

been dismissed with costs, and the respondent claimed to be allowed, as part of his costs of appeal, copies of documents which had been used in the appeal, but which had been prepared for and been used on a prior appeal to a Divisional Court. The taxing Master disallowed these items and, on appeal, Lawrence, J., held that the Master was right, and the Court of Appeal (Williams and Farwell, L.JJ.) affirmed the decision of Lawrence, J.

WORKMEN'S COMPENSATION—WORKMAN EARNING MONEY IN
ANOTHER CHARACTER—COMPENSATION.

In *Simmons v. Heath Laundry Co.* (1910) 1 K.B. 543 the plaintiff was employed in a laundry, and in the course of her employment she sustained an injury. She earned 7s. a week in the laundry and also gave music lessons, by which she earned 3s. a week, and in fixing compensation the question arose whether her earnings in the latter capacity could be taken into account, the amount of compensation being regulated by the earnings of the injured person. The County Court judge held that only the earnings in the laundry could be taken into account, and the Court of Appeal (Cozens-Hardy, M.R., and Moulton and Buckley, L.JJ.) affirmed his decision.

DEFAMATION—SLANDER—WORDS ACTIONABLE PER SE—INNUENDO
—CHARGE OF CRIMINAL OFFENCE—PUNISHMENT—LIABILITY
TO ARREST.

Hellwig v. Mitchell (1910) 1 K.B. 609 was an action of slander. The statement of claim alleged that the defendant, who was proprietor of a hotel, had said to the plaintiff, "I cannot have you in here; you were on the premises last night with a crowd, and you behaved yourself in a disorderly manner and you had to be turned out," and upon the plaintiff protesting that the defendant had made a mistake, the defendant said, "Oh, no, I have not made any mistake, and there are plenty of people here now who saw you and the disorderly way in which you behaved; you have to go out at once; and if you don't go I shall call in the police and have you turned out." The innuendo charged was that the plaintiff had committed a breach of the peace and refused to quit licensed premises, and as thereby having committed criminal offences. No special damage was alleged. On a motion