for certain furniture and to pay costs of and incident to the motion, and as an indulgence to the wife it was provided that she might buy the furniture at a value to be fixed by an independent valuer. The valuation was made and the furniture bought at the value fixed, and the only question in dispute was whether the valuer's fee was taxable as part of the trustee's costs. Horridge, J., held that it was, and held the case governed by the rule laid down by Mellish, L.J., in *Krebe* v. *Park* (1875), L.R. 10 Ch. 334, 339, that "where costs of suit were given generally by decree of the hearing, the subsequent costs of working out the directions of the decree will be included."

CRIMINAL LAW—USING INSTRUMENTS TO PROCURE ABORTION—EVIDENCE OF SIMILAR USER ON ANOTHER WOMAN—ADMISSIBILITY.

The King v. *Lovegrove* (1920) 3 K.B. 643. This was a prosecution for using instruments on a woman to procure abortion. For the prosecution evidence was adduced to show that the accused had used instruments on another woman also for procuring abortion. The accused was convicted. An appeal from the conviction was brought on the ground that this evidence was inadmissible. The Court of Criminal Appeal (Lord Reading, C.J., and Salter and Acton, JJ.) held that the evidence was rightly admitted.