

Where petroleum spirit is kept in the tank of a motor car which is placed for the night in a garage, the garage is a "storehouse" and a "building, . . . in which petroleum spirit is kept:" *Appleyard v. Vaughan*, 83 L.J.K.B. 193, [1914] 1 K.B. 528.

The right of lien conferred by the Innkeepers Act (1 Geo. V. (Ont.) c. 49, s. 3), upon livery stable keepers, does not apply to keepers of automobile garages. As distinguished from the common law lien of an innkeeper on property of a third party in possession of the debtor, the statutory lien will not be construed as covering the property of a third person: *Automobile & Supply Co. v. Hands*, 13 D.L.R. 222, 28 O.L.R. 585.

The fact that an automobile was returned in a damaged condition to the care of the garage-keeper, on the order of the conditional vendee, to be left until repaired but without any change of the terms upon which the garage-keeper had therefore taken care of it, will not change the latter's status to that of a warehouseman so as to entitle him to a lien for the fixed monthly compensation as against the conditional vendor: *Webster v. Black*, 17 D.L.R. 15, 24 Man. L.R. 456.

In Quebec there is a lien for automobile repairs enforceable by conservatory attachment, and it is payable as a preferred claim out of the proceeds of the sale of the vehicle: *Morin v. Garbi*, 50 Que. S.C. 273.

The owner of a garage is a paid depository, and as such is responsible for damage by fire to an automobile entrusted to his care, unless he can prove that the accident did not result from any fault on his part: *Brunet v. Painchaud*, 48 Que. S.C. 59.

Offences and Conviction.—Under the Ontario statute (6 Edw. VII. c. 46, s. 13) the owner of a motor vehicle for whom a permit is issued is responsible not only in regard to fines and penalties imposed by the Act, but also in damages, for any violation of the Act or of any regulation provided by order of the Lieutenant-Governor in Council: *Mattei v. Gillies*, 16 O.L.R. 558. This case was distinguished in *B. & R. Co. v. McLeod*, 7 D.L.R. 579, 5 A.L.R. 176; 18 D.L.R. 245, 7 A.L.R. 349.

Under the provisions of the Motor Vehicles Act (N.B.), 1911, 1 Geo. V. c. 19, s. 4, sub-sec. 4, the motorist violating its provisions incurs a fixed penalty by way of fine for the violation. This penalty is additional to, not in lieu of, civil damages to the person injured by the motorist's negligence: *Campbell v. Pugsley* (N.B.), 7 D.L.R. 177.

Under the Quebec Motor Vehicles Act (R.S.Q. 1909, art. 1416, as amended in 1914, c. 12, s. 4), a person driving an automobile must stop when signalled or called upon to do so under penalty of fine although the officer making the signal is not in official uniform or exhibiting his badge of office: *Collector of Revenue v. Auger* (Que.), 25 Can. Cr. Cas. 412; *The King v. Hyndman*, 17 Can. Cr. Cas. 469.

Driving a motor car without a light is "an offence in connection with the driving of a motor car." *Ex. p. Symes*, 103 L.T. 428, 22 Cox C.C. 346, 27 T.L.R. 21.

A violation of the Defence of the Realm Regulations (1914), prohibiting the use of powerful lamps on motor cars is an offence "in connection with the