

under the Act that the defendants were liable for the expense of board and maintenance and conveyance home of the seaman in question but not for any surgical or medical expenses, and that under the Act it is only where the seaman is suffering from any illness not being venereal disease or due to his own wilful act, default, or misbehaviour, that the shipowner is liable for medical attendance.

SHIP—GENERAL AVERAGE—EVIDENCE—ONUS OF PROOF—SEAWORTHINESS.

*Lindsay v. Klein* (1911) A.C. 194 may be briefly noticed. The action was by shipowners to recover from the cargo owners a contribution to general average for damage to the ship and expenses occasioned by its having to go into port and discharge and reload the cargo. The House of Lords (Lord Loreburn, L.C., and Lords Shaw, Kinnear and Dundas), affirming the First Division of the Scotch Court of Session, held that the onus of shewing that the ship was seaworthy at the commencement of the voyage, was on the plaintiffs, and having failed to discharge that onus the action failed.

MASTER AND SERVANT—SLANDER BY SERVANT—LIABILITY OF MASTER FOR SLANDER UTTERED BY SERVANT.

*Glasgow v. Lorimer* (1911) A.C. 209. This was an action brought by the plaintiff against the City of Glasgow to recover damages in respect of a slander by a tax collector, employed by the defendants. The plaintiff alleged that the collector in question went to the plaintiff's house to demand payment of taxes, and she produced a receipt for 7s. 6d., which the collector then declared had been altered from the sum of 4s. 6d. for which it had been made out, and when the plaintiff denied the charge, he threatened to lodge an information with the police authorities, which would result in her being put in gaol for three months for forgery, and that he repeated the slander in the house of a neighbour of the plaintiff. The Scotch Court of Session held that the averments were relevant, but the House of Lords (Lord Loreburn, L.C., and Lords Kinnear, Atkinson, and Shaw) were unanimously of the opinion that they disclosed no cause of action and that the tax collector had no authority from the defendants, express or implied to express any opinion as to the genuineness of the receipt.