

The statement in the opinion that the decision represents what has been the undisputed law for centuries seems rather broad. The judges who decided *Broadwood v. Granara*, 24 Law J. Rep. Exch. 1; L. R. 10 Exch. 417, and *Threfall v. Borwick*, 44 Law J. Rep. Q. B. 37; L. R. 7 Q. B. 711, for instance, apparently had a contrary principle in mind. And Wharton, in his book on innkeepers, p. 119, makes the unqualified assertion that the innkeeper has no lien on goods he knows are not the property of the guest. That this view has often been taken in America, too, is shown by such cases as *Cook v. Kane*, 13 Oreg. 482, and *Covington v. Newberger*, 99 N.C. 523. However, the doctrine of the case under discussion seems clearly preferable. As the innkeeper's lien is grounded, not on the credit he gives his guest on the faith of the goods, but on the extraordinary liability imposed on him by law, it seems only just that on all goods which he is bound to receive he should have his lien, whether or not he knows them to be the property of another than his guest. As to articles which he is not bound to receive, his state of knowledge or ignorance may be material, but in the ordinary case, where he has no choice, it should not be the crucial test.—*Harvard Law Review*.

GENERAL NOTES.

MR. JUSTICE HAWKINS AND THE OATH.—At the Cambridge Assizes; Mr. Justice Hawkins commented strongly upon the absurdity of the oath administered to witnesses. Was there a jurymen who understood this: 'The evidence you shall give to the Court and jury, sworn between our Sovereign Lady the Queen and the prisoner at the bar,' &c.? Counsel were engaged in asking a child of seven whether she understood it. He did not believe that one witness sworn that day could explain it, and his lordship was astonished that no one had suggested a simpler form than the complicated formula used in Courts. It was surprising that the Legislature had not turned its attention to the matter and devised a much simpler form. His lordship suggested that the words, 'I swear to God that I will speak the truth,' would be sufficient for all purposes, and would be understood even by little children.