

the orders of the firm and their servants as to the working of the crane, and the defendants had no control in the matter. The plaintiff was a servant of the wharfingers, and was injured through the negligence of the man in charge of the crane. Pollock, B., who tried the action, dismissed it on the ground that the man in charge of the crane was for the purpose of a particular service, in which he was engaged—the servant of the wharfingers; and the Court of Appeal (Lord Esher, M.R., and Lindley and Bowen, L.JJ.) affirmed his decision. We may observe, *en passant*, that this seems to have been the case which gave rise to the "Cock-fight" recorded in the pages of our contemporary, the English *Law Times*, of March 11th last, p. 439.

DIVORCE—FOREIGN LAW—DOMICIL—ENGLISH MARRIAGE—AMERICAN DIVORCE.

*Green v. Green*, (1893) P. 89, although a divorce case, deserves a brief notice, inasmuch as the validity of an American divorce came in question. The husband was an Englishman, domiciled in England: the wife was an American citizen of Pennsylvania: the marriage took place in England. After some months' cohabitation in England the wife went to Philadelphia, partly, as she alleged, to visit her mother, who was ill, and partly to be present at her sister's marriage. She refused to return, and, after repeated attempts to induce her husband to consent to an amicable separation, she commenced proceedings for divorce in the Court of Common Pleas in Philadelphia, alleging cruelty. By the statute law of Pennsylvania, the court had jurisdiction over all matrimonial causes when it could be shown by any wife that she was formerly a citizen of the commonwealth, and that, having intermarried with a citizen of any other state, she had been forced to abandon the domicile of her husband by reason of his cruelty and adultery, and had been domiciled within the state for a whole year prior to the commencement of the suit. The husband was personally served with process, but did not appear, and the court of Philadelphia pronounced a decree of divorce. The wife subsequently went through the form of marriage with another man, with whom she was living as his wife. The court (Barnes, J.) held the American divorce invalid, on the ground that the American court had no jurisdiction to dissolve the marriage of a British subject domiciled in England, and who had never submitted himself to the jurisdiction of that court.