

chief to investigate a complaint made by an officer in the army, and that the privilege is effectual even though the statements are not made in good faith. After seventeen years' service in the Queen's Bench, Sir Colin Blackburn was, in October, 1876, created a Lord of Appeal in Ordinary under the Act of 1876, and on this occasion the approval of his appointment was general and emphatic. He took part in many important cases, both in the House of Lords and in the Privy Council, and seldom failed to make a valuable contribution to the judgments delivered. Among the most important decisions in which he shared were the many appeals in the liquidation of the City of Glasgow Bank. In the well-known case, *Wilson v. Waddell*, his was the principal judgment by which it was decided that when mineral workings cause a subsidence and a consequent flow of rainfall into an adjacent mine, no damages can be recovered by the owner of the neighbouring mine. He also gave judgment in two ecclesiastical cases which made a great stir at the time. One was *Julius v. The Bishop of Oxford*, under the Clergy Discipline Act, which related to the alleged ritual excesses of Mr. Carter of Clewer, and the other was *Enright v. Lord Penzance*, when Lord Blackburn presided in the House of Lords. *Dalt on v. Angus*, in which he also assisted, and which was heard in 1881, is memorable, not only for the law laid down with respect to the right of lateral support for a building by adjacent land, but for the circumstance that it was the last occasion on which the judges were asked by the House of Lords to deliver their opinions. Lord Blackburn retired in 1886, owing to the state of his health.—*Law Journal*.

INNKEEPER'S LIEN.

The recent case of *Robins & Co. v. Gray*, in the English Court of Appeal, brings up an interesting point. A commercial traveller did not pay his hotel bill, and the proprietor set up a lien on certain articles in his custody, although he had known all along that they were the property of the salesman's employer. The Court held that, as the innkeeper was bound to receive the articles, regardless of whose they were, he was entitled to his lien, notwithstanding his private knowledge of the ownership. Lord Esher's opinion is refreshing. Whether agreeing with his conclusion or not, all will welcome so clear and straightforward a treatment of a subject which has often been handled vaguely and unsatisfactorily.