

exceeding the value of £10." The gun was injured through the negligence of the defendants' servants, and the judge of the County Court gave judgment in favour of the plaintiff for £5 5s. od. On appeal, however, the judgment was set aside and the action dismissed by the Divisional Court (Cave and Lawrence, JJ.) on the ground that the stipulation on the ticket meant not only that the company would not be responsible for the loss of articles over the value of £10, but also that they would not undertake any responsibility for any damage to such articles.

BILL OF SALE—"PLANT"—HORSE—EJUSDEM GENERIS.

In *London and Eastern Counties Loan Co. v. Creasy*, (1897) 1 Q.B. 768, the Court of Appeal (Lord Esher, M.R., and Smith and Chitty, L.JJ.) have agreed with the decision of the Divisional Court (Wright and Bruce, JJ.) (1897) 1 Q.B. 442 (noted ante p. 420) to the effect that in the construction of the Bills of Sales Act, a "horse" is not within the term "plant" used therein, and that the decision in *Yarmouth v. France*, (1887) 19 Q.B.D. 647, was properly distinguished.

PRACTICE—DISCOVERY—PRODUCTION OF BOOKS—SEALING UP IRRELEVANT ENTRIES.

In *Graham v Sutton*, (1897) 1 Ch. 761, a very simple point of practice was involved, and yet it was one in which the Court of Appeal differed from North, J. An order for production had been made, and on the production of certain books for inspection thereunder, the defendant claimed the right simply to cover up such portions as contained irrelevant entries, instead of sealing them up as authorized by the terms of the order, on the ground that the sealing up of these parts of the books would seriously interfere with the carrying on of their business. North, J., refused to modify the order, except to the extent of authorizing the defendants from time to time to unseal and reseal on oath the irrelevant parts, but the Court of Appeal (Lindley, Smith and Rigby, L.JJ.) considered that the covering up of the irrelevant entries, accompanied by an affidavit that no parts of the books which were relevant had been covered up would answer all necessary purposes, and modified the order accordingly.