
REVIEW OF CURRENT ENGLISH CASES.

(Registered in accordance with the Copyright Act.)

**HEARING IN CAMERA—PUBLICATION OF EVIDENCE TO THIRD PARTIES
—CONTEMPT.**

Scott v. Scott (1912) P. 4 was a suit for nullity of marriage on the ground of alleged impotence of the defendant. The cause was ordered to be heard in camera. After the trial the plaintiff and her solicitor procured a copy of the shorthand writer's notes of the proceedings in camera, and communicated them to the father and sister of the defendant. A motion having been made to commit the plaintiff and her solicitor for contempt in so doing, Deane, J., held that the publication was a contempt, but the plaintiff and her solicitor pleading ignorance and apologising, he refused to make any order except that they should pay the costs of the motion.

ADMIRALTY—SHIP—COLLISION—ACTION IN REM—FOREIGN DEFENDANTS—ARREST—BAIL—VOLUNTARY APPEARANCE—PERSONAL LIABILITY OF DEFENDANT.

The Duplex (1912) P. 8 was an action in rem by the owners of a British ship to recover damages for a collision on the high seas. The vessel alleged to have been responsible for the collision was owned by foreigners domiciled abroad. She was arrested, and the owners appeared, and obtained the release of the vessel by giving bail to the value of the ship and freight. They then defended the action denying their liability, and counter-claiming for damage which they had sustained by the collision. The foreign vessel was in the result found to be solely to blame, and judgment was pronounced in the usual form condemning the defendants and their bail to the amount of the damage they had sustained by the collision, with costs of claim and counter-claim. The defendants moved to vary the decree by limiting it to the value of their vessel, freight and costs. But Evans, P.P.D., held that (apart from an application for a statutory limitation of liability) the appearance of the defendants being voluntary, and their proceedings in the action amounting to a submission to the jurisdiction of the Court, they were personally liable to the full extent of the plaintiff's proved claim.