

weight such as Mr. Sedgwick, Sir Frederick Pollock, and Mr. Beven."

The question seems to have been carried to the extreme verge of the "ideal boundary" in the case of the *Toronto Ry. Co. v. Grinstead* (1895) S.C.R., p. 570, in which it was held by a majority of the Court that illness resulting from exposure to cold in consequence of ejection from a street car, in the City of Toronto, was not too remote a cause of damages. It is true the night was a cold one; but there was no evidence that the plaintiff was inadequately clothed. He took cold which brought on an attack of rheumatism and bronchitis, and it was held the subsequent illness was the natural and probable result of the ejection. It was alleged by the plaintiff that in consequence of the altercation with the conductor, when ejected from the car, he was in a state of perspiration and in a fit condition to take cold. Five hundred dollars damages were allowed for the ejection and subsequent illness.

The following rules and dicta of the judges cannot be too firmly fixed in the mind of the practitioner.

1. The rule of English law as to the damages which are recoverable for negligence is that the damages must be the natural and reasonable result of the defendant's act; such a consequence as in the ordinary course of things would flow from the act.—Brett, M.R., 9 P.D., p. 105.

2. To enable a plaintiff to recover damages for a wrong done, he must prove resulting damages to himself and a natural and continuous sequence uninterruptedly connecting the wrong or breach of duty with the damage as cause and effect.—Sherman and Redfield on Negligence.

3. Remoteness as a legal ground for the exclusion of damage in an action of tort means, not severance in point of time, but the absence of direct and natural casual sequence—the inability to trace in regard to the damage the "propter hoc" in a necessary or natural descent from the wrongful act.—Kennedy, J., in *Dubieu v. White* (1901) 2 K.B., p. 678.

4. The decisions shew that no general rule can be laid down by reference to which the question, whether in any particular case the damage sought to be recovered is too remote, can be determined. Whether it is, or is not too remote, is a question of