

men's Compensation Acts in England is wrong, and that he has come to the conclusion that in the interests of the working classes the two later English Acts should be repealed. He remarks that it is only to a comparatively limited class that the manifold imperfections of those Acts are known, viz., to the legal profession to whose mill they bring grist in the way of litigation, to the medical profession who also pecuniarily profit thereby, and to the insurance companies which also make business thereout; but the public in general is in the dark. His remarks, therefore, are disinterested and deserve attention not only in England, but in every other country where such litigation is contemplated.

**LIABILITY OF MANUFACTURERS OF FOOD PRODUCTS
FOR INJURIES TO THIRD PERSONS.**

An important decision has recently been given by the Court of Error and Appeal, New Jersey, U.S., on this subject (*Tomlinson v. Armour*). The plaintiff brought an action against the well-known pork packers in Chicago, Armour & Co., for damages in respect of his purchase of some canned meat, which, as he alleged, was so carelessly, negligently and improperly put up as to cause deleterious and poisonous results; the plaintiff, having eaten a piece of ham taken from one of these cans had been taken ill from ptomaine poison. The Supreme Court of the State held that there was no liability on the part of the defendants, there being at common law no implied warranty by a manufacturer or dealer as to the wholesomeness of food supplied, and that, assuming a different rule to exist in case of such dealer and a consumer, yet the consumer in the absence of a statute could not hold a manufacturer or original vendor to a higher degree of duty than that cast upon him by common law with respect to his own vendee.

The Appellate Court reversed this decision. Pitney, C., who delivered the judgment of the court thus concludes his judgment: "Upon both reason and authority we are clearly of the opin-