Pleas, 15 Alb. L.J. 248), and in Massachusetts (*Davis* v. *Sawyer*, 133 Mass. 289; S.C., 43 Am. Rep. 519), and in Missouri (*Leete* v. *Pilgrim Congregational Church*, 14 Mo. App. 590). Even if the *Times*' presses were so noisy as to be a nuisance they might be restrained by injunction. We can hardly conceive a more annoying nuisance than to be aroused from slumber by church or factory bells at the hour of five a.m. Those "sweet bells" would always sound to us "jangled, out of tune, and harsh." We should prefer a "still alarm." But courts will generally regulate rather than forbid the ringing of bells. In a recent Canadian case the court prohibited whistling for cabs at a London boxing-club between midnight and seven a.m.—*Albany Law Journal.*

How to Apply for Shares.—A curious story is going the round of the press to the effect that a speculative agent of the name of B. made application for some shares in an exploration company floated not long ago. The form required the applicant to give his name, address, and "description." Mr. B., it seems, took this instruction very seriously, and being of a naturally suspicious disposition, and chary of seeking the advice of others, this is what the astonished directors found on his application form immediately following the space for name and address: "Description—height, 5 ft. 4½ in.; weight, 9st. 11lb.; complexion fair, hair light; features small and sharp; thin beard, short, no moustache; teeth sound, with one exception in front; marks, none in particular; married, second time; family, three children by first wife, no issue by second; age thirty-six; occupation, none at present, lately in Government service, expect position in P——— when railway opens. Any other particulars please apply Rev.———. P.S.—Forgot to say have been out here seventeen years, understand the native character, and cattle, as Rev. Mr. ——— will bear out." This very literal gentleman handed in a draft for full amount of shares applied for.—*The Law Journal.*

Innkeepers and Guests.—What constitutes the relationship between innkeeper and guest? The reported cases which throw light on this point are so few in number as to give some value to the decision of the Court of Appeal last week in *Medawar* v. *The Grand Hotel Company*, in which this question was discussed. *York* v. *Grindstone*, 1 Salk. 388; 2 Ld. Raym. 388, *sub nom. Yorke* v. *Greenhaugh*, was a replevin of a horse, which the plaintiff, a traveller, had left at the defendant's inn, and which the defendant had detained for its keep. In this case Chief Justice Holt doubted whether the plaintiff was a guest, because he never went into the inn himself, but only left his horse there, which the innkeeper was not obliged to receive, and, if he did, did so as a livery stable keeper. Three other judges, however, held that the plaintiff was a guest by leaving his horse as much as if he had stayed himself, "because the horse must be fed, by which the innkeeper has gain; otherwise, if he had left a trunk or a dead thing." In *Bennett* v. *Mellor*, 5 T.R. 273, in 1793, an action for the value of goods stolen