has been declared invalid, but merely for the techniacl reason that it was made applicable to a class of employés not embraced in the title[3].

[3] *Wabash R. Co.* v. *Young* (1904) 162 Ind. 102, 69 N.E. 1003 (1003, 1004).

C. B. LABATT.

A recent decision as to the law of dogs is referred to in the English *Law Times*. The writer recalls the case of *Jones* v. *Owen*, 24 L.T. Rep. 587, where the owner of two greyhounds was held liable for negligence for an accident caused by his permitting them to rush about a road, coupled with a chain, but otherwise uncontrolled. In a recent case a County Court judge in England held that the owner of a blind dog was liable for an accident caused by the animal getting into the way of a cyclist and causing his fall and injury. This finding which seems reasonable enough and might well be said to follow the reasoning in *Jones* v. *Owen*, was reversed by a Divisional Court. Our contemporary after referring to the perils incident to the use of modern roads from sleepy, drunken or reckless drivers, automobile "road hogs," etc., very properly says: "Among these dangers there is no greater terror to the cyclist and cautious motorist than the irresponsible dog. We should have thought that a dog owner, knowing that the animal was blind, and aware of a dog's habit to wander irresponsibly in every direction, would have been deemed negligent not to have adopted some means of controlling its movements." Possibly the members of the Divisional Court were not in the habit of bicycle riding; if they had been a more common sense view of the situation would perhaps have prevailed. The writer might have added to the irresponsible dog the reckless child or worst of all the indefinite and exasperating female who stops to dance a minuet in the middle of the road when she sees a bicycle approaching.