The jury at the trial found that the defamatory words were used, but it was contended on behalf of the defendant that the imputation of drunkenness was not actionable in the case of the occupant of an office without emolument, and from which the imputation, if true, would not be a ground for removing him. The judge at the trial held that the slander was actionable, and entered judgment for the plaintiff. This ruling was reversed by the Court of Appeal. Lord Herschell, pronouncing judgment, remarked that, as regarded a man's business or calling or an office of profit held by him a mere imputation of want of ability was sufficient to support an action of slander without any suggestion of immorality or crime. In the case, however, of offices, not of profit, the law was different, and he felt very strongly that the courts ought not to extend the limits of such actions beyond the lines at present laid down. No case had been cited wherein slander had been held maintainable by a man holding an office of credit as distinguished from an office of profit, unless the imputation would be a ground for removing him from that office. The law was, that where the office was one of credit and honour, and the defamatory statement was not of misconduct in that office, slander would not lie in absence of proof of special damage where the charge was one which, if true, would not lead to exclusion from the office. The court was now asked to extend the law to a case in which the act alleged would not involve exclusion from the office. This was a step in advance which his lordship thought ought not to be taken.—*London Law Times.*

ANIMALS FERÆ NATURÆ—RIGHTS OF TRESPASSER.—While the rights to animals *feræ naturæ* as between the owner of the soil and others have been fairly settled by a considerable series of cases, the relative rights of parties, both of whom acknowledge the superior right of the owner of the soil, seem never to have been precisely described. In a recent Rhode Island case (*Rexworth* v. *Com.*, 23 Atl. Rep. 37) the plaintiff, without permission, placed a hive upon the land of a third person. The defendant, also a trespasser, removed the bees and honey which had collected in the hive. The court find no cause of action, holding that neither title nor right to possession is shown either to the bees or to the honey. The discussion, especially in a case where the precise point is clearly new, is unfortunately general and largely irrelevant. Most of it is given up to showing, on the basis of *Blades* v. *Higgs* (11 H.L. Cas. 621), that the right of the owner of the soil, uncertain as it is, cannot be terminated by the act of a trespasser, as no title to such animals can be gained except by a legal act. While this is undoubted law, it scarcely need follow that a trespasser cannot maintain, on the basis of mere possession, an action against a later trespasser. There may have been a possible doubt as to the plaintiff's having reduced the animals to possession by collecting them in his hive, but in the preceding cases that would seem to give him actual physical possession, enough for this action. About the honey there would seem to be even less doubt; but, strange to say, neither in this case nor elsewhere does the question seem to have been discussed—how far the law about animals *feræ naturæ* applies to their produce, as eggs or