

In teaching history it is essential to be truthful for truth's sake; but it is equally essential that all immigrant citizens as well as native born Americans realize the struggle and the sacrifices of the hundreds of years consumed in building up the Anglo-Saxon foundations of liberty upon which the government of civilized democracy rests to day. Knowing its history they will recognize the vast heritage of civil liberty which they here enjoy, and that that heritage was not built up by America alone, but is the common work of the English-speaking race. They will feel in their inmost souls that civilized democratic government is a pearl without price, and will view with the deepest anxiety, and place before everything else, the danger of its being shaken or checked in the world, and with their backs to the wall will resist every kind of encroachment upon it.

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#### DAMAGES AGAINST JOINT TORT FEASORS.

On the appeal from the judgment at the trial in the action of *Basil v. Spratt*, 15 O.W.N. 174, the learned Chief Justice of Ontario in delivering the judgment of the majority of the Court is said to have dissented from the dictum of Lord Atkinson in *London Association for Protection of Trade v. Greenlands* (1916) 2 A.C. 15. In so doing his Lordship virtually dissented, not only from the particular dictum referred to, but from the unanimous opinion expressed by all of their Lordships in the House of Lords who heard that case. All were unanimous that the damages against joint tortfeasors cannot be separately assessed against the individuals. That was an action for libel against an unincorporated association, its secretary, and its local agent. Judgment was given on the verdict of the jury for £1,000 against the association and its secretary and for £750 against the local agent. The association and its secretary appealed from an order directing a new trial. The local agent did not appeal. All of their Lordships agreed that the judgment against the appellants could not be set aside unless the judgment against the local agent was also set aside and he was accordingly notified of the appeal in order that