

unless made within three days after delivery of the goods in respect of which the claim was made, or "in the case of non-delivery of any package or consignment" within fourteen days after despatch. When the consignment arrived at its destination there were twelve of the carcasses missing. A claim was made by the consignor within fourteen days from the despatch of the whole consignment, but not within three days from the delivery of the rest of the carcasses. The Court below considered that the non-delivery of the twelve carcasses was "the non-delivery of a consignment," and therefore that the plaintiff's claim was made in time. The majority of the House of Lords considered that the "non-delivery of a consignment" in the consignment note, meant non-delivery of the consignment as a whole, and that it was really a question of fact whether the delivery of the 740 carcasses was a substantial delivery of the consignment, notwithstanding the shortage in delivery, and that, strictly speaking, there ought to be a new trial on that question; but the amount involved being small, the parties agreed to waive a new trial, and their Lordships (Lords Loreburn, Haldane, Kinnear, and Parmoor—Lord Shaw dissenting), disposed of the case on the assumption that the delivery of the 740 carcasses was a substantial delivery of "the consignment," and therefore that the time for making claim was limited to the three days from that delivery and the plaintiff was therefore too late. Lord Shaw considered that "the delivery of the consignment" meant the delivery of every part of it, and that the omission to deliver any part of it was a "non-delivery of the consignment;" but the majority thinking otherwise the appeal was therefore allowed.

JURY—FAILURE TO REVISE JURY LIST—VERDICT—NEGLECT TO OBEY STATUTORY REGULATIONS.

*Montreal Street Ry. v. Normandin* (1917) A.C. 170, deserves attention. It was an appeal from a Quebec Court and the question raised thereby was as to the validity of a verdict given in a civil action, where the proper officers had neglected to revise the list of jurors as required by R.S.Q. c. 909, art. 3426; and it was claimed that one of the jury was disqualified from being a juror under art. 455 (2) of the Code. Their Lordships the Judicial Committee of the Privy Council (Lords Haldane, Buckmaster, Dunedin, and Parker, and Sir A. Channell), found that