

mittee of the Privy Council in *Huntington v. Attrill* (1892), 8 Times L.R. 341. The question arose as to the proper test of whether or not an action is "penal" within the meaning of the well-known rule of private international law which prohibits one state from enforcing the penal law of another; and their lordships adopted "without hesitation" that prescribed by Mr. Justice Grey in *Wisconsin v. The Pelican Insurance Company* (127 U.S. 20 Davis, at p. 265): "The rule that the courts of no country execute the law of another applies not only to prosecutions and sentences for crimes and misdemeanors, but to all suits in favor of the State for the recovery of pecuniary penalties for any violations of the statutes for the protection of its revenue or other municipal laws, and to all judgments for such penalties."—*Ib.*

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LAW OF SLANDER.—It used to be a common reproach on the part of foreigners against English law that offences against property were punished with undue severity as compared with offences against the person. It might, perhaps, be urged with greater justice that our system has too little regard for honor or reputation where no material interests are involved. The decision of the Court of Appeal, on Tuesday, in the action of *Alexander v. Jenkins* discloses what many will consider the unsatisfactory condition of the law of slander. The plaintiff is a town councillor of Salisbury, and the slander alleged against the defendant was that he had said that the plaintiff was never sober and was not a fit man for the council, and that on the night of the election he was so drunk that he had to be carried home. Verdict and damages were entered for the plaintiff in the court below, but the Court of Appeal reversed that decision on the ground that allegations which would be actionably slanderous against a man in relation to an office of profit were not so when the office was one of mere honor or credit. Lord Herschell admitted that the distinction might be considered unsatisfactory, but held that it was clearly established by the authorities, and, if removed, could only properly be removed by the legislature. In the case of women and in the matter of chastity a step has already been taken in this direction by Mr. Milvain's Act of last session. It is doubtless undesirable to encourage actions for slander, but it is worthy of serious consideration whether this particular distinction might not advantageously be swept away. Offices of honor often constitute a man's career, and false imputations with respect to his fitness may inflict as heavy a blow upon his welfare and happiness as if they affected him in his material circumstances.—*Law Journal.*

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RAILWAY UNPUNCTUALITY.—The decisions of County Court judges may not be of binding authority in the High Court, but the judgments of such men as Judge Stonor contain such a wealth of learning that they repay perusal. His Honor has delivered judgment in a case interesting not only to the legal theorist or practitioner, but also to the ordinary layman who is wont to grumble at the unpunctuality of the railway companies. The case to which we refer is *The Great*