

ing that the law is quite reasonable on this point, yet concludes that "it is impossible, looking at the long series of cases extending over many years, in which the doctrine of scienter has been applied and acted upon, to arrive at any other conclusion than that, in actions for injury sustained by man through the bite of a dog, the scienter which it is necessary to show is that the dog had a ferocious disposition towards mankind—that he had bitten or attempted to bite mankind."

ADMINISTRATION—INTESTATES ESTATE OF VALUE OF £500—GRANT TO EXECUTOR OF WIDOW WHO HAD NOT TAKEN ADMINISTRATION—INTESTATES ESTATES ACT, 1890 (53 & 54 VICT., C. 29), SEC. 1—(58 VICT., C. 21 O.)

In *In the goods of Bryant*, (1896) P. 159, a man died intestate, his estate being under £500. He left a widow but no issue, and under the Intestates Estates Act, 1890 (53 & 54 Vict. c. 29) the widow was entitled to the whole of the estate (see 58 Vict., c. 21 O.). She died without having taken out administration, but leaving a will. Her executor now applied for administration to the husband's estate, which was granted.

PRACTICE—SOLICITOR AND CLIENT—COSTS—TAXATION—TAXING ONE OF SEVERAL BILLS—ORDER OF COURSE FOR TAXATION.

In *re Ward*, (1896) 2 Ch. 31, establishes an exception to the general rule that where a solicitor delivers several bills of costs, it is not open to the client to tax one of them without taxing the others also. In this case the solicitor had delivered seven bills of costs relating to seven different matters which, amounted in the aggregate to £261 15s. The solicitor acknowledged the receipt of £160 on account, and claimed a balance of £101 15s. due to him. The clients paid him a further sum of £50 on account of the balance, he giving a written undertaking to return any sum that might be found due on a taxation of his bills. The next day the solicitor wrote to the clients accepting the £50 in full of the balance due, and of all claims against them, and asked them to treat the £50 as the balance due on the cash account. The clients were dissatisfied with one of the bills, which was for £172 18s., and obtained an order of course to tax it. Their new solicitor