

PASSENGER TRAVELLING ON FREE PASS—LOSS OF LIFE AND PROPERTY BY PASSENGER TRAVELLING ON FREE PASS—CONDITIONS OF FREE PASS—LORD CAMPBELL'S ACT (9 & 10 VICT., c. 93)—(R.S.O. c. 135).

The Stella (1900) P. 161, was an application in the Admiralty Court made by a widow on behalf of herself and children to recover out of a fund paid into court by the owners of a steamship which had been wrecked, compensation for the loss of her husband, and also for the loss of certain property in consequence of the negligence of the owners of the steamer or their servants. The facts were that the husband was a railway official and had obtained from another railway company a free pass for himself and wife from London to Jersey, the pass being subject to a condition printed on the back, "That it shall be taken as evidence of an agreement that the company are relieved from the responsibility for any injury, delay, loss or damage, however caused, that may be sustained by the person or persons using this pass." Part of the journey had to be made in a steamer, which, owing to the negligence of the servants of the railway company, was stranded, and the husband was drowned and his own and also his wife's luggage was lost. Barnes, J., on appeal from the registrar of the court, held that the claim for compensation could not be sustained, that in respect of the loss of life, the widow and children could only claim under Lord Campbell's Act (R.S.O. c. 135), where, if death had not ensued, the deceased would have been entitled to maintain an action, and that the condition on the pass was a bar to any such action which applied as well to the sea passage as to the land transit; and that the condition on the pass also precluded any claim for damages either as administratrix for the loss of her husband's luggage, or individually for the loss of her own property.

COMPANY—DECEASED SHAREHOLDERS—NOTICE WHERE SHAREHOLDER IS DEAD—REGISTERED ADDRESS—FORFEITURE OF SHARES.

In *Allen v. Gold Reefs* (1900) 1 Ch. 656, the Court of Appeal (Lindley, M.R., and Williams, and Romer, L.JJ.,) have reversed the decision of Kekewich, J., (1899) 2 Ch 40 (noted ante vol. 35, p. 678). The case when before him was disposed of on the ground that the proceedings taken to forfeit the shares of a deceased shareholder were invalid for want of due notice, the notice of the meeting having been sent to the registered address of the deceased, and not to his personal representatives. The articles of association provided that