

vessel suing for wages, and describing himself as "of Norway, now at Quebec," will be compelled to give security for costs.—*Andersen v. Brugaard*, 3 Q. L. R. 287.

2. Where, by a letter addressed to the suppliant, the Public Works Department offered the sum of \$3,950 in full settlement of the suppliant's claim against the Department, an application on the part of the Crown for security for costs was refused, on the ground that the Crown in this case could suffer no inconvenience from not getting security, and the application was not made in proper time.—*Wood v. The Queen*, 3 Q. L. R. 17.

County Councils.—County Councils have the same power as Local Councils to pass by-laws prohibiting the sale of intoxicating liquors.—*Hart v. Corporation of County of Missisquoi*, 3 Q. L. R. 170.

Curé.—See *Election Law*.

Damages.—1. Physical and mental pain may give rise to the action of damages resulting from a bodily injury.—*Pelletier v. Bernier*, 3 Q. L. R. 111.

2. The measure of damages for the detention of a vessel after a collision is the amount she can earn while unemployed by reason of it.—*The Normanton*, 3 Q. L. R. 303.

Decret.—See *Adjudicataire*.

Delivery.—Absence of delivery is only an indication of fraud, and it may be rebutted by other presumptions equally strong.—*Bell & Rickaby*, 3 Q. L. R. 243.

Deposit.—See *Notice of Deposit*.

Election Law.—1. The threat by a Catholic priest to refuse the Sacraments to those who should vote for a candidate, constitutes an act of undue influence within the terms of clause 258 of the Quebec Election Act.—*Hamilton v. Beaucheme*, 3 Q. L. R. 75.

2. Where the *curés* of a county take an active part in an election in favor of one of the candidates who, in a speech to the electors, declared himself the candidate of the clergy, that he was brought out by the clergy, and that without the assurance of their support he would not have accepted the candidature, the *curés* will be considered agents of the candidate, and the latter will be responsible for their acts. Therefore, if a *curé*, so constituted agent, threatens his parishioners in the presence of a candidate with a refusal of the sacraments in case they

vote for the opposite candidate, the candidate present will be deemed to have consented to this act of undue influence and to have approved it, and will be disqualified, if in a speech pronounced some hours afterwards he declares himself the candidate of the clergy, and does not disavow the threats or free himself otherwise from responsibility.—*Ib.*

3. It is "treating" within the meaning of Sec. 257 of the Que. Election Act, for a candidate to give a glass of liquor to the representatives of the two candidates and the deputy returning officer, in the poll, saying: "Gentlemen, if you wish to take a glass of brandy there is some in the room; go and help yourselves, but before you go, go and vote for whom you like."—*Ib.*

4. A deed given to transfer property to a candidate merely to qualify him, and with the intention that the property shall for all other purposes remain in the possession of the transferor, is insufficient under Sect. 124 of the Election Act, even though it be clothed with all the formalities required for the valid transfer of the property. And the proof of such intention appears in the fact of simulated payment of the price, and the transferor remaining in possession of the immovable as proprietor.—*Ib.*

5. Even if the petitioner succeeds, each party will be ordered to pay his own costs where the defendant succeeds in a recriminatory case under section 55 of the Election Act.—*Ib.*

6. The Provincial Legislature, in enacting the Quebec Controverted Elections Act, having created the Superior Court a tribunal for the purpose of trying election petitions in a manner which should make its decisions final, the prerogative right to admit an appeal from such decisions to Her Majesty in Her Privy Council does not exist.—*Landry v. Thérberge*, 3 Q. L. R. 202.

7. Under the Election Act of 1875, (1) the valuation roll is conclusive as to the value of the property. (2) No one can be on the list of electors if he is not on the roll. (3) All those who by the roll appear qualified should be on the electoral list, unless there be personal disqualification which does not appear on the roll.—*Electoral Lists of Kamouraska*, 3 Q. L. R. 308.

8. The Municipal Code directs how a valuation roll may be attacked, and in a collateral