act with the promptitude and precision that a private trustee can. The increase of officialism in the Bankruptcy Court demonstrates the justice of the hostile observations usually made upon red-tapeism, and justifies the dislike with which practitioners view the efforts of influential men to introduce officialism into the management of private estates. An official department would not possess that personal knowledge of the estate and the beneficiaries which enables an ordinary trustee to act promptly and wisely. The result of this absence of personal knowledge would be that strict proof of everything would be required, and in this way, not to mention others, the expense of administration would be increased. The primary object of the measure is to benefit the beneficiaries, but even in the light of the considerations we have found space to refer to, it may confidently be stated that this object would not be attained. Would the State be answerable for the errors of the public trustee? This is a question to which a definite answer is needed.—*Law Gazette.*

Liability for Injuries Caused by Barbed-Wire Fencing.—Commenting on the recent decision of the learned Recorder of Belfast in *M'Quillan* v. *Crommellin Iron Ore Co.* (26 Ir. L.T. Rep. 15), the *Albany Law Journal* of the 5th inst. observes: "This has long been the law of this country (U.S.A.), the home of the barbed-wire fence, and the structure is in some States, we believe, prohibited by statute. The particular reason, perhaps, was that hides were thus injured for tanning." So far back as 1887, indeed, attention was directed to *Polak* v. *Hudson*, the first decision in the United States on this subject (see "Duty as to Fences," 21 Ir. L.T. 319), where, in an action to recover damages for fatal injuries to a horse by reason of his coming in contact with a barbed-wire fence, erected by the defendant between his land and the adjoining land on which the horse was depastured, it was held that an owner of land who erects a division fence owes it to his neighbor not to incorporate in the fence anything which, in view of the habits of the animals for which the land would naturally be used, would naturally tend to their injury. The defendant's liability, as put, seemed to turn on the circumstance that the defendant knew that the plaintiff was accustomed to turn the horse into the pasture, and therefore that the injury would be the natural consequence; but we ventured to suggest that such cases should rather be deemed to come within the class of cases, such as *Firth* v. *The Bowling Iron Co.* (3 C.P.D. 254) and *Groucott* v. *Williams* (23 L.J. Q.B. 237), where the tort-feasor is held liable regardless of intention or negligence—a barbed-wire fence being so dangerous *per se* that in erecting it at all he acts at his peril. The view so suggested appears to have eventually prevailed in *M'Quillan* v. *Crommellin Iron Co.*, where—without reference to the English and American cases just cited—the learned Recorder followed *Bennett* v. *Blackmore* (90 L.T. 395, 26 L.J. 228), which itself it followed the Scottish case of *Elgin Road Trustees* v. *Innis* (1886, 14 Rettie, 48). The learned County Court Judge of Kilkenny, in his well-known work (De Moleyns, L.P.G., 7th ed., 316), observes that, "apart from negligence as to the sufficiency of the fence, the owner of an