

and ordered to be sold by order of the Admiralty Court, and at the sale realized less than the sum allowed for salvage. Their Lordships reversed the decision appealed from, and held that assuming the possession by salvors of a derelict vessel to be only a constructive total loss, yet the subsequent sale constituted an actual total loss, of both ship and cargo, and that it was not necessary to constitute a total loss, that the ship and cargo should have been actually annihilated; it was sufficient to constitute such a loss, that by an adverse valid sale, and legal transfer, the owner's right of property and possession has been transferred to a purchaser, in consequence of a peril insured against.

NEGLIGENCE—NERVOUS SHOCK RESULTING FROM FRIGHT—DAMAGES TOO REMOTE.

The only other case to which we think is necessary to draw attention is *Victorian Railway Commissioners & Coultas*, 13 App. Cas. 222. This was an appeal from the Supreme Court of Victoria. The action was brought to recover damages for negligence under the following state of facts: The gate-keeper of the defendant's railway company had negligently invited the plaintiff to drive over a level crossing, when it was dangerous to do so. An actual collision with a train was avoided, but the plaintiff claimed damages for physical and mental injuries sustained by the fright, and the jury assessed damages therefor; but the Judicial Committee was of opinion that such damages were too remote, and not a natural and reasonable result of the defendant's act, and the appeal was consequently allowed, and the action dismissed.

Reviews and Notices of Books.

The most recent of the Text-Book Series of the Blackstone Publishing Company, of Philadelphia, is "Leading Cases in Equity," by Thomas Brett, with notes on American cases by F. S. Dickson. This is a valuable addition to the series.

A Compendium of the Law of Torts, specially adapted for the use of Students.
By HUGH FRASER, M.A., LL.M., of the Inner Temple, Barrister-at-Law.
London: Reeves & Turner.

This little book claims to be nothing more than rough notes of the outlines of the author's lectures delivered at Liverpool and Newcastle-upon-Tyne. It was compiled, in the first instance, with the object of assisting those of the author's own pupils, who wished to enter on the wider course of study indicated in his lectures. It is clear and concise in its statements, the topics treated of are well arranged, and the numerous references to cases, and to other works dealing at large with each subject under discussion, will prove helpful in obtaining more detailed information on any point of inquiry than can be given in an outline.