

from fright caused by negligence, which is the subject of a note in 3 L.R.A. (N.S.) 49, is presented by the recent Maryland case of *Philadelphia, B. & W.R. Co. v. Mitchell*, 17 L.R.A. (N.S.) 974, holding that the rupture of an artery, due to a muscular contraction in attempting to avoid injury from an article which falls upon one's umbrella, may be the basis of a recovery against the one responsible for the fall. This case is distinguishable from the other cases on the subject in that here the injury resulted immediately from the involuntary act of the plaintiff in throwing herself back to escape from impending danger, and thus twisting her body in such a way as to rupture an artery, and not from the effect of the impending danger on her mind and nervous system; but the case was argued and decided entirely on the theory that the injury was caused by fright or shock.

SHUTTING OFF GAS TO COMPEL PAYMENT OF AN ARREARAGE.—

The question of the right of a public-service corporation to discontinue service to the representative, such as an assignee or receiver, of a delinquent customer, seems to have been considered for the first time in the recent Massachusetts case of *Cox v. Malden & M. Gaslight Co.*, 17 L.R.A. (N.S.) 1235, holding that assignees for creditors are not identified with the assignor so as to entitle a corporation which had been supplying gas to the assignor to refuse to supply it to the assignees, who desire temporarily to continue the business, until the amount due by the assignor is paid, under a statute giving it permission to shut off gas from the premises of one who refuses to pay the amount due therefor, but forbids it to do so merely because the bill remains unpaid by a previous occupant of the premises.

CODE OF ETHICS FOR LAYMEN.

A code of ethics for laymen will be reported to the Illinois State Bar Association at its annual meeting in Peoria next June, by Elmer E. Rogers, chairman of the committee on professional ethics. Among other things the report will say:—

“Probably the first duty of the citizen is obedience to law, which is none the less a moral, civic, and political duty as well as an ethical duty. If a law be unjust, then it is the ethical duty of the citizen, through the ballot box, to elect representatives who will repeal the offensive statute.

“Respect for the courts and their executive officers, while in performance of their duties, is an ethical duty incumbent upon every citizen. If any public official be derelict in performance of