MASTER AND SERVANT.—One who engages to work in saving property from the debris left by a fire is held, in *Gans Salvage Co.* v. *Byrnes, use of Higgins* (Md.), 1 L.R.A. (N.S.) 272, to assume the risk of injury from falling walls, where the peril is open and obvious.

A youth sixteen years old is held, in *Mundhenke* v. *Oregon City Mfg. Co.* (Or.), 1 L. R. A. (N.S.) 278, to have assumed the risk of injury plainly apparent from coming in contact with exposed gears, though not expressly warned of the danger.

The right of an employee to hold his master liable for injuries caused by the latter's breach of duty to furnish an independent contractor with safe appliances for the performance of the work is denied in *Miller* v. *Moran Bros.' Co.* (Wash.), 1 L.R.A. (N. S.) 283.

The diligence required of a master to learn the habits or characters of servants employed with due care is held, in *Southern P. Co.* v. *Hetzer* (C. C. A. 8th C.), 1 L.R.A. (N.S.) 288, to be reasonable diligence and care only.

STREET CARS.—A street car company which stops its cars for the purpose of receiving passengers is held, in *Normile* v. *Wheeling Traction Co.* (W. Va.) 68 L.R.A. 901, to be charged with the highest degree of care to see that all passengers lawfully entering its cars get to a place of safety thereon before starting the cars.

COMMON CARRIERS.—That livery stable keepers are not within the rule that common carriers of passengers are bound to exercise extraordinary care for the safety of their passengers is decided in *Stanley* v. *Steele* (Conn.) 69 L.R.A. 561.

HOTELKEEPERS.—A trespass committed upon a guest in a hotel by a servant of the proprietor, whether actively engaged in the discharge of his duties at the time or not, is held, in *Clancy* v. *Barker* (Neb.) 69 L.R.A. 642, to be a breach of the implied undertaking that the guest shall be treated with due consideration for his comfort and safety, for which the proprietor is liable in damages. A note to this case reviews the other authorities on the liability of an innkeeper for injury to guest by servant. That an innkeeper is not liable for an injury inflicted upon a guest in his hotel by a servant who was not at the time of the injury acting within the apparent or actual scope of his employment is declared in *Clancy* v. *Barker* (C.C. App. 8th C.) 69 L.R.A. 653.