

A novel question was before the court in the Iowa case of *Kramer v. Rickmeier*, 45 L.R.A. (N.S.) 928, which holds that no action lies for causing the relapse of a convalescent woman by calling her over the telephone during her husband's known absence, and with threatening and abusive language ordering her to take charge of her husband's cattle, which had escaped from their inclosure, under penalty of a threatened visit to her home to avenge the speaker of the assumed wrong inflicted by failure to keep the cattle inclosed.

This case is also authority for the proposition that abusing and threatening a woman over a telephone is not an assault.

A case was recently decided in Quebec by Judge Beilieu (*Langlois v. Quebec & Lake St. John Ry. Co.*), which brought up an interesting question. The plaintiff sued for damages for being ejected from a train because he refused to surrender his ticket on account of not being provided with seating accommodation. In consequence of such refusal the conductor stopped the train shortly after it had left a station along the road and put the plaintiff off. The judge in rendering judgment said that the fact of the plaintiff remaining on the train and standing was an acknowledgment that he was prepared to proceed on the train, and therefore his ticket was collectable. He, however, gave plaintiff judgment for the sum of \$10 and costs on account of the conductor putting him off between two stations, which was not justifiable.