

posed of them and fled to the Territories with the proceeds. He was arrested on a warrant issued in the Territories charging him with having obtained goods under false pretences.

An objection was taken to the regularity of the proceedings on the ground that grand larceny was no offence in Canada, and therefore did not come within the term "extraditable offence." Further it was objected that Article 1 of the Imperial Order of 1890 did not cover obtaining goods by false pretences.

On these objections *In re Hall*, 8 A.R. 31, and *In re Martin*, 26 O.R. 163, and 22 A.R. 386, were cited on behalf of the accused, and for the State R.S.C. c. 142, s. 2, sub-sec. b, *In re Murphy*, 26 O.R., per MEREDITH, C.J., 176, and *In re Bollencontre* (1891), 2 Q.B. 122.

Held, that though the offences were known in the State of Minnesota and in Canada by different names, nevertheless the same facts constituted and the same evidence would prove a crime in each country, and the name was immaterial.

Held, also, that as provided by s. 2 of the Extradition Act, sub-sec. b, obtaining property under false pretences being described in schedule 1 of said Act, and further being described in s. 3 of Article 1 of the Imperial Order-in-Council of 1890, the same constituted an extraditable offence, and the accused was committed.

Norman Mackenzie, for the State.

T. C. Johnstone, for the accused.

United States

NOTES OF RECENT DECISIONS.

ELECTRIC WIRES.—The duty of insulating electric light wires, running on the outside of a building is held in *Griffin v. United Electric Light Co.* (Mass.) 32 L.R.A. 400, to be due to every person who for purposes of business is rightfully upon the premises. With this case is a note collecting the authorities as to negligence in respect to electric wires in or upon buildings.

INSURANCE AGAINST INSOLVENCY.—Indemnity to merchants against loss by insolvency of customers is held, in *Shakman v. United States Credit System Co.* (Wis.), 32 L.R.A. 383, to constitute insurance.

Injury to an employee of a telegraph company caused by accidental contact of the telegraph wires with electric light wires attached to the same poles, was held, in *Western Union Teleg. Co. v. McMullen* (N.J.), 32 L.R.A. 351, to raise questions for the jury as to the negligence of the employer and of the employee. The annotation to the case reviews the authorities on liability of an electric company to its employees for injury caused by an electric shock.

Payment of a claim for injuries to an employee is held in *Hoven v. West Superior Iron & Steel Co.* (Wis.), 32 L.R.A. 388, to be not necessary as a condition precedent to recovery of insurance to the employer for what he "shall become liable" to employees.