

Women who have had their time wasted through injuries that have been inflicted upon them, and have thus been prevented getting their usual earnings, while entitled to good compensation therefor, must not expect to get a fortune out of the guilty party. Mrs. Langley was laid up by an accident, and was deprived temporarily of earning \$9 a week, as was her wont. Twelve jurymen, with that lavish liberality often noticeable in people who are not spending their own money, offered her as compensation \$6,000 of the money of the railway company that hurt her, but the judges intervened and said that was far too large a sum. And where a railway company carried a lady of the name of Marshall beyond the station at which she wished to alight, and she had to pay \$1.50 to reach her desired haven, and lost three hours of her valuable time in getting there, the judges would not let her keep the \$750 which the jurors of Missouri in their ardor and gallantry gave her. Too much, the impassive judges said. Yet in such a case the fair claimant may, to influence the verdict of the jury, show that there was no conveyance to be had at the place where the railway left her, that she had to walk several miles, over dusty roads, spending several hours tramping through the night; that she got wet crossing a creek, was chased by dogs, and otherwise frightened, and so with heat, and wet, and fright, and fatigue, was made sick. (48 N. Y. Super. Ct. 542; 78 Mo. 610; 94 Ind. 179.)

What sums sad and sorrowing survivors have received when women have been killed is too mournful a subject to touch upon just now.

R. VASHON ROGERS.

COMMENTS ON CURRENT ENGLISH DECISIONS.

Law Reports for May continued.

MARITIME COLLISION--NEGLIGENCE IN BOTH SHIPS--DAMAGES FOR LOSS OF LIFE--LIABILITY OF OWNERS--LORD CAMPBELL'S ACT.

Turning now to the appeal cases, the first is *Armstrong v. Mills*, 13 App. Cas. 1, in which the House of Lords affirm the decision of the court, which is reported as *The Bernina*, 12 P. D. 58, noted *ante* vol. 23, p. 143. It may be remembered that the action was brought to recover damages under Lord Campbell's Act for the loss of life occasioned by the collision of two steamships, the *Bushire* and *Bernina*. The collision occurred through the negligence of the masters and crews of both vessels, one of the deceased persons was a passenger, and the other, one of the crew of the *Bushire*, neither of whom had anything to do with the negligent navigation. The Court of Appeal held that the deceased persons were not identified in respect of the negligence with those navigating the *Bushire*, and that their representatives were entitled to recover the whole of the damages against the *Bernina*, the admiralty rule as to half damages in case of collision not being applicable to actions under Lord Campbell's Act. This decision the Lords affirmed, overruling, as the Court of Appeal had done, *Thorogood*