

appeal, the last case having been tried with a rigid observance of the rules of evidence, and great care having been exercised by the trial judge with a view to preventing either side from taking advantage of any errors of judgment. The main contention of the hospital was to the effect that all necessary care was exercised in the treatment of the patient; that the burns were unavoidable. The plaintiff set up that the nurse in charge of her case after the operation was an undergraduate, and therefore not wholly qualified to act. A novel proposition raised by the hospital's attorneys was that the placing of a hot water bag did not require any special degree of qualification; hence, the question of inexperience was not to be raised. The jury appears to have held, however, that the nurse was an agent of the hospital, and that the latter was therefore liable for her acts.

"There are two similar cases in Buffalo which will now either be brought to trial or settled on the strength of this verdict. In each case patients were burned more or less severely by the application of hot water bottles placed by undergraduate nurses. In one case it is stated that considerable deformity has resulted."

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#### **CANADIAN MEDICAL ASSOCIATION.**

**MONTREAL MEETING, SEPT., 16, 17, 18, 1902.**

Below will be found a list of papers already promised for the annual meeting at Montreal in September next. Members and others contemplating contributing to the success of this meeting should notify the General Secretary at an early date of their intention. Arrangements as to railroad and steamship rates, entertainments, clinics, etc., will be announced in due time.

"Address in Medicine"—Professor William Osler, Baltimore.

"Address in Surgery"—Dr. John Stewart, Halifax, N.S.

"Lantern Demonstration on the Exanthemata"—Dr. Corlett, Cleveland, Ohio.