

The Court of Appeal held that upon a proper construction of the Bills of Exchange Act the cheques in question were made payable to a fictitious person within the meaning of s. 7 (3) (see 53 Vict., c. 33, s. 7 (3) (D.), and therefore the cheques were under that section payable to bearer, and the fact that the drawers thought that Brett was an existing person was immaterial.

SHIP—MARITIME LIEN FOR DAMAGES OCCASIONED BY A COLLISION

*Currie v. McKnight*, (1897) A.C. 97, was an appeal from a Scotch court, but inasmuch as the point of law involved is one in which the law of Scotland and England are the same, it may be useful to note it here. The question was whether the appellant was entitled to a maritime lien. The facts were that the crew of the ship upon which the lien was claimed, had cut the cables of the appellant's ship, and she had been driven on shore and damaged, and the House of Lords (Lords Halsbury, L.C., Watson, Morris, and Shand,) determined that there was no lien for the damage thus occasioned, because liens for damages to ships by reason of a collision only arise where the damage is caused by the ship itself on which the lien is claimed; the wrongful act of the crew is not sufficient to give a lien on the ship for damages resulting from such wrongful act.

NUISANCE—OBSTRUCTION OF STREET—TRAMWAY—SNOW AND SALT—INJUNCTION.

*Ogston v. Aberdeen District Tramways Co.*, (1897) A.C. 111, as the name of the case imports, was also an appeal from a Scotch Court—the point involved, however is one of general interest. The action was brought by the plaintiff, who carried on business in Aberdeen to restrain the defendants, a tramway company, from clearing their lines of rails when there is snow upon the ground in such a way as to impede and obstruct the general traffic upon the public thoroughfares. The injunction was specifically asked against heaping up snow which the defendants removed from their lines on to other parts of the streets, and allowing it to lie there; and also against scattering salt upon the snow, and thus forming