collided with the defendant's wagon, she being thrown out and injured, the accident being occasioned by mutual negligence of both drivers, without any blame on part of plaintiff unless in riding with a careless driver. She was held not to be chargeable with the negligence of her driver. The court said (p. 165): "The plaintiff is not chargeable with the negligence of the driver of the team after which she rode. She could have sued him for the injury she has sustained. The defendant is guilty of injuring her as well as he is. They have severally wronged her. She might sue either." It was said in *Brown v. Rd.*, *supra*, that this case was not good law. but *Robinson v. Rd.*, *supra*, and *Dryer v. Erie Ry.*, *supra*, settle the rule this way in N. Y.

The principal case fully sustains the New York rule.

EUGENE MCQUILLEN.

[Since the receipt of the above note, a decision of the Court of Errors and Appeals of New Jersey has been published, in which that court also declines to adopt the rule laid down in *Thorogood v. Bryan*. See *N. Y., L. E. & West. Rd. v. Steinbrenner, 18 Vroom, 161 ante, p. 684.*—ED.]

—(*American Law Register.*)

EDITORIAL NOTES.

With this number the MANITOBA LAW JOURNAL ceases publication. Our bar is as yet far too small to support a journal. Coupled with the Reports it might live, but, the Law Society having now undertaken that work, it must die. We trust that before many years it may revive under better auspices and abler direction.