so received, but that case turned on the fact that notice was given of the existence of the spring guns.

In *Bird* v. *Hollander*, 4 Bing. 628, it was held that where the plaintiff had gone into the defendant's premises in search of a strayed fowl, and was injured by a spring gun, of the existence of which there was no notice, the defendant was liable. But in the later case of *Wooton* v. *Dawkins*, 2 C.B. (N.S.) 112, the court held such an action would not lie; and in *Jordin* v. *Crump*, 8 M. & W. 782, the placing of dog spears in the defendant's own premises to protect his game was held to give no cause of action to the plaintiff, whose dog was injured thereby; but in *Townsend* v. *Walton*, 9 East 277, 9 R.R. 553, a contrary decision was arrived at, and in *Deane* v. *Clayton*, 7 Taunt. 489, 18 R.R. 553, the court of Common Pleas was equally divided whether such an action would lie or not.

In *Blithe* v. *Topham*, 1 Ro. Abr. 88, it was held that a man digging a pit on a waste land 36 feet from a highway, was not liable to the plaintiff whose horse escaped into the waste and fell into the pit and was killed, because it was the plaintiff's fault that the horse escaped. In a case before Lord Kenyon, *Brock* v. *Copeland*, 1 Esp. 203, 5 R.R. 730, that learned judge held that a defendant who kept a mischievous bull in his close, which injured the plaintiff, who was crossing the close with the licence of the defendant, was liable in damages. This decision is practically the same as in *Lowery* v. *Walker*.

But there are some expressions of the learned Lords in the case of *Lowery* v. *Walker* which as we have said, rather lead to the conclusion that a person may not, without notice to the public, maintain, even on his own premises, an animal likely to be dangerous to persons entering thereon, even though they do so without right, and if that proposition be sound, then it would seem to follow, neither can a man maintain dangerous engines, or pitfalls, about his premises liable to cause injury to persons likely to come innocently thereon.

It seems to be assumed in the *King* case that the being on premises not your own is conclusive evidence of a trespass,