

A note of a somewhat novel case appears in a recent number of the *Central Law Journal*, decided in the State of Georgia in *Atlanta Street R. W. Co. v. Keeny*. A passenger tendered to a conductor in payment of his fare a coin of unusual appearance, but still a genuine coin of the United States. The conductor pronounced it a counterfeit and ejected the passenger. It was contended on the part of the railway company that if the coin tendered, though genuine, was so rare or of such appearance as to make it doubtful whether it was genuine, the conductor had a right to refuse it if he really believed it was not genuine. But the Court held that a genuine silver coin of the United States, even though unlike those in common use, was nevertheless a legal tender, and a passenger ejected for refusal to make payment otherwise than by tendering such a coin was entitled to an action for damages, and the fact that the conductor declined to receive a coin of this character because he, in good faith, believed it was a counterfeit, would not relieve the railroad company from liability.

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The same journal discusses the question as to whether a bicycle is ordinary baggage within the meaning of the law governing common carriers. This particular question, from the nature of things, could not have come up for decision until recently. The only case directly in point, so far as we are aware, is cited by our contemporary (vol. 43, p. 377), and was decided in the Circuit Court of St. Louis. The judge held that the bicycle in question was baggage, and that a railway company is bound to carry it (if within statutory limit as to weight) as personal baggage, without extra compensation. The reasons given for the judgment were that the bicycle is a machine or vehicle in very common use among a large class of people for health, recreation and locomotion; that the plaintiff belonged to this class which is usually denominated wheelmen or bicycle riders, and that it is the use or custom for such generally to make trips on railroads, taking their bicycles with them for the purpose of using them at the end