

## UNITED STATES DECISIONS.

OSTEOPATHY:—The practice of osteopathy is held, in *Bragg v. State* (Ala.) 58 L. R. A. 925, to be a practice of medicine within the meaning of the statute requiring a license to engage in such practice.

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PRESUMPTION OF DEATH:—In case of the death of two persons in a common calamity it is held in *United States Casualty Co. v. Kacer* (Mo.) 58 L. R. A. 436, that there is no presumption of survivorship.

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HUSBAND AND WIFE:—A husband's common-law liability for his wife's torts is held, in *Henley v. Wilson* (Cal.) 58 L. R. A. 941, not to be changed by statutes preserving to her her separate estate and empowering her to manage it.

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ACCIDENT—RAILWAY:—If one in charge of an electric car, seeing that a horse is frightened by the approach of the car, and that its driver is in danger, continues to sound the gong or ring the bell, and further frightens the horse and causes it to run away, the car company is held, in *Oates v. Metropolitan Street Ry. Co.* (Mo.) 58 L. R. A. 447, to be liable for the injuries thereby caused to the driver.

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NEGLIGENCE:—Where a licensee walking upon railroad tracks was approached by a train, and stepped therefrom to avoid collision, but was pushed upon the rails by a stray cow pasturing on the right of way, it is held in *Schreiner v. Great Northern R. Co.* (Minn.) 58 L. R. A. 75, that the failure of the company to build the statutory fences cannot be held the proximate cause of the accident, for which it would be liable to answer in damages.

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WATERCOURSE.—The title to accretions is held, in *De Lassus v. Faherty* (Mo.) 58 L. R. A. 193, not to be lost by the fact that a stream changes its course, and, forcing its way through the newly formed land, cuts the portion in controversy off from the main land. One who, for his own benefit, whether as a riparian owner or under the right of eminent domain, erects an embankment on a stream in such a way as to change the current of the stream and destroy its habit of forming alluvial deposits on the opposite bank, is held, in *Freeland v. Pennsylvania R. Co.* (Pa.) 58 L. R. A. 206, to be liable for the damage caused to the riparian owner by the loss of future alluvial deposits. With these two cases is a note discussing the law of accretions to shore lands.