have unanimously reversed the decision of the Court of Appeal (1910) 1 K.B. 173, and Divisional Court (1909) 2 K.B. 433 (noted ante, vol. 45, p. 465, and vol. 46, p. 171). It may be remembered that the Court of Appeal held that a person having a savage horse in his field through which people were accustomed to pass without permission, was not liable for injury done by the horse to a trespasser. Their Lordships came to the conclusion that the plaintiff had passed through the field, not of right, but as one of the public who habitually used the field, and that the defendant knowing of such user did not prevent it; and that in such circumstances he was guilty of a wrongful act in keeping a savage horse in a field so used to his knowledge, without giving any warning to the plaintiff or the public of the dangerous character of the animal. The original judgment of the County Court judge was therefore restored. We notice the appeal was in formâ pauperis.

ADMIRALTY—COLLISION—BOTH SHIPS TO BLAME—LIMITATION OF LIABILITY—ADMIRALTY RULE AS TO DAMAGES.

Owners of Cargo of SS. Tongariro v. *Owners of SS. Drumlanrig* (1911) A.C. 16. This is an appeal from the judgment of the Admiralty Court in *The Drumlanrig* (1910) P. 249 (noted ante, vol. 46, p. 654). The action was by cargo owners of one ship against the owners of another ship with which it had been in collision, both vessels being to blame; and the court decided that the admiralty rule as to damages applied and that the plaintiffs could only recover against the defendant shipowners one-half the damage sustained. This decision the House of Lords (Lord Loreburn, L.C., and Lords Halsbury, Atkinson and Shaw) have now affirmed. It may be noted that Lord Loreburn refers to the doctrine of *Thoroughgood* v. *Bryan*, 8 C.B. 115, as laying down "a supposed rule" of the common law for which there was nothing to say either in principle or good sense, and that it was exploded by the House in *The Berrina*, 13 App. Cas. 1.