

judgment was upheld in the appellate tribunal on the ground that the dissimilarity was so great that a person of ordinary intelligence, before using the button picture, in connection with the article, would have made further investigation. And, in order to prove how careless and reckless the action of the publishers had been in the matter, and thus to impose upon them in the jury's discretion, punitive damages, the court permitted the respondent to introduce in evidence the two photographs.—*Central Law Journal*.

In *Ingraham v. Stockamore*, 118 N.Y. Supp. 399, Justice Spencer, of the New York Supreme Court, holds that the owner of an automobile who permits his machine to be taken out and driven by another person is liable for injuries caused by the negligence of the latter in operating the machine. It appeared that at the time of the accident in question the chauffeur was in charge of the machine, with the consent of the owner, and was taking a pleasure trip or "joy ride" with some boon companions, when he negligently ran into a vehicle on the street, causing the injuries complained of. A verdict was rendered against the owner under an instruction that a verdict might be found against him if the machine was being used with his consent, the charge being in these words: "I am going to charge you that the owner of an automobile should be responsible for injuries caused by it by the negligence of any one whom he permits to run it in the public street." The legal proposition contained in this instruction is said to be a novel one, but is declared to find full justification in the novelty of the situation. The statute requiring the registration of the names of the owner and chauffeur and number of each automobile and the display of the number on the back of each car is held to shew that the legislature regarded automobiles as dangerous machines, and the court arrives at this conclusion: "An automobile being a dangerous machine, its owner should be held responsible for the manner in which it is used; and his liability should extend to its use by any one with his consent. He may not deliver it over to any one he pleases and not be responsible for the consequences."