the ore, but no ore had been taken. The men employed in the mine were drawn up in a bucket unprovided with guides, which was the offence charged. The defendants contended that the shaft in question was, under the circumstances above stated, not a "working shaft," but the court (Hawkins and Stephens, JJ.) held that it was, and that the defendants were therefore liable to the penalty, and that it was immaterial whether ore had been obtained or not; it was sufficient that the shaft was being used for the purposes of the mine.

FOREIGN POWER OF ATTORNEY, CONSTRUCTION OF—CONFLICT OF LAWS—ENGLISH LAW, HOW FAR APPLICABLE TO FOREIGN POWER OF ATTORNEY.

Chatenay v. *The Brazilian Submarine Telegraph Co.* (1891), 1 Q.B., 79, was an action brought by plaintiff to compel the defendants to rectify their register of shareholders and restore his name as owner of certain shares which had been transferred in assumed exercise of a power of attorney executed by the plaintiff in Brazil in the Portuguese language in favor of a broker resident in London. A preliminary issue had been directed in the action to determine whether the construction of the power of attorney was to be governed by Brazilian or English law, which issue was tried before Day, J., who decided that it must be governed by English law, and on appeal the Court of Appeal (Lord Esher, M.R., and Lindley and Lopes, L.JJ.) affirmed his decision, holding that in such a case the meaning of the instrument is to be ascertained by the evidence of competent translators and experts, including, if necessary, lawyers of the country where the document was executed, and that if it appears that it was the intention of the donor of the power that it should be acted on in England, then as to anything done under it in England its construction is to be governed by English law, and the certificate of Day, J., was expanded in accordance with this holding.

TRESPASS TO THE PERSON—WOUNDING WITH GUN—ACCIDENT—ABSENCE OF NEGLIGENCE.

In *Stanley* v. *Powell* (1891), 1 Q.B., 86, the plaintiff sought to recover damages for injuries sustained in consequence of a pellet from the defendant's gun having glanced off the bough of a tree and struck the plaintiff. The jury found the defendant was not guilty of negligence, and the court (Denman, J.) held that he was not liable to the plaintiff.

DEFAMATION—LIBEL—CORPORATION, WHEN IT MAY MAINTAIN ACTION FOR LIBEL.

Manchester v. *Williams* (1891), 1 Q.B., 94, was an action for libel brought by a municipal corporation. The libel complained of charged the plaintiffs with bribery and corruption. Day and Laurance, JJ., were of opinion that the action would not lie, and that the limits of a corporation's right to bring such an action were correctly stated by Pollock, C.B., in *Metropolitan Saloon Omnibus Co.* v. *Hawkins*, 4 H. & N., 90, viz., that a corporation may sue for a libel affecting property, but not for one merely affecting personal reputation.

PRACTICE—RENEWAL OF WRIT OF SUMMONS—STATUTE OF LIMITATIONS.

In *Hewett* v. *Barr* (1891), 1 Q.B., 98, the Court of Appeal (Lord Esher, M.R., Lopes and Kay, L.JJ.) affirmed the rule of practice laid down in *Doyle* v. *Kauf-*