such cases there must be the doing of some wrongful act, or the wrongful neglect of some duty. The mere permission to bring a bear upon one's premises is not *per se* a wrongful act, the wrong is occasioned by the neglect of the owner or keeper of the animal safely to keep it, so that it may not do harm. That appears to be a wrong for which the owner or keeper of the animal alone is responsible, and not the person who merely passively permits him to use his land on which to keep it.

In the case under consideration the wife virtually said to her husband, "I will permit you to use my land on which to keep your bear, but you are to keep it, not I." The Court, however, has stepped in and said that if she permits her husband to use her land for such a purpose she must also assume the duty of bear keeper herself.

We have suggested one or two instances where this rule would seem difficult to reconcile with sound principles, let us instance one more case. Suppose instead of a bear the husband had brought into the house a loaded gun, which he left so carelessly and negligently about that, like the bear, it went off and injured a man, would the wife be liable for the injury? If she is liable for the bear going off without leave, owing to her husband's negligence, why should she not be equally liable for his gun going off too, through his negligence? This, and many other questions might be propounded, but it is easier to propound questions sometimes than to give them a satisfactory solution.

COMMENTS ON CURRENT ENGLISH DECISIONS.

The Law Reports for July comprise 25 Q.B.D., pp. 1-192; 15 P.D., pp. 121-135; 44 Chy.D., pp. 217-329; and 15 App. Cas., pp. 201-251.

PRACTICE—STAYING ACTION—LIBEL—SECOND ACTION FOR SAME PUBLICATION—RES JUDICATA—FRIVOLOUS AND VEXATIOUS ACTION.—PUBLICATION OF PART OF JUDICIAL PROCEEDINGS.

Macdougall v. *Knight*, 25 Q.B.D., 1, is one instance; and *Laurance* v. *Norreys*, to which we shall refer later on, is another, of the power the Court sometimes exercises to put an end in a summary way to frivolous and vexatious litigation. This was a second action for libel in respect of the same publication as was in question in *Macdougall* v. *Knight*, 17 Q.B.D., 636, and 14 App. Cas., 194 (noted *ante* vol. 22, p. 395, and vol. 25, p. 492). The libel complained of was the publication by the defendant of a verbatim report of a judgment of North, J. But in this action the plaintiff selected other passages than those objected to in the former action as being libellous. The defendant moved to strike out the statement of claim, and to dismiss the action as frivolous and vexatious, and an order was made to that effect by the Master, and confirmed by the Judge at Chambers. On appeal to the Divisional Court (Lord Coleridge, C.J., and Mathew, J.), the latter made an order that if the balance of the costs of the former action were paid within a week, the appeal should be allowed; but if not, the action should be stayed until the costs of the former action were paid. The defendent appealed from this order, and the Court of Appeal (Lord Esher, M.R., and Fry and Lopes,