

and also that Nos. 10 and 11 are contradictory. The following is the Privy Council's summing up after reviewing the case from its inception :

"Their Lordships are not called upon to pronounce any opinion as to the question of privity, nor has it been argued at the bar. It may be assumed on this occasion that a *lien de droit* has been established between the parties. The question is whether any right to damages by the complaining parties has been established by the findings of the jury. The sole reason assigned for ordering a new trial is that the findings of the jury Nos. 10 and 11 are contradictory. Their Lordships cannot see the contradiction. What the jury find is that Dr. England suffered no damage by reason of the death of his wife, while his son suffered thereby to the amount of \$1,000. Why should not those two findings stand together? They may be wrong or against evidence, but that is not the ground taken for the new trial. It is easily conceivable that the death of a woman may cause pecuniary loss to her child, and none to her husband; and that is what the jury have found.

Their Lordships cannot agree with the learned Judges that the jury have awarded \$1,000 to the boy. They have awarded nothing. It is common enough to take the opinion of a jury as to the amount of damages suffered, leaving it for the Court to say whether on all the facts of the case the plaintiff can recover it from the defendant. That is the effect of the proceedings at this trial. If the findings do not establish the requisite connection between the defendants and plaintiffs, as held by the Court of Review, no damage can be recovered. If they do, as the Court of Queen's Bench hold, there ought to be a judgment for such damages as the other findings justify, and for no more. As the jury have found that the death of Mrs. England was not accelerated by the poison to any appreciable extent, it follows as a legal consequence that the damage attributable to the defendant is inappreciable. It cannot be appreciable for the boy any more than for his father. As regards the father, he has suffered no pecuniary loss; the son has suffered loss estimated at \$1,000, but the extent to which the defendants have caused it is inappreciable, or, in other words, is nothing at all which a Court of Justice can recognize. No damages being recoverable, it is right to dismiss the action as the Court of Review has done. A large part of the argument for the plaintiff was taken up with an attempt to displace findings Nos. 3 and 9 on the ground that they are against evidence, and their Lordships' attention was called in detail to the evidence on the point. They do not feel it necessary to comment on it in detail. They agree entirely with the position taken by the Court of Queen's Bench—that whatever might be the opinion they would form if they were the jury, the conclusion to which the jury have come was quite open to them on the evidence and cannot properly be disturbed. Their Lordships will humbly advise Her Majesty to discharge the order appealed from, with costs, and to restore that of the Court of Review. The respondents must pay the costs of this appeal.

PARKE DAVIS & Co's. POSITION.

The above firm desire us to state for the benefit of their patrons throughout the Dominion that they have taken action to have set aside as illegal the Patent on Antitoxin recently granted to Professor Behring, by the United States patent office. While the case is in the courts, they wish it to be understood that they stand prepared to protect any and every Customer in handling their goods. They do not anticipate any interference with their business in the Dominion; no patent is registered here, nor is it in the least probable that such can be secured under our laws.

THE BRITISH PHARMACEUTICAL CONFERENCE.

For the second time in its history the B. P. Conference has met in Ireland, and judging from reports in our English contemporaries the meeting has been a most successful one. The meetings were held in Queen's College, Belfast. The address of the President, Dr. Chas. Symes, of Liverpool, was a scholarly paper on pharmacy, and its needs, aims, etc. He touched on the new pharmacopœia, metric weights and measures, and synthetic remedies. At the end of his address he feelingly referred to the great loss which English pharmacy had sustained in the death of Michael Conroy, "a former Vice-President, an active member of the conference and an Irishman withal," and also to the death of Dr. de Vry.

After the usual routine business, the following list of papers was taken up :

- "Kieselguhr," by John Moss.
- "Note on Oil of Eucalyptus," by E. J. Parry.
- "Gluten Flour and its analysis," by Victor G. L. Fielden.
- "Green Extracts of the Pharmacopœia, by W. A. Naylor and J. J. Bryant.
- "The Commercial Varieties of Dill and their Essential Oils," by John Umney.
- "A new constituent of Oil of Lemon," by John C. Umney and R. S. Swinton.
- "A Quick Polarimetric method for the estimation of Strophanthin in the B. P. Tincture and Extract," by Ed. Douzard.
- "Notes on Commercial Oil of Lemon," by T. H. W. Idris.
- "Note on Extract of Ginger," by the same.
- "The salient features of the Irish Flora," by G. C. Druce.
- "The amount of Carbonic Anhydride available in the official granular effervescent Preparation," by C. S. Dyer.
- "Albumen and some types of Proteid Digestion,"