

*v. Bryan*, 8 C. B. 115, and *Armstrong v. Lancashire & Yorkshire Railway Company*, L. R. 10 Ex. 47. The theory that a passenger upon a public conveyance becomes so far identified with the owner and his servants that if any injury results from their negligence he must be considered a party to it, is now completely exploded.

PRACTICE—IMPRISONMENT FOR DEBT—JUDGMENT SUMMONS—ORDER FOR COMMITMENT OF DEBTOR—DEBTORS' ACT, 1869 (32 & 33 VICT. C. 62), s. 5. (R. S. O. c. 51, s. 240).

In *Stoner v. Fowle*, 13 App. Cas. 20, the House of Lords reversed the decision of the Court of Appeal reported as *Reg. v. Judge of Brompton County Court*, 18 Q. B. D. 213. Judgment was recovered in a county court and an order made for the payment of £20. Default having been made in payment, a judgment summons was taken out, and the judge having heard evidence and being satisfied as to the defendant's means, made an order to commit him for ten days, but directed that the warrant be suspended if the debtor paid instalments of £4 a month, the first payment to be made in fourteen days. It was held by their Lordships that the order was in reality an order for commitment in respect of the past default in payment of the £20, and not an anticipatory order for commitment in respect of any future default, and that being so, the order was valid under the Debtors' Act, 1869, (32 and 33 Vict. c. 62), s. 5, (see R. S. O. c. 51 s. 240).

RAILWAY COMPANY—COMMON CARRIERS—PASSENGERS' HAND-LUGGAGE—DELIVERY TO PORTER—NEGLIGENCE.

*The Great Western Railway Company & Bunch*, 13 App. Cas. 31, is an instance of the pertinacious way in which railway companies are prone to litigate cases. The sole cause of action was the loss by Mrs. Bunch of her Gladstone bag, which she left in charge of a railway porter at a station for a few minutes while she went to meet her husband and get her ticket for a train about to start. Ten minutes afterwards she returned to the platform, and the Gladstone bag had disappeared. The Court of Appeal held the railway company liable (17 Q. B. D. 215), and the House of Lords affirmed the decision. Mrs. Bunch may congratulate herself that her protracted law suit has had a more successful issue than did that of Mr. Jackson (3 App. Cas. 193), who lost not only his thumb, but his case as well, with all the enormous costs it must have involved; had all the learned law lords, however, been of the same opinion as Lord Bramwell, Mrs. Bunch might have been in a similar position to Mr. Jackson.

INFANT—MARRIED WOMAN—POST NUPTIAL SETTLEMENT—INFANTS' SETTLEMENT ACT (R. S. O. c. 44, s. 32).

*Seaton v. Seaton*, 13 App. Cas. 61, is a case which was known in the courts below as *Buckmaster v. Buckmaster*, in which the Court of Appeal (35 Chy. D. 21), held that neither the sanction of the court nor the effect of the *Infants' Settlement Act* (R. S. O. c. 44, s. 32), could make a post nuptial settlement of the wife's reversionary interest in personalty binding on her, and that no acts of ac-