

REVIEW OF CURRENT ENGLISH CASES.

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ATTACHMENT OF DEBTS—COUNSEL'S FEES—HONORARIUM—GARNISHEE ORDER.

Wells v. Wells (1914), P. 157. This was a divorce proceeding by a wife who had obtained an order for payment of alimony *pendente lite*. The order, not having been obeyed, the plaintiff sought to attach counsel fees due to her husband, received by a firm of solicitors, but not paid over. The registrar granted a garnishee order, but Evans, P.P.D., set it aside, and the Court of Appeal (Eady, and Pickford, L.JJ.) affirmed his decision, on the ground that counsel fees are an honorarium and not a debt, and that they could not be recovered as such from the solicitors, though they had received them from the client.

ADMIRALTY—COLLISION—LOSS OF LIFE THROUGH NEGLIGENCE—DAMAGES RECOVERABLE.

The Amerika (1914), P. 167. This was an action on behalf of the Lord High Admiral to recover damages against a German steamship for sinking a submarine. The Registrar fixed the damages for the value of the vessel at £26,500, but disallowed a claim for loss of life of officers and crew. On appeal Evans, P.P.D., reduced the sum allowed to £23,850, but affirmed the Registrar's decision as to the damages for loss of life. The Court of Appeal (Buckley, Kennedy, and Scrutton, L.JJ.) held that the President erred in reducing the damages, merely on the question of quantum, there being no question of principle involved. But on the question of the damages for loss of life, in the absence of any statute to the contrary, they held that the ruling of Lord Ellenborough in *Baker v. Bolton* (1808), 1 Camp. 493, that "in a civil Court the death of a human being could not be complained of as an injury," was too firmly established and could only be reviewed, if at all, by the House of Lords.

BRIDGE ACROSS HIGHWAY—STATUTORY DUTY TO KEEP BRIDGE IN REPAIR—STANDARD OF REPAIR.

Attorney-General v. Sharpness N.D. & G. & B. Navigation Co. (1914), 3 K.B. 1. In this case the defendants, a canal company, were, by an Act passed in 1791, empowered to erect bridges to carry highways over their canal, and a statutory duty was imposed