

The Queen v. Justices of Berkshire, 4 Q.B.D., per COCKBURN, C.J., at p. 471, and *Atlas v. Bramwell*, 29 S.C.R., at p. 545, followed.

Chapman and Green, for plaintiffs. *Affleck and Kemp* for defendants.

Bench and Bar.

JUDICIAL APPOINTMENTS.

The Honourable Désiré Girouard, a puisne judge of the Supreme Court of Canada, to be the Deputy of His Excellency the Governor-General, for the purpose of assenting, in His Majesty's name, to any bill or bills passed or to be passed during the present Session of Parliament. (March 15.)

United States Decisions.

NEGLIGENCE.—Crossing Accident: If both plaintiff and defendant could have prevented the accident, but neglected to do so, their negligence was concurrent, and the last chance doctrine would not apply.—*Bruggeman v. Illinois Cent. R. Co.*, Iowa 123 N.W. 1007.

PARENT AND CHILD.—Liability for Torts of Child: Relationship alone does not make a parent answerable for the wrongful acts of his minor child; but it must appear that he approved such acts, or that the child was his servant or agent.—*Brittingham v. Stadiem*, N.C. 66 S.E. 128.

PRINCIPAL AND AGENT.—Personal Injuries: In general when a person acts avowedly as an agent for another who is known as the principal, his acts and contracts within the scope of his authority are considered the acts and contracts of the principal, and involve no personal liability.—*Roach v. Rutter*, Mont. 165 Pac. 555.

RAILROADS.—Duty to Stop and Listen: One having a right to cross a railroad track need not stop to look or listen before crossing, in order to discover whether a train is approaching.—*Chesapeake & O. Ry. Co. v. Patrick*, Ky. 122 S.W. 820.