

PERJURY A CONTEMPT OF COURT.—Perjury, apart from the penalty due to it as an indictable offence, is punishable as a contempt of court. We learn from the *Chicago Legal News* that Judge Pendergast committed Leopold Newhouse for ten days for contempt of court in testifying falsely in a matter before the court, and deferred the execution of the sentence for fifteen days on account of the illness of Newhouse's wife. Bail was taken for his appearance at the time named. The punishment, of course, is not for the crime of perjury, but for the imposition upon the court. Every court has the power to protect itself from imposition. The offender may still be indicted and punished for perjury. Judge Bradwell, when he was judge of the same court, committed a culprit to jail, and kept him there for one year, for pretending to die, and imposing upon the court by having his will presented for probate, so as to obtain a large sum of money for which his life was insured.

VICIOUS ANIMALS.—The Supreme Court of New Jersey held in *State v. Donohue*, that if an animal having no natural propensity to be vicious, commits an injury to the person of another, the owner is not liable unless he had previous knowledge of the vicious disposition. The fact that the owner of a dog permitted him to be at large on the highway when he inflicted the injury sued for, will not make the owner liable without proof of the *scienter*. We glean from an exchange that the facts were as follows:—The plaintiff, while walking on the public street in front of the defendant's premises, was bitten by the defendant's dog, which was lying unmuzzled on the sidewalk. Owing to the darkness of the night, the plaintiff did not see the dog until he sprang up and bit her. It also appears that a city ordinance prohibited the running at large of dogs in the street at any time without a muzzle. The plaintiff argued that the dog, lying on the sidewalk, contrary to the city by-law, was a nuisance, and the owner therefore liable. The court, in giving judgment, cited numerous English decisions concurring in the view that a dog is not of fierce nature, but rather the contrary, and that a demurrer to a declaration, which did not allege the defendant's knowledge of the vicious propensities of the animal, should be sustained. The American decisions support the same view. The court, in giving judgment, said that it might be that if the plaintiff, while on her way in the public streets, had unavoidably fallen over the dog, and thereby injured herself, the owner of the dog would have been liable in damages for such injury.

MARRIED WOMEN AND CREDITORS.—The opinion of the Supreme Court of Pennsylvania, delivered by Gordon, J., in *Blum v. Ross*, reported in the *American Law Register*, sustained the finding of an inferior court wherein it was held that where an insolvent opened a store and carried on business in the name of his wife, who signed for goods purchased, certain notes subsequently paid out of the proceeds of the business, but was not further known in the business, the obvious use of the wife's name was to defraud creditors. The Supreme Court held that