

tion. It would naturally occur to any one that a husband or wife or mother might be greatly shocked to know that a wife, husband or child had been very ill for a day and that a telegram should have been delivered a day sooner, but for the negligence of the agents of the company.

In the recent case of *Hamrick v. Western Union Telegraph Co.* (N. Car.), 52 S. E. Rep. 252, the Court reiterated the doctrine previously laid down in that State, that in such cases damages may be recovered. It is also worthy of note in this regard that the Supreme Court of North Carolina, has one of the strongest supreme benches of the country the opinions of which are most worthy of confidence and respect. Alabama, Texas and Kentucky are in line with North Carolina, and we predict that this doctrine will become the law generally. Any one who has witnessed the agony of a mother resulting from a delay in a telegram informing her of the serious illness of a child at a long distance from her, would hardly fail to see the wisdom of the policy of the law which regards such suffering as a proper element of damages, for which there should be a recovery. There is good reason why the mental suffering in the case of delayed telegrams, at least, should be compensated in damages separate and apart from the proof of other injuries for which damages might be allowed arising out of the same matter.

#### *THE BRITISH CRIMINAL APPEAL BILL.*

Among those entitled to speak about the merits of the Criminal Appeal Bill there is, on the whole, a remarkable consensus of opinion. It is admitted by most of our correspondents in the many letters which we have received on the subject that the present system of appeal, or the absence of it, is unsatisfactory. Something more is needed than the recognition of a right to have a special case stated. Public opinion has changed much on the subject. It is not convinced by the arguments used by some of our correspondents against assimilating in any way civil and criminal procedure. The public conscience cannot reconcile itself to the existence of the present facilities for appeal