

action. There is, I am inclined to think, at least one limitation. The shock, when it operates through the mind, must be a shock which arises from a reasonable fear of immediate personal injury to oneself."

PRIVATE PROPERTY IN CEDED TERRITORY.

There is much speculation as to what is to happen to private property in the territories which must inevitably be ceded by Germany as a term of peace. For instance, the German mine-owner of Lorraine—will he still remain *dominus* of the mine and its mineral wealth? The general opinion seems to be that ownership of private property will be studiously respected by the Allies. In this they would follow Germany herself, who, after the Franco-German War, did not interfere with private rights in Alsace and Lorraine. This accords with international law.

A judgment of the United States Supreme Court in the case of *Coffee v. Groover* states this: "It is no doubt the received doctrine that in cases of ceded or conquered territory the rights of private property in lands are respected. Grants made by the former Government, being rightful when made, are not usually disturbed. . . . It is true that the property rights of the people in those cases were protected by stipulations in the treaties of cession, as is usual in such treaties; but the Court took a broader ground, and held, as a general principle of international law, that a mere cession of territory only operates upon the sovereignty and jurisdiction, including the right of the public domain, and not upon the private property of individuals which had been segregated from the public domain before the cession."

There is nothing which more strikingly illustrates the extent of Greater Britain than an occasional glance at the proceedings of the Judicial Committee of the Privy Council. In a recent number of the *Law Times* reports, we notice cases going there for final adjudication from all quarters of the earth. From the Supreme Court of Canada comes an appeal as to the powers of expropriation of land for railway and other purposes. The next case is an appeal from His Majesty's Supreme Court in Shanghai, China, dealing with a question of practice and procedure in an