

order of the sanitary authority at a cost of £83 10s., which he claimed to recover from the defendant as an outgoing. The Court of Appeal (Collins, M. R., and Romer and Mathew, L.JJ.,) were clear that it was, and that the tenant was liable therefor, and affirmed the judgment of Wright, J., in the plaintiff's favour, though expressing some sympathy for the defendant.

MARITIME LAW—SALVAGE—VALUE OF SALVED VESSEL FOR PURPOSES OF AWARD.

The Germania (1904) P. 131, was a claim for salvage in which the question to be determined was the value of the salved vessel for the purposes of the award of salvage. The plaintiff's steamer had fallen in with the *Germania* in distress off the coast of Scotland and about thirty miles from Aberdeen bay. The *Germania* was taken in tow and brought to Aberdeen bay, and the master of the plaintiff's steamer then suggested that a tug should be engaged to take her into the bay. Not being able to come to terms with a tug the master of the plaintiff's ship was directed to take the *Germania* in, but the hawser parted. The *Germania's* anchor failed to hold and she was driven ashore. Before going ashore she was worth £8,500, but the expense of floating her off and repairing her amounted to £6,750, and her owners claimed that for salvage purposes her value should be taken as £1,750. Barnes, J., however, held that it was a case of towage and that the plaintiffs were entitled to salvage on £8,500, the value at the time the vessel was safely brought within reach of the tug, the subsequent calamity to the vessel not being attributable to the plaintiffs.

EVIDENCE—REGISTER KEPT PURSUANT TO STATUTE—DATE OF BIRTH.

In re Goodrich, Payne v. Bennett (1904) P. 138, Jeune, P.P.D., held that the certified copy of an entry in a register of births kept pursuant to a statute is evidence, not merely of the fact of birth, but of birth on the date therein mentioned.

HUSBAND AND WIFE—DESERTION—CONDONATION.

Williams v. Williams (1904) P. 145, was an appeal from an order made by justices at the sessions. The proceedings were instituted by a wife for a judicial separation on the ground of desertion, and during an adjournment of the hearing of the summons, the complainant resumed cohabitation with her husband