UNITED STATES DECISIONS.

LABOR UNIONS.—An injunction against threats by a labor union upon employers for the purpose of making them induce employees who had withdrawn from the union and become members of another to rejoin the former is upheld in *Plant* v. *Woods* (Mass.) 51 L.R.A. 339, although no actual violence was shewn.

PHYSICIAN AND PATIENT.—The right of a physician to determine in the first instance how often he ought to visit a patient and to his compensation for visits, if the party accepts his services without telling him to come less frequently, is sustained in *Ebner* v. *Mackey* (Ill.) 51 L.R.A. 298, and there is a note to the case on the question of a physician's right to determine the frequency of such visits.

SUNDAY OBSERVANCE.—The work of a barber is held, in *Ex parte Kennedy* (Tex.) 51 L.R.A. 270, not to be a work of necessity within the meaning of an exception to the Penal Code forbidding Sunday labour.

WATERCOURSE.—Water intermingling with the ground or flowing through it by filtration or percolation or by chemical attraction, being but a component part of the earth, is held, in *Willow Creek Irrigation Co.* v. *Michaelsen* (Utah) 51 L.R.A. 280, to have no characteristic of ownership distinct from the land itself and to be excluded from rules of law applying to the appropriation of surface waters.

ALIMONY.—A decree for alimony is held, in *Barclay* v. *Barclay* (Ill.) 51 L.R.A. 351, to be a penalty for failure to perform a duty, and not a debt which can be proved and discharged in bankruptcy proceedings.

RAILWAY NEGLIGENCE.—The killing at a railway station of a man awaiting the arrival of a relative by train, in consequence of the negligence of the railroad company in leaving a baggage truck where it turned a little as the train passed and was struck by one of the cars, which hurled it against the man standing there, is held, in *Denver & R. G. R. Co.* v. *Spencer* (Colo.) 51 L.R.A. 121, to make the railroad company liable for his death.

COMPENSATION.—The establishment of a smallpox hospital, depreciating the value of neighboring real estate, is held, in *Frazer* v. *Chicago* (Ill.) 51 L.R.A. 306, not to constitute a taking or damaging of such property within the constitutional provision requiring compensation.

NEGLIGENCE.—The mere presumption of negligence arising from the infliction of a personal injury by dropping a brick from a building in the course of construction is held, in *Wolf* v. *Downey* (N.Y.) 51 L.R.A. 241, not to be sufficient to charge the contractor for either the carpenter or the mason work, in the absence of proof to shew from what part of the building