

pany an alien enemy, and, therefore, that it was entitled to prove its claim.

SHIP—BILL OF LADING—EXCEPTIONS—GENERAL SHIP—LOADING
AT DIFFERENT PORTS—RIGHT TO RE-STOW CARGO—DAMAGE
OCCASIONED IN COURSE OF RE-STOWING.

Bruce Marriot Co. v. Houlder Line (1917) 1 K.B. 72. This was an action by owners of a part of a cargo, for damages occasioned thereto in the following circumstances. The cargo in question was shipped on a general ship which carried cargo for various ports. She took on part of her cargo at Antwerp, and then proceeded to London, and took on the plaintiff's cargo. The bill of lading therefor excepted, *inter alia*, damages arising from breakage. The vessel then proceeded to Newport to take on more cargo. It was found necessary for the safe voyage of the ship that two large cylinders of the plaintiff's cargo should be taken out of the hold where they have been placed, and re-stowed in another hold. For this purpose they were temporarily placed on the quay, and while there were damaged. The evidence shewed that this method of dealing with the cargo in case of a general ship was quite usual. Rowlatt, J., who tried the case, thought that the defendants were not entitled to take the cylinders out of the hold for the purpose of re-stowing them, therefore, that the defendants were not protected by the exception in the bill of lading; but the Court of Appeal (Eady, and Bankes, L.JJ., and Lawrence, J.) unanimously reversed his decision, and the action was dismissed.

CRIMINAL LAW—HIGH TREASON—AIDING THE KING'S ENEMIES—
ADHERENCE WITHOUT THE REALM—TREASON ACT, 1351
(25 EDW. 3, STAT. 5, C. 2).

The King v. Casement (1916) 1 K.B. 98. This will probably hereafter constitute one of the leading cases on the subject of high treason. The accused was indicted under the Treason Act of 1351. His alleged offence being, that being a British subject he had gone to Germany in time of war, and there endeavoured to induce certain subjects of His Majesty, there prisoners of war, to join the armed forces of the enemy. It was contended that this act having been committed out of the realm was not treason within the Act, and not triable in England, but the King's Bench Division (Lord Reading, C.J., and Avory, and Horridge, JJ.) and the Court of Criminal Appeal (Darling, Bray, Lawrence, Scrutton, and Atkin, JJ.) unanimously agreed that the offence