

**MASTER AND SERVANT—INJURY TO WORKMAN ON HIS WAY TO WORK—  
ACCIDENT "IN COURSE OF EMPLOYMENT."**

*Holmes v. Great Northern Ry.* (1900) 2 Q.B. 409, is a very similar case to *Holness v. McKay* (1899) 2 Q.B. 319 (noted ante vol. 35, p. 707). An engine cleaner employed by the defendants at their station at King's Cross, was directed by the defendants to work in a new engine-shed at Hornsey, about four miles distant. He was conveyed by the defendants free of charge to and from his work at Hornsey, and while crossing the line at the station at Hornsey in order to get to his work he was killed by a passing train. The Court of Appeal (Smith, Williams and Romer, L.JJ.) held that the accident took place in the course of his employment.

**DESERTION BY WIFE—REFUSAL OF MARITAL INTERCOURSE.**

*Synge v. Synge* (1900) P. 180, deserves attention, as bearing on the law of alimony, inasmuch as Jeune, P.P.D., held that the refusal by a wife of marital intercourse with her husband is desertion by her, and she cannot allege desertion by her husband if in consequence he refuses to live with her.

**PRIVATE INTERNATIONAL LAW—DOMICIL—FRENCH SUBJECTS—WILL—RE-  
VOCATION OF WILL BY SUBSEQUENT MARRIAGE—HUSBAND AND WIFE.**

*In re Martin, Lonsdale v. Lonsdale* (1900) P. 211, is a case brimful of difficult questions of private international law. The question at issue was whether a will made by a Frenchwoman domiciled in England was revoked on her subsequent marriage in England to a Frenchman under the following circumstances. The testatrix was an unmarried Frenchwoman living in England at the date of the will, and she was then living in service. She subsequently set up a laundry business and married a Frenchman who had been accused and, in his absence, convicted of crime in France, and who had fled from that country to escape punishment. There was no settlement. After marriage the husband assisted to carry on his wife's laundry business and after the lapse of twenty-two years he left his wife, returned to France, and had ever since lived there, the lapse of twenty years having, according to French law, relieved him from any further liability for his alleged offence. The question is to whether or not the ante-nuptial will had been revoked or not caused a difference of opinion. Jeune, P.P.D., held that the domicile of the parties throughout was French, and that