

*Principal and agent—Scope of agent's authority—Negligence—Bailment.*

Action for damages in respect of injury done to a bass fiddle. Plaintiff left her fiddle in ante-room of a hall belonging to defendant and hired for a concert. The fiddle was so placed that the hall-keeper, when he came to turn on the gas, was obliged to move it, when almost immediately it fell with a crash and was seriously injured. No notice had been given to the hall-keeper that the fiddle had been placed where it was, but the judge found that it was not an improper place in which to leave it. Held, that there was no evidence of any contract of bailment between the plaintiff and the defendants, and no duty and no evidence of negligence on the part of the hall-keeper, and that the care of valuable instruments was not within the scope of his authority. Judgment for defendant.—*Neuwirth v. Over Darwen Industrial Co-operative Society*, Q.B.D. (Mathew and Collins, JJ.), February 14th, L.T. 392; L.J. 133; 10 T.R. 282.

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*Salvage—Unsuccessful services—Remuneration.*

Where there is a request to render assistance to a ship, and service is in fact performed as far as it is possible to do it, and the ship is afterwards saved by other means, the persons who rendered the services are entitled to some salvage remuneration.—*The Helvetia*, P.D. & Ad. (Barnes, J.), February 27th.—L.T., 439.

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*THE LATE LORD JUSTICE BOWEN.*

It is with deep regret that we record the death of Lord Bowen, which took place early on Tuesday morning, April 10, at Albert Hall Mansions. The event is accentuated by the fact that he has passed away within a few days of the death of Lord Hannen, whom he succeeded as lord of appeal about seven months ago. He fell a victim to an internal disease, the growth of which caused him frequently to be absent from the Court of Appeal, but the terrible pain of which never caused him, even up to the last hour of his suffering, to lose that serenity of temper which was not the least of the many gifts he displayed. He knew that death was near several days before it came, but "resignation